

2026

# Sustainability Disclosure Requirements Entity Report





# Contents

|                            |    |
|----------------------------|----|
| CEO & Compliance Statement | 02 |
| <b>Chapter 1</b>           |    |
| Overview                   | 04 |
| <b>Chapter 2</b>           |    |
| Governance                 | 06 |
| <b>Chapter 3</b>           |    |
| Strategy                   | 10 |
| <b>Chapter 4</b>           |    |
| Risk management            | 18 |
| <b>Chapter 5</b>           |    |
| Metrics and targets        | 22 |

# CEO & Compliance statement

## CEO Statement

I am pleased to introduce TrinityBridge's first Sustainability Disclosure Requirements (SDR) Entity-Level Report. This report explains how we govern and manage the sustainability-related risks and opportunities that are material to our business and to our responsibilities as a long-term steward of clients' capital.

Our approach is underpinned by clear accountability and oversight. Our executive committee (ExCo) provides overall strategic direction and monitoring, supported by committees that oversee enterprise risk, investment risk and our stewardship and responsible investment obligations.

This report sets out the key non-climate sustainability risks we prioritise across our investments, including under or over-appreciating environmental, social and governance risks and operations, alongside operational sustainability risks, including talent and culture, supplier sustainability, and meeting reporting requirements. Climate-related matters are addressed through cross-reference to our TCFD Entity-Level Report to ensure consistency and avoid duplication.

I hope you find this report clear and useful, and I encourage you to read it alongside our related product and stewardship disclosures to understand how these elements fit together.

## Compliance Statement

I confirm that this Sustainability Entity-Level Report, including any climate-related disclosures cross-referenced to the TCFD Entity-Level Report, has been prepared in accordance with the relevant rules under Chapter 2 and Chapter 5 of the FCA Environmental, Social and Governance Sourcebook.

A handwritten signature in black ink, appearing to read 'N. Stockton', with a long horizontal stroke extending to the right.

**Nigel Stockton**  
CEO, TrinityBridge



# 1. Overview

This is our first entity-level sustainability report, produced in line with the FCA's Sustainability Disclosure Requirements (SDR). The report covers the 12-month period from 1st April 2025 to 31st March 2026.

The report covers our governance, strategy, risk management, metrics and targets in relation to managing the sustainability-related risks and opportunities that we deem to be material. Climate-related issues are a subset of these risks and opportunities and have been covered separately in our Task Force for Climate-Related Financial Disclosures (TCFD) Entity-Level Report. This report is therefore supplementary and covers the remaining material sustainability-related risks and opportunities.

As a UK wealth manager, we recognise that our most significant exposure to material sustainability-related risks and opportunities arises through the investments we manage on behalf of clients. However, this report also covers the material sustainability risks and opportunities that we face in our operations as these have the potential to hinder or advance our ability to operate as long-term stewards of our clients' capital.

The report should be read in conjunction with the following reports that provide further context and details on how we approach sustainability-related issues across our investments and operations.

- [TCFD Entity-Level Report](#)
- SDR Product Reports ([Select Fixed Income](#), [Select Global Equity](#), [Sustainable Balanced](#))
- [Stewardship and Responsible Investment Report](#)
- [Stewardship and Responsible Investment Policy](#)



## 2. Governance

Addressing the sustainability risks and opportunities that we face as business has been supported by consistent and reliable governance frameworks.

### 2.1 Role of committees at TrinityBridge

#### **TrinityBridge Executive Committee (ExCo)**

Central to our governance structure is the role of our Executive Committee (ExCo). The ExCo is responsible for the execution of strategy and for monitoring the effectiveness and compliance of TrinityBridge's governance and controls. They provide day-to-day management of and responsibility for all TrinityBridge business such as monitoring key financial metrics and the development, embedding and monitoring of culture and Business Principles. Their mandate includes agreeing and reviewing TrinityBridge's sustainability strategy, including goals to mitigate and harness sustainability-related risks and opportunities respectively within our operations and investments. They are also responsible for promoting continuous improvement of sustainability management and performance, defining the overall sustainability strategic direction, and ensuring compliance with legal and regulatory obligations.

