CORUM Butler Asset Management Ltd

BUTLER CREDIT OPPORTUNITIES FUND

Website Sustainability- related Disclosures

Contents

1. Summary

This Disclosure is made by CORUM Butler Asset Management Ltd (the "Manager") on behalf of BUTLER Credit Opportunities Fund (the "Fund" or "financial product") classified as art.8 in accordance with the Sustainable Finance Disclosure Regulation (EU) 2019/2088 ("SFDR").

The Fund promotes an environmental and/or social characteristic under Article 8 of the SFDR by investing in companies that have robust fundamental characteristics combined with good or improving environmental, social and governance ("ESG") profiles.

The ESG analysis conducted by Butler Investment Managers (the "Investment Manager") on a company is then fed back into the financial analysis conducted on the company and helps the Investment Manager to form a view on how the company can remain competitive over the long term. The Investment Manager sources the information it requires to evaluate a company's ESG profile directly from companies, including accounts and reports issued by the company, as well as from third parties such as data providers, research providers and ratings providers.

However, the Investment Manager may encounter difficulties in assessing companies' alignment with the Fund's characteristics and their performance from an ESG perspective due to challenges in the availability, quality, comparability and timeliness of both financial and sustainability data. The Investment Manager reviews and monitors investee companies' alignment with the characteristics on an ongoing basis.

The Investment Manager views engagement as an ongoing and valuable part of its fundamental dialogue with investee companies and, where necessary, companies within the Fund's investment universe.

The Investment Manager will engage as part of ongoing monitoring of the company's business, for elevating company awareness of issues, for deeper company analysis and challenge/feedback, and when seeking to affect real change in a company due to specific behaviour or event.

2. No Sustainable Investment

This financial product promotes ESG characteristics, but does not have as its objective sustainable investment.

3. ESG Characteristics of the financial product

As part of its ESG risk assessment, the Investment Manager considers the following ESG characteristics:

1. the management of risks related to an investee company's own operational energy use and green house gas ("GHG") emissions, as well as that company's management of the energy efficiency and/or GHG emissions of its services and products during the use phase;
2. The management and respect of fundamental human rights within an investee company's own operations and supply chain;

3. The management by an investee company of human resources;
4. The efficiency and effectiveness of an investee company's use of raw material inputs, in production, and how that company manages related risks, including the management of risks related to water scarcity and raw material inputs within its supply chain; and
5. The management of the impact of an investee company's operations on land, ecosystems and wildlife.

Furthermore, the Fund only invests in companies that comply with the United Nations (UN) Global Compact Principles. In particular, the following principles relate to the environmental and/or social pillars as these principles provide the obligation for a company to:

- support and respect the protection of internationally proclaimed human rights (Principle 1);
- make sure it is not complicit in human rights abuses (Principle 2);
- uphold the freedom of association and the effective recognition of the right to collective bargaining (Principle 3);
- support the elimination of all forms of forced and compulsory labour (Principle 4);
- support the effective abolition of child labour (Principle 5);
- support the elimination of discrimination in respect of employment and occupation (Principle 6);
- support a precautionary approach to environmental challenges (Principle 7);
- undertake initiatives to promote greater environmental responsibility (Principle 8); and
- encourage the development and diffusion of environmentally friendly technologies (Principle 9).

The Fund does not use a specific index designated as a reference benchmark for the purpose of attaining the characteristics being promoted. Portfolio construction follows a benchmark agnostic approach which will seek adequate diversification across opportunities and individual securities.

The Fund promotes ESG characteristics by applying exclusion strategies, as well as assessing the ESG risk on the basis of an ESG risk rating. When relevant, principal adverse indicators are used to underpin these exclusion strategies and the ESG risk assessment integrated into the investment process and described below.

Norm-Based Exclusions – United Nations Global Compact

Companies that do not respect the principles of the UN Global Compact on human rights, working conditions, the environment and the fight against corruption are excluded from the investable universe. The decision to exclude these companies is based on a defined methodology which includes an assessment of a company's impact on stakeholders and the extent to which a company causes, contributes or is linked to violations of international norms and standards.

For these purposes, the Investment Manager monitors violations of UN Global Compact Principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises using information obtained from a third-party ESG research provider as well as publicly available information and alternative data sources.

Norm-Based Sectorial Exclusions

A "norm-based" sectoral exclusion policy is applied to all companies that do not comply with the Ottawa Treaty (being the convention on the prohibition of the use, stockpiling, production and transfer of anti-personnel mines and on their destruction of 1997) and the Oslo Convention on cluster mines.

Therefore, as part of its investment process, the Investment Manager excludes companies which derive more than 0% of their revenue from anti-personal mines, cluster weapons, controversial weapons and biological and chemical weapons.

