

GAM Star Fund Plc – GAM Star MBS Total Return - Sustainability-related disclosures

GAM Star MBS Total Return (The “Fund” or “Financial Product”) operates in accordance with Article 8 of Regulation (EU) 2019/2088 (“SFDR”) and this disclosure is written in accordance with Article 24-36, of the Commission Delegated Regulation (EU) 2022/ 1288 (the “SFDR Delegated Act”).

Summary

This Fund promotes environmental or social characteristics but does not have as its objective sustainable investment.

Environmental or social characteristics of the financial product

GAM Star MBS Total Return (the “Financial Product” or “Fund”) invests predominantly in US mortgage-backed debt securities (“MBS”), US asset-backed debt securities (“ABS”), and, to a lesser extent, other debt securities (such as bonds, CLOs, notes) issued by corporations and governments. These securities are primarily issued by US issuers and listed or traded on Recognised Markets, and are subject to the Investment Restrictions, as defined by the Fund’s Prospectus. MBS are pooled structures backed by hundreds, or even thousands, of residential and/ or commercial mortgages or other assets, issued either by a US government Agency (one of three Government Sponsored Enterprises) or a Non-Agency entity (i.e., bank or other financial institution). Given the unique structure of these securities, and absence of a prescribed asset class specific approach to such securities within the SFDR framework, this Fund promotes environmental and social (E/S) characteristics at the issuer level and/or at the level of the parent company of the issuer (hereinafter referred to collectively as “Issuer”), rather than at the level of the underlying assets.

The Fund promotes the following environmental and social characteristics, at the Issuer level:

1. Exclusion of securities from Issuers that are assessed as R(ed) in the internal MBS Sustainability Due Diligence framework. This framework incorporates an assessment of sustainability issues (including corruption, bribery, money laundering, executive compensation issues, fraud, tax evasion, anti-competitive practices, violation of international standards, predatory lending, among others),
2. Exclusion of securities from Issuers involved in specific activities considered to cause negative environmental and social impact, as described below in the Sustainability Exclusion Criteria, and
3. Assessed adherence to generally accepted international norms and standards set by the United Nations Global Compact (UNGC).

These characteristics are achieved through the Investment Strategy as set out in the following section. Investors with specific sustainability preferences or sustainability-related objectives should consider the relevant disclosures in the Prospectus in detail to ensure that the sustainability profile of the Fund reflects such preferences or objectives, in addition to their financial objectives and risk tolerance. Any decision to invest in the Fund should take into account both the financial and non-financial characteristics of the Fund. There is no assurance that any sustainability-related objectives will be achieved. Investors should note that disclosures under the SFDR regime may be amended over time as further guidance is issued or practices evolve. This is particularly the case where investments are made in asset classes that are not directly referenced in the regulatory technical standards, for example relating to the indicators for adverse impacts on sustainability factors which are defined for investee companies, sovereigns (and supranational organisations) and real estate assets.

Investment Strategy

MBS Sustainability Due Diligence

The MBS Sustainability Due Diligence is an internal assessment applied at the Issuer level and uses a flagging approach to assess entities flagged in ‘very severe’ risk incidents, relating to sustainability issues that are considered most relevant to the MBS/ABS asset class. Where ‘very severe’ sustainability incidents are flagged, these will be qualitatively assessed for relevance, severity and Issuer response and the Issuer will be classified according to the following system:

Non-sovereign Issuers

- R(ed): Issuer meets one or more of the following criteria:
 - Indications of very severe incidents related to the sustainability issues highlighted above. Insufficient actions have been taken to address the issue.
 - Breaches of the Sustainability Exclusions Criteria detailed below.
 - Serious breach of the UNGC and insufficient actions have been taken to address the issue.
- A(mber): Issuer meets one or more of the following criteria:
 - Indications of very severe incidents related to the sustainability issues highlighted above and material actions have been taken to address the issue.
 - Serious breach of the UNGC and material actions have been taken to address the issue.
- G(reen): Issuer assessed as not flagged for ‘very severe’ sustainability risk incidents related to sustainability issues outlined above or serious breaches of the UNGC.

Sovereign Issuers

- R(ed): Issuer meets one or more of the following criteria:
 - Listed as involved in EU Sanction violation(s),
 - Listed as “Not Free” by the Freedom House Global Freedom Score, as detailed below,
- G(reen): not in breach of EU Sanctions and is not listed as “Not Free” by the Freedom House Global Freedom Score.

Where an Issuer receives a R(ed) classification, once in the Fund, the Co-Investment Manager will determine how best to liquidate and having regard to the interests of the Fund's investors. Where an Issuer receives an A(mber) classification, the Issuer will be placed on a watch list and the Co-investment Manager will perform ongoing monitoring and engagement with the issuer until the Issuer is considered to have sufficiently addressed the issue.

Sustainability Exclusion Criteria

Non-sovereign Issuers

- Involvement manufacture or selling of controversial weapons (including biological weapons, chemical weapons, cluster munitions and landmines).
- Derive over 5% of their annual revenue from tobacco production.
- Derive 25% of their annual revenue from the extraction of oil sands.
- Derive over 25% of their annual revenue from generating electricity from thermal coal, unless the Issuer has published a coal phase-out plan.

Sovereign issuers

"Not Free" Sovereign Issuers: investments in sovereign issuances from countries which have been assessed as "Not Free" by the Freedom House Global Freedom Score, unless this sovereign is working through an international organization, such as the World Bank, the United Nations, a regional development bank or another body with robust and transparent sustainability safeguards.

