



PINESTONE ASSET MANAGEMENT INC.

DIVERSITY, EQUITY, AND INCLUSION (DE&I) POLICY

Effective Date: January 2024

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1. PURPOSE OF THE POLICY

We believe that fostering a diverse, equitable, and inclusive workplace is essential for our success, and we are committed to supporting our employees in this effort. The purpose of this policy is to ensure that all employees are respected and have equal opportunities to grow and thrive.

2. POLICY OWNER

Chief Executive Officer

3. PERSONS AFFECTED

The Policy applies to PineStone employees.

4. DEFINITIONS

DE&I: Diversity, Equity, and Inclusion.

Diversity: The variety of identities found within an organization, group, or society. Diversity is expressed through factors such as culture, ethnicity, religion, sex, gender, sexual orientation, age, language, education, ability, family status or socioeconomic status.

Equity: The principle of considering people's unique experiences and differing situations, and ensuring they have access to the resources and opportunities that are necessary for them to attain just outcomes.

Inclusion: The practice of using proactive measures to create an environment where people feel welcomed, respected, and valued, and to foster a sense of belonging and engagement.

6 DIVERSITY, EQUITY, AND INCLUSION POLICY

6.1 DE&I Statement

PineStone is built on our commitment to our clients, our investment approach and each other. Our goal is to strive to achieve sustainable returns for our clients, and for an industry where human capital is paramount, that all begins with our people.

A culture of Diversity, Equity and Inclusion is fundamental to this objective and an integral part of our values. The diverse backgrounds of our firm, whether it be educational, ethnic, gender or age demographic, have resulted in a collaborative dynamic where diversity of thought is at the forefront. The collective sum of the individual differences, life experiences, and unique capabilities of our talent represents a significant part of our company's achievement as well.

6.2 Commitment to Diversity

Within the context of this policy, PineStone is committed to fostering an ongoing culture built on the premise of Diversity, Equity, and Inclusion, through:

- Respectful working environment.
- Inclusive Human Resources policies.
- Development opportunities for all to reach their full potential.
- Inclusive Recruitment Practices.
- Community Involvement.
- Vendor Inclusion.
- Measurement and accountability to ensure continued progress.

6.3 Respectful Working Environment

Our culture promotes equality and respect through a harmonious and collaborative work environment. All employees of PineStone have a responsibility to treat others with dignity and respect at all times.

We promote open communication and teamwork, thereby permitting the representation of all groups and employee perspectives. We understand the importance of creating clear channels for reporting and addressing incidents of discrimination, harassment, or retaliation promptly and confidentially. We believe that by promoting open communication and creating a supportive atmosphere, we can build stronger relationships and work together towards achieving our diversity, equity, and inclusion goals.

Employees are required to complete awareness training on an annual basis to enhance their knowledge to fulfill this responsibility. Additional tools and training will be made available in order to further educate employees on the importance of an inclusive work environment.

6.4 Inclusive Human Resources Policies

We strive to provide employees with a variety of benefits that meet their diverse needs and circumstances. Some of these include:

- a) Comprehensive Group health insurance plans
- b) Hybrid work from home schedule
- c) Paid Family and Personal Days
- d) Parental and other Leave Policies

Additionally, our Compensation programs are designed to reward both individual and team according to performance indicators outlined for everyone. We conduct an annual performance evaluation that are both fair

and objective. Our core belief is to reward employees based on their merit and their valuable contributions to the organization. In doing so, we ensure that promotion and compensation decisions are in alignment with our commitment to DE&I principles.

6.5 Learning and Development Opportunities

We are committed to continuously investing in our employees by providing compelling work in a dynamic, growth-oriented environment. Coaching is conducted within the firm's various departments to encourage internal career development as we believe knowledge transfer is instrumental to the future prosperity of the firm and its clients.

PineStone's Talent Development Policy, described within the Employee Handbook, supports the professional development of our employees via financial assistance and course reimbursements.

6.6 Inclusive Recruitment Practices

We are committed to attracting a diverse talent pool of candidates for all levels and functions in the organization. We will continue to evolve our attraction, selection and hiring practices to ensure diversity, equity, and inclusion (DE&I) throughout the process. Strategies include:

- a) Unbiased job descriptions.
- b) Sourcing using a variety of sources.
- c) Diverse interview panels to provide different perspectives on candidates.
- d) Standardized set of questions for all candidates to ensure fairness.

6.7 Community Involvement

Supporting causes and organizations aligned to our values is a valuable and important way to promote diversity, equity, and inclusion. We are working on identifying opportunities that will enhance the social experience for all employees, contribute to the broader community and promote greater awareness in our industry.

