

ETHICAL INVESTMENT GUIDELINES

Ethical investment guidelines for Storm Capital Management Ltd

Storm Capital Management's objectives, targets, and other framework is set by the Board of Directors. Employed personnel with investment mandates will make investment decisions based on the framework set by the Board.

Any investments managed by Storm Capital Management is subject to ethical guidelines defined by the Board of Directors.

The Guidelines

Storm Capital Management's investment guidelines largely follow the ethical guidelines as defined by Norway's sovereign wealth fund (formal name: Government Pension Fund Global).

In addition to these rules, Storm Capital Management Ltd shall not invest in companies:

- whose main activity is to produce thermal coal
- whose main activity is gambling

Attached in **Appendix 1** is a summary of the ethical guidelines from Government Pension Fund Global.

London, 06/10/2017

Storm Capital Management Ltd
Board of Directors

APPENDIX 1

GOVERNMENT PENSION FUND GLOBAL GUIDELINES FOR OBSERVATION AND EXCLUSION FROM THE FUND

<https://www.nbim.no/en/the-fund/governance-model/guidelines-for-observation-and-exclusion-from-the-fund/>

This translation is for information purposes only. Legal authenticity remains with the original Norwegian version. This English version was last updated on 9 February 2016.

Adopted 18 December 2014 by the Ministry of Finance pursuant to the Royal Decree of 19 November 2004 and section 2, second paragraph, and section 7 of Act no. 123 of 21 December 2005 relating to the Government Pension Fund. Amended 21 December 2015 and 1 February 2016.

SECTION 1. SCOPE

(1) These guidelines apply to the work of the Council on Ethics for the Government Pension Fund Global (the Council) and Norges Bank (the Bank) on the observation and exclusion of companies from the portfolio of the Government Pension Fund Global (the Fund) in accordance with the criteria in sections 2 and 3.

(2) The guidelines cover investments in the Fund's equity and fixed-income portfolios, as well as instruments in the Fund's real-estate portfolio issued by companies listed on a regulated market.

(3) The Council makes recommendations to the Bank on the observation and exclusion of companies in the Fund's portfolio in accordance with the criteria in sections 2 and 3, and on the revocation of observation and exclusion decisions; cf. section 5(5) and section 6(6).

(4) The Bank makes decisions on the observation and exclusion of companies in the Fund's portfolio in accordance with the criteria in sections 2 and 3, and on the revocation of observation and exclusion decisions; cf. section 5(5) and section 6(6). The Bank may on its own initiative make decisions on observation and exclusion and on the revocation of such decisions; cf. section 2(2)-(4).

SECTION 2. CRITERIA FOR PRODUCT-BASED OBSERVATION AND EXCLUSION OF COMPANIES

(1) The Fund shall not be invested in companies which themselves or through entities they control:

- a) produce weapons that violate fundamental humanitarian principles through their normal use
- b) produce tobacco

c) sell weapons or military materiel to states that are subject to investment restrictions on government bonds as described in the management mandate for the Fund, section 3-1(2)(c).

(2) Observation or exclusion may be decided for mining companies and power producers which themselves or through entities they control derive 30 per cent or more of their income from thermal coal or base 30 per cent or more of their operations on thermal coal.

(3) In assessments pursuant to subsection (2) above, in addition to the company's current share of income or activity from thermal coal, importance shall also be attached to forward-looking assessments, including any plans the company may have that will change the share of its business based on thermal coal and the share of its business based on renewable energy sources.

(4) Recommendations and decisions on exclusion of companies based on subsections (2) and (3) above shall not include a company's green bonds where such are recognised through inclusion in specific indices for green bonds or are verified by a recognised third party.

SECTION 3. CRITERIA FOR CONDUCT-BASED OBSERVATION AND EXCLUSION OF COMPANIES

Companies may be put under observation or be excluded if there is an unacceptable risk that the company contributes to or is responsible for:

- a) serious or systematic human rights violations, such as murder, torture, deprivation of liberty, forced labour and the worst forms of child labour
- b) serious violations of the rights of individuals in situations of war or conflict
- c) severe environmental damage
- d) acts or omissions that on an aggregate company level lead to unacceptable greenhouse gas emissions
- e) gross corruption
- f) other particularly serious violations of fundamental ethical norms.

SECTION 4. THE COUNCIL ON ETHICS

(1) The Council consists of five members appointed by the Ministry of Finance after receiving a nomination from the Bank. The Ministry also appoints a chair and deputy chair after receiving a nomination from the Bank. The Bank's nomination shall be sent to the Ministry no later than two months prior to the expiry of the appointment period.

(2) The composition of members shall ensure that the Council possesses the required expertise to perform its functions as defined in these guidelines.

(3) Members of the Council shall be appointed for a period of four years. Upon the initial appointment, the Ministry of Finance may adopt transitional provisions.

(4) The Ministry of Finance sets the remuneration of the members of the Council and the Council's budget.

(5) The Council has its own secretariat, which administratively is under the Ministry of Finance. The Council shall ensure that the secretariat has appropriate procedures and routines in place.

(6) The Council shall prepare an annual operating plan, which shall be submitted to the Ministry of Finance. The operating plan shall describe the priorities set by the Council for its work; cf. section 5.

(7) The Council shall submit an annual report on its activities to the Ministry of Finance. This report shall be submitted no later than three months after the end of each calendar year.

(8) The Council shall evaluate its work regularly.

SECTION 5. THE WORK OF THE COUNCIL ON ETHICS ON RECOMMENDATIONS CONCERNING OBSERVATION AND EXCLUSION

(1) The Council shall continuously monitor the Fund's portfolio, cf. section 1(2), with the aim of identifying companies that contribute to or are responsible for production or conduct as mentioned in sections 2 and 3.