Assessed adherence to generally accepted international norms and standards

Issuers are expected to adhere to minimum standards as defined by the UNGC and international treaties governing the use of weapons. The UNGC is a special initiative of the United Nations Secretary-General which calls companies worldwide to align their operations and strategies with ten principles in the areas of human rights, labour rights, the environment and anti-corruption. Further information is available at www.unglobalcompact.org.

Good governance

The assessment of good governance at the Issuer level is integrated into the internal MBS Sustainability Due Diligence, using third-party data, to review where 'very severe' risk incidents are flagged for relevant governance factors including tax compliance and bribery and corruption. Good governance is assessed in a predominantly qualitative way and supported by assessing adherence to UNGC.

Proportion of investments

The Co-investment Manager targets 70% (or above) of net asset value to be allocated to securities aligned with the E/S characteristics of the Fund. The remaining 30% is allocated to #2 Other includes cash, cash equivalents, certain derivatives, Issuers assessed as A(mber) and Issuers where there is a lack of ESG data coverage.

Monitoring of environmental or social characteristics

To monitor and measure the attainment of each of those environmental or social characteristics promoted by the Fund, the Co-investment Manager will report on selected sustainability indicators relating to each characteristic, as disclosed in the Prospectus, as part of the Fund's periodic reporting.

Methodologies

The indicators and processes are applied on a best-efforts basis by the Co-investment Manager using investment controls, external data and/or external or internal research and analysis, as relevant to the particular environmental or social characteristics.

Data sources and processing

The Fund relies on third-party data for the characteristics promoted. This data is supplemented by internal research and analysis as outlined.

Limitations to methodologies and data

Limitations to data on specific indicators will be reported in the Fund's periodic report alongside the relevant sustainability indicator and/or reporting section. Limitations may include issues relating to data scope, coverage, relevance, quality, and timeliness. These limitations are not expected to significantly affect how the environmental and/or social characteristics would be promoted. Where there is no third-party data, alternative sources and/ or internal research is used.

Due diligence

The internal MBS Sustainability Due Diligence is applied at the Issuer level. This process incorporates an assessment of "very severe risk incidents" relating to material sustainability issues, which are considered most relevant to the MBS, ABS, or other debt security issued. An assessment of good governance at the Issuer level is integrated into this process.

Engagement policies

Engagement is an important part of the MBS Sustainability Due Diligence. The Co-investment Manager will engage with Issuers flagged as by third-party ESG data providers as being involved in "very severe" ESG issues, as outlined above. The aim of engagement is to verify the allegation, understand whether the Issuer is taking appropriate steps to resolve the incidents or where not, encourage appropriate steps to be taken.

Designated reference benchmark

No reference benchmark has been designated for the purpose of attaining the environmental and social characteristics promoted by the Fund.

Further details on these topics can be found in the full version of this disclosure and at the following websites:

<https://www.gam.com/en/funds/list>

<https://www.gam.com/en/corporate-responsibility/responsible-investing>

GAM Star Fund Plc – GAM Star MBS Total Return - Sustainability-related disclosures

GAM Star MBS Total Return (The “Fund” or “Financial Product”) operates in accordance with Article 8 of Regulation (EU) 2019/2088 (“SFDR”) and this disclosure is written in accordance with Article 24-36, of the Commission Delegated Regulation (EU) 2022/ 1288 (the “SFDR Delegated Act”).

Full Disclosure

No Sustainable investment objective	<p>This Fund promotes environmental or social characteristics but does not have as its objective sustainable investment.</p>
Environmental or social characteristics of the financial product'	<p>GAM Star MBS Total Return (the “Financial Product” or “Fund”) invests predominantly in US mortgage-backed debt securities (“MBS”), US asset-backed debt securities (“ABS”), and, to a lesser extent, other debt securities (such as bonds, CLOs, notes) issued by corporations and governments. These securities are primarily issued by US issuers and listed or traded on Recognised Markets, and are subject to the Investment Restrictions, as detailed in the Fund’s Prospectus. MBS are pooled structures backed by hundreds, or even thousands, of residential and/ or commercial mortgages or other assets, issued either by a US government Agency (one of three Government Sponsored Enterprises) or by structures set up by a Non-Agency entity (i.e., bank or other financial institution). Given the unique structure of these securities, and absence of a prescribed asset class specific approach to such securities within the SFDR framework, this Fund promotes environmental and social characteristics at the issuer level and/or at the level of the parent company of the issuer (hereinafter referred to collectively as “Issuer”), rather than at the level of the underlying assets.</p> <p>The Fund promotes the following environmental and social characteristics at the issuer level:</p> <ol style="list-style-type: none"> 1) Exclusion of securities from Issuers that are assessed as R(ed) as part of the internal MBS Sustainability Due Diligence framework as detailed in this Appendix in response to the question “What investment strategy does this financial product follow?”. This framework incorporates an assessment of sustainability issues (including corruption, bribery, money laundering, executive compensation issues, fraud, tax evasion, anti-competitive practices, violation of international standards, predatory lending, among others), 2) Exclusion of securities from Issuers involved in specific activities considered to cause negative environmental and social impact, as described below in the Sustainability Exclusion Criteria, and 3) Assessed adherence to generally accepted international norms and standards, as set by the United Nations Global Compact (“UNGC”). <p>These characteristics are achieved through the investment strategy and binding characteristics as set out in this Appendix.</p> <p>Investors with specific sustainability preferences or sustainability-related objectives should consider the relevant disclosures in the Prospectus, Supplement and this Appendix in detail to ensure that the sustainability profile of the Fund reflects such preferences or objectives, in addition to their financial objectives and risk tolerance. Any decision to invest in the Fund should take into account both the financial and non-financial characteristics of the Fund, as further described in the Supplement. There is no assurance that any sustainability-related objectives will be achieved. Investors should note that disclosures under the SFDR regime may be amended over time as further guidance is issued or practices evolve. This is particularly the case where investments are made in asset classes that are not directly referenced in the regulatory technical standards, for example relating to the indicators for adverse impacts on sustainability factors which are defined for investee companies, sovereigns (and supranational organisations) and real estate assets.</p> <p>Furthermore, investors’ attention is drawn to the heading “Risk Factors” in the Prospectus and Supplement, which should be considered before investing in the Fund.</p> <p>No reference benchmark has been designated for the purpose of attaining the environmental and social characteristics promoted by the Fund.</p>
Investment Strategy	<p>The Co-Investment Manager applies a combination of top-down market analysis and fundamental, bottom-up security selection to ensure risk is actively managed in a diversified portfolio of US</p>