#### **Risk and Compliance Committee (RCC)**

Provides oversight, management and monitoring of risks that could affect our clients' capital and the business, including sustainability-related risks. The RCC ensures TrinityBridge adheres to its risk management policies and framework, and risk-related regulatory requirements.

#### **Investment Review Committee (IRC)**

Provides oversight and control of investment process, performance and risk in accordance with the company's agreed investment strategy. The IRC is the governing

body of our stewardship and responsible investment approach, ensuring that we can best serve our clients' interests. This includes the integration of financially material climate risks and opportunities in our investment research when relevant. The committee also monitors the progress of our responsible investment and stewardship reporting obligations, such as the Sustainability Disclosure Requirements, Task Force for Climate-Related Financial Disclosures, UK Stewardship Code and Principles for Responsible Investment. The Head of Wealth Planning, who is the member of the senior management team responsible for stewardship and responsible investment, chairs the IRC.

#### **Responsible Investment Committee**

The Responsible Investment Committee oversees the firm's Stewardship and Responsible Investment Policy and guides our responsible investment approach, including how we integrate climate risks and opportunities when they are material to our investment research. It consists of the Responsible Investment team, Head of Wealth Planning and representatives from Research, Investment Specialists, Bespoke and fund investment managers. It is chaired by the Head of Responsible Investment. The Responsible Investment Committee communicates and informs our responsible investment approach and our stewardship approach and activities.

#### **Sustainable Investment Oversight Committee (SIOC)**

The SIOC oversees our sustainable investing methodologies, review holdings and ensure product/service messaging is aligned across the firm.

The committee's responsibilities include reviewing the Sustainable Investment Policy and Process, reviewing securities held in funds and data providers, and ensuring firmwide strategy alignment on a sustainable investment offering. It is chaired by the Head of Responsible Investment. Members include representatives from the Socially Responsible Investment (SRI) Service, Funds, Risk, Compliance and Head of Wealth Planning. The SIOC is especially important for monitoring the progress that three of our funds (Sustainable Balanced, Select Global Equity and Select Fixed Income) are making towards their carbon intensity objectives.

Our governance model is further defined by stringent reporting and accountability measures. These mechanisms provide necessary transparency to our stakeholders. We recognise the importance of transparency in building trust and credibility, as well as supporting the maturity of sustainability reporting in the market.

## 2.2 Governance and resources for our SDR labelled and non-labelled products

Under the UK's Sustainability Disclosure Requirements, TrinityBridge has two labelled funds and one non-labelled fund. Details of these funds can be found on their respective webpages: [Sustainable Balanced Portfolio Fund](#), [Select Global Equity](#), [Select Fixed Income](#).

### **Governance for labelled funds (Sustainable Balanced Portfolio Fund and Select Global Equity)**

The SIOC determined the sustainability standards for Sustainable Balanced Portfolio Fund and Select Global Equity to be appropriate, robust and evidence based. The SIOC ultimately oversees the sustainable investing methodologies and will serve as the appropriate forum to discuss, challenge and approve the qualifying criteria and data against which holdings are assessed. The SIOC will review the standards on at least an annual basis and

determine whether the thresholds for carbon intensity remain appropriate and that the data remains robust. The funds will report the necessary key performance indicators to the IRC.

The Funds are supported by the Responsible Investment (RI) team who have multi-year experience working on responsible and sustainable investment approaches. The RI team is comprised of independent, dedicated individuals whose roles include the verification and assessment of whether a particular asset meets the applicable standard.

On an ongoing basis the second line investment risk team will monitor the funds against their sustainable objective and process, providing independent challenge where necessary.

### **Governance for non-labelled funds (Select Fixed Income)**

The SIOC ultimately oversees the carbon intensity focused goal and methodology of the fund, and will serve as the appropriate forum to discuss, challenge and approve the qualifying criteria and data against which holdings are assessed. The fund will report the necessary key performance indicators to the IRC.

On an on-going basis the investment risk team will monitor the funds against their sustainable objective and process, providing independent challenge where necessary.

