



13<sup>th</sup> August 2018

**Statement of Support from CEO**

Dear Stakeholders,

Duxton Asset Management (Duxton) is fully committed to the UN Global Compact's Ten Principles with respect to human rights, labour, environment and anti-corruption. The principles are incorporated into the company's strategy, culture and day-to-day operations.

The emerging markets in which Duxton invests in often lack the needed resources and proper standards of governance to regulate business and investment practices. To ensure sound environmental, social and governance (ESG) practices, we screen and manage our investments rigorously.

Duxton is committed to ensuring that ESG practices are held to the highest standards possible. We believe that through our work and commitment to the UN Global Compact's Ten Principles, significant value and positive externalities will be created for all our stakeholders. We will continue to ensure that the Ten Principles are embedded in all of our operations.

Sincerely yours,

Mr. Scott Jaffray

CEO Duxton Asset Management

## **HUMAN RIGHTS**

### **Assessment, policy and goals**

- Duxton Asset Management ("Duxton") strongly supports and respects the protection of internationally proclaimed human rights and seeks to avoid complicity in human rights abuses.
- We are fully committed to conducting our business in an ethical and responsible manner that supports and respects the protection of human rights.

### **Implementation**

- Our employees are required to abide by the Code of Conduct where it is stated that we are committed to treating everybody with dignity and respect regardless of level or circumstance.
- When resolving problems, we aim to do so in a way that is respectful to the individual and pursue solutions which, to the extent possible, adequately take into account the interests and requirements of the individuals concerned.
- Duxton ensures that we keep an open policy for employees to freely voice out any issues they may have. These are then resolved seriously, confidentially and as quickly as possible.
- As part of our pre-investment screening process, reasonable due diligence is conducted to become aware of, prevent and address any potential human rights abuses.
- Each investment is managed closely by Duxton's investment team. Frequent site visits, regular board meetings and regular operational reports are closely scrutinized by our investment professionals, who have a comprehensive understanding of the social risks involved.

### **Measurement of outcomes**

- There were no breaches to the principles of human rights at Duxton Asset Management.

## **LABOUR**

### **Assessment, policy and goals**

- Duxton is a strong supporter of the Labour Principles. We do not tolerate the use of child or forced labour, slavery or human trafficking. This also includes the exploitation of children, their engagement in unacceptably hazardous work, or the trafficking, physical punishment, abuse, or involuntary servitude of any worker.
- We are committed to providing equal employment and advancement opportunities for all individuals without distinction or discrimination based upon an individual's race, colour, sex, national origin, age, religion or belief, disability, marital status, pregnancy, sexual orientation, veteran status, citizenship or any other characteristic protected by law.
- We expect our investee companies and partners with whom we do business with to uphold the same standards.

### **Implementation**

- Duxton has implemented the Fair Employment Practices as required by Singapore law in our internal Code of Conduct Policy.
- On-farm management is required to operate in accordance with the principles upheld by us. No child labour or 'slavery-like' working conditions are in existence in any of our investments.
- Visits by Duxton's investment monitoring team ensure any deviation from these standards would come to the immediate attention of our shareholders and investors.
- Staff on the farms are retained at fair market rates in all of our investments. Our investee companies are required to adhere to all safety regulations in the jurisdictions in which they operate.
- Where local regulations are sub-standard, or poorly enforced, Duxton requires that the investee company work to implement international standards as far as local conditions will allow.

### **Measurement of outcomes**

- None of Duxton's employees reported any violations of Labour Principles.

## **ENVIRONMENT**

### **Assessment, Policy and Goals**

- Duxton strongly supports the Environmental Principles and we are committed to leading the industry in reducing the impact of its activities on the environment.
- We aim to minimise greenhouse gas emissions, reduce waste by actively promoting recycling, and to meet or exceed all the environmental legislation relating to the company.
- Duxton is also very active in the Environmental, Social, and Corporate Governance (ESG) sphere as we understand the importance of sustainable investment. We are highly involved in incorporating ESG factors into our investment policy and processes where appropriate.