For these purposes, the Investment Manager monitors the exposure of investee companies to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons), using information obtained from a third-party ESG research provider as well as publicly available information and alternative data sources.

Sectoral Exclusions

In addition to the norm-based sectoral exclusions, certain controversial sectors are excluded by the Investment Manager, such as tobacco production, adult entertainment, whale meat, predatory lending, palm oil, oil sands, recreational cannabis (therapeutic allowed), arctic oil and gas exploration and thermal coal.

Therefore, as part of the investment process, the Investment Manager excludes from the investable universe companies which derive more than 0% of their revenue from these sectors (except for thermal coal, in respect of which a threshold of 30% of a company's revenue has been set).

For these purposes, the Investment Manager monitors the involvement of investee companies in these sectors, including the exposure of companies active in the fossil fuel sector, using information obtained from a third-party ESG research provider as well as publicly available information and alternative data sources.

ESG Risk Rating

The Investment Manager also takes into account the material ESG risks of companies within the portfolio, the magnitude of ESG risks they face and how those risks might affect performance. For these purposes, the Investment Manager relies on the ESG risk rating obtained from a third-party ESG research provider to perform a screening of the outstanding investable universe. The score ranges from 0 and 100, with 0 indicating that risks have been fully managed (no unmanaged ESG risks) and 100 indicating the highest level of unmanaged risk.

As part of the investment process, the Investment Manager systematically excludes companies with an overall score of 40 and higher points, such score corresponding to the portion of the company's ESG risk exposure that cannot be managed away through relevant policies, programmes or initiatives. The enterprise value of these companies is considered to have a severe risk of material financial impacts driven by ESG factors.The ESG risk rating is composed of three building blocks that contribute to a company's overall rating. These building blocks include corporate governance, material ESG issues (MEIs), and idiosyncratic ESG issues. The following indicators are used to assess the MEIs:

- Carbon (Own Operations /Products and Services)

This indicator refers to a company's management of risks related to its own operational energy use and GHG emissions, as well as the company's management of the energy efficiency and/or GHG emissions of its services and products during the use phase.

- Human Rights and Human capital (Own Operations /Supply Chain)

These indicators focus on how companies manage and respect fundamental human rights within their own operations as well as a company's management of fundamental human rights issues occurring in its supply chain. Emphasis is placed on measures taken to protect civil and political rights as well economic, social and cultural rights, including child and forced labour.

- *Human Capital*

This indicator focuses on the management of human resources.

- *Resource Use – Own operations/ Supply Chain*

This indicator focuses on how efficiently and effectively a company uses its raw material inputs (excluding energy and petroleum-based products) in production and how it manages related risks. It also focuses on how efficiently and effectively a company manages risks related to water scarcity and raw material inputs within its supply chain.

- *Land Use and Biodiversity – Supply Chain / Own Operations*

This indicator focuses on how companies manage the impact of their operations on land, ecosystems and wildlife. Topics covered include land conversion, land rehabilitation and forest management, as well as the protection of biodiversity and ecosystems.

4. Investment Strategy (and methodology)

The Manager, in consultation with the Investment Manager, has identified the Fund as falling within the scope of Article 8 for the purposes of the SFDR on the basis that it seeks to promote ESG characteristics. The Fund promotes ESG characteristics, but does not have sustainable investment as its objective nor does it make any sustainable investments.

The Investment Manager integrates sustainability risks in the investment process by applying a four-step approach on potential investee companies prior to any investment being made.

Regarding the companies covered by the third-party ESG research provider referred to above, any companies with severe ESG risks (with an ESG risk above 40) are excluded. Regarding the companies which are not covered by the third-party ESG research provider, the Investment Manager's in-house ESG research team exclude any companies which are rated "Severe ESG Risk" according to the Investment Manager's in-house ESG risk assessment.
Finally, the Investment Manager also engages with investee companies on material issues, in accordance with its engagement policy including but not limited to ESG matters aligned with the Investment Manager's promotion of E/S characteristics.
Engagement will therefore mainly focus on three ESG themes:

i) UN Global Compact and Norms compliance;
ii) enhanced transparency on ESG-related information, notably on good governance factors; and
iii) climate policies.

The assessment of the quality of good governance practices is performed on a pre-trade basis and an ongoing basis as part of the periodic checks performed by the Investment Manager.

The Investment Manager when analysing company governance across the Investable Universe of potential investments, will consider four key areas of corporate practice which are highlighted in the Disclosures Regulation, each of which reveals something about the investee company's business.