## 2.3 Data selection for our SDR labelled and non-labelled products

We utilise internationally and industry recognised data providers to support the carbon intensity thresholds, business involvement screens and UN Global Compact screens that together compromise the sustainable and responsible investment approaches on SDR labelled and non-labelled products respectively. The following table sets out the key criteria we can assess when selecting suitable data providers:

| Criteria            | Definition                                                                                                         |
|---------------------|--------------------------------------------------------------------------------------------------------------------|
| <b>Coverage</b>     | Broad coverage of investable universe, and sustainability factors                                                  |
| <b>Transparency</b> | Accessible methodology documents and policies, including all assumptions and definitions                           |
| <b>Accuracy</b>     | Reporting is accurate and complete                                                                                 |
| <b>Consistency</b>  | Consistency in data collection and methodologies used over a demonstrated time horizon                             |
| <b>Timeliness</b>   | Data is published regularly and consistently, and is available to align with our internal business reporting needs |

Fund Managers can challenge the accuracy of the data by bringing a case to the SIOC who will then vote on whether to uphold the challenge.

For more information on how we monitor our data providers please see our Stewardship and Responsible Investment report [here](#).



# 3. Strategy

## 3.1 Our sustainability strategy

We recognise that potential sustainability-related risks and opportunities that could impact our business can arise through our investment exposure as well as our operations. As an independent business we have begun to focus on the sustainability-related risks and opportunities that are material to the commercial sustainability of the business and to develop a suitable strategy to mitigate these. We recognise that failure to effectively manage these risks may result in higher operating costs, lower assets under management due to mispriced sustainability risks, potential regulatory sanctions, and reputational damage.

In addition to the climate-related risks and opportunities covered in our [entity-level TCFD report](#), we have assessed the following operational and investment sustainability-related risks to be the most material to our business.

## 3.2 Sustainability risks and operations in our operations

Across our operational footprint, there are three main sustainability-related risks that could have financial planning implications and therefore shape our strategy.

### 1. Risk: We fail to retrain or attract the best talent

A material sustainability-related risk for TrinityBridge is the potential impact of people-related factors on the firm's ability to retain talent, maintain productivity and deliver consistently high-quality outcomes for clients. This risk arises where colleagues do not experience an inclusive culture, where benefits and support are perceived to be uncompetitive, or where trust in the organisation is undermined.

Where an inclusive and supportive culture is lacking, TrinityBridge faces an increased risk of colleague attrition. Higher levels of turnover can lead to rising recruitment and onboarding costs and place additional strain on remaining teams. In parallel, there is a risk that colleagues become demotivated and less efficient, which can negatively affect productivity and service quality. Taken together, these factors can result in a deterioration in client outcomes, ultimately contributing to lower assets under management and reduced revenue over time.

### 2. Risk: Suppliers represent sustainability-related risks

We have identified a sustainability-related risk arising from the sustainability practices of our suppliers. Where suppliers have a poor sustainability profile, the firm may be exposed to reputational risk, particularly if supplier behaviours conflict with TrinityBridge's own standards of conduct or stated sustainability commitments. While the likelihood of this risk materialising is currently assessed as low, the potential consequences include increased scrutiny from clients and stakeholders, as well as additional costs associated with remediation or supplier replacement.

Financial impacts associated with this risk are expected to arise primarily through increased costs, for example where reliance on suppliers with weaker sustainability practices results in inefficiencies, higher compliance burdens, or the need to transition to alternative providers. Although the anticipated financial impact is assessed as low relative to other sustainability risks, the firm recognises that unmanaged supplier-related issues could undermine broader sustainability objectives and trust in the business over time.

To mitigate this risk, we have a target to develop minimum sustainability standards for suppliers. These standards are intended to provide a clear baseline of expectations and support more consistent assessment and oversight of supplier practices. By strengthening its approach to supplier sustainability, TrinityBridge aims to reduce reputational exposure, manage cost impacts and ensure that third-party relationships remain aligned with the firm's values, regulatory obligations and long-term commercial interests.

