



Polen Capital ESG Investment Policy Statement

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Polen Capital ESG Investment Policy Statement

Overview and Purpose

Through our distinctive growth and income solutions, we aim to fulfill our mission to preserve and grow our client assets to protect their present and enable their future. Our philosophy is to build high conviction and competitively advantaged portfolios and invest for the long term with patience and discipline, harnessing the power of compounding returns.

At Polen Capital, ESG represents a holistic assessment of a company's ability to deliver at high levels for the key stakeholders it was built to serve, today and into the future. We believe businesses that can thoughtfully balance the (sometimes competing) interests of key stakeholders over time, including uniquely delivering the value they seek and mitigating the issues they see, are best positioned to deliver sustainable outcomes for all key stakeholders involved. Our explicit and systematic integration within our investment process of multiple business issues, including but not limited to those that are commonly classified as "environmental, social, or governance" issues, is aligned with our fiduciary duty and supports our aim to deliver attractive risk-adjusted returns to our clients.

Our ESG Investment Policy Statement provides an overview of our approach to ESG integration within our equity and credit portfolios, a description of ESG roles and governance at our firm, and an explanation of how we report on our ongoing progress on our ESG-related initiatives.

Equity Approach to ESG Integration

Objective, Stakeholder-centric approach

We employ a disciplined investment approach for each of our investment strategies, with a focus on a company's stakeholder value creation, through each stage of our investment processes. Our ESG approach is rooted in the belief that every business is built to serve certain key stakeholder groups, and it is only companies that can deliver effectively for those stakeholders including customers and employees over the long run that will be positioned to also deliver for shareholders in a way that can allow our clients' investment objectives to be realized over time.

Our ESG framework first involves identifying the key stakeholders of each business we study. This includes a company's employees, customers, shareholders, suppliers and other business partners, local communities, and the environment.

Next, we study the value proposition that our research suggests key stakeholders of a particular business need to see to engage and continue engaging with the company, how effectively the



company is delivering the value its key stakeholders seek, the company's initiatives that can allow it to mitigate the issues these stakeholders see over time, and the competitive advantages that we believe the company has built over time that can allow the company to continue delivering for its key stakeholders in a unique way.

Additionally, we assess whether the company has the governance structures and ongoing initiatives in place that our research suggests are needed to amplify the value its key stakeholders seek and mitigate the adverse impacts of a business that typically surface for growing companies over time.

Each member of the investment team is responsible for conducting research across the issues we believe matter to the key stakeholders we study. We take an objective, stakeholder-centric approach to studying these issues and determining whether a company is delivering the type of value its key stakeholders seek rather than impose our personal or moral judgments. We believe inserting personal or moral judgments can lead to poor outcomes and inconsistent processes because one's personal, moral views are often not reflective of the views of the larger stakeholder groups these businesses were built to serve and can be difficult to consistently apply given the different "moral compasses" individual investment team members can have across different companies and issues.

For a company to be viable and then sustainable for all key stakeholders involved over the long-term, we believe the company must be able to deeply understand its key stakeholders, the value they seek, and the issues they would like to see mitigated, and then deliver the value these stakeholders seek while making progress on the adverse impacts these stakeholders see in a unique way, both on an absolute basis and relative to the alternatives these stakeholders have.

Fundamental Analysis and ESG Analysis – One and the Same Under Our Holistic Approach

Given our holistic approach to ESG, we do not distinguish between fundamental research and ESG research. We consider ESG issues and business issues as one and the same. For example, a company's ability to deliver the value its customers seek through providing high quality products and services, in their view, in exchange for the hard-earned money these customers pay to access these products and services is both a business issue and an issue we classify as a social issue under our ESG approach. Each issue and its sub-issues that we believe are important to study for a business's key stakeholders can be classified as either an environmental, social, or governance issue in our view. We conduct fundamental, qualitative analysis across each of these issues and sub-issues, which leads to a holistic, comprehensive review of a business's value proposition for its key stakeholders, its competitive advantages and financial strength that can allow this value proposition for stakeholders to endure, and the initiatives that management has in place to both enhance the company's value proposition and mitigate the adverse impacts of the business that surface over time.