### **Implementation**

- A Socially Responsible Investing (SRI) and Environmental, Social and Corporate Governance (ESG) Committee (SEC) was set up to help Duxton manage and monitor social and environmental issues.
- Duxton is part of a group of asset managers who are working to develop a set of implementation guidelines based around the Principles for Responsible Investment in Farmland (PRIF)<sup>1</sup>.
- We follow the PRIF in our farmland investments by applying the principles to our pre-investment due-diligence, and to the selection of investment managers and operators acting on our behalf, and through ongoing oversight and governance of our investments.
- In addition, we have adapted the Environmental Social Review Procedure (ESRP) modelled on those developed by the International Finance Corporation (IFC) to assess the potential environmental and social impact of our potential investments.
- For projects identified to have a higher ESG risk, enhanced pre-investment due-diligence, additional liaison with Duxton's investors, a higher degree of structural protection from sponsors, and enhanced post-investment monitoring are required.

### **Measurement of outcomes**

- There were no breaches to the Environmental Principles at Duxton Asset Management.

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<sup>1</sup> [http://www.unpri.org/commodities/Farmland%20Principles\\_Sept2011\\_final.pdf](http://www.unpri.org/commodities/Farmland%20Principles_Sept2011_final.pdf)



## **ANTI-CORRUPTION**

### **Assessment, policy and goals**

- Duxton is fully committed to support the Anti-Corruption Principles.
- We comply strictly with Singapore's Anti-Corruption and Anti-Bribery laws. This includes prohibition against the acceptance, offer, payment or authorization of any bribe and any other form of corruption as defined under the Anti-Corruption Policy found in our Key Operating Procedures.
- We prohibit any direct or indirect giving, promising, authorizing, or offering of anything of value that is not in accordance with the Anti-Corruption Policy.
- We make all necessary efforts to avoid conflicts of interest. As stated under our internal Code of Conduct Policy, without Duxton's prior consent, our employees do not run a business for themselves or a third party, transact business in full or partial competition to Duxton or participate as a partner in a business.
- Two of the main anti-money laundering laws in Singapore are the Corruption, Drug Trafficking and Other Serious Crimes Act and the Terrorism Act. These Acts apply to the proceeds of all crimes including drug trafficking, corruption, fraud, terrorism and theft.
- Where there are any suspicious activities, Duxton is required to report to the Suspicious Reporting Transaction Office, Commercial Affairs Department of the Singapore Police Force ("STRO").

### **Implementation**

- Our audited financial statements and control report are provided to our clients upon their request.
- All complaints are resolved in a timely and appropriate manner, and as far as possible, within 7 working days of receipt of the complaint.
- We ensure that detailed and accurate records are kept in reasonable detail to accurately and fairly reflect all transactions and disposition of assets.
- All employees are required to acknowledge on an annual basis that they have read and understood the Handling Conflicts of Interest, Anti-Corruption, Anti-Fraud, Gifts and Entertainment, Handling Clients Complaints and Anti-Money Laundering Policies. If they are in doubt, they can seek clarification directly with the Compliance Officer or alternatively in his/her absence, the Head of Legal and Compliance.
- Potential conflict of interests will need to be logged at the earliest possible time on the register of Potential Conflict of Interest.
- In managing a conflict of interest, there will be implementation of specific Chinese Walls or other additional information segregation methods.

- For business dealings, special consideration is made for any “red flags” (for example, if location is known for corruption, or if there are special payment instructions, or if the involved party refuses to comply with Duxton’s requirements).

#### **Measurement of outcomes**

- There were no cases of conflict of interest in the company.
- There were no cases relating to attempt of bribery or fraud as well as complaints on Duxton.
- There have been no Code of Ethics violations nor any regulatory action or sanction on Duxton.