

Controversial Weapons Policy

CREATION: FEBRUARY 2020

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1. Introduction and Purpose

This policy outlines Addenda Capital's approach to avoid the investment of client in entities that manufacture controversial weapons.

Addenda Capital's mission is to create sustainable wealth, in close partnership with our clients for a better future. Investing in a way that respects international humanitarian laws and norms supports this mission and reflects our commitment to values of integrity and sustainability.

Controversial weapons cause superfluous injury, unnecessary suffering, or indiscriminate harm. International humanitarian law conventions and protocols have come into force which define and prohibit these weapons and related activities. Canada is a party to these conventions and protocols. The weapons and activities they address are illegal under Canadian law.

2. Scope and Definition

This policy applies to all of Addenda Capital's investment activities.

Controversial weapons are defined as those weapons prohibited under international humanitarian law through the conventions and protocols in the table below.

Weapon	Convention (Entry into Force Date)
Biological	Convention on the Prohibition of Biological Weapons (1975)
Chemical	Convention on the Prohibition of Chemical Weapons (1997)
Weapons with Non-detectable Fragments	Protocol I (1983) to the Convention on Certain Conventional Weapons
Incendiary	Protocol III (1983) to the Convention on Certain Conventional Weapons
Blinding Laser	Protocol IV (1998) to the Convention on Certain Conventional Weapons
Land Mines and Related Devices	Convention on the Prohibition of Anti-Personnel Mines (Ottawa Treaty) (1999); Protocol II, as amended (1998), to the Convention on Certain Conventional Weapons.
Cluster Munitions	Convention on Cluster Munitions (2010)

¹ International Committee of the Read Cross, Customary International Law Database, Chapter 20, Rule 70 and 71 https://ihl-databases.icrc.org/customary-ihl/eng/docs/v1_cha_chapter20

Manufacturing is defined as:

- The production of the whole controversial weapon system, and/or
- The production of components that were developed or are significantly modified for exclusive use in a controversial weapon system.

3. Framework of Policy

Addenda Capital will not knowingly invest in the securities issued by an entity that is in the business of manufacturing a controversial weapon.

Addenda Capital, with the support of a third-party expertise, will maintain and annually update a list of companies that are likely to be in the business of manufacturing one or more controversial weapons.

4. Amendments and Reviews

Date of Modification

Amendments/Reviews

February 2020

Creation