Among the business issues we study that we classify as governance issues, we evaluate the quality and track record of the management team along with the composition, diversity, independence, and experience of the company's board to gain confidence in the company's



ability to set and execute a sound, long-term, strategic vision in a way that can effectively balance the (sometimes competing) interests of the company's key stakeholders. In addition, we evaluate executive compensation practices to determine whether we believe company management is properly aligned with the long-term interests of the company's key stakeholders, including shareholders. We are also attentive to practices that clarify the company's commitment to complying with applicable laws and regulations.

The business issues we classify as social issues include those issues we believe are important to study relating to the company's customer, employee, supplier and other business partner relationships, and communities. We study an expansive set of business issues across these areas that enable us to determine whether we believe a company is delivering the value these stakeholder groups seek and whether the company remains in a position to amplify this value and mitigate the issues these stakeholders see over time.

For customer relationships, we assess whether the company has brought unique products and services to market that are viewed as being higher quality, more convenient and/or lower cost than alternatives by these customers, whether the company is transparent with pricing, and whether the company takes appropriate measures to protect consumer privacy.

We believe assessing a company's relationships with its employees is critical to understand whether the company can attract and retain the right talent, which is critical for product development (among other reasons), which is critical for customer satisfaction and ongoing innovation, which is critical for company financial performance and shareholder returns. We assess a company's ability to create jobs and pay competitive wages within a culture of innovation and career development that employees appreciate, within a culture that promotes diversity and inclusion within the workplace, and whether we have come across meaningful employee controversies that suggest widespread employee dissatisfaction.

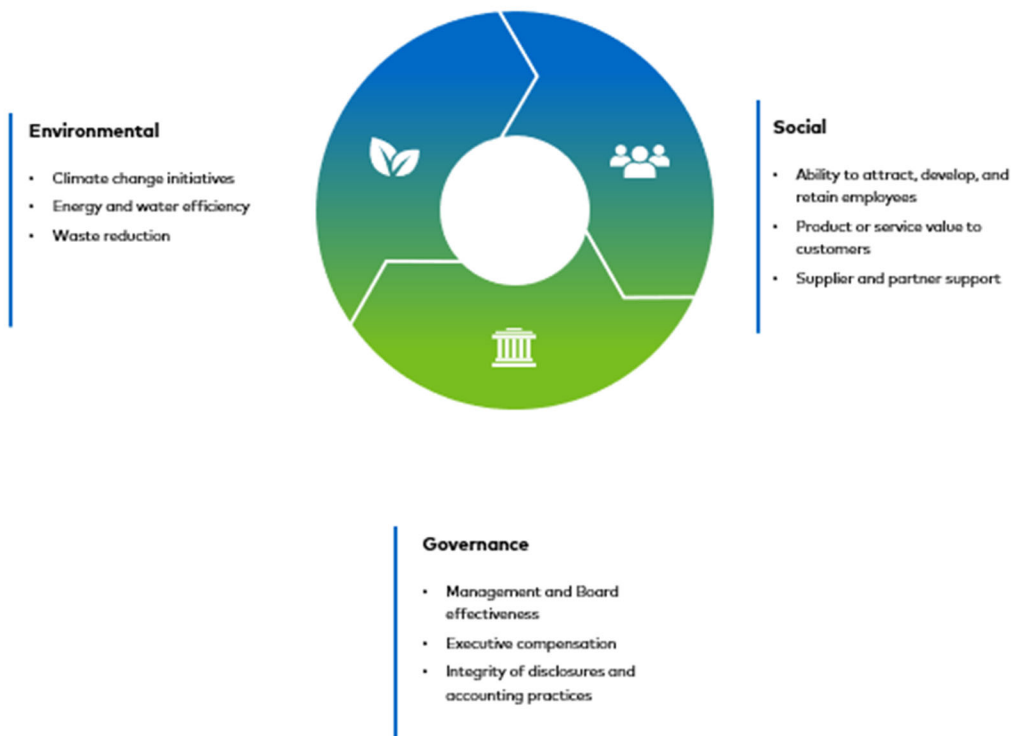
For supplier relationships, we assess whether the company has adopted supplier policies that seem in-line with industry best practices and whether it monitors suppliers for compliance with such policies that generally cover product quality, product and workplace safety, and human rights policies.

