



European SRI Transparency Code

Artemis Funds (Lux) – Positive Future

June 2022

Statement of Commitment

Sustainable and Responsible Investing is an essential part of the strategic positioning and behaviour of Artemis Investment Managers LLP ("Artemis"). We have been involved in SRI since 2015 and welcome the European SRI Transparency Code.

This is our second statement of commitment and covers the period 1 July 2022 to 30 June 2023. Our full response to the European SRI Transparency Code can be accessed below.

Compliance with the Transparency Code

Artemis is committed to transparency and we believe that we are as transparent as possible given the regulatory and competitive environments that exist in the countries in which we operate. Artemis meets the full recommendations of the European SRI Transparency Code for its Artemis Funds (Lux) – Positive Future fund.

June 2022

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1. List of funds covered by the Code

Name of the fund(s): Artemis Funds (Lux) – Positive Future					
Dominant/preferred SRI strategy (Please choose a maximum of 2 strategies)	Asset class	Exclusions standards and norms	Fund capital as at 31 December	Other labels	Links to relevant documents
<input type="checkbox"/> Best-in-Class Investment section <input type="checkbox"/> Engagement & Voting <input type="checkbox"/> ESG Integration <input type="checkbox"/> Exclusions <input checked="" type="checkbox"/> Impact Investing <input type="checkbox"/> Norms-Based Screening <input type="checkbox"/> Leading to exclusions <input type="checkbox"/> Leading to risk management analysis/engagement <input type="checkbox"/> Sustainability Themed	Passively managed <input type="checkbox"/> Passive investing – core benchmark: specify the index tracking <input type="checkbox"/> Passive investing – ESG/SRI benchmark: specify the index tracking Actively managed <input type="checkbox"/> Shares in a euro area country <input type="checkbox"/> Shares in an EU country <input checked="" type="checkbox"/> International shares <input type="checkbox"/> Bonds and other debt securities denominated in euro <input type="checkbox"/> International bonds and other debt securities <input type="checkbox"/> Monetary assets <input type="checkbox"/> Short-term monetary assets <input type="checkbox"/> Structured funds	<input checked="" type="checkbox"/> Controversial weapons <input checked="" type="checkbox"/> Alcohol <input checked="" type="checkbox"/> Tobacco <input checked="" type="checkbox"/> Arms <input checked="" type="checkbox"/> Nuclear power <input checked="" type="checkbox"/> Human rights <input checked="" type="checkbox"/> Labour rights <input checked="" type="checkbox"/> Gambling <input checked="" type="checkbox"/> Pornography <input checked="" type="checkbox"/> Animal testing <input type="checkbox"/> Conflict minerals <input checked="" type="checkbox"/> Biodiversity <input type="checkbox"/> Deforestation <input type="checkbox"/> CO2 intensive (including coal) <input checked="" type="checkbox"/> Genetic engineering (note: uncontrolled release) <input type="checkbox"/> Other <input checked="" type="checkbox"/> Global Compact <input type="checkbox"/> OECD Guidelines for MNCs <input type="checkbox"/> ILO Conventions <input checked="" type="checkbox"/> Other (please specify) Fossil fuels	GBP 18,44m as at 31 December 2021.	<input type="checkbox"/> French SRI label <input type="checkbox"/> French TEEC label <input type="checkbox"/> French CIES label <input checked="" type="checkbox"/> Luxflag Label <input type="checkbox"/> FNG Label <input type="checkbox"/> Austrian Ecolabel <input type="checkbox"/> Other (please specify)	- KIID - Prospectus -Management report -Financial and non-financial reporting -Corporate presentations - Other (please specify) Please see links below.

		(engaged in extraction)			
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Relevant documents: KIIDs, prospectus, annual reports, etc. can be found on:

<https://www.artemisfunds.com/en/lux/professional/resources/fund-literature>

Blogs, whitepaper, product impact framework and annual impact report can be found on:

<https://www.artemisfunds.com/en/lux/professional/responsible-investing/artemis-positive-future>

2. General information about the fund management company

2.1. Name of the fund management company that manages the applicant fund

FundRock Management Company S.A. H20 Building 33, rue de Gasperich, L-5826 Hesperange Grand Duchy of Luxembourg, is the management company of Artemis Funds (Lux), of which Artemis Funds (Lux) – Positive Future is a sub-fund.