MBS, US ABS, and, to a lesser extent, other debt securities (such as bonds, CLOs, notes). Details of the investment process are provided in the Supplement relating to the Financial Product.

The environmental and social characteristics of the Financial Product are integrated into the investment process and implemented on a continuous basis as follows:

1) MBS Sustainability Due Diligence

The internal MBS Sustainability Due Diligence is applied at the Issuer level, and assesses entities involved in very severe risk incidents, relating to sustainability issues that are considered most relevant to the MBS/ABS asset class. The due diligence process uses third-party ESG data, and qualitative analysis and is applied to all securities in the Fund. This framework incorporates an assessment of 'very severe risk incidents' for material sustainability issues (including corruption, bribery, money laundering, executive compensation issues, fraud, tax evasion, anti-competitive practices, violation of international standards, predatory lending, among others).

Where 'very severe' sustainability incidents identified, these will be qualitatively assessed for relevance, severity and Issuer response and the Issuer will be classified according to the following system:

Non-sovereign issuers

- R(ed): Issuer meets one or more of the following criteria:
 - Indications of very severe incidents related to the sustainability issues highlighted above. Insufficient actions have been taken to address the issue.
 - Breaches of the Sustainability Exclusions Criteria detailed below.
 - Serious breach of the UN Global Compact and insufficient actions have been taken to address the issue.
- A(mber): Issuer meets one or more of the following criteria:
 - Indications of very severe incidents related to the sustainability issues highlighted above and material actions have been taken to address the issue.
 - Serious breach of the UN Global Compact and material actions have been taken to address the issue.
- G(reen): Issuer assessed as not flagged for 'very severe' sustainability risk incidents related to sustainability issues outlined above or serious breaches of the United Nations Global Compact.

Sovereign issuers

- R(ed): Issuer meets one or more of the following criteria:
 - Listed as having an EU Sanction violation
 - Listed as "Not Free" by the Freedom House Global Freedom Score, as detailed below,
- A(mber): Issuer meets one or more of the following criteria and material actions have been taken to address the issue.
 - EU Sanctions violations, where material actions have been taken to address the issue.
- G(reen): is not in breach of EU Sanctions and is not listed as "Not Free" by the Freedom House Global Freedom Score, as detailed below.

An overall issuer is assessed as R(ed), A(mber), or G(reen). Where an Issuer receives a R(ed) classification, once in the Fund, the Co-Investment Manager will determine how best to liquidate or having regard to the interests of the Fund's investors (s). Where an Issuer receives an A(mber) classification, the Issuer will be placed on a watch list and the Co-investment Manager will perform ongoing monitoring and engagement with the issuer until the Issuer is considered to have sufficiently addressed the issue. The Co-investment Manager will aim to review the watch list quarterly, or on an ad-hoc basis as the result of a significant change in the condition of the security as known and identified by the Co-investment Manager.

An overall issuer classification is assigned based on the occurrence of R(ed), A(mber), or G(reen) assessment across the sustainability incidents assessed. If one or more incidents is assessed as R(ed), the issuer will receive a R(ed) overall classification. If one or more incidents is assessed as A(mber) and there are no R(ed) incidents, the overall classification will be A(mber). Issuers are only classified as G(reen) if they are not associated any incidents assessed as A(mber) or R(ed).

Where an Issuer receives a R(ed) classification as part of the due diligence process, the Co-Investment Manager will determine how best to liquidate the position(s) having regard to the interests of the Fund's investors. The Issuer will be placed on a pre-trade list and the Co-

investment Manager will abstain from investing securities associated until the Issuer is considered to have sufficiently addressed the issue.

An Issuer is classified as A(mber) where material actions have been taken to address the identified issue. A(mber) Issuers are placed on a watch list and the Co-investment Manager will undertake ongoing monitoring and engagement with the issuer until the Issuer is considered to have sufficiently addressed the issue. The Fund may still invest in securities related to A(mber) issuers. The watch list is aimed to be reviewed on at least a quarterly basis, or on an ad-hoc basis as the result of a significant change in the condition of the security as known and identified by the Co-investment Manager.