For community-related issues, we assess whether the company is finding ways to invest to support and strengthen the communities in which they operate, which other key stakeholders including employees and customers tend to find value in based on our objective analyses.

With respect to environmental issues, our objective company assessments continue to demonstrate that a high and increasing percentage of company customers, employees, and shareholders believe that companies have a responsibility for taking reasonable action to help protect the environment in which they operate to help ensure there will continue to be a similar planet to operate within for itself and others for centuries to come. As a result, environmental sustainability should be embedded within companies' business strategies to minimize risks and capture opportunities. We study a set of business issues that we classify as environmental factors including climate change initiatives, energy and water efficiency, and the development of sustainable products and services to better assess

how companies are performing and progressing in these areas based on what their respective key stakeholders are looking for. We continually assess whether it seems stakeholder perceptions or engagement with the company is shifting because of the company's efforts to operate in an environmentally sustainable manner.

Examples of business issues considered:



Research Tools and Resources

Our ESG analysis is a product of our bottom-up, fundamental research to which each investment team member contributes as part of our holistic ESG approach.

In addition to our internal, qualitative research, we currently subscribe to the ESG research of Sustainalytics, a third-party ESG ratings provider that attempts to measure a company's exposure to and management of risks it considers to be ESG risks. We utilize Sustainalytics' ESG ratings reports primarily to note any issues Sustainalytics has flagged to be more aware of differences in views between us and third parties, and perhaps (although likely very rare), to note a risk or issue that has not yet come up in our internal research. We believe it is beneficial to be aware of third-



party ESG ratings and methodologies for additional perspective on the companies we study. That said, we believe our holistic approach to ESG and the resources and experience we have (i.e., a team of dedicated, experienced business analysts who study a small subset of the broader indexes) allow us to go further by offering better perspective around the risks a company is exposed to and how it is managing those risks, and to be more holistic by having the ability to assess the value stakeholders seek from the business and how the company is delivering for them as opposed to studying risk and risk management alone. As business analysts, we believe our holistic approach, experience and perspective give us a deeper understanding of a business's risks, risk management practices, and opportunities.

In addition, we currently source data from Clarity AI, a third-party data provider, primarily to monitor and report on certain indicators defined as principal adverse impacts under the EU Sustainable Finance Disclosure Regulation, or SFDR (see page 12 for further information on the regulation).

In all cases, we rely on our own evaluation of the company across the business issues we study to make our investment decisions. To enhance the organization and documentation of our research efforts across the business issues we study, we have developed an in-house, proprietary application that we use to collect relevant facts and summarize our views in a centralized location for how we believe companies fare across the issues. The application stores our collection of relevant facts and the analyst(s)' summarized views on how a company is performing across the business issues we study under our ESG framework and enables us to track a company's progress over time. The tool also enables each investment team member to access information from a centralized source across these issues for each company within portfolios.

Approach to Exclusions

We exclude the substantial majority of companies within our broader benchmarks as part of our investment process that aims to only invest in companies that we believe are delivering for key stakeholders across the business issues we study at high levels on balance. Based on our company assessments and the characteristics we look for to determine whether a company is delivering for its key stakeholders at a high level, including having the competitive advantages, financial strength and governance required to allow their unique value propositions to endure, we typically find that we have eliminated and excluded all companies from certain sectors as of a certain point in time. To the extent this applies to certain sectors as of a certain point in time, we note this as part of our exclusion policies. We will consider client-driven restrictions that do not materially alter the investment strategy and our ability to deliver strong, long-term risk-adjusted returns.

The current exclusions associated with our UCITS funds are detailed in the SFDR section on page 12. Within the UCITS prospectus guidelines, we have formalized certain exclusions based on our view that companies principally involved in certain activities are not currently serving their respective key stakeholders as effectively as other opportunities we have following our objective assessments.