**3. Risk:** Regulatory reporting requirements are not met

We have identified a sustainability-related risk arising from failure to meet mandatory regulatory and relevant voluntary sustainability reporting requirements. This includes obligations under frameworks such as the Task Force on Climate-related Financial Disclosures (TCFD) and Sustainability Disclosure Requirements (SDR), as well as selected voluntary reporting commitments.

Where the firm does not meet applicable sustainability reporting requirements, it may be exposed to reputational harm, reduced stakeholder confidence and regulatory scrutiny. Such outcomes may negatively affect client perceptions of the firm's governance and risk management capabilities, potentially contributing to lower assets under management and reduced revenues over time.

In addition, failure to comply with regulatory sustainability disclosure requirements may result in regulatory enforcement action or financial penalties, leading to direct increases in operating costs.

## Risk 1

We fail to retrain or attract the best talent

## Risk 2

Suppliers represent sustainability-related risks

## Risk 3

Regulatory reporting requirements are not met

### 3.3 Sustainability risks and opportunities in our investments

#### 1. Risk/Opportunity: Meeting clients' sustainability and ethical preferences

We have identified a sustainability-related risk arising from our ability to meet current and evolving client sustainability and ethical preferences through our products and services. Client expectations in relation to sustainability considerations are relevant to investment selection and mandate retention. Where we are unable to provide products or services that align with these preferences, we may be exposed to client attrition, reduced ability to attract new business and downward pressure on assets under management.

To mitigate these client-related sustainability risks, we have developed a suite of products and services to meet sustainability-related and ethical client demand. These include our labelled and non-labelled SDR funds (see section 3.5), our Socially Responsible Investment Service (see section 3.5) and ethical screening capability for our Bespoke portfolios. As part of the Bespoke Portfolio Service, clients can opt to screen out companies that are unaligned to their ethical values. Our investment managers use a questionnaire to help identify industries or activities clients want to avoid based on their preferences. Once the Bespoke clients' screening preferences have been captured, the Investment Risk team carries out weekly post-trade screening and notifies the investment manager if any trades are in breach. The investment manager will then adjust the portfolio as appropriate.

These products and services are intended to support client mandates, regulatory expectation and the firm's long-term commercial interests.

#### 2. Risk: Mispriced sustainability-related risks and opportunities

We are aware of the challenges and opportunities presented by environmental, social and governance (ESG) issues in relation to their potential impacts on investment value and client portfolios. There is a risk that under-appreciation or mispricing of ESG issues could lead to weaker investment performance and reduced assets under management. We aim to mitigate this risk through our approach to integrating ESG issues into our investment research, investee engagement and voting.

#### Research

We prioritise those ESG issues which we deem to be financially material to our investments, on a case-by-case basis, and we can consider them through bottom-up fundamental and top-down thematic research.

From a bottom-up fundamental perspective, we are aiming to integrate ESG considerations across direct equity, direct fixed interest, diversifiers and active third-party fund managers. For each of these investment types we have developed either ESG frameworks or questionnaires to guide the understanding of ESG issues relevant to our investments. Any bottom-up analysis is performed by the analyst covering a particular investment or sector for which they are producing investment research. We believe this is best practice because the analysts have a deep understanding of their coverage and it allows ESG information to be considered in conjunction with financial information.

Our equity investment research approach focuses on identifying good quality companies, with strong balance sheets, robust governance and competent management, that are priced attractively. An integral part of our understanding of the quality of a business is to consider the risks and opportunities posed to it by non-financial issues.

Our equity research analysts incorporate a qualitative analysis of financially material ESG issues into their initiation reports within a defined section. The section is structured around an ESG integration framework which asks our analysts to consider the following broad questions:

- What are the key drivers to the business model and the investment case?
- How might ESG issues and externalities affect those drivers and the value of the business respectively?
- What is the likelihood of those ESG issues arising and over what time-period?
- What are management doing to mitigate the risks or capitalise on the opportunities?
- How might the above information affect the financial statements?
- Have the answers to the above questions affected the investment case?

