



Agecroft Partners, LLC. Environmental, Social and Corporate Governance (ESG) Policy

SUMMARY

Agecroft Partners affirms the need for attentive stewardship and the key role that the investment industry plays in regards to Environmental, Social, and Corporate Governance (ESG) policy. We believe that the sound integration of ESG policies have a substantial and lasting impact on our business practices and will ultimately lead to prosperous outcomes for not only our firm, but also the alternative investment industry and society as a whole in both local and global settings. It is our understanding that the addition of material ESG considerations lead to more well-rounded and comprehensive decisions.

The goal of this policy is to lay the broad framework for our approach to ESG integration as we seek to provide equitable outcomes to all stakeholders.

DEFINITION

We define ESG factors as material considerations that influence the Sustainable Development Goals (SDG) set by the United Nations:

1. No Poverty	10. Reduced Inequalities
2. Zero Hunger	11. Sustainable Cities and Communities
3. Good Health and Well-Being	12. Reasonable Consumption and Production
4. Quality Education	13. Climate Action
5. Gender Equality	14. Life Below Water
6. Clean Water and Sanitation	15. Life on Land
7. Affordable and Clean Energy	16. Peace, Justice and Strong Institutions
8. Decent Work and Economic Growth	17. Partnership for the Goals
9. Industry, Innovation & Infrastructure	

COMMITMENT

As signatories of the United Nations-Supported *Principles For Responsible Investment* (PRI) we affirm these 6 principles and their applications to our strategic context:

1. We will incorporate ESG issues into investment analysis and decision-making processes.
2. We will be active owners and incorporate ESG issues into our ownership policies and practices.
3. We will seek appropriate disclosure on ESG issues by the entities in which we invest.
4. We will promote acceptance and implementation of the Principles within the investment industry.
5. We will work together to enhance our effectiveness in implementing the Principles.
6. We will each report on our activities and progress towards implementing the Principles.

PROCESS

We believe that Agecroft Partners is uniquely positioned within the alternative investment industry as a third party marketer firm and can help drive meaningful change throughout the industry. Through our extensive communication with managers, investors and other professionals alike, we have the ability to reach a broad range of individuals. In doing so, we will also collaboratively engage with others as well as supplement industry discussion to foster positive change.

Direct Engagement: We are committed to actively integrating ESG standards within our business. In our direct engagements, we will work to help educate our partners and peers on the 6 principles set by the UN-Supported Principles for Responsible Investment and the benefits of following them. This includes, but is not limited to: managers, investors and service providers. We are also committed to increasing industry-wide dialogue in order to enhance the understanding and acceptance of ESG issues. First, we will be hosting an ESG-focused webinar in 2021. Additionally, we also will be writing an article regarding ESG policies relative to the alternative investment industry. Both of these efforts will be broadly promoted across the alternative investment industry.

Collaborative Engagement: We are committed to championing ESG policies and seeking out other leading industry organizations and firms to promote it. Our goal is to set an industry example in order to encourage firms to officially establish ESG policy or improve upon their current practices. The long-term goal is to help create a unified trajectory that encompasses industry professionals across all managers, investors and service providers.

CONTINUED REVIEW

Agecroft Partners fully recognizes and acknowledges that Environmental, Social and Corporate Governance (ESG) policies encompass a long-term time horizon. Our leadership team is committed to the active development of our internal processes, professional engagements, and industry advocacy and involvement. Our firm-wide policies are reviewed and will be amended promptly upon change but no less frequently than on an annual basis in order to maintain the highest standards of ESG.

Agecroft Partners is a licensed broker-dealer, registered with the Securities and Exchange Commission (SEC) and is a member of The Financial Industry Regulatory Authority (FINRA), a MSRB registered Municipal Advisor, a member SIPC and a member of The National Futures Association (NFA).