Credit Approach to ESG Integration

Beyond Risk Assessment

Polen Credit endeavors to identify material factors that may contribute to financial downside (in particular, significant event risks that can negatively affect an issuer's creditworthiness and therefore its ability to meet its ongoing fixed income principal and interest obligations), as well as to assess whether or not market pricing adequately reflects those risks with respect to any proposed investment. Polen Credit integrates various ESG considerations, such as transparency in corporate governance, the existence of an independent and experienced board of directors, a commitment to environmental protection, and a track record of product safety, into the bottom-up fundamental analysis of each fixed income investment opportunity. If the research analyst, in consultation with the portfolio manager, believes that an identified factor will have a material positive or negative impact on the business that may disproportionately change the risk/reward profile of such investment, the team will factor that assessment into our investment decision-making process (and, accordingly, may not make such investment on behalf of our clients).

The Credit team shares the equity teams' approach to ESG, which involves an understanding of a company's relationships with its key stakeholders, including employees, customers, and suppliers. The assessment of material ESG-related business issues is embedded in the team's internal analysis as part of a holistic process designed to understand a company's current and future business prospects. We believe this approach provides a deeper insight into critical risk factors, including exogenous factors not typically exposed in a traditional business analysis model, which ultimately results in sounder investment decisions on behalf of our clients. Furthermore, ESG integration within the investment process does not occur only when evaluating new investment opportunities; rather, Polen Credit monitors existing positions on an ongoing basis.

Supplemental to the investment team's work, Polen Credit leverages ESG ratings and research provided by MSCI. MSCI rating changes are communicated and reviewed by the investment team on a monthly basis. Notably, given the limited third-party coverage of private high yield debt issuers, Polen Credit also assigns an internally generated ESG rating with respect to any holdings that are not rated by MSCI. Polen Credit's analysts generate these internal ESG ratings by using MSCI's industry-wide ESG reports together with comparable company analysis, as well as their own business judgment, to determine the critical ESG factors that influence the risk profile of each unrated company.

Credit Approach to Exclusions and ESG Guideline Customization

In addition to the ESG integration that occurs within all of the firm's portfolios, the Polen Credit team also has the capability to manage customized accounts to align with a client's values and ESG objectives. For example, the team implements exclusionary screens prohibiting certain types of investments on behalf of its clients' portfolios that maintain such requirements. Our trade



order and portfolio management system is coded with pre-trade restrictions related to such prohibited investments.

We also manage specific ESG-focused mandates. For instance, the ESG Upper Tier High Yield strategy entirely excludes any exposure to fossil fuel production, distribution, transportation and power generation industries, and only invests in issuers that meet minimum ESG ratings requirements. In addition, the team has developed simulated portfolios pursuing certain ESG-related investment objectives, specifically (i) the Environmental Sustainability High Yield strategy, which seeks to identify resilient businesses that help mitigate or potentially benefit from evolving environmental issues, trends, and regulations, and (ii) the Sustainable Development High Yield strategy, which focuses on certain Sustainable Development Goals (SDGs) with positive gender and racial equity and environmental impact.

Stewardship

Engagement as Equity Investors

As fundamental, long-term minded investors who think like business owners of the companies in which we invest, ongoing monitoring and engagement with company management across the business issues we study are a notable aspect of our research process. Our long-term mindset and philosophy around the importance of making substantial investments in the relatively few businesses that we believe exist at any given time that can deliver at high levels across the issues we study, generally resonates with company management teams, and helps foster productive discussions.

We typically engage with a company's management on a variety of topics in a way that we believe can help us clarify management's views across issues so we can better understand a company's strengths and weaknesses, better assess how a company is delivering on behalf of its key stakeholders, and allow us to express our views as appropriate. These discussions might cover many commonly defined ESG factors. These discussions also cover many other business issues that we consider ESG issues under our holistic ESG approach but might not be defined by all others as such currently. We also believe engagement can be useful in assessing the performance and suitability of management teams. While we do not typically seek to change the strategy or beliefs of investee management teams, there are situations where we find engagements useful to express differing viewpoints. We may also engage with companies as part of our ongoing review of the principal adverse impacts defined under SFDR or other negative consequences of the business, as we see necessary.

