



Sustainability Policy Statement

Sigma Irish HoldCo and all subsidiaries

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1. Introduction

Waystone's strategic vision is to be a leading global provider of specialist services to the asset management industry by driving sustainable growth through an unwavering commitment to excellence, innovative solutions, and a client centric approach.

Sustainable behaviour is therefore crucial to Waystone's success in maximising opportunities, creating a positive impact, and mitigating risk. The company is committed to assessing, addressing, and monitoring its impact on the environment, relationships with employees, clients, and the communities in which it operates, achieved through applying good governance to its sustainability programme.

This Policy Statement is the cornerstone of Waystone's approach to embedding sustainability principles and values into strategic and day-to-day operations. Business functions and employees will, by upholding this Policy Statement, align with Waystone's values and help meet the expectations of stakeholders, thereby driving sustainable growth, creating value, and delivering meaningful impact for shareholders, clients, employees, and the wider community.

2. Entity Background

Waystone is a global financial services firm providing specialist services for the asset management industry. As the first common parent company within the Waystone group of companies' ownership structure, Sigma Irish HoldCo 1 Limited has been charged by the Board of Directors of the ultimate parent of the Waystone group, Sigma Irish TopCo Limited ("TopCo"), with responsibility for approval of Waystone's global, jurisdictional, and/or regional policies. "Waystone" hereafter refers to Sigma Irish TopCo Limited and all its subsidiaries.

3. Purpose and Scope

Sustainability encompasses a broad range of ideas and initiatives, which are often organised into Environmental, Social, and Governance ("ESG") categories to facilitate strategic planning, performance measurement, and reporting. This structure helps businesses systematically address sustainability issues, ensuring they can meet stakeholder expectations, comply with regulatory requirements, and track progress on their sustainability goals.

Waystone is a global business offering governance, administration, and advisory services to funds, fund managers, advisors, and other client types. While certain Waystone services already consider or apply ESG principles, such as ESG monitoring of funds as an appointed fund manager, and providing ESG strategy, framework, advice, and assurance advisory, this Policy Statement specifically outlines the company's internal sustainability efforts as a global corporate enterprise.

4. Policy Statement

Sustainability Governance

Waystone has established a Group Sustainability Committee, comprising members selected for their expertise in sustainability matters, their interest and capacity to drive the Group's sustainability initiatives, and to represent the key functions and global footprint of the organisation.

The committee includes the Group COO, General Counsel, Chief People Officer, Corporate Sustainability Lead, and the ESG Regulations Director. The Group COO serves as the executive

sponsor for ESG, connecting the committee to both the Waystone Executive Committee (“ExCo”) and the Waystone Board.

The Committee’s responsibilities are set out in section 5.

Sustainability Approach

Sustainability covers an extensive range of topics, and for Waystone to make meaningful progress the company has decided to focus on areas that are most relevant to the organisation, the broader financial services sector, and where it can have the greatest impact. Waystone conducted a double materiality assessment (“DMA”) which enabled the organisation to identify and prioritise the sustainability issues that matter most to both the business and its stakeholders.

A DMA is a prescribed framework and process that looks at sustainability from two perspectives: financial materiality and impact materiality. Financial materiality focuses on how sustainability issues affect a company’s financial performance, while impact materiality assesses how a company’s activities impact the environment, society, and broader stakeholders. By considering both dimensions, the DMA helps ensure that the company focuses on sustainability efforts not only to protect the business but also to contribute positively to the world around us.

Waystone engaged with a broad range of stakeholder groups during the DMA including employees, senior management, service partners, clients, investors, regulators, media, and peers. This comprehensive approach allowed the gathering of diverse insights, ensuring the sustainability strategy aligns with both internal and external expectations.

The results of the DMA confirmed that the following sustainability topics are of key importance to Waystone:

Environmental:

- Climate change mitigation.

Social:

- Gender equality & equal pay
- Training & skills development
- Access to quality information.

Governance:

- Corporate culture
- Cybersecurity
- Data privacy & security.

This Policy Statement focuses on these seven topics that were identified as the most significant from a financial and/or impact perspective. The exclusion of a topic from this Policy Statement does not imply that it is not being addressed by Waystone. Rather, it means that effort in terms of underlying policies, initiatives, and reporting will be prioritised and aligned with these seven topics.

Waystone commits to continuously reviewing both the DMA process and DMA itself by staying informed of best practices, emerging trends in sustainability, and evolving stakeholder expectations. Regular updates to the DMA will ensure that the assessment, priorities, and reporting remain current, actionable, and impactful.

Environmental

Waystone is committed to managing the environmental risks that are material to its business and key stakeholders. As part of this commitment, the company strives to minimise its environmental impact and mitigate the effects of climate change by focussing on its carbon emissions and waste.