Exclusion of R(ed) and the limitations to investing further in A(mber) securities are applied on a best-efforts basis through the integration of the pre-trade list by the Co-investment Manager and adherence is intended to be reviewed quarterly, or on an ad-hoc basis as the result of a significant change in the condition of the security as known and identified by the Co-investment Manager. The Co-investment Investment Manager may use third party data and alternative sources to form their judgement regarding the allegations and response.

2) Sustainability Exclusion Criteria

Involvement by the issuer or issuer parent in the following activities, beyond the revenue threshold specified, would result in the investment being ineligible.

Non-sovereign issuers

- Involvement manufacture or selling of controversial weapons (including biological weapons, chemical weapons, cluster munitions and landmines).
- Derive over 5% of their annual revenue from tobacco production.
- Derive 25% of their annual revenue from the extraction of oil sands.
- Derive over 25% of their annual revenue from generating electricity from thermal coal, unless the Issuer has published a coal phase-out plan.

Sovereign issuers

“Not Free” Sovereign issuers: investments in sovereign issuances from countries which have been assessed as “Not Free” by the Freedom House Global Freedom Score, unless this sovereign is working through an international organization, such as the World Bank, the United Nations, a regional development bank or another body with robust and transparent sustainability safeguards.

The definition of the Freedom House Global Freedom Score and further detail on the Scores are available at: <https://freedomhouse.org/countries/freedom-world/scores>.

The Co-Investment Manager uses third-party data to assess involvement in the ineligible activities outlined above, this is validated by internal research and verification against other third-party data providers. Breaches of the Sustainability Exclusion Criteria would result in an Issuer being assessed as R(ed) in the MBS Sustainability Due Diligence and being liquidated and/or ineligible for further investment as per the guidelines above.

3) International norms and standards

Issuers are expected to adhere to minimum standards as defined by the United Nations Global Compact and international treaties governing the use of weapons.

Issuers involved in serious relevant breaches of the United Nations Global Compact (the “UN Global Compact”) are added to the R(ed) or A(mber) list as part of the MBS Sustainability Due Diligence process, unless the Issuer is considered to have taken substantial and adequate steps to have addressed the allegations. The Co-Investment Manager uses third party data provider’s framework and data to categorise serious breaches, which are intended to identify credible allegations of a violation of global norms. The Co-Investment Manager may use third party data and alternative sources to form their judgement regarding the allegations and response. The UN Global Compact is a special initiative of the United Nations Secretary-General which calls companies worldwide to align their operations and strategies with ten principles in the areas of human rights, labour rights, the environment and anti-corruption. Further information is available at www.unglobalcompact.org.

The elements of the Fund’s Investment Strategy outlined above, including any sustainability assessments and exclusions, are applied on a best-efforts basis, drawing on information from independent ESG rating providers, recognised third party sources and internal research as

necessary. Should an investment breach one of the characteristics once in the Fund, as described above, the Co-Investment Manager will determine how best to liquidate the position, if appropriate, unless there is adequate and substantial justification for an exception as detailed in the GAM Sustainability Exclusions Policy. Where an exception is determined and approved, the Co-Investment Manager will work with the issuer to remediate the breach through engagement. The Co-Investment Manager may use third party data and alternative sources, including engagement with the Issuer, to form its judgement regarding whether there is an adequate justification for an exception as detailed above. This may also be necessary where there is a difference in assessment between ESG data or ratings providers and/or our internal research. The security may be held while the appropriate course of action is determined. The Co-Investment Manager will abstain from investing in similar investments until the identified ESG issue(s) is resolved and the relevant position is no longer considered in breach of the Fund's characteristics.

Good governance assessment

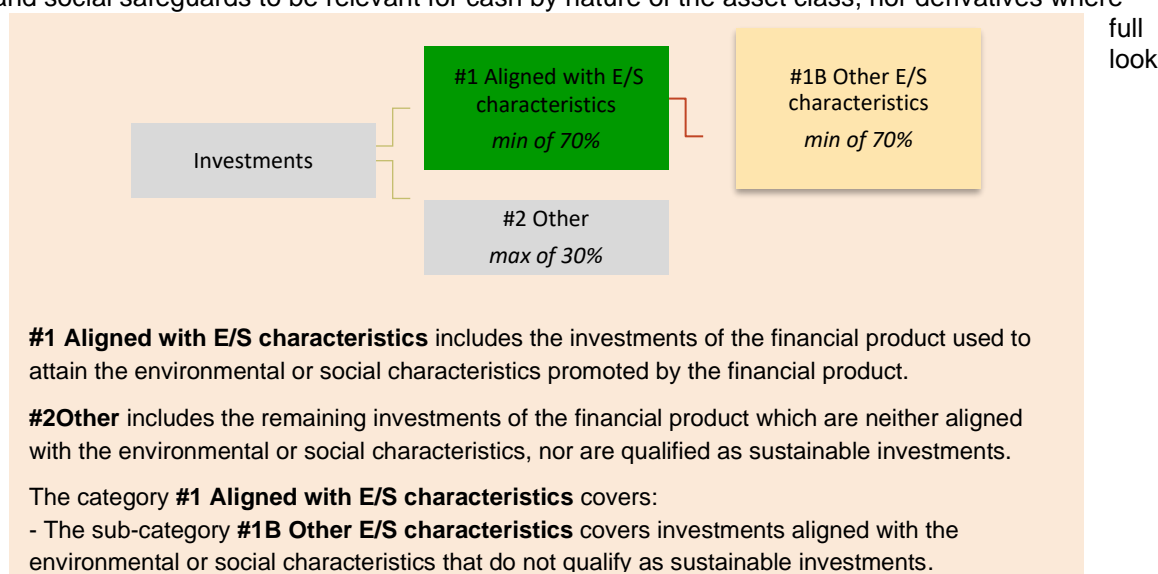
Article 8 of Regulation (EU) 2019/2088 ("SFDR") and the European Commission Q&A on SFDR published 25 May 2022, confirm that good governance practices referred to in Article 2, point (17), and Article 8(1), first subparagraph of SFDR, relate to investee companies and do not apply to government bonds. It follows then that the requirements are not relevant to government/sovereign issuers, while the application of this to non-sovereign issued MBS/ABS securities is not specifically mentioned in the regulation. For this reason, the approach to assessing good governance is applied to eligible MBS/ABS securities at the Issuer level using relevant criteria.