The investment team is responsible for continuously monitoring companies and holdings to ensure they remain appropriate for investment based on our investment philosophy and ESG approach. Meetings are typically held with companies to clarify specific results, discuss events, or to discuss other topics such as corporate strategy, financial performance, risk management, corporate governance, executive compensation, capital structure, and other research initiatives.



We may also engage with companies to discuss specific proxy issues or votes, enabling us the opportunity to ask questions and share feedback on proxy ballot issues.

Within our equity strategies, we generally do not set specific, predefined engagement topics that go across all companies. Instead, our company engagements are based on our ongoing assessment of each company and the business issues we feel are important to clarify and discuss. Our engagements typically do not involve attempting to influence management or meaningfully change the company's direction, particularly due to our aim of investing only in companies that we believe are faring well across the issues we study on balance. Dialogue with company management generally extends over the course of our investment. We may not always agree with a company's decisions or hear the desired message in our company interactions, and we approach each situation on a case-by-case basis, and holistically. As equity owners, we have the ability to vote for or against company recommendations for director votes, executive compensation, and other matters. If our analysis no longer supports maintaining an investment based on our investment philosophy and process, including our ESG approach, we would opt to sell our position.

Engagement as Credit Investors

Polen Credit believes that issuer engagement as a debt holder tends to be more indirect when compared to that of an equity owner. However, opportunities to actively engage as a fixed income investor do arise, especially with respect to events such as new debt issuances and corporate restructurings. In such circumstances, Polen Credit, on behalf of our client accounts, may have incremental leverage to influence an issuer with respect to environmental, governance, and reporting issues. Our active approach to fixed income investing generally includes frequent interaction with company management and we seek to keep an open line of communication with respect to actions that could negatively impact the value of the fixed income investment made on behalf of our clients. Polen Credit's engagement efforts are selected based on the materiality of the issue at hand combined with our ability to engage (e.g., amount of financial leverage, relationship with management, etc.). We set predefined objectives when seeking to engage with an issuer. Such objectives are determined by the investment team based on the individual facts and circumstances surrounding each individual engagement and have historically spanned across the ESG spectrum. Polen Credit's analysts typically conduct the engagement; however, depending on the specific issue (i.e. corporate restructuring), portfolio managers and legal counsel may also be involved as well.

Polen Credit's investment team also identifies inconsistencies between the research on certain companies provided by our third-party ESG research provider and our own evaluation of those companies as part of our fundamental analysis. In such cases, the investment team has initiated discussions with both the issuers and with our third-party ESG research provider in an effort to improve the quality of the ESG research produced. We also encourage our portfolio companies to improve and expand their ESG disclosures.

A typical engagement effort involves numerous discussions with company management and shareholders. An escalated engagement often becomes a collaborative effort involving other stakeholders of the company as well as other third parties (e.g., restructuring and legal advisors). Overall, our engagement activities have led us to conclude that, while time and effort-consuming, engagement can be effective. However, in the event that issuer engagement is not



successful, and the team does not believe that it can advocate for practical change, divestment may be warranted, depending on the nature of the ESG factors and the corresponding effect on the investment's risk/reward profile.

Collaborative engagements

Within our equity strategies, we generally prefer to have direct contact with management and have not been involved in collaborative engagements. We monitor the PRI Collaboration Platform for any initiatives which would be a fit for us to participate.

Polen Credit engages with third-parties acting on behalf of an issuer (e.g., underwriters, legal counsel) on certain terms and conditions relating to a new issuance, refinancing, and/or restructuring. Polen Credit may collaborate with other investors when engaging with an issuer (or with a third-party acting on their behalf) regarding a new issuance, refinancing, and/or restructuring.