The Investment Manager of Artemis Funds (Lux) is:

Artemis Investment Management LLP
Cassini House,
57 St James's Street,
London SW1A 1LD

Tel: +44 (0) 20 7399 6000

<https://www.artemisfunds.com>

Contact in relation to the applicant fund:

Ryan Smith, Fund Manager (ryan.smith@artemisfunds.com)

2.2. What are the company's track record and principles when it comes to integrating SRI into its processes?

Artemis Investment Management LLP (Artemis) published its first Corporate Governance and Voting policy in October 2011 in response to the first UK Stewardship Code published in 2010. Artemis has had a dedicated responsible investment resource since 2013 and has been a signatory to the Principles for Responsible Investment (PRI) since 2015. In its most recent assessment of signatories, published in July 2020, the PRI rated Artemis an A for our strategy and governance of responsible investment activities.

Artemis' principal aim is for ESG to be integrated into all investment strategies to produce value and long term returns for clients. Each investment team selects, manages and incorporates relevant ESG factors in a way that is best suited to their specific investment approach.

The Artemis investment committee reviews ESG developments on a monthly basis. Further details on Artemis' approach to stewardship and ESG can be found in Artemis' annual Stewardship Report:

<https://www.artemisfunds.com/en/stewardship-and-esg>

2.3. How does the company formalise its sustainable investment process?

Details of Artemis' approach to stewardship and ESG, including Artemis' engagement policy, can be found at the following link:

<https://www.artemisfunds.com/en/stewardship-and-esg>

2.4. How are ESG risks and opportunities – including those linked to climate change – understood/taken into account by company?

All strategies integrate ESG into their investment processes however, due to the nature of the issues being considered, these processes are continually evolving. Artemis use a number of materiality frameworks and research providers as an input to ESG risk and opportunity assessment such as SASB, MSCI ESG, Sustainalytics, TruValue Labs, and sell-side research. These supplement Artemis' own research and engagement with companies.

As with all risks and opportunities, analysis of climate change is rooted in the investment case and how this might impact cash flows over the long term. Some of Artemis' investment strategies avoid investing in specific sectors such as oil exploration and production, believing there are more interesting opportunities in other areas. Other strategies employ a more nuanced approach and are prepared to support those firms in high impact sectors which are taking steps to transition to a low carbon economy. Artemis' analysis is not just about assessing climate risk. There are investment opportunities as economies and businesses transition. As with any investment, Artemis' fund managers and analysts assess changes to business models, capital allocation decisions, robustness of any targets, governance and oversight within the context of the investee company's overall strategy and how this will affect the view of potential future returns.

More information on Artemis' approach to ESG integration including climate change can be found in the Stewardship Report 2021, available at the following link:

<https://www.artemisfunds.com/en/stewardship-and-esg>

2.5. How many employees are directly involved in the company's sustainable investment activity?

The team that work on the Artemis Positive Future strategy have over 40 years of combined experience in impact investing. In addition to the team of four who work on the Artemis Positive Future Strategy, Artemis has a dedicated stewardship team of two people.

Inez Oliver joined Artemis in 2005. She is a specialist in corporate governance, and advises Artemis' fund managers on this and on environmental and social issues. She has a degree in information systems and management from the University of London; a Masters in sustainability from the University of Cambridge; and holds the advanced certificate in corporate governance from the Institute of Chartered Secretaries and Administrators.

Antonia Stirling joined Artemis in 2019 from Standard Life Aberdeen where from 2010 she was Head of Corporate Stewardship. Before that, Antonia spent five years at Deloitte, where she became ACA qualified. She holds a MA in Human Sciences from the University of Oxford. Antonia also holds the Certificate in ESG Investing from CFA UK.

Both Inez and Antonia report into the Artemis Chief Investment Officer. Artemis' investment committee is responsible for the oversight of our investment activities and stewardship role.

Fund managers take the lead on stewardship including ESG integration; it is part of their investment processes. In Artemis' view, this should not be considered separately and in silo from the approach to investment. It must be embedded in everything Artemis does. The stewardship team's role is to support, discuss and challenge approaches and works with fund managers on a range of activities including, ESG integration, engagement & voting and participation in industry wide initiatives to develop and promote best practice internally and across the industry.