The assessment of good governance at the Issuer level is integrated into the internal MBS Sustainability Due Diligence, using third-party data, to review where 'very severe' risk incidents are flagged for relevant governance factors, in particular relating to tax compliance and bribery and corruption. Good governance is assessed in a predominantly qualitative and/or quantitative way.

In addition, good governance at the Issuer level is supported by assessing whether Issuers adhere to minimum standards as defined by the ten principles of the United Nations Global Compact, which cover anti-corruption (Principle 10) and labour rights and relations (Principles 3-6) and well as environmental governance (Principles 7-9).

Proportion of Investments

The Co-Investment Manager targets a minimum of 70% (or above) of the net asset value of the Fund to be aligned with environmental/social characteristics promoted by the Fund. The Fund does not commit to holding sustainable investments. The Fund may hold a maximum of 30% of the net asset value of the Fund in investments that are not aligned with the environmental or social characteristics promoted by the Fund and which fall into "#2 Other" category of investments. The investments under #2 Other includes cash and certain derivatives, Issuers assessed as A(mber) as part of the MBS Sustainability Due Diligence process, and Issuers where there is a lack of sustainability data coverage. We do not deem an assessment of minimum environmental and social safeguards to be relevant for cash by nature of the asset class, nor derivatives where



through is not possible. The Co-Investment Manager continuously seeks to engage with data providers to improve coverage. A(mber) Issuers are monitored on an ongoing basis and the Co-Investment Manager will engage with the entity to remediate the incident and prevent further harm.

While derivatives are permitted, their use is limited. Derivatives are assessed against the binding elements of the investment strategy based on their underlying, where full look-through is possible. For example, where the underlying exposure of a derivative is an ineligible Issuer according to the binding characteristics, the derivative would not be eligible for inclusion in the Fund. Derivatives where the underlying is not a company or sovereign are not aligned to the Fund's E/S characteristics and are included in #2 Other.

While the Fund promotes environmental and social characteristics within the meaning of Article 8 of the SFDR, it does not currently commit to investing in any "sustainable investments" within the meaning of the SFDR and it does not currently commit to take into account the EU criteria for environmentally sustainable economic activities within the meaning of the Taxonomy Regulation. As such, the minimum proportion of the Fund's investments that contribute to environmentally sustainable economic activities for the purposes of the Taxonomy Regulation will be 0%. The Fund may consider setting minimum taxonomy as data and reporting on taxonomy alignment improves

Monitoring of environmental or social characteristics

The Fund's E/S characteristics are implemented in accordance with the Investment Strategy outlined above and uses the following sustainability indicators to monitor and measure the attainment of each of those environmental or social characteristics promoted by the Fund. Additional indicators are reviewed as part of ongoing monitoring of the environmental and social characteristics of the Fund. In particular, the MBS Sustainability Due Diligence incorporates a wide range of additional data points, both quantitatively and qualitatively, within the internal assessment, which is applied at the issuer/ parent level.

The annual financial statements of GAM Star Fund Plc will include a periodic report for this Fund, which will disclose the extent to which environmental or social characteristics are met.

1) Indicators relating to the MBS Sustainability Due Diligence

MBS Sustainability Due Diligence assessment: share of investments in Issuers that have been classified R(ed) or A(mber) in the MBS Sustainability Due Diligence.

2) Indicators relating to Sustainability Exclusion Criteria

Involvement in controversial weapons: share of investments in Issuers involved in the manufacture or selling of controversial weapons (including biological weapons, chemical weapons, cluster munitions and landmines).

Involvement in tobacco production: share of investments in Issuers involved in tobacco production (above 5% revenue threshold).

Involvement in oil sands extraction: share of investments in Issuers involved in oil sands extraction (above 25% revenue threshold).

Involvement in thermal coal: share of investments in Issuers involved in generating electricity from thermal coal (above 25% revenue threshold).

"Not Free" Sovereign issuers: share of investments in sovereign issuances from countries which have been assessed as "Not Free" by the Freedom House Global Freedom Score.

The definition of the Freedom House Global Freedom Score and further detail on the Scores are available at: <https://freedomhouse.org/countries/freedom-world/scores>.

3) Indicators relating to UNGC

Violations of UN Global Compact principles: share of investments in Issuers that have been involved in violations of the UNGC principles.

Methodologies

The methodologies to measure how the social or environmental characteristics promoted by the Fund are as follows:

- 1) MBS Sustainability Due Diligence:** The GAM MBS Sustainability Due Diligence is applied at the Issuer, and assesses entities flagged for very severe risk incidents, relating to sustainability issues that are considered most relevant to the MBS/ABS asset class. The due diligence process uses third-party ESG data, and qualitative analysis. This framework identifies entities involved in 'very severe risk incidents' the material issues identified (including corruption, bribery, money laundering, executive compensation issues, fraud, tax evasion, anti-competitive practices, violation of international standards, predatory lending, among others). The entities identified will undergo further research and analysis to assess relevance, severity and company response.