Climate change mitigation

Waystone is committed to measuring and reporting its carbon footprint annually and has also committed to setting both near- and long-term carbon emissions reduction targets. These targets will be aligned with the Paris Agreement and will be submitted to the Science Based Targets initiative for validation by summer 2025.

In support of its carbon emissions reduction goals, Waystone is committed to developing a comprehensive climate action plan that incorporates tangible, real-world initiatives. As part of this effort, the company will:

- prioritise purchasing renewable energy for its offices wherever feasible i.e. in locations where it has control or considerable influence over energy procurement
- actively engage with its suppliers to help reduce Scope 3 carbon emissions across the value chain
- identify the largest emitting groups within the Scope 3 Employee Commuting category and explore targeted strategies to minimise these emissions, and continue to support Waystone's Hybrid Working Policy and
- engage with its partners, track, and benchmark Waystone's progress, and build in learnings aligned with the principle of continuous improvement.

Waystone is a large global organisation, operating across various jurisdictions each of which may have its own laws and regulations governing energy use and efficiency. We are fully compliant with all relevant requirements, and energy-saving audits have been conducted at several of our offices. Based on these audits, Waystone is committed to implementing the recommended actions to reduce energy consumption. In addition, the company will establish a global programme aimed at reducing energy use across all its office locations, with regular energy monitoring to track and ensure progress.

Waystone is also focused on identifying, preventing, and mitigating the potential risks and impacts of climate change on its business and operations through risk reviews.

Emissions from waste will be formally assessed as part of the company's Scope 3 emissions and the company is committed to reducing waste in line with the waste hierarchy of reducing, reusing, and recycling wherever possible. Waystone provides appropriate recycling bins and encourages sustainable waste practices across all its offices.

Waystone aims to prioritise the purchase of services from suppliers who uphold similar sustainability values to its own, and to minimise the consumption and depletion of resources through sourcing environmentally responsible, sustainable, and locally produced goods.

In line with the EU Directive on Waste Electrical and Electronic Equipment, Waystone is committed to ensuring the responsible disposal of e-waste, preventing it from ending up in landfill. Wherever possible, the company will also repurpose e-waste, diverting it from disposal and contributing to its wider sustainability goal of supporting the communities in which it operates.

Social

Waystone respects workers rights and the health, safety, and wellbeing of employees. These principles are outlined in the Employee Handbook, and the company is compliant with all applicable legislation in this regard.

Waystone offers a range of inclusive benefits, including flexible working arrangements, parental leave, sick pay, paid time off, and health care and wellness benefits, designed to support the welfare and diverse needs of the workforce.

Gender equality & equal pay

Waystone is committed to ensuring gender equality and equal pay across all levels of the organisation. As an Equal Opportunity Employer, the company prioritises fairness in all aspects of employment, ensuring that all employees are compensated equitably, regardless of gender.

The diversity of employees is recognised as one of Waystone’s greatest strengths, and the company is dedicated to fostering an inclusive environment where all individuals feel respected, valued, and empowered to bring their authentic selves to work. Waystone is committed to reviewing the metrics it uses to measure diversity beyond simply binary gender.

Waystone is committed to establishing a Diversity, Equity, and Inclusion (“DEI”) working group / committee responsible for developing and overseeing the company's DEI strategy and monitoring key initiatives and metrics. The company is also committed to ensuring its people managers undergo regular DEI training and to developing unconscious bias training to further inclusivity, and it will engage with third-party organisations that promote diversity, equity, and inclusion within the industry.

Training & skills development

At Waystone, continuous training and skills development are integral to the success of employees and the wider business. A Learning and Development platform provides employees with access to a broad range of training and development courses ensuring that individuals at every level have opportunities to enhance their knowledge, skills, and competencies, and align with the evolving needs of the business and financial services industry.

Waystone is committed to ensuring that career advancement is both fair and inclusive. A structured performance and promotions process, with formal 6-monthly reviews, provides all employees with equal access to career development. Regular employee surveys are conducted to measure engagement and gather feedback, ensuring that employees' experiences are reflected in continuous improvement efforts.

Access to quality information

Waystone is committed to providing high-quality, accessible information to both employees and external stakeholders, including clients, investors, and regulators. Ensuring that information is clear, accurate, and easily understandable is critical to supporting informed decision-making, maintaining transparency, and strengthening trust.

Waystone collects key performance indicator (“KPI”) statistics for certain service areas and conducts regular reviews with clients. The company is dedicated to acting on the information gathered from these KPIs to enhance the customer experience for all.