2.6. Is the company involved in any RI initiatives?

General Initiatives	Environmental/Climate Initiatives	Social Initiatives	Governance Initiatives
<input type="checkbox"/> ECCR – Ecumenical Council for Corporate Responsibility <input type="checkbox"/> EFAMA RI WG <input type="checkbox"/> European Commission's High-Level Expert Group on Sustainable Finance	<input type="checkbox"/> CDP – Carbon Disclosure Project (please specify carbon, forest, water etc.) <input type="checkbox"/> Climate Bond Initiative <input type="checkbox"/> Green Bond Principles <input type="checkbox"/> IIGCC – Institutional Investors Group on Climate Change	<input type="checkbox"/> Access to Medicine Foundation <input type="checkbox"/> Access to Nutrition Foundation <input type="checkbox"/> Accord on Fire and Building Safety in Bangladesh	<input type="checkbox"/> ICGN – International Corporate Governance Network <input checked="" type="checkbox"/> Other (please specify) Investment Association

<input type="checkbox"/> ICCR – Interfaith Center on Corporate Responsibility <input type="checkbox"/> National Asset Manager Association (RI Group) <input checked="" type="checkbox"/> PRI - Principles For Responsible Investment <input type="checkbox"/> SIFs - Sustainable Investment Fora <input checked="" type="checkbox"/> Other (please specify) The Investor Forum SASB Alliance Please see below.	<input type="checkbox"/> Montreal Carbon pledge <input type="checkbox"/> Paris Pledge for Action <input type="checkbox"/> Portfolio Decarbonization Coalition <input checked="" type="checkbox"/> Other (please specify) Climate Action 100+ Investment Association Climate Change Working Group Net Zero Asset Managers Initiative	<input type="checkbox"/> Other (please specify)	
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Artemis became a signatory to the PRI in April 2015.

Artemis is a member of a number of industry bodies, committees and initiatives, including:

- **The Investor Forum.** Artemis were a founder member of the forum in 2015.
- **SASB Alliance.** Artemis became members in 2019.
- **Climate Action 100+.** This is an investor initiative launched to ensure the world's largest corporate greenhouse gas emitters take necessary action on climate change.
- **The Investment Association.** Artemis has a member participating in the IA's Climate Change Working Group, the Corporate Reporting Accounting Group and a number of staff sit as members of key committees.
- **Net Zero Asset Managers initiative.** The Net Zero Asset Managers initiative is an international group of asset managers committed to supporting the goal of net zero greenhouse gas emissions by 2050 or sooner, in line with global efforts to limit warming to 1.5 degrees Celsius, and to supporting investing aligned with net zero emissions by 2050 or sooner. Artemis became signatories in 2021.

2.7. What is the total number of SRI assets under the company's management?

As at 31 March 2022, total net assets in strategies with an explicit ESG focus amounted to GBP 2.15b.

Further details can be found at the following link:

<https://www.artemisfunds.com/en/lux/professional/funds/explorer>

3. General information about the fund covered by the Code

3.1. What is the fund aiming to achieve by integrating ESG factors?

Most responsible investors continue to focus on investing in established companies which, almost by definition, tend to favour the status quo over change. Yet it seems obvious (to us) that tweaking traditional investment approaches and making incremental moves towards greater sustainability are insufficient to address the challenges that we all face.

For real positive impact, what is actually required is transformational change – change to a future that is 10 times better as opposed to a 10% improvement. History shows that transformational change typically occurs where there is disruptive innovation. Moreover, disruptive innovation is often the preserve of high-growth businesses – hence this is where we focus as investors.

Our mission is therefore to outperform the market by investing in innovative companies that have transformational positive impact, by identifying companies at the intersection of disruptive innovation and the unsustainable status quo. We believe disruptive innovation creates significant economic value where sustainability challenges are most acute and that disruptive change is necessary to solve the multitude of sustainability challenges that we face. Furthermore, we believe undertaking impact analysis, as an integral part of our fundamental analysis, provides a source of investment insight that enables us to identify and invest in disruptive change early.

3.2. What internal or external resources are used for ESG evaluation of the issuers who make up the investment universe of the fund?

We use a team-orientated, bottom-up approach to identifying potential investment ideas. We spend most of our time researching mid-cap companies (\$1bn-\$10bn market cap), which are growing faster than the market and disrupting incumbent industries. We avoid extremely well-covered large and mega-cap companies, unless there is clear evidence of positive disruption, a sufficiently immature market and significant market dispute which we can exploit.