To answer the framework our analysts will use proprietary knowledge, third-party ESG data, industry research and company reports. Where the investment case is affected, the analyst will explain how this has contributed to the overall recommendation (buy, neutral or source of funds).

In addition, the analysts will note in their research whether the company in the initiation has severely or very severely contravened the UN Global Compact on human rights, labour rights, the environmental or corruption grounds.

More details of our progress on ESG integration across investment types can be found in our annual [Stewardship and Responsible Investment Report](#) on our website.

The bottom-up analysis is complemented by the thematic research conducted by our Responsible Investment team. This research provides investment managers and the wider business with insights into sustainability topics and longer-term social and environmental trends and themes. The research focuses on four, structural long-term themes that we think will impact the economy now and in the future. These are: Shifting Demographics, Energy Transition, Technology & Innovation and Evolving Consumption. We have publicly published papers on the first two themes [here](#) and [here](#).

## Engagement

We aim to reinforce the focus on ESG issues through engagement. Engagement is the intentional dialogue by investors, typically, with the management or Board of an issuer, with the purpose of influencing the corporate's behaviour. We integrate engagement in our investment strategy as a tool to influence corporate behaviour, mitigate against potential investment risks, promote sustainability, and aid our voting practices. We engage on a broad range of topics including strategy, performance, corporate governance, social, environmental and cultural issues.

The three key pillars of our engagement system are 1) thematic engagements, 2) ad-hoc engagements, and 3) voting.

Thematic engagements are long-term strategic engagements, typically on sustainability issues. The Responsible Investment team leads the engagement activities in this category.

## Risk 1

Meeting clients' sustainability and ethical preferences

## Risk 2

Mispriced sustainability-related risks and opportunities

Ad-hoc engagements are usually driven by events or specific objectives representing our clients' interests in investment performance and questioning management on material issues.

These objectives are typically identified as part of our bottom-up analysis or on-going monitoring of our investments and are set and led by either the research analysts responsible for coverage or investment and fund managers where they have relevant interests, both of whom can be supported by the Responsible Investment team as required and appropriate.

Our methods of engagement include meeting with management and/or investor relations teams; formal and informal correspondence and calls with issuers; meeting with the Chair or Board; proxy voting at AGMs and EGMs; writing open letters to the issuer; co-signing letters with other investors or taking part in collaborative initiatives for engagement.

Engaging with issuers is important to our investment process as active managers. Not only does it increase common understanding between us and our issuers, but it also allows us to use our expertise and knowledge to put our clients' interests at the forefront of our actions.

We make efforts to engage across all asset classes where necessary but given the resource intensive nature of engagement we mostly focus our attention on public companies, in which we hold shares with voting rights, within our core holdings, across our portfolios and funds.

### **Voting**

We closely monitor forthcoming voting resolutions of the core holdings we invest in and vote via proxy or by attending general meetings.

We have developed voting principles which reflect our convictions on best practice corporate governance based on our expertise and experience. We also subscribe to ISS voting research, which has been customised to reflect our voting principles alongside ISS's benchmark research of best practice corporate governance. The analysts and investment managers on our Voting Panel determine the best way to vote that reflects shareholders' greatest interests.



# Voting Principles

## Remuneration

01

CEO's variable short and long-term compensation should be largely performance conditioned.

02

Total compensation can be large but should not be excessive; the targets should always be stretching and disclosed with malus/clawback provisions in place.

03

Performance metrics should be appropriate and balanced across criteria and timeframes.

04

We aim to stand behind a global standard but are mindful of common practices within sectors and geographies; compensation peer groups should be relevant.

05

A well-designed compensation scheme doesn't require retrospective adjustments.

## Ownership

06

Management and boards should have a material and proportionate investment in the company.

07

We will apply additional scrutiny to forms of increased corporate control.

## Board composition

08

Whilst being mindful of common practices within sectors and geographies, boards should have adequate levels of independence and diversity, with board members able to fulfil their obligations with respect to time and expertise.

## Auditor

09

There should be sufficient auditor turnover to minimise familiarity risk.

## Environmental and social

10

We will support proportionate disclosure of material environmental and social issues; where relevant, we encourage companies to have adequate climate transition plans.

