NORTHSTAR
ASSET MANAGEMENT

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Northstar Asset Management (Pty) Ltd
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The Code for Responsible Investing in South Africa (CRISA) provides guidelines on how investors should implement their analysis, investment activities, and disclose their progress in applying the principles.

The 5 key Principles of CRISA are as follows:

***Principle 1**: An institutional investor should incorporate sustainability considerations, including environmental, social, and governance (ESG), into its investment analysis and investment activities as part of the delivery of superior risk-adjusted returns to the ultimate beneficiaries*

- We incorporate ESG factors in our investment process and analysis which is used to inform our decision-making process.
- ESG factors are covered in detail through the Sustainability pillar of our fundamental research process. This incorporates environmental factors, social and human capital as well as leadership and governance. The outcome of this is carried through into our risk management step in determining weighting constraints of stocks.
- The Responsible Investment Committee meets semi-annually to ensure ESG integration across our investment processes.

***Principle 2**: An institutional investor should demonstrate its acceptance of ownership responsibilities in its investment arrangements and investment activities.*

- We vote on proxies according to our Proxy Voting Policy and record these on an ongoing basis.
- Proxy voting is not prescriptive and controversial proxies are raised in our weekly investment meetings.
- Our approach to active ownership is reported in our Responsible Investment Policy.

***Principle 3**: Where appropriate, institutional investors should consider a collaborative approach to promote acceptance and implementation of the principles of CRISA and other codes and standards applicable to institutional investors*

- We are a signatory to the Principles for Responsible Investment (PRI) which is backed by the UN.
- We encourage the management of companies to disclose ESG information and liaise with industry members in promoting CRISA guidelines.

***Principle 4**: An institutional investor should recognise the circumstances and relationships that hold a potential for conflicts of interest and should pro-actively manage these when they occur.*

- We are aware of circumstances, both internal and external, that could hold a potential for conflict, therefore, Northstar has adopted a Conflict of Interest Policy.

***Principle 5**: Institutional investors should be transparent about the content of their policies, how the policies are implemented and how CRISA is applied to enable stakeholders to make informed assessments.*

Through adoption and integration of both the PRI and CRISA principles, Northstar is committed to ensuring transparency in its approach, including the publication of the following:

- Responsible Investment Policy
- Proxy Voting Policy
- Proxy Voting History

Please visit the UN PRI website (https://www.unpri.org/) to view our transparency report.