We use a wide variety of ESG information sources including:

- Industry journals and datasets
- Academic research
- Investment data providers e.g. Bloomberg, Sentieo, etc.
- Investment research from sell-side banks and independent providers
- Company disclosures
- NGO reports
- Third party ESG rating and data providers e.g. MSCI ESG (<https://www.msci.com/esg-ratings>), FactSet Truevalue Labs (<https://www.factset.com/solutions/business-needs/esg-solutions>).
- Expert podcasts
- Social media

As regards third-party ESG ratings, we use them as an analytical tool (rating, company and industry reports), but they do not drive our investment decisions.

3.3. What ESG criteria are taken into account by the fund?

We believe a company's products and services ('what') a company does is the principal determinant of its impact (positive or negative). 'How' it operates is critical (and is often the focus of many investors from an

ESG perspective) – and the right management team, incentive structure and operational practices are critical to successfully deliver on the stated strategy – but it's the products and services (and their impact) which determine competitive positioning and which are more likely to determine commercial success or otherwise.

'What' we consider from an operational practices ESG perspective varies depending on the company and the nature of its activities. Since we are often investing in technology-based, intangible-heavy businesses, 'culture' is a critical factor. In addition as part of our impact analysis, we are always careful to consider and document, the potential negative impacts of a company's products or practices. Finally, climate and diversity are engagement focus areas for all companies we invest in.

Our detailed positive impact analysis is focused on understanding and assessing company and industry-specific material ESG factors. Determining what is considered material for each company we consider, is principally driven by experience, but also the Sustainability Accounting Standards Board (SASB) framework and to a lesser extent, reflecting on the ESG issues and weights that are provided by 3rd-party ESG ratings.

The following product exclusions are applied at Stage 1 of the investment process:

Alcohol: companies deriving more than 10% (5%, subject to regulatory approval) of their revenues from alcohol;

- **Tobacco:** companies deriving more than 10% (5%, subject to regulatory approval) of their revenues from tobacco;
- **Weapons:** companies that produce or sell civilian firearms and/or manufacture or sell armaments, nuclear weapons or associated strategic products;
- **Nuclear power:** companies which mine uranium, own or operate nuclear power stations, generate nuclear power, or which supply key nuclear-specific products and services;
- **Gambling:** companies deriving more than 10% (5%, subject to regulatory approval) of their revenues from gambling;
- **Animal testing:** companies that produce or sell cosmetics tested on animals;
- **Adult entertainment:** companies that own an adult-entertainment company or produce adult entertainment;
- **Genetic modification:** companies involved in the uncontrolled release of genetically engineered organisms into the environment;
- **Fossil fuels:** companies which:
 - own oil & gas reserves; or
 - engage in conventional or unconventional oil and gas production and processing; or
 - own thermal coal reserves, mine thermal coal or derive more than 10% revenue from thermal coal-based electricity generation.
- **Biodiversity and land use:** (subject to regulatory approval) Companies that the Investment Manager determines to be implicated in severe controversies related to the company's use or management of natural resources.
- Companies that the Investment Manager determines to be in breach of the United Nations Global Compact principles on human rights, labour rights, the environment and anti-corruption.

Further detailed company specific impact analysis is undertaken at Stage 4 of the investment process. Details of how we measure product impact is provided in our answer to Question 3.5 below..

3.4. What principles and criteria linked to climate change are taken into account by the fund?

The climate crisis is the biggest sustainability challenge that we face. However, because of the scale of the challenge, we also believe that it provides us with a wealth of investment opportunities. As we state above,

we believe disruptive innovation creates significant economic value where sustainability challenges are most acute.

The pressing need to address the climate crisis is driving structural changes in many industries. Our process ensures we avoid investing in those companies which will likely be the wrong side of the energy transition whilst supporting those who will enable a low-carbon future. To date, this has meant that the managers have invested in a range of climate-related technologies including; renewables, electric vehicles (EVs) and EV charging infrastructure, battery technology, hydrogen, alternative proteins, the circular-economy, heat-pumps and manufacturing process efficiency.

Finally, because the climate crisis is increasingly relevant to all companies, we have a particular engagement focus on this issue. Specifically we seek all companies (even those who are low-carbon solution providers) to disclose their Scope 1 & 2 emissions and then consider moving towards Net Zero.

3.5. What is the ESG analysis and evaluation methodology of the fund manager (how is the investment universe built, what rating scale is used etc.)?