- 2) **Sustainability Exclusion Criteria:** The Sustainability Exclusion Criteria are assessed, on a best-efforts basis, as part of the MBS Sustainability Due Diligence, using information from independent ESG rating providers and recognised third party sources and internal research as necessary.
- 3) **International norms and standards:** UN Global Compact compliance is assessed, on a best-efforts basis, as part of the MBS Sustainability Due Diligence, drawing on information from independent ESG rating providers and recognised third party sources and internal research as necessary. The Co-Investment Manager uses a third-party data provider's framework and data to categorise serious breaches, which are intended to identify credible allegations of a violation of global norms. The Co-Investment Manager may use third party data and alternative sources, including engagement with the Issuer, to form its judgement regarding the allegations and the Issuer response to any allegation. Exceptions relating to UN Global Compact (as described in the GAM Sustainability Exclusions Policy) will be reviewed and approved by the Sustainability Committee. The Fund will report on UN Global Compact compliance in the Fund's periodic report using data from third-party sources.

The internal MBS Due Diligence combines the three processes listed above into a single rating of either R(ed), A(mber) or G(reen) according to the criteria specified in the investment strategy section. Should an investment receive a R(ed) assessment as part of this framework once in the Fund, the Co-Investment Manager will determine how best to liquidate the position having regard to the interests of the Financial Product's investors. The Co-Investment Manager may use third party data and alternative sources, including engagement with the Issuer, to form the R(ed) / A(mber) / G(reen) assessment. Results of the assessment are reviewed and approved by the relevant internal committee. The Fund will report on these indicators in the Fund's periodic report using data from third-party sources

Data sources and processing

- 1) MBS Sustainability Due Diligence: third-party ESG data is combined with a qualitative overlay to assess each Issuer. The primary third-party data provider is RepRisk and screens over 100,000 public sources daily across 23 languages for ESG issues and topics relating to each entity in their universe. This is achieved by combining AI and machine learning with human intelligence to transform big data into targeted metrics. The qualitative overlay incorporates additional internal research using further third party data and alternative sources to assess relevance, severity and Issuer response.
- 2) Sustainability Exclusion Criteria are reliant on third-party data for implementation. Our main providers are MSCI and RepRisk but this may be supplemented as necessary. Where there is no or limited coverage from our standard third-party research providers, conflicting research between research providers or conflicting research between a research provider and the company, then we will use our own internal research to form a judgement. Data is processed and assessed as part of the MBS Sustainability Due Diligence.
- 3) Adherence to international norms and standards relies on third-party data to categorise serious breaches, which are intended to identify credible allegations of a violation of global norms and standards. Our main providers are MSCI and RepRisk but this may be supplemented as necessary. Where there is no or limited coverage from our standard third-party research providers, conflicting research between two research providers or conflicting research between a research provider and the company, then we will use our own internal research, to determine involvement. The Co-Investment Manager may use third party data and alternative sources, to form its judgement regarding the allegations and the company response to any allegation. Data is processed and assessed as part of the MBS Sustainability Due Diligence

GAM encourages improved disclosure through engagement with data providers on data quality, new methodologies, and coverage. ESG data providers are reviewed regularly, and new data or research sources are reviewed on an ongoing basis. As the Co-Investment Manager identifies any data quality concerns, they contact the vendors for feedback and for any updates in the datasets when required. The Co-Investment Manager also provides feedback to research providers on new or updated methodologies or analytics. Data limitations are outlined in the following section.

Data coverage from the Fund's primary third-party providers is typically over 90% for non-sovereign issuers and 100% for sovereign issuers. Where there are data coverage issues, this will be flagged in the Fund's periodic reporting alongside the relevant indicator, as well as the proportion of estimated data where available. The data or third-party assessments may also use estimates or otherwise apply subjective judgements (for example when qualitatively assessing a company policy).

Limitations to methodologies and data

The Co-Investment Manager will rely on sustainability-related data both in order to assess risk to the Fund's investments and as part of its investment strategy. The quality, timeliness, completeness and availability of sustainability-related data may still not be comparable with the general quality, timeliness, completeness and availability of more standardised and traditional financial data. The assessment of risk and the implementation of the investment strategy may be adversely impacted as a result and the Fund may suffer losses (including loss of opportunity) as a result of investment decisions taken in reliance on sustainability-related data which may not be accurate, complete or timely or if the Co-Investment Manager does not correctly assess the impact of such data on the Fund.

The main data limitations are:

Data scope – there is limited third-party ESG data for MBS/ABS securities. The Fund promotes environmental and social characteristics at the issuer level and/or at the level of the issuer parent of the issuer, rather than the underlying assets (beyond the nature of the assets themselves). Many Issuers are private companies and trusts; therefore, the Fund uses data from a specialized provider with coverage across private and public entities.

Data Coverage – the primary third-party ESG data provider covers more than 90% of the investments in the Fund and the. As data gaps are identified, the Co-Investment Manager engages with the data provider to improve coverage. Gaps may persist where MBS/ABS instruments are part of historical issuances from entities that are no longer in existence. Additional third-party data providers are reviewed to compare and validate the assessment from the primary provider.