These are:
• Sound management structures;

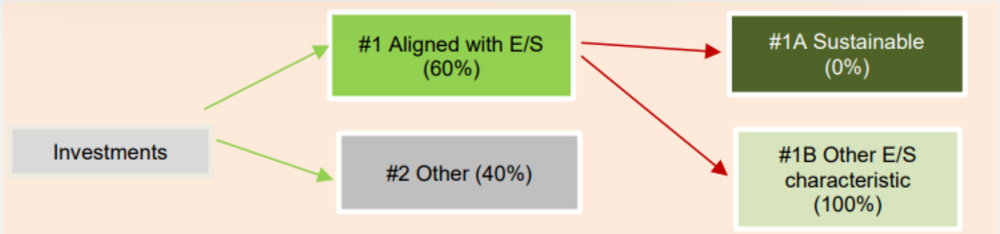
- Strong employee relations;
- Fair remuneration of staff;
- Tax compliance.

The Investment Manager is of the opinion that companies should have suitable practices and policies in place across all four of these areas to ensure that they are best placed to evolve in a sustainable manner over the long-term.

In order to assess how well companies are governed, the Investment Manager may use a range of different metrics associated with each of the above areas, which may involve the use of proprietary tools with various data points, analysis of the financial statements and related materials of companies, direct interactions with the management and/or governance information and ratings from the third-party ESG research provider.

The Investment Manager will avoid investments in companies that fail to protect the basic rights of investors and employees that are involved in tax evasion, corruption or other governance scandals (and fail to take adequate remedial action).

5. Proportion of Investments



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments. [include the note below where the financial product commits to making sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:
- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

**The percentage asset allocations disclosed may fluctuate.*

Investments selected by the Investment Manager will generate exposure to companies, issuers and/or collective investment schemes as disclosed in the investment policy section of the Fund Supplement, which in addition to economic and financial objectives, promote ESG characteristics.

The minimum proportion of investments used to meet the ESG characteristics promoted by the Fund is 60% of the total net exposure of issuers.

The percentage asset allocations disclosed may fluctuate. The proportion of '# Other' investments is 40% and will be in sovereign bonds and treasury bills, derivatives on indices for hedging purposes, short positions of any derivatives used for investment purposes and cash and cash equivalents

6. Monitoring of ESG characteristics

The environmental and social characteristics which are being promoted by the product are monitored in the following ways:

First, external data, such as the ESG risk ratings provided by the Investment Manager's third party ESG research provider, sector involvement, and controversy involvement, is updated on at least a monthly basis.
Once an issuer fails to pass the exclusion criteria post investment, the Investment Manager is requested to take necessary action.

In addition to its periodic ESG due diligence, the Investment Manager performs an ongoing monitoring of the ESG related news and controversies affecting the portfolio companies. In the case of material developments at an investee company, an ad-hoc ESG committee meeting will be held to reassess the Investment Manager’s opinion on that company and to decide the action to be taken.

Finally, a review of the ESG characteristics of each company will be carried out on a twelve-month rolling basis by verifying each of the four-step ESG due diligence initially performed prior to the investment being made. Any position which does not fit the ESG filters outlined above will have to be sold within a time period set by the Investment Manager's ESG committee.

Monitoring will be conducted by a quarterly ESG Meeting composed of representatives of the Investment Manager (Compliance and risk Function and portfolio management) and the Manager (CEO, risk and compliance Function). The quarterly ESG Meeting is responsible for:

- the review and ratification, if appropriate, of investment decisions made by the ad-hoc ESG committee within the period;
- the oversight of any controversies affecting the portfolio companies;
- the monitoring of the Investment Manager's engagement policy and its impact on the portfolio companies; and
- the monitoring of the review of the ESG characteristics of each company.

7. Data Sources and processing

The Investment Manager’s research is based on primary sources, company meetings and regular engagement with companies on key issues.
The Investment Manager uses certain external data providers of ESG data, as well as internal ESG frameworks. Prior to an ESG data provider being appointed as a supplier, due diligence is conducted and periodic ongoing due diligence, engagement and feedback on their products is carried out thereafter.

The Investment Manager engages with ESG data providers periodically and this engagement covers a range of issues, including accuracy, timeliness and coverage of data as well as investigating methodologies and changes to those methodologies.

The Investment Manager’s intention is always to automate data processing as much as possible to avoid unnecessary risks with manual intervention. In general, as ESG data continues to evolve and data coverage improves, the proportion of estimated data used is constantly changing and difficult to assess.

The Investment Manager will use third-party data as an input for the pre-trade implementation of exclusion criteria, however, the Investment Manager will retain full discretion over the implementation of the data and final conclusion over the ESG profile and performance of a company on a case-by-case basis.