In addition to the product-based exclusions detailed in 3.3. above, our detailed impact analysis considers the impacts of a company's products and services, the impact of its practices or behaviours (incl. traditional ESG factors) and finally its future impact, or what is changing.

Understanding Product Impact in particular is critical to our investment process. we do this via a framework that considers intentionality, additionality and materiality, which are widely recognised impact investing principles. In the context of our process this means:

Intentionality – Is the company's vision and mission consciously aligned with positive impact?

Materiality – Does or will the company have significant positive impact on the world if it successfully executes on its strategy?

Additionality – Is the company attempting to disrupt an unsustainable incumbent system?

This in-depth Product Impact analysis is both qualitative and quantitative in its considerations and results in a score for Intentionality, Additionality and Materiality respectively. The sum of these individual component scores is the Product Impact score which determines whether a company is suitable for investment and ensures each portfolio company has demonstrable positive impact. A company must score at least +3 for inclusion in the portfolio.

Proprietary impact analysis process

Framework	Intentionality	Additionality	Materiality		
Concept	Alignment of mission with positive impact?	Disruption of an unsustainable system?	Significant impact if successful?	=	Product impact score
In-depth analysis	<ul style="list-style-type: none"> • Clear mission and focus • Authenticity • Transparency 	+ <ul style="list-style-type: none"> • Innovative product • Counter-positioned vs. incumbents • Disrupts existing market dynamics 	+ <ul style="list-style-type: none"> • Scale of challenge & market size • SDG alignment & geographic focus • Ability to scale 		

Minimum product impact score

THREDUP

-9 -8 -7 -6 -5 -4 -3 -2 -1 0 +1 +2 +3 +4 +5 +6 +7 +8 +9

thredUP Inc.					
Example	<ul style="list-style-type: none"> • Founder run • Mission driven, inspire new generation to think 2nd hand first • Investment and policy division to elevate and influence mission 	+3 <ul style="list-style-type: none"> • Innovative product – disbelief during early days to secure funding • Counter-positioned to traditional linear fast fashion • Enabled by convergence of tech; ecommerce, vision, machine-learning 	+3 <ul style="list-style-type: none"> • Main operations in US, recent acquisition of EU peer • Externalities of status quo are global • Operations increasingly scaled as network effects bring in more users • SDG12 – responsible consumption 	+2	+8

Note: A qualitative and quantitative analysis results in scores for each factor. The sum of these scores is the 'product impact' score which ranges from -9 to +9. A minimum of +1 for each factor and +3 in total is required for portfolio inclusion. Reference to specific stocks should not be taken as advice or a recommendation to invest in them. Image source: brandsoftheworld.com.

Finally, as part of our positive impact analysis we identify and track material company-specific impact KPI's for each business that we invest in. Since we believe that climate change and diversity are highly relevant

for every company, we have a particular focus on these two issues as we outline elsewhere in this document.

3.6. How often is the ESG evaluation of the issuers reviewed? How are any controversies managed?

Our internal impact analysis research is constantly updated with a formal review at least annually. News-flow including any controversies associated with portfolio companies are tracked via various data platforms. Controversies or other developments that meaningfully change the positive impact investment thesis of a holding would result in its prompt sale from the portfolio subject to market conditions, liquidity and best execution requirements.

4. Investment Process

4.1. How are the results of the ESG research integrated into portfolio construction?

Our investment philosophy means that considering impact is embedded in our investment process at every stage; from the initial screening of the investable universe to exclude companies based on their unsustainable products or services; via our focus on seeking transformational disruption which addresses sustainability challenges; and finally detailed bottom-up positive impact analysis for every holding. The culmination of this process is a concentrated global equity portfolio of 35 to 45 stocks, which we strongly believe is the best way to maximise both impact and risk-adjusted investment returns

4.2. How are criteria specific to climate change integrated into portfolio construction?

The product exclusions prevent the fund from investing in companies where there is a significant negative environmental impact, including those companies and sectors with significant Scope 3 emissions.

Our focus is then on identifying and investing in disruptive innovation which is specifically addressing the many sustainability challenges that we face. The largest of these challenges is the climate crisis. To date this has meant that the managers have invested in a range of climate-related technology solutions including; renewables, electric vehicles (EVs) and EV charging infrastructure, battery technology, hydrogen, alternative proteins, heat-pumps, the circular-economy and manufacturing process efficiency.