Data relevance – The Co-Investment Manager overlays a qualitative assessment of the third-party data to improve relevance and accuracy to the MBS/ABS asset class. The internal qualitative assessment may be adversely impacted if the Co-Investment Manager does not correctly assess the impact of such data on the Fund

Data quality – The Fund uses recognised ESG data providers with their own internal quality control processes. Data is frequently reviewed by the Co-Investment Manager. Where errors of accuracy, omission or timeliness are found, these are captured as part of the qualitative overlay and are communicated to the research provider for correction.

Data timeliness – data is predominantly based on corporate disclosures and updated on an annual basis. The data may therefore not reflect the current situation.

Limitations to methodologies and data will be reported in the Fund's periodic report alongside the relevant sustainability indicator and/or reporting section as relevant. There are no foreseen limitations that would significantly affect how the environmental and/or social characteristics would be promoted.

Due diligence

The MBS Sustainability Due Diligence framework is applied at the Issuer level. This framework incorporates an assessment of "very severe risk incidents" relating to material sustainability issues, which are considered most relevant to the MBS, ABS, or other debt security issued. An assessment of good governance at the Issuer level is integrated into the framework as outlined.

We aim to update the MBS Sustainability Due Diligence assessment on a quarterly basis, and we will use third-party ESG data, company reports, and other sources as considered appropriate. This due diligence is conducted by the Governance and Responsible Investment Team, and the outcome is reviewed by the relevant internal committee.

The Investment manager(s) receive the list of issuer(s)/ issuer parent(s) classified as R(ed) on a quarterly basis. The Investment Manager will not invest in additional securities issued by the R(ed) list issuers and will determine how to best liquidate any existing investments, while having regard to the interests of the Fund's investors.

Adherence to the MBS Sustainability Due Diligence assessment is monitored as part of the investment controls.

Engagement policies

Engagement is an important part of the MBS Sustainability Due Diligence. The Co-Investment Manager will engage with issuers/ issuer parents flagged by third-party ESG data providers as being involved in "very severe" ESG issues, as outlined above. The aim of engagement is to verify the allegation, understand whether the Issuer is taking appropriate steps to resolve the incidents or where not, encourage appropriate steps to be taken. Where there is willingness to engage take action by the Issuer, the entity will be rated as A(mber) and placed on a watch-list for ongoing monitoring and engagement until the issue is sufficiently resolved. Where there is no response from the Issuer or a lack of willingness to take action, the Co-Investment Manager will escalate

engagement efforts. Where there is still a lack of action following escalation, we will take the appropriate action within the portfolio and the Issuer would be downgraded to R(ed).

The Investment Manager engages with companies as outlined above and in the GAM Engagement Policy. Further details are available in the GAM Engagement Policy, which can be accessed from the following link: <https://www.gam.com/en/corporate-responsibility/responsible-investing>.

**Designated
reference
benchmark**

No reference benchmark has been designated for the purpose of attaining the environmental and social characteristics promoted by the Fund.

Important legal information

This document is not intended for distribution to or use by persons or entities with nationality of or with their residence, domicile or registered office in a State or Country in which such distribution, publication, making available or use is contrary to laws or other regulations. The responsibility for the further use of fund descriptions contained in this document lies solely with the intermediary. Nothing contained herein constitutes investment, legal, tax or other advice, nor is it to be solely relied on in making an investment or other decision. This document qualifies as marketing material. The views expressed herein are those of the manager at the time and are subject to change. The price of shares may go down as well as up and the price will depend on fluctuations in financial markets outside GAM's control. As a result an investor may not get back the amount invested. Past performance is not indicative of future performance and reference to a security is not a recommendation to buy or sell that security. Allocations and holdings are subject to change.

This is not an invitation to invest in any GAM product or strategy. Investments should only be made after a thorough reading of the current prospectus, offering memorandum, the Key Investor Information Document "KIID", the articles of association and the current annual and semi-annual reports (the "legal documents"), as well as after consulting an independent finance and tax specialist. The legal documents can be obtained in hard copy and free of charge from the addresses indicated below.

Some of the sub-funds may not be registered for sale in all jurisdictions. Therefore, no active marketing must be carried out for them. Subscriptions will only be received and shares or units issued on the basis of the current fund prospectus.

Shares of the fund have not been registered under the US Securities Act of 1933, as amended (the "Securities Act") and the fund is not registered under the US Investment Company Act of 1940, as amended (the "Company Act"). Accordingly, such shares may not be offered, sold or distributed in the United States or to US persons unless an exemption from registration under the Securities Act and the Company Act is available. In addition, certain GAM products are closed to all US investors.

This material/presentation mentions one or several sub-funds of GAM Star Fund p.l.c., registered office at Dockline, Mayor Street, IFSC, Dublin D01 K8N7, Ireland, an umbrella investment company with variable capital and segregated liability between the sub-funds, incorporated under the laws of Ireland and authorised by the Central Bank of Ireland (CBI) as a UCITS Fund in accordance with the Directive 2009/65/EC. Management Company is GAM Fund Management Limited, Dockline, Mayor Street, IFSC, Dublin D01 K8N7, Ireland. Within the UK, this material has been issued and approved by GAM London Ltd, 8 Finsbury Circus, London EC2M 7GB, authorised and regulated by the Financial Conduct Authority.