8. Limitations to Methodologies and data

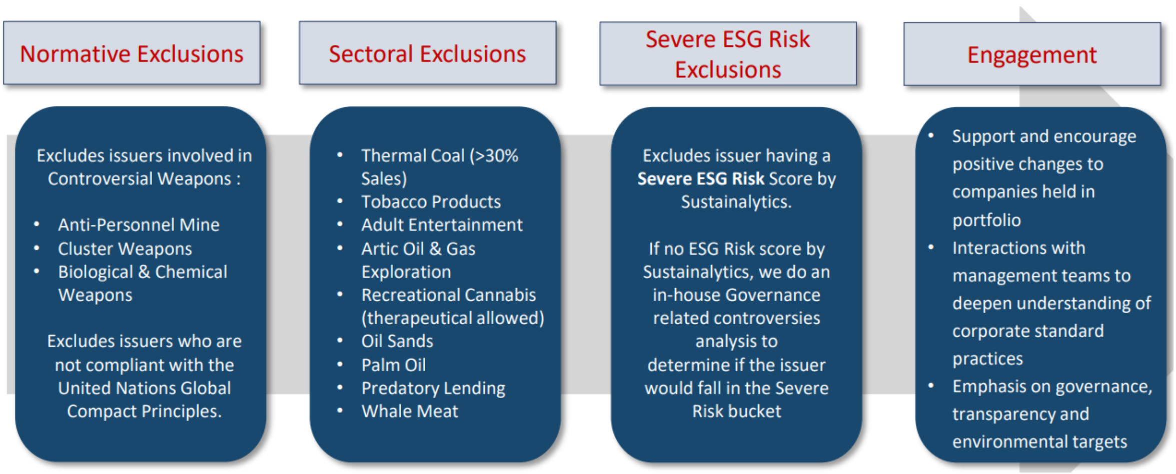
The Investment Manager’s approach to evaluating the ESG profiles of companies within its investment universe may be constrained by the availability, quality and relevance of sustainability-related data available to the Investment Manager. Limitations in the availability, quality and relevance of the sustainability-related data outlined above may make it difficult for the Investment Manager to ascertain the sustainability profile of a company, to assess the progress of a company from a sustainability perspective over a certain timeframe, to carry out consistent analysis on companies from a sustainability perspective against its industry peers in the same or other jurisdictions or to verify the Investment Manager’s assumptions and calculations concerning a particular company.

The Investment Manager engages with companies to encourage improved transparency and disclosure on material topics. Where there is insufficient information to determine the level of risk, the Investment Manager does not automatically penalise a company, but reviews management quality and whether this is reflective of the company’s early-stage approach or poor strategy is driving the lack of information.

9. Due Diligence

The Investment Manager identifies the following as part of its ESG due diligence. This is performed at a pre-trade level.

As part of the Due Diligence process, the following steps are followed by the Investment Manager:



The Investment Manager also performs a periodic review of the ESG characteristics of the portfolio companies and the results of this review are reported to its ESG quarterly committee.

10. Principal Adverse Impacts ("PAIs")

The Investment Manager considers the below selected PAI indicators for the purposes of the exclusion strategy applied to the Fund. These PAIs are also integrated in the ESG risk rating provided by the third-party ESG data provider referred to above:

1. GHG emissions (Table 1, PAI 1);
2. Exposure to companies active in the fossil fuel sector (Table 1, PA1 4);
3. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises (Table 4, PAI 10);
4. Board gender diversity (Table 2, PAI 13); and
5. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons) (Table 2, PAI 14).

The annual report will underpin the monitoring of the Fund through these bespoke PAI chosen for this Fund and enable engagement with the companies with the aim of seeking to improve on these specific PAIs over the longer term.

A separate PAI Statement detailing data and methodologies applied is available on the website.

11. Engagement Policies

The Investment Manager views engagement as part of its ongoing and fundamental dialogue with companies within the Fund's investment universe and as a constant and valuable part of its work. Engagement can take the form of meetings, on-site visits, calls and emails or via voting and can be with stakeholders such as management, competitors, suppliers, customers, industry experts and lower-tier employees.

The Investment Manager aims to be proactive in engaging through these methods and with these stakeholders, rather than waiting to engage following a particular event.

In summary, there are three main reasons for the Investment Manager engaging with a company in the investment universe of the Fund:

1. ongoing monitoring of the company's business and elevating company awareness;

2. deeper company analysis and challenge/feedback;

3. seeking to affect real change in a company due to specific behaviour or event.

The relevant Annual Engagement Report is available at www.corumbutler-am.com

12. Designated Reference Benchmark

No index has been designated as a reference benchmark to determine whether this financial product is aligned with the ESG characteristics that it promotes.