COMGEST ASSET MANAGEMENT INTERNATIONAL LIMITED

CAPITAL ADEQUACY AND RISK DISCLOSURES

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1. INTRODUCTION

Comgest Asset Management International Limited ("CAMIL" or the "Company") is the Irish subsidiary of Comgest Global Investors S.A.S CGI is the direct/indirect parent of all entities within the Comgest group namely Comgest S.A., Comgest Asset Management International Limited (including its branches Comgest Italia and Comgest Belgium and its UK Representative Office) , Comgest Deutschland GmbH, Comgest Benelux B.V., Comgest U.S. LLC, Comgest Far East Limited, Comgest Asset Management Japan Limited, Comgest Singapore Pte Limited, and Comgest Australia Pty Limited (together the "Comgest Group" or the "Group").

The principal activity of CAMIL is to manage collective investment schemes authorised by the Central Bank of Ireland ("CBI") or by other financial regulatory authorities as well as the management of private investment portfolio mandates.

CAMIL commenced its activity on 14 December 2004 and was authorised to act as an investment manager by CBI on 22 December 2005. CAMIL is authorised by the Central Bank of Ireland as an Investment Firm under Regulation 8 (3) and deemed authorised under Regulation 5 (2) of the Statutory Instrument No. 375/2017 European Union (Markets in Financial Instruments) Regulations 2017 ("MiFID"). CAMIL is also a Registered Investment Advisor with the Securities and Exchange Commission ("SEC") in the United States of America. Furthermore, the Company has established branches in Italy and Belgium on a freedom of establishment basis in accordance with Article 35(2) of the Markets in the Financial Instruments Directive ("MiFID") (2014/65/EU) and in this regard is registered with the CONSOB in Italy and the FSMA in Belgium. CAMIL is also registered with the Companies House in the United Kingdom.

In addition to the requirement for CAMIL to meet its regulatory obligations on a solo basis, the Comgest Group became subject to the prudential supervision of CBI on consolidated basis, pursuant to the European common framework for consolidated supervision, when CAMIL joined the Group in 2013.

2. PRUDENTIAL REGIME

A new prudential regime comprised of the Investment Firms Regulation ("IFR") and the Investment Firms Directive ("IFD"), entered into force on 25 December 2019. The purpose of this revised legislation is to ensure more proportionate rules for all MIFID investment firms on capital, liquidity and other risk management requirements, while ensuring a level-playing field between large and systemic financial institutions.

Similar to the Capital Requirements regime which previously applied to CAMIL, the IFR and IFD have a three-pillar structure. Pillar 1 represents the minimum capital requirement, Pillar 2 an Internal Capital

Adequacy Assessment Process ("ICAAP") and Supervisory Review and Evaluation Process ("SREP") with the possibility of capital add-ons and Pillar 3 imposes a compulsory disclosure regime.

In order to ensure that CAMIL acts with an appropriate level of transparency in its operations with regard to its capital adequacy and risk assessment requirements, this disclosure is being made.

This disclosure relates to CAMIL's Pillar 1 and Pillar 2 requirements, on an individual basis only.

3. RISK DISCLOSURE AND MITIGATION

There are two levels of risk committee at CAMIL. The Executive Risk Committee comprised of representatives of the executive functions and the Board Risk Committee, which is a sub-committee of the Board of CAMIL and is comprised of Non-Executive Directors including an Independent Director (collectively the "Risk Committee").

The Board Risk Committee is responsible for assisting the Board in its oversight of risks relevant to CAMIL. It deals with oversight of the activities of CAMIL's Risk Management process and the Executive Risk Committee. The responsibilities of the Board Risk Committee include:

- To review and approve the Internal Capital Adequacy Assessment Process ("ICAAP") including the Risk Mapping annually and upon material changes in the interim.
- To assess and advise the Board on its views on material business or strategic initiatives proposed.
- To keep existing and developing business area under review from a risk perspective.
- To monitor risks related to Outsourcing, IT/Cybersecurity and BCP.
- To monitor risks related to tax and transfer pricing risk (in conjunction with the Audit Committee, as necessary).
- To remain up to date in relation to Risk Management regulatory requirements and committee responsibilities.

Both the Executive Risk Committee and the Board Risk Committee meet on a quarterly basis. The Board Risk Committee reports to the Board of Directors.

There are a number of potential risks and uncertainties that could have a material impact on CAMIL's long-term performance. In connection with its ICAAP, CAMIL sets its risk management objectives and policies annually and maintains a risk assessment process in order to monitor the risks to which it is exposed. The core risks to which CAMIL is exposed include market risk, currency risk, concentration risk, interest rate risk, credit risk, cash flow (liquidity) risk, legal, regulatory and tax risk and operational risk. CAMIL also considers reputation risk on an overall basis and in doing this assesses how it could impact on business areas. The Board reviews and agrees policies for the prudent management of these risks as follows:

Market Risk

Together with general economic and political events, factors that affect interest and currency exchange rates and stock markets globally can have a significant impact on the level and mix of portfolio assets under management and, therefore, on CAMIL's fee income.

CAMIL's risk management objectives include maintaining low fixed overhead costs and keeping variable costs closely correlated to its assets under management ("AUM") in order to manage possible decreases in fee income. As CAMIL does not trade on its own account, it does not have direct exposure to market risk.