4.3. How are the issuers that are present in the portfolio, but not subject to ESG analysis evaluated (not including mutual funds)?

Not applicable. All investments are subject to both the product exclusions and detailed positive impact analysis.

4.4. Has the ESG evaluation or investment process changed in the last 12 months?

Artemis Funds (Lux) – Positive Future launched on 30 June 2021. A fund managed using the same investment strategy and process, Artemis Positive Future Fund, a UK OEIC, was launched in April 2021, however, the managers of the fund ran a similar strategy for four years at their previous employer. There have been no changes to the ESG evaluation or investment process since launch.

4.5. Is a part of the fund invested in entities pursuing strong social goals/social enterprises?

The Artemis Positive Future strategy has a dual mandate of positive impact and investment returns. In fact, by investing for impact, we believe that we are more likely to achieve investment success.

Detailed impact analysis of every stock as outlined above, including prudent mapping of a company's products and services to the UN Sustainable Development Goals (SDGs) ensures every company in the portfolio has a demonstrable positive impact on society.

4.6. Does the fund engage in securities lending activities?

The fund does not engage in securities lending activities.

4.7. Does the fund use derivative instruments?

The prospectus of the fund permits the limited use of derivatives only for the purposes of efficient portfolio management. However, it is unlikely that derivatives will be used.

4.8. Does the fund invest in mutual funds?

The fund does not invest in mutual funds.

5. ESG controls

5.1. What internal and/or external control mechanisms are in place to ensure compliance of the portfolio with the ESG rules on managing the fund, as defined in section 4?

The product exclusions are coded into Artemis' trading systems to ensure that no stocks that undertake these activities can be purchased. This system provides pre-trade checks at three levels when a fund manager is seeking to place a deal: 1) warning 2) deal requiring clearance and 3) complete prohibition.

In addition, the Artemis investment risk function regularly review various aspects of portfolio compliance including independently reviewing the portfolio using third party ESG ratings.

6. Impact measures and ESG reporting

6.1 How is the ESG quality of the fund assessed?

Our experience is that it is difficult to measure the real 'ESG quality' of any fund, or indeed any company held within the fund, in a purely quantitative fashion. Understanding the positive (and negative) impact of any investment requires experience and consideration of both quantitative and qualitative factors and we use the three dimensions and intentionality/additionality/materiality frameworks outlined above to do this. Once invested, we then carefully track the companies in the fund to ensure that our positive impact investment thesis is still correct. Finally, we then ensure that we report openly and honestly to clients via our annual Impact Report and other regular communications.

6.2. What ESG indicators are used by the fund?

As detailed in our answer to 3.3., our detailed positive impact analysis is focused on understanding and assessing company and industry specific ESG material factors. Determining what is considered material is principally driven by experience, but also the Sustainability Accounting Standards Board (SASB) framework and to a lesser extent, reflecting on the ESG issues and weights that are provided by third party ESG ratings. In addition, each holding is tested against and mapped to the UN Sustainable Development Goals.

At the portfolio level, we track a variety of ESG-related metrics including greenhouse gas emissions intensity, energy consumption, water consumption, equality and insider ownership.

6.3. What communication resources are used to provide investors with information about the SRI management of the fund?

We are strong believers in regular communication with our clients in order to demonstrate our passion for the subject, build credibility and highlight nuances that might otherwise be underappreciated. Monitoring and measuring the impact of the investments we make on behalf of our clients is therefore of the utmost importance. We strive to offer all of our client's full transparency with regard to our holdings and our positive impact rationale. Over the course of a calendar year, we aim to produce the following:

- A detailed annual impact report including qualitative and quantitative analysis of impact, company case studies and details of engagement, advocacy and voting activity.
- Quarterly 'white papers' on specific topics of interest or investment themes in the portfolio.
- Quarterly investment reports which incorporate impact analysis, case studies and stewardship activity.
- A brief fortnightly blog highlighting interesting research, themes, case studies, stewardship activities or simply our opinions.

6.4. Does the fund management company publish the results of its voting and engagement policies?

Artemis publicly discloses a summary of its voting record on a quarterly basis on the Artemis website:

<https://www.artemisfunds.com/en/stewardship-and-esg>

Important information

The data in this document are accurate as of the date of issue.

For more information about some of the terms used in this document, please visit www.artemisfunds.com/glossary.

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