Proxy Voting

In the case of our equity ownership, we believe proxy voting is a powerful tool that allows us the opportunity to directly influence corporate policy in a way we believe will maximize shareholder value. We also leverage proxy voting matters in certain company engagements to better understand company views, express our views and share feedback, and deepen our knowledge about certain of the company's practices. Investment team members undertake review and consideration of all proxy votes, including for governance matters and shareholder proposal topics.

Our proxy voting is based on our investment philosophy, approach, and principles. We generally take each proxy ballot issue for each company on a case-by-case basis, taking in the context of the company, its positioning, its end markets, recent developments and other factors when voting. There are generally certain common proxy ballot issues where we have identified a best corporate practice and vote proxies accordingly including voting proxies in favor of a one share, one vote share-class structure.

To assist with our internal review, we subscribe to a third-party service from Institutional Shareholder Services (ISS) for research and recommendations on proxy issues. Specifically, we utilize ISS's Sustainability Voting Guidelines, which are designed to support positive corporate ESG actions that promote practices that present new opportunities or mitigate related financial and reputational risks. We come to our proxy voting decisions independently, but our proxy votes often align with the guidance from the ISS Sustainability Voting Guidelines. As a matter of proxy voting process, the investment team makes final proxy voting determinations. If the investment team disagrees with ISS's recommendation, we document a record that summarizes our decision.

Additional information is available within our Proxy Voting Policy.



Stewardship Process

The investment team members carry out engagement and proxy voting (where applicable) as part of the overall investment process and are tracked within each team's internal documentation. We study companies holistically, and any material information stemming from engagement and proxy voting is integrated into our company assessments.

ESG Governance

Stewardship and oversight of ESG activities are performed through several capacities:

- All investment team members are responsible for the integration of the business issues that we also consider ESG factors in the investment process, along with conducting company engagements and proxy voting activities. Certain members of the investment team also have direct sustainable investing leadership roles that help better organize the investment team's efforts in this area.
- The ESG Committee, a cross-functional group, helps set the strategic direction and helps support the ongoing advancement of our ESG goals. The ESG Committee meets at least monthly and reports into the firm's Operating Committee.
- The Advisory Board, an independent committee of outside advisors responsible for providing non-binding strategic advice to the firm, provides diverse insights on our ESG efforts.
- The Advisory Board Risk Committee and Risk & Compliance Committee review the firm's climate management approach and are updated semi-annually on the progress of climate risk management implementation and our ESG initiatives.

Sustainable Finance Disclosure Regulation – Article 8 Classification

The EU Sustainable Finance Disclosure Regulation (SFDR) was introduced by the European Commission as part of a package of legislative measures arising from the EU Sustainable Finance Action Plan. The SFDR imposes mandatory ESG disclosure obligations for asset managers and other financial market participants operating in the EU to raise the transparency of a fund's sustainability considerations. Under the SFDR, funds must classify as Article 6, Article 8, or Article 9, depending on the level or objective of sustainability in the investment process.



Equity Funds

The following Polen Capital UCITS funds for our equity strategies are currently classified as Article 8, the designation for funds that promote environmental and/or social characteristics and invest in companies that follow good governance practices.

- Polen Capital Focus U.S. Growth Fund
- Polen Capital International Growth Fund
- Polen Capital U.S. Small Company Growth Fund
- Polen Capital Global SMID Company Growth Fund
- Polen Capital Emerging Markets Growth Fund
- Polen Capital Emerging Markets ex-China Growth Fund
- Polen Capital Asia ex-Japan Growth Fund

Our Article 8 commitment for our equity funds involves two primary activities: inclusionary, based on our qualitative company assessments that employ our objective, stakeholder-centric approach, and exclusionary, based on our views of companies that are not currently serving their stakeholders as effectively as other opportunities we have and have therefore been excluded from consideration. In addition, we have certain exclusions of companies that have involvement in certain product areas.

Inclusions:

To identify companies that we believe promote environmental and/or social characteristics, we study business issues as part of our investment framework that enables us to assess how effectively a company is serving its customers, employees, shareholders, communities, suppliers and other business partners, and the environment, as described earlier in the policy. For example, we analyze issues such as the company's climate change initiatives (an environmental characteristic under our approach) and how companies attract, retain and grow key stakeholder bases such as employees and customers (social characteristics under our approach). Our framework also includes issues that we believe enable us to assess whether a company has good governance in our view, including sound management structures, management of employee relations, management of remuneration of staff, and tax compliance.