Currency Risk

The financial assets and revenue of CAMIL are exposed to foreign exchange movements principally between the Euro and each of the US Dollar, Sterling Pound, Swiss Franc, Canadian Dollar, Australian Dollar and Japanese Yen. CAMIL manages the risk through periodic conversion of foreign currency to CAMIL's operating currency in order to average out the exposure to the foreign currency during the year. At 30 September 2021 the capital resources requirement for currency risk amounted to €1,071,728.

Concentration Risk

CAMIL holds cash in credit institutions. In order to limit concentration risk this cash is divided among a number of credit institutions (as appropriate).

Interest Rate Risk

With the exception of fixed term deposits CAMIL does not invest in financial instruments involving exposure to interest rates. Fixed term deposits may attract negative interest rates. CAMIL does not borrow funds and, therefore, is not exposed to interest rate risk through borrowing. CAMIL considers its interest rate risk to be insignificant.

Credit Risk

CAMIL does not trade on its own account or lend, therefore, its credit risk exposure is limited to (i) the credit institutions at which cash assets are held, (ii) debtors from whom investment management or performance fees are outstanding and (iv) the risk that its insurance providers are unable to pay claims.

In order to manage credit risk, CAMIL selects high credit quality counterparties and monitors the credit quality of the institutions to which it is exposed. At 30 September 2021 the capital resources requirement for credit risk amounted to €3,913,587.

Cash Flow (liquidity) Risk

CAMIL's policy is to ensure that sufficient resources are available from cash balances and cash flows to ensure all obligations can be met when they fall due. To achieve this, CAMIL maintains its assets in cash with high credit quality counterparties and manages the maturity of cash balances.

Legal, Regulatory, Tax Risk

This includes current or prospective risk to earnings and capital arising from violations or non-compliance with laws, rules, regulations, agreements, prescribed practices, or ethical standards. CAMIL has a Compliance Officer who has overall responsibility to ensure compliance with regulatory and legal matters.

Operational Risk

This is the risk of loss resulting from inadequate or failed internal processes, people and systems or from external events. CAMIL manages operational risk through internal processes and controls which are monitored on a regular basis. Any material discrepancies noted following review are brought to the attention of the Board of Directors.

The operational risks considered include:

Business Continuity

The ability to maintain "business as usual" in the event of systems, people and/ or office space being unavailable is critical. CAMIL has a business continuity plan ("BCP") whose objectives are to minimise disruption of service to business units, ensure timely continuity of operations and to limit the impact of disruption. Any BCP incidents arising are reviewed by the Risk Committee and the Board of Directors of CAMIL.

Information Technology ("IT")

While business continuity plans are taken into consideration for the Finance, Legal and Compliance departments the main focus of the BCP is our Middle Office and Dealing Desk activities, as these are the most critical activities in our day to day operations.

Therefore, CAMIL's ability to restore these functions is a priority within its business continuity planning. In this respect the Group IT Charter is designed to protect the Group against various IT risks (fraud, loss of data, etc.). CAMIL has a business continuity plan in place to ensure the recovery of its activities in as short a timeframe as possible.

Outsourcing Risk

This is the risk that CAMIL suffers loss to earnings or capital due to a failure to monitor and control outsourced services and processes. CAMIL carefully selects and monitors each of its service providers.

What - if Scenarios

As part of its ICAAP, CAMIL considers many what-if scenarios in regard to each risk. The principle scenarios contemplated are:

Market down-turn/drop in equity prices

CAMIL maintains an investment philosophy/ management style of long-term quality growth equity investment. In periods of economic downturns and volatile markets, this investment philosophy has historically performed well and the management style has maintained investor confidence.

Sudden loss of significant customers in terms of AUM

The break-even point (i.e. income necessary to cover fixed costs) of CAMIL is reviewed by the Risk Committee and reported to the Board of Directors.

Errors resulting in claims on insurance and/or claims under the amount of the deductible and the combination thereof

Based on past performance CAMIL has concluded through risk mapping that overall operational risk is "low" and hence has determined the likelihood of a significant claim being low. As part of its self-assessment, CAMIL sets aside capital on a prudent basis in order to cover a potential claim.

4. CAPITAL ADEQUACY AND CAPITAL RESOURCES

The objective of the ICAAP is to assess the risks to which CAMIL is exposed and to determine whether capital needs to be allocated to cover the eventuality of the risk producing a loss for CAMIL. In analysing the risks and capital requirements, CAMIL looks at risk mitigation as a tool for reducing the risk including both the occurrence and the potential financial loss.

The ICAAP is reviewed on an annual basis. If there is a change to: (i) the business model or activities of CAMIL; or (ii) critical systems or procedures, then a review of the Risk Mapping will be carried out by the Risk Committee and the minutes of the meeting documenting the assessment of the Risk Committee are submitted to the Board of Directors. Where amendments to the capital requirements are identified, the ICAAP will be submitted to the Board earlier than its annual review.

An early review can be requested by any Board member or the Group Risk Committee by submitting such request to the Risk Committee. The Risk Committee is responsible for determining the necessity of the review ahead of its scheduled time and for coordinating the review and approval of any changes.

Capital Resources

At 30 September 2021 the capital resources of CAMIL consisted of called up share capital and reserves (Tier 1). CAMIL did not hold any Tier 2 or Tier 3 capital as at 30 September 2021. At all times CAMIL complies with externally imposed capital requirements.

At 30 September 2021 the capital resources of CAMIL were as follows (as based on audited figures):

Tier 1	€
Called Up Share Capital	125,383
Reserves	68,385,455
Total	68,510,838