

## Sustainability-related disclosures

*GAM Star Fund Plc – GAM Star Credit Opportunities (USD), GAM Star Credit Opportunities (EUR), GAM Star Credit Opportunities (GBP)*

<b>Summary</b>	This Fund selects investments with 1) a positive tilt towards companies considered to have leading ESG ratings relative to their sector and 2) excludes those issuers involved in specific activities considered to cause negative environmental and social impact.
<b>Sustainable investment objective</b>	This Fund promotes environmental or social characteristics but does not have sustainable investment as its objective.

The Fund utilises the following sustainability indicators to measure the promotion of ESG characteristics.

The Delegate Investment Manager selects investments with a positive tilt towards companies considered to have leading ESG ratings relative to their sector. The Delegate Investment Manager currently uses MSCI ESG ratings to define the categories of Leader, those rated AAA or AA. However, the ESG ratings provider may be changed to an equivalent ESG research provider at the Delegate Investment Manager's discretion. No binding commitments are made on the basis of MSCI ESG rating.

The Delegate Investment Manager excludes issuers involved in the activities specified below. The exclusions are applied on a best-efforts basis drawing on information from independent ESG rating providers and recognised third party sources

### Sustainability Exclusion Criteria

	Activity	Description	Restriction Criteria / Revenue Threshold
<b>Investment Strategy</b>	<b>Controversial Weapons</b>	Controversial weapons including anti-personnel mines, biological and chemical weapons, blinding laser weapons, cluster munitions, incendiary weapons, and non-detectable fragments.	Any involvement
	<b>Nuclear Weapons</b>	A nuclear weapon is a device that is capable of releasing nuclear energy in an uncontrolled manner, due to fusion and/or fission reactions, making it a highly destructive explosive. The indiscriminate and disproportionate impact on civilians makes nuclear weapons a controversial weapon.	Any involvement
	<b>Depleted Uranium</b>	Depleted Uranium (DU) munitions are projectiles (bullets, rockets, etc.) that have been equipped with the radioactive chemical substance DU.	Any involvement
	<b>Civilian Weapons</b>	Companies that manufacture handguns, pistols, shotguns, rifles, revolvers, and ammunition for civilian use.	Derive over 10%
	<b>Conventional Weapons</b>	This involvement area provides an assessment of whether companies derive revenue from the manufacturing of weapons or weapon components or from providing tailor-made products or services to the army or the defence industry.	Derive over 10%
	<b>Tobacco</b>	Tobacco production - manufactures tobacco products	Derive over 5%
		Tobacco retail - distribution and/or retail sale of tobacco products	Derive over 25%
	<b>Fossil fuels</b>	Oil sands - extraction of oil sands	Derive over 25%
		Thermal coal extraction	Derive over 25% (unless there is a clear phase-out plan)
Thermal coal power generation - generation of electricity from thermal coal		Derive over 25% (unless there is a clear phase-out plan)	

	<b>UN Global Compact</b>	Serious breaches of the UN Global Compact. These ten principles cover human rights, labour rights, the environment and anticorruption.	Serious breach (unless substantial actions to address)
<b>Investment strategy</b>	<p>This Fund excludes those issuers involved in specific activities considered to cause negative environmental and social impact, as set out in the Sustainability Exclusion Criteria.</p> <p>For those issuers that are considered eligible, the assessment of good governance incorporates consideration of board structure and independence, alignment of remuneration, transparency of ownership and control and accounting. The Delegate Investment Manager satisfies themselves that good governance practices are in place.</p>		
<b>Proportion of investments</b>	<p>All issuers comply with the sustainability exclusion criteria. On this basis, the investment team consider the proportion of investments to break down as follows:</p> <p>Aligned with E/S characteristics – all issuers contributing to a portfolio that does not breach the sustainability-related exclusions.</p> <p>#2 Other – Cash positions that are present in the portfolio for diversification and efficient portfolio management reasons.</p>		
<b>Monitoring of environmental or social characteristics</b>	<p>Sustainability exclusions are coded into investment controls where possible and reviewed on a quarterly basis. Where any of the requirements are not met, the Delegate Investment Manager will determine how best to liquidate the position(s), if appropriate, or where applicable take action to remediate the situation through active engagement with the issuer. The Delegate Investment Manager will abstain from similar investments going forward until the identified ESG issue(s) is resolved.</p>		
<b>Methodologies</b>	<p>The Delegate Investment Manager currently uses MSCI ESG ratings as well as its own analysis. However, the ESG ratings provider may be changed to an equivalent ESG research provider at the Delegate Investment Manager’s discretion.</p> <p>The exclusions are applied on a best-efforts basis drawing on information from independent ESG rating providers and recognised third party sources.</p>		
<b>Data sources and processing</b>	<p>ESG analysis is conducted using a range of research sources, including direct corporate engagement, the monitoring of controversies, and the issuer’s MSCI ESG Rating.</p>		
<b>Limitations to methodologies and data</b>	<p>In line with the wider fundamental research process, analysis will go well beyond the MSCI ESG rating and trends to focus on the underlying drivers of the rating. As well as including ESG into formal research notes, the team will be closely monitoring any new ESG ratings changes and controversies on an ad-hoc basis. We undertake due diligence and quality control on the ESG research providers.</p>		
<b>Due diligence</b>	<p>As detailed above, Sustainability exclusions are coded into investment controls where possible and reviewed on a quarterly basis. Where any of the requirements are not met, the Delegate Investment Manager will determine how best to liquidate the position(s), if appropriate, or where applicable take action to remediate the situation through active engagement with the issuer.</p>		
<b>Engagement policies</b>	<p>The Delegate Investment Manager maintains a very active approach to corporate engagement. Further details are available in the GAM Engagement Policy.</p>		
<b>Designated reference benchmark</b>	<p>The Fund does not utilise a designated ESG benchmark.</p>		