6.8 Vendor Inclusion

The Compliance Department surveys current and potential vendors on their DE&I practices as part of the standard evaluation process.

6.9 Measurement & Accountability

Accountability is a fundamental component of our DE&I commitment. We hold ourselves accountable for attracting, developing, and retaining talented employees by fostering a culture where all employees are empowered to succeed. To ensure this outcome, we have established a Responsible Investment / ESG working group whose role is to make recommendations to the Management Committee on matters relating to DE&I. Additionally, we have committed to reviewing our DE&I KPIs (Key Performance Indicators) on an annual basis in order to track our progress and identify areas for improvement. Measurement of identity within PineStone is outlined in [Appendix 1](#). KPIs are outlined in [Appendix 2](#).

7 POLICY ADMINISTRATION

7.1 Roles and Responsibilities

All Employees:

It is the responsibility of Employees to:

- Respect PineStone’s Policies and Procedures.
- Report any violation of a policy and/or a procedure that they may have identified to their Manager or Human Resources.

Chief Compliance Officer:

It is the responsibility of the Chief Compliance Officer to:

- Review the Policy on a regular basis to ensure it reflects current processes, best practices and regulatory and/or legal requirements.
- Communicate all changes to all employees in writing and in a timely manner.

Management Committee

It is the responsibility of the Management Committee to:

- Promote and monitor the application of the Policy.
- Approve all required changes in writing.

7.2 Books and Records

All documentation must be retained in a secure location in accordance with this policy and PineStone’s Books and Records Chart.

7.3 Policy Updates

This DE&I policy will be reviewed and updated as needed to ensure alignment with best practices and evolution of our initiatives.

7.4 Version History

Version 1	January 2024
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APPENDIX 1

VOLUNTARY SELF-IDENTIFICATION QUESTIONNAIRE

WHY SELF-IDENTIFY?

PineStone is committed to fostering an environment that respects and values diversity. A harmonized self-identification data collection process allows us to accurately report on and track the firm's progress on equity, diversity, and inclusion. All information collected is kept strictly confidential and will be used for statistical purposes. Completing this survey is required however, you have the ability to opt out of each self-identification question.

Note: For practical purposes, considering PineStone is based in Canada, the terminology and definitions set forth in this form are aligned to the Canadian Government's standards.

INSTRUCTIONS

Please read each question carefully and either mark with an X or highlight the response that you feel best applies to you. You may identify as a member of more than one demographic group. Completing this survey is voluntary, however, you have the ability to opt out of each self-identification question.

1. GENDER:

- Man
- Woman
- I would like to specify a gender identity/expression not listed:
- Prefer not to answer

2. INDIGENOUS PEOPLES: Indigenous Peoples in Canada include persons who are First Nation (Status and non-status), Inuk and Métis. The term 'Aboriginal' Peoples was established by the federal government under the Employment Equity Act and refers to diverse Indigenous peoples in Canada. Are you an Indigenous person?

- Yes
- No
- Prefer not to answer

3. VISIBLE MINORITY: A person in a visible minority in Canada is someone (other than an Aboriginal person defined in question 2 above) who is non-white in colour/race, regardless of place of birth.

3a) Are you in a visible group?

- Yes
- No
- Prefer not to answer

3b) Please select any and all categories (groups) with which you identify.

- Black
- Chinese
- Filipino

- Japanese
- Korean
- South Asian/East Indian (including Indian from India; Bangladeshi; Pakistani; East Indian from Guyana, Trinidad, East Africa; etc.)
- Southeast Asian (including Burmese; Cambodian; Laotian; Thai; Vietnamese; etc.)
- Non-White West Asian, North African or Arab (including Egyptian; Libyan; Lebanese; Iranian; etc.)
- Non-White Latin American (including indigenous persons from Central and South America, etc.)
- Person of Mixed Origin (with one parent in one of the visible minority groups listed above)
- None of these categories applies to me
- I would like to specify an identity not listed:
- Prefer not to answer

4. DISABILITY AND/OR FUNCTIONAL CONSTRAINTS: The Accessible Canada Act defines disability as “any impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment—or a functional limitation—whether permanent, temporary or episodic in nature, or evident or not”
Do you identify as a person with a disability?

- Yes
- No
- Prefer not to answer

APPENDIX 2

KEY PERFORMANCE INDICATORS

- Diversity of Candidates Hired.
- Employee Demographics:
 - Firmwide.
 - Per Team.
 - Management/Leadership Role.
- Promotion and Retention.
- Employee Engagement.
- Vendor Diversity.