The information in this document is given for information purposes only and does not qualify as investment advice or as meeting any particular financial objectives, risk profiles, sustainability preferences or sustainability-related objectives of the recipient. There is no assurance that any sustainability-related objectives will be achieved. Further information on GAM's approach to responsible investing can be found here: <https://www.gam.com/en/corporate-responsibility/responsible-investing> <https://www.gam.com/en/policies-and-disclosures#sfdr>

The ESG-focused investment strategy described in this document may involve the selection, prevent the acquisition of or require the disposal of securities of certain issuers for reasons other than investment performance or other financial considerations. As a result, the strategy may underperform other strategies with a similar financial objective or policy that do not utilise an ESG-focused investment strategy and may suffer investment losses if it is required to dispose of a security as a result of non-financial considerations.

The investment strategy described in this document is reliant on sustainability-related data. The quality, timeliness, completeness and availability of sustainability-related data may not be comparable with the general quality, timeliness, completeness and availability of more standardised and traditional financial data. The implementation of the investment strategy may be adversely impacted as a result and may result in losses (including loss of opportunity) as a result of investment decisions taken in reliance on sustainability-related data which may not be accurate, complete or timely or if decisions are taken which do not correctly assess the impact of such data. Estimates, proxies and subjective judgements may be used when assessing sustainability risk or applying an investment strategy which, if incorrect, may result in losses (including loss of opportunity).

The Co-Investment Manager may rely on third parties for inputs used in its investment decisions including data vendors and ESG ratings providers. The data and ratings provided by such third parties may be impacted by the quality, timeliness, completeness, and availability of sustainability related data available to them.

ESG ratings generally assess the impact of environmental, social and governance (ESG) factors on a company and/or a company's impact on the outside world and provide an opinion, expressed as a rating, of such impacts. ESG ratings may not capture all sustainability risks or impacts of a particular company. As different ESG ratings may rely on different data sources and calculation methodologies (including the weightings applied to ESG factors), the ratings applied to one company by a ratings provider may be different to the rating applied to the same company by another provider. The businesses of ESG ratings and ESG data providers are generally unregulated. ESG ratings may be provided by third parties that have an existing relationship with the companies that are being rated (and may have been engaged by that company to provide ESG ratings), which can create a conflict of interest for the ESG ratings provider. ESG ratings providers may also not make timely changes in a rating to reflect changes to the relevant company, sustainability risks or other external events. The investment strategy may suffer losses (including loss of opportunity) and its ESG performance may be different from that intended as a result of reliance on data or ratings which prove inaccurate, incomplete or out of date or if the Co-Investment Manager does not correctly assess the impact of such data.

The Portfolio ESG Rating, where applicable, stated in respect of the strategy is derived from ratings provided by a third party in respect of the investments and is designed to help investors understand the resiliency of the portfolio to long-term ESG risk and opportunities.

A strategy with a high Portfolio ESG Rating implies that its investments are perceived to have a strong or improving management of financially relevant ESG risks and may be more resilient to disruptions from ESG events. However, the investments of a strategy with a high Portfolio ESG Rating may still create significant negative externalities on environmental or social factors such as pollution and poor labour practices. Further, a strategy with a high Portfolio ESG Rating does not necessarily achieve or seek any positive ESG or sustainability impact. There can be no assurance that the Portfolio ESG Rating correctly represents the strategy's exposure to financial loss as a result of ESG risks.

The strategy described in this document may invest in economic activities which are aligned with the EU Taxonomy. Alignment of investments with the EU Taxonomy is calculated by specific metrics (such as revenue or expenditure) and determined by data most recently disclosed or provided by investee companies or collected by third parties in relation to those economic activities. Such metrics are calculated and disclosed, provided or collected as at a point in time for each investee company and are based on the activities of those investee companies which may vary over time or be impacted by external events. As a result, any taxonomy-alignment of the strategy will be indicative only and will not be a true reflection of the taxonomy-alignment of the strategy as at a point in time or over a particular reference period. The strategy may involve investment decisions based on the taxonomy alignment of an investment and the impact of such decisions may result in the strategy generating lower financial returns than if the taxonomy alignment were not taken into account.

The strategy described in this document may include sustainable investments as defined in the EU's Sustainable Finance Disclosure Regulation (EU 2019/2088) ("SFDR"). A sustainable investment is an investment in an economic activity which contributes to an environmental or social objective, which does not significantly harm any environmental or social objective and where the investee company follows good governance practices. SFDR does not provide for objective criteria to determine the contribution of an economic activity to a particular environmental or social objective or set thresholds for identifying whether an economic activity causes significant harm to an environmental or social objective. As a result, the definition of "sustainable investments" is not standardised and requires firms to make subjective decisions. Firms subject to SFDR may take different approaches to categorising such investments. There can be no guarantee that a sustainable investment will attain its environmental or social objective or avoid harm to any particular environmental or social objective. The strategy may involve investment decisions based on whether or not an investment is determined to be a "sustainable investment" and the impact of such decisions may result in the strategy generating lower financial returns than if it did not take into account such determination.

The strategy described in this document may be intended to have an ESG-related impact. Any impact will be calculated based on sustainability-related data. The quality, timeliness, completeness and availability of sustainability-related data may not be comparable with the general quality, timeliness, completeness and availability of more standardised and traditional financial data and may result in losses (including loss of opportunity) as a result of investment decisions taken in reliance on sustainability-related data which may not be accurate, complete or timely or if decisions are taken which do not correctly assess the impact of such data. The Manager may be required to use estimates, proxies or otherwise apply subjective judgements in assessing ESG-related impacts. Any ESG-related impact may not be as expected. There is no assurance that any ESG-related impact will be achieved.