Exclusions:

Companies will be excluded if we believe the company is not promoting environmental and/or social characteristics by effectively balancing stakeholder interests at high levels or the company is not following good corporate governance, based on our assessment and judgment. Based on our approach and our objective assessments, the companies we currently exclude includes the following:

Companies whose revenues are made up of at least 25% of the following:

- adult entertainment production,
- small arms,
- tobacco production,
- thermal coal, and
- controversial weapons



Additional information can be found on our website within the UCITS section of each strategy: [Strategies | Polen Capital | Concentrated Growth Manager](#)

Credit Funds

Within our credit strategies, the Polen Capital Opportunistic High Yield Fund, a Qualifying Investor Alternative Investment Fund (QIAIF) created within an ICAV vehicle for the strategy of the same name, is classified as Article 8.

Our Article 8 commitment for the QIAIF fund involves two primary activities: inclusionary, based on our bottom-up, fundamental analysis to attain certain environmental characteristics of the fund (and specifically the achievement of a portfolio with an estimated carbon intensity lower than benchmark), and exclusionary.

Inclusions:

To identify companies that we believe promote the environmental characteristic, we measure the actual carbon intensity of individual issuers (where such information is available through public or private sources) held in the fund or otherwise estimate the carbon intensity of individual issuers based on industry information otherwise available to us. As an outcome of this process, we seek to achieve a portfolio with a lower estimated carbon intensity, as measured by our methodology, than that of the broad high yield fixed income investable universe, as represented by ICE BofA U.S. High Yield Index.

Exclusions:

From our analysis, we exclude companies that do not adhere to good governance practices or are operating in sectors that we believe have a negative impact on sustainability. Examples of companies that the fund does not currently invest in based on our assessment and judgement are:

- Companies classified as tobacco within the level 4 sub-sector of the ICE BofA High Yield industry classification scheme;
- Companies that generate at least 30% of their revenue from thermal coal mining; and
- Companies involved in the production or manufacture of controversial weapons.

Associations

Signatory to the United Nations-supported Principles for Responsible Investment (PRI)

The PRI is the world's largest network of asset owners, asset managers, and service providers joined to support the incorporation of ESG factors into investment decisions to promote a more sustainable global financial system. This initiative is centered on six Principles, that signatories will:

- Incorporate ESG issues into investment analysis and decision-making processes
- Be active owners and incorporate ESG issues into ownership policies and practices.
- Seek appropriate disclosure on ESG issues by the entities in which we invest



- Promote acceptance and implementation of the Principles within the investment industry
- Work together to enhance our effectiveness in implementing the Principles
- Report on our activities and progress towards implementing the Principles

We became a signatory to the PRI in 2018 to demonstrate our commitment to our stakeholders to uphold a focus on ESG throughout our investment and business decisions.

Public Supporter of the Task Force for Climate-Related Financial Disclosures (TCFD)

The TCFD is a set of recommended disclosures for reporting on climate-related financial risks and opportunities. We became a public supporter of the TCFD in 2020 to support enhanced disclosure across industries in an effort to better enable investors to identify and assess these risks. We report on our governance and measurement of climate-change related risks in our annual ESG report.

CDP Capital Markets Signatory

We have been a Capital Markets Signatory of CDP, formerly Carbon Disclosure Project, since 2020. The CDP facilitates a global disclosure system for companies to disclose on environmental impacts, such as climate change.

Reporting

As a signatory to the PRI, we complete the annual PRI Transparency Report detailing our activities in line with the six principles outlined above. We produce annual Sustainability and ESG reports detailing our ESG integration across the firm and our investment activities. Additionally, we can also provide quantitative ESG reports to our clients upon request.

Policy Review

Our intention is to review this policy at least annually and update the policy as needed to reflect any developments as we go forward. For any questions or to learn more, we invite you to contact us.