

Engagement Policy
**Aristotle Atlantic
Partners, LLC**



Engagement Policy

General Approach & Philosophy

Engagement with management teams is an important component of the Aristotle Atlantic Partners, LLC (“Aristotle Atlantic”) investment process. We believe our meetings give us insight into management’s strategic priorities, risks and opportunities, the sustainability of a company’s business model, stewardship practices, financial strength, and ability to endure (and potentially rise above) during times of adversity.



Members of the Aristotle Atlantic investment team directly engage the companies in which we invest. These engagements may focus on addressing specific issues related to sustainability and with stewardship. We aim to promote appropriate disclosure on material ESG issues, encourage the implementation of a sustainability framework (if one doesn't already exist) and establish dialogue around alleged violations of global norms, including Principles of the UN Global Compact. We also seek to understand how the company thinks about risks and opportunities related to climate change, as well as their environmental goals (future and progress already achieved).

Through our long-term investment approach, we seek to foster congenial relationships with company management, which can help provide a sounding board if we believe the company has taken fundamental missteps or has failed to create value for its shareholders. We believe this provides an effective means in providing better dialogue between us and the companies in which we invest.

Procedure

Our team meets prior to each engagement to establish priorities for discussion and prepare questions. We seek to identify any alleged violations of global norms, including Principles of the UN Global Compact, review items that required follow-up from past engagements and review the Sustainability Accounting Standards Board's (SASB) engagement guide to ensure we cover topics that are pertinent to each particular industry. The team maintains clear records of each meeting in a centralized database outlining our engagement activity. Engagement notes contain the purpose of the meeting, attendees, topics discussed, outcomes, and items for future follow-up. These records are shared with members of the investment team and help us monitor companies' progress over time.

Collaborative Engagement

On occasion, members of our team will participate in collaborative engagements. The purpose of these activities is to share best practices and voice our concerns (or support) with likeminded investors in an effort to enhance engagement outcomes. Moving forward, as part of our overall engagement and networking efforts, we aim to increase active participation in collaborative engagements. Through involvement in organizations with fellow asset managers, asset owners and other industry experts, we intend to continue to stay current with the latest responsible investment standards and engagement best practices.



Disclosures:

The opinions expressed herein are those of Aristotle Atlantic and are subject to change without notice. This material is not financial advice or an offer to purchase or sell any product. Aristotle Atlantic reserves the right to modify its current investment strategies and techniques based on changing market dynamics or client needs.

Aristotle Atlantic Partners, LLC is an independent investment adviser registered under the Investment Advisers Act of 1940, as amended. Registration does not imply a certain level of skill or training. More information about Aristotle Atlantic, including our investment strategies, fees and objectives, can be found in our Form ADV Part 2, which is available upon request.

AAP-2404-3