(2) The Council may investigate matters on its own initiative or at the request of the Bank. The Council shall develop and publish principles for the selection of companies for closer investigation. The Bank may adopt more detailed requirements relating to these principles.

(3) The Council shall be free to gather the information it deems necessary, and shall ensure that each matter is thoroughly investigated before making a recommendation regarding observation, exclusion or revocation of such decisions.

(4) A company that is being considered for observation or exclusion shall be given an opportunity to present information and opinions to the Council at an early stage of the process. In this context, the Council shall clarify to the company what circumstances may form the basis for observation or exclusion. If the Council decides to recommend observation or exclusion, its draft recommendation shall be presented to the company for its comments; cf. section 7.

(5) The Council shall regularly assess whether the basis for observation or exclusion still exists. In light of new information, the Council may recommend that the Bank revoke an observation or exclusion decision.

(6) The Council shall describe the grounds for its recommendations to the Bank; cf. sections 2 and 3. The Bank may adopt more detailed requirements relating to the form of such recommendations.

(7) The Council shall publish its routines for the consideration of possible revocation of an observation or exclusion decision. Excluded companies shall be informed specifically of these routines.

SECTION 6. NORGES BANK

(1) The Bank shall make decisions on observation and exclusion in accordance with the criteria in sections 2 and 3 and on the revocation of such decisions, after receiving recommendations from the Council. The Bank may on its own initiative make decisions on observation and exclusion in accordance with section 2(2)-(4) and on the revocation of such decisions.

(2) In assessing whether a company shall be excluded under section 3, the Bank may consider factors such as the probability of future norm violations, the severity and extent of the violations and the connection between the norm violation and the company in which the Fund is invested. The Bank may also consider the breadth of the company's operations and governance, including whether the company is doing what can reasonably be expected to reduce the risk of future norm violations within a reasonable time frame. Relevant factors in these assessments include the company's guidelines for, and work on, safeguarding good corporate governance, the environment and social

conditions, and whether the company is making a positive contribution for those affected, currently or in the past, by the company's conduct.

(3) Before making a decision on observation and exclusion in accordance with section 6(1), the Bank shall consider whether other measures, including the exercise of ownership rights, may be more suited to reduce the risk of continued norm violations, or whether such alternative measures may be more appropriate for other reasons. The Bank shall consider the full range of measures at its disposal and apply the measures in a coherent manner.

(4) Observation may be decided when there is doubt as to whether the conditions for exclusion are met or as to future developments, or where observation is deemed appropriate for other reasons.

(5) The Bank shall ensure that sufficient information is available before making each individual observation, exclusion or revocation decision.

(6) The Bank shall regularly assess whether the basis for observation or exclusion still exists.

SECTION 7. EXCHANGE OF INFORMATION AND COORDINATION BETWEEN THE BANK AND THE COUNCIL ON ETHICS

(1) To help ensure the most coherent possible use of measures in the context of promoting responsible management, the Bank and the Council shall meet regularly to exchange information and coordinate their work.

(2) Communication with companies shall be coordinated and with the aim to be perceived as consistent. The Bank shall exercise the Fund's ownership rights. The Bank shall seek to integrate the Council's communication with companies into its general company follow-up. The Bank shall have access to the Council's communication with companies, and may participate in meetings between the Council and companies.

(3) The Council may ask the Bank for information on matters concerning individual companies, including how specific companies are dealt with in the context of the exercise of ownership rights. The Bank may ask the Council to make its assessments of individual companies available.

(4) The Bank and the Council shall put in place detailed procedures for the exchange of information and coordination to clarify responsibilities and promote productive communication and integration of the work of the Bank and the Council.

SECTION 8. PUBLICATION

(1) The Bank shall publish its decisions pursuant to these guidelines. Such publication shall occur in accordance with the management mandate for the Fund, section 6-2(4). When the Bank publishes its decisions, the Council shall publish its recommendations.

(2) The Bank shall maintain a public list of companies excluded from the Fund or placed under observation pursuant to these guidelines.

SECTION 9. MEETINGS WITH THE MINISTRY OF FINANCE

(1) The Ministry of Finance, the Bank and the Council shall meet at least once a year. The information exchanged at such meetings shall be part of the basis for the reporting on responsible management included in the annual report to the Storting (the Norwegian parliament) on the management of the Fund. When the Bank on its own initiative makes decisions in accordance with section 6(1), the grounds for the decision shall be included in the publication of the decision.

(2) The Ministry of Finance and the Council shall meet at least once a year. The following matters shall be discussed at the meetings:

a) activities in the preceding year

b) other matters reported by the Ministry and the Council for further consideration.

SECTION 10. POWER OF AMENDMENT

The Ministry of Finance may supplement or amend these guidelines.

SECTION 11. ENTRY INTO FORCE

(...)

SECTION 12. TRANSITIONAL PROVISIONS

(1) Recommendations from the Council which the Ministry of Finance has received, but not finally processed, by 1 January 2015 shall:

a) where the matter concerns a company in the Fund's portfolio, be sent back to the Council for consideration of further handling in accordance with these guidelines

b) where the matter concerns a company not included in the Fund's portfolio, be taken note of by the Ministry. Such recommendations shall be made public.

(2) The Bank may make decisions on the exclusion of securities that are not in the investment portfolio on 1 February 2016 and that fall under section 2(2)-(4). In such cases, decisions and the grounds for such decisions shall be made public in accordance with section 8.