



## **Troy Asset Management Limited** **Ethical Exclusion Criteria**

### **Introduction**

The assets of Trojan Ethical Fund (Ireland) (the "Fund"), a sub-fund of Trojan Funds (Ireland) plc (the "Company"), will be invested in accordance with Troy Asset Management Limited's (the "Investment Manager") investment process. For inclusion in the Fund's investible universe, certain potential investments will be screened against the Investment Manager's ethical exclusion criteria using a combination of third party data and the Investment Manager's primary research.

### **Ethical Exclusion Criteria**

The Investment Manager's ethical exclusion criteria apply to the categories of investment listed below. These criteria do not apply to other assets within the Fund. For example, investment in money market funds, cash, cash-equivalents and deposits will not be covered by ethical exclusion criteria.

### **Corporate securities**

Potential investments in companies will be screened against ethical exclusion criteria using a combination of third party data and the Investment Manager's primary research. The ethical exclusion criteria prohibit investment by the Fund in any company which:

**Armaments** - (a) generates more than 10% of its total turnover from strategic military supplies relating to conventional weapons and/or (b) produces key parts of, or provides services for, cluster munitions systems, and/or (c) is alleged to have contravened the convention on anti-personnel mines in the last ten years and which has not addressed the allegations, and/or (d) manufactures products, or provides services, which are all or part of a nuclear weapons system.

**Tobacco** - makes more than 10% of its total turnover from tobacco products.

**Pornography** - derives more than 3% of its total turnover from pornography or adult entertainment.

**Fossil Fuels** - (a) derives more than 10% of its total turnover from the refining or extraction of, or generation of power from, fossil fuels and/or (b) derives more than 10% of its turnover from coal mining activities. Companies whose listing falls within the Oil & Gas sector are also excluded.

**Alcohol** - derives more than 10% of its total turnover from the sale or production of alcohol.

**Gambling** - derives more than 10% of its total turnover from gambling (including spread betting).

**High Interest Rate Lending** - derives more than 10% of its total turnover from high interest rate lending (high interest being defined as lending at an annual percentage rate (APR) of over 100%).

This screening process is designed with the intention of excluding investment in companies



which do not fit within the ethical exclusion criteria as set out in this document.

The Investment Manager, for a fee borne by the Investment Manager, obtains ethical screening and research services from a third party, currently Ethical Investment Research Services (EIRIS) Limited, which are used to assist in monitoring the behaviour and activities of companies. The Investment Manager will use such data and research as an element of the investment process for investing in companies. The Investment Manager may change the provider in the future without pre-agreement or notice being provided to investors.

### Government and public securities

When investing, on behalf of the Fund, in government and public securities, there are certain key criteria the Investment Manager applies which restrict such investments:

1. The Fund will not invest in the securities of any sovereign issue which is issued or guaranteed by any issuer which is subject to a sanction issued by either the United Nations or the European Union.
2. When investing assets in government and public securities the Fund will only invest in the securities issued or guaranteed by the following countries: Canada, France, Germany, Italy, Japan, the United States of America, the United Kingdom of Great Britain and Northern Ireland (commonly known as the "G7"), being countries whose governance and institutions are considered by the Investment Manager to be robust, or by a single local authority or public authority of those countries.

### Precious metals

From time to time the assets of the Fund may be invested in precious metals, including gold. The Investment Manager will seek to minimise exposure to gold mined prior to 2012 which is the date after which it can be ascertained that gold has been sourced in compliance with the London Bullion Market Association's responsible sourcing programme. The purpose of this programme is to combat money laundering, terrorist financing, human rights abuses and environmental harm.

The Investment Manager keeps these ethical exclusion criteria under review and they may be updated from time to time.

### Portfolio monitoring

Where an investment is identified as no longer meeting the ethical exclusion criteria, the Investment Manager will seek to sell the investment within the following 90 days. The prices at which such an investment can be sold in these circumstances may be lower than the prices that might otherwise have been realised for the investment if such a sale was not required.

### Responsible investment & stewardship policy

The Investment Manager has in place a responsible investment & stewardship policy which summarises the Investment Manager's approach to responsible investment and the integration of environmental, social and governance ("ESG") factors. The Investment



Manager's investment process integrates ESG risks and opportunities into its fundamental analysis. The Investment Manager does not narrowly define or limit ESG factors but rather may analyse a wider range of factors than those covered by the ethical exclusion criteria. A copy of the Investment Manager's responsible investment & stewardship policy is available at [www.taml.co.uk](http://www.taml.co.uk).

### **Risk Warnings**

This document is not intended as an investment recommendation and should not be treated as such. Instead, it gives an overview of the current process which is part of a wider, ongoing process of research which is carried out by the Investment Manager.

Exposure to asset classes will be varied and at times the Fund may have no exposure to a particular asset class.

Readers should be aware that a fund which undertakes ethical screening in seeking to meet its investment objective is unable to invest in certain sectors and/or companies. The exclusion of some sectors of the market or particular companies may result in periods of underperformance with respect to funds which are able to invest in the market generally. For instance, if tobacco stocks are enjoying extremely strong returns the Fund would not be able to participate in their gains.

Past performance is not a guide to future returns. The value of investments and any income from them may go down as well as up and there is no guarantee that the investment objective of the Fund will be achieved.

The Fund may invest in non-UK securities and be exposed to currencies other than pounds sterling, which is the base currency of the Fund. The effects of changes in exchange rates may impact the value of investments and you may get back less than you invested.

### **Important information**

Before investing, you should read the relevant key investor information document for the share class you are interested in investing in and the prospectus, each of which can be obtained from the website of the Investment Manager at [www.taml.co.uk](http://www.taml.co.uk) or from the Company's registered office. If you are in any doubt about whether or not an investment in the Fund is suitable for you, you should seek professional advice before investing. The Investment Manager is not able to provide investment advice.

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