Much of Waystone’s business relies on due diligence activities, leveraging technology to streamline information gathering and review processes. This approach balances rigorous due

diligence with operational efficiency, reducing the burden on colleagues both within the company and among clients and service partners.

Where available and appropriate, Waystone will seek to adopt standardised formats for the presentation of information. For instance, sustainability information will be presented in accordance with the European Sustainability Reporting Standards (“ESRS”) from 2026.

Waystone is considering potential improvements to further enhance the accessibility of information. These include reviewing best practices for creating and presenting accessible information, equipping employees with the skills needed to communicate information clearly and effectively and developing metrics to quantify accessibility. This may involve usability testing, user surveys, and feedback mechanisms to assess how easily stakeholders can access and use the information provided. Whilst not commitments at this time, these initiatives are areas of focus for continuous improvement as the company develops tools and systems to enhance information accessibility.

Governance

Good corporate governance fosters an environment of trust, transparency, and accountability, which is essential for driving long-term investment, financial stability, and business integrity. This, in turn, supports stronger growth and more inclusive societies. Waystone is committed to promoting strong oversight, transparency, and risk management across all levels of the organisation and upholds good governance through robust metrics and procedures, including but not limited to management structures, decision-making processes, audit and risk controls, a Code of Ethics, and compliance with all applicable laws and regulations.

The Group COO serves as the executive sponsor for ESG, bridging the Group Sustainability Committee with both the Waystone ExCo and TopCo Board. Waystone is committed to ensuring that both ExCo and TopCo Board regularly review the group sustainability strategy and programme, with sustainability formally discussed at least annually as part of the TopCo agenda and more frequently at the ExCo level.

Additionally, Waystone is committed to publishing its first public update on its sustainability efforts in 2025, ahead of the regulatory requirement to report under the Corporate Sustainability Reporting Directive (“CSRD”) in 2026 (see section 8).

Corporate culture

The successful operation and reputation of Waystone is built on the principle of ethical conduct among all employees and to achieve this Waystone has established a Code of Ethics, and anti-corruption, anti-bribery, and whistleblowing policies and accompanying procedures.

Waystone’s company culture is deeply rooted in a legacy of growth and collaboration, shaped by the amalgamation of numerous businesses acquired over the years. Each of these companies has contributed its own unique identity, values, and expertise, creating a diverse and dynamic environment that reflects a rich history. As the company continues to evolve as a global leader in fund governance, there is a strong recognition of the need to reinvigorate the internal culture to unify and inspire teams. The focus remains on fostering a workplace that values collaboration, innovation, and employee engagement, ensuring colleagues feel connected to both the company’s legacy and its vision for the future.

Waystone is committed to strengthening its Modern Slavery and Human Trafficking Statement, alongside its internal processes and training, to further elevate its ethical standards. This includes requiring both new and existing suppliers to attest to modern slavery compliance within their own

supply chains, as well as providing additional ESG metrics. These measures will enable the company to uphold its commitment to choosing more sustainable suppliers and to deliver on its sustainability goals, including the net zero carbon emissions target.

Data privacy & security, and cybersecurity

Waystone is dedicated to creating a secure environment that protects the data of both its employees and clients, while ensuring compliance with applicable laws and regulations. The confidentiality, integrity, and security of the company's systems and data is fundamental to the business, so security is embedded at every stage of the technology and data lifecycle. By applying a comprehensive and consistent approach to information security management, both the likelihood and impact of any potential security incidents are minimised.

In line with this commitment, Waystone has adopted a Cybersecurity Policy and Personal Data Protection Framework based on the requirements of the EU's General Data Protection Regulation. This framework includes:

- Global Data Protection Policy
- Data Protection Procedures including:
 - o Personal Data Breach Management
 - o Data Subject Rights
- Information Security Policy
- Data Protection Information Notices
- Data Protection Training Programme
- Records of Processing Activities.

Waystone has an ongoing programme of education and awareness training on Data Privacy, Security, and Cybersecurity, including phishing simulations conducted across the entire organisation, and is committed to achieving ISO 27001:2022 certification.

Corporate Social Responsibility

Waystone recognises the importance of corporate social responsibility ("CSR") in contributing to the well-being of its employees and the communities in which it operates. As an organisation formed from the amalgamation of many different businesses spanning the globe, Waystone appreciates the diversity of local needs and the unique history that each office and its employees bring to the company. This global presence means that CSR initiatives must be tailored to reflect the specific challenges, opportunities, and needs present in each location.

Each year, Waystone will adopt a theme for its charity and volunteering initiatives. The theme for 2025 is **Community Partnership** which underscores the company's commitment to building meaningful connections with local communities and address the unique social needs of each region. Each office has the flexibility to align its efforts with the specific needs of its community, ensuring that Waystone's CSR activities create a positive, lasting impact. Colleagues are encouraged to provide suggestions for, and participate in, the Community Partnership initiatives from each office.

5. Responsibilities

It is the responsibility of all employees to familiarise themselves with this Policy Statement and to actively consider how sustainability practices can be incorporated into their individual roles, their team or function, and their local environment. Managers, team leaders, business unit heads, and senior management are responsible for supporting sustainability initiatives proposed by colleagues and providing the necessary assistance to embed and implement operational changes that advance and enhance Waystone's commitment to sustainability.

To implement and embed this Policy Statement, Waystone is committed to:

- investing the necessary time and resources to meet the commitments outlined in this document
- facilitating a 'Sustainability Champion' in each Waystone office location with more than 10 employees, whose responsibilities will include serving as the primary contact for sustainability matters and reporting on local progress towards the commitments in this Policy Statement
- reporting progress on these commitments to key stakeholders, including employees, investors, and the public (see section 8).

Waystone employees are required to promptly notify the Corporate Sustainability Lead if they believe or suspect a conflict with this Policy Statement has occurred or may occur, or if they become aware of an actual breach.

The Corporate Sustainability Lead and the Group Sustainability Committee hold the responsibility of offering expert guidance on sustainability matters to the business. The responsibilities of the committee are enshrined in its Terms of Reference and are:

Develop and Implement Sustainability Policies:

- Ongoing management of the Group Sustainability Policy to ensure it remains aligned with its corporate values and strategic sustainability objectives
- Continuously evaluate and improve Group sustainability practices and policies in line with best practice.

Set Sustainability Goals and Objectives:

- Establish short-term and long-term sustainability goals
- Develop strategies and action plans to achieve these goals.

Community and Stakeholder Engagement:

- Participate in and promote sustainability initiatives amongst colleagues
- Act as a coordinated, global resource for the Group's stakeholders to refer to and engage with on sustainability matters
- Collaborate with other organisations, institutions, and sustainability networks
- Stay informed about industry best practices and emerging trends in sustainability
- Review membership of sustainability organisations and accreditations.

Monitor and Report on Sustainability Performance:

- Track progress towards sustainability goals
- Develop a framework of metrics appropriate to report on sustainability
- Oversee regular reporting on sustainability metrics and performance for stakeholders
- Communicate sustainability achievements and challenges to stakeholders.

6. Record Keeping and Monitoring

Records will be kept in accordance with Waystone's Data Protection and Data Retention Policies.

A framework will be developed to monitor and report on the commitments and ambitions outlined in this Policy Statement, ensuring consistent tracking of progress. This framework will be made available to internal Waystone boards, providing transparency and accountability. Any material matters arising under this Policy Statement will be periodically reported to relevant entity boards for their review, ensuring robust oversight and governance across the group.

7. Policy Review Frequency and Ownership

Updates to this Policy Statement are the responsibility of the Corporate Sustainability Lead.

As per the Waystone Group Policy on the Use of Policies and Procedures, all Policies of Waystone Group entities are subject to at least annual review and approval by the Board of Directors of the Entities to which those Policies apply.

8. Disclosures to Investors and Third Parties

Waystone will fall within the scope of the reporting obligations of the Corporate Sustainability Reporting Directive in 2026. This new regulatory framework will require Waystone to align its sustainability disclosures with the same level of rigour and importance as financial disclosures, ensuring transparency and accountability in the company's ESG practices.

The CSRD introduces the European Sustainability Reporting Standards, a detailed framework that standardises sustainability reporting across the EU. These standards cover a wide range of ESG metrics, ensuring that companies like Waystone provide clear, consistent, and comparable data on their sustainability performance.

Waystone is committed to publishing its first public update on its sustainability efforts in 2025, ahead of the regulatory requirement to report under the CSRD in 2026. This interim update will highlight key achievements in areas such as environmental impact reduction, community support, and responsible governance. Through proactive reporting, the company aims to demonstrate its commitment to sustainability and ensure readiness for the ESRS framework, positioning it to meet future regulatory demands while reinforcing its broader sustainability goals.

Appendix 1 – Version Control History

Note that the below table must be completed for all amendments made to policy, regardless of whether or not Board approval is required.

Version#	Major/Minor/Annual Review	Updated By	Review Date	Approved By	Approval Date	Reason for/Explanation of Changes
1.0	Major	Brett Sanderson	22 October 2024	Sigma Irish Holdco 1 Limited	29 October 2024	Creation of new Policy Statement

Appendix 2 – Board Adoption Date Control History

Entity / BU Name	Adoption Date