### 3.4 Policies on human rights and climate change

#### Human Rights

We recognise that human rights issues can present material risks for our investments. Human rights issues are prevalent around the world but can be hard to identify due to a lack of transparency and global reporting standard.

We invest in a wide range of industries with global supply chains. We endeavour to understand the material human rights issues related to our investments and consider them as part of the investment case. We are committed to using engagement and research to reduce our investment exposure to material human rights issues. We aim to continuously improve our due diligence process to correctly identify potential negative human rights outcomes. To support our focus, we are endorsers of the PRI Advance initiative, which targets improvement in corporate behaviour towards human rights policy commitments and due diligence processes.

#### Climate Change

We recognise that climate change can create material risks for our investments, and that the investment industry has a role to play in the transition to a lower carbon economy. We aim to address climate change risks and opportunities, as they pertain to our investments, as part of our ESG research.

### 3.5 Strategy for specific products and services

#### Products

TrinityBridge has three funds that have specific objectives focused on carbon intensity and are therefore managed differently from our overall entity-level approach to sustainability-related governance, strategy, risk management, and targets and metrics. More details on each of these funds can be found in their individual product-level sustainability reports:

- Sustainable Balanced Portfolio Fund: [Product Report Link](#)
- Select Global Equity: [Product Report Link](#)
- Select Fixed Income: [Product Report Link](#)

Our remaining 12 unitised funds do not have any sustainability characteristics or use any sustainability terms in their marketing. However, they do utilise the aforementioned research, engagement and voting approach where appropriate.

#### Service

TrinityBridge runs a Socially Responsible Investment (SRI) service for discretionary portfolios that is not captured by UK's Sustainability Disclosure Requirements regulation. The methodology for the SRI Service is materially different to our entity-level approach to sustainability issues within investments.

Our SRI portfolios aim to maximise returns by investing in global businesses within pre-agreed investment risk constraints and with consideration for wider social, environmental and governance issues. The focus of the investment selection is on the positive alignment of company revenues with the United Nations' Sustainable Development goals (UN SDGs). In addition to traditional financial analysis, the framework for our SRI portfolios includes the following three building blocks:

### Avoiding bad actors

We avoid investment in businesses whose primary revenue comes from products that do harm when used as intended. This includes businesses involved in the manufacture of tobacco and thermal coal because the SRI team believe these sectors are in structural decline.

In order to identify these businesses, we use third-party data from MSCI which details Business Involvement Revenue which allows us to minimise exposure to companies contradictory to the achievement of UN SDGs.

We also use Norms Based Research data from ISS Ethix to identify companies which have severe breaches of the UN Global Compact. Breaches are monitored against the following four categories: Labour Rights, Human Rights, Anti-corruption and Environmental Protection.

### Aligning with UN SDGs

We identify companies that are positively aligned with the UN SDGs because we believe that these direct equity investments have more sustainable and interesting growth trajectories. We use data from MSCI Sustainable Impact to identify these direct equity investments, screening for the percentage of revenue that aligns with UN SDGs.

### Targeting strong ESG profiles

We positively screen for companies that have favourable ESG characteristics because we are seeking to minimise risks from material ESG factors. We use MSCI ESG Ratings to identify which companies have the most attractive ESG profile.



# 4. Sustainability Risk Management

## 4.1 Risk mitigation

We seek to manage and mitigate any potential impacts through our emerging risk framework, with appropriate oversight and responsibility assumed by both senior management and ExCo.

### Operational Sustainability-Related Risks

| Risk                                             | Mitigation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|--------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| We fail to retrain or attract the best talent    | We have identified building, measuring and continuously enhancing an inclusive, supportive and motivating culture as the primary means of mitigating this risk. This includes aligning colleague experience more closely with the firm’s stated values and ensuring that sustainability considerations support, rather than conflict with, TrinityBridge’s commercial objectives.                                                                                                                                                     |
| Suppliers represent sustainability-related risks | To mitigate this risk, we have a target to develop minimum sustainability standards for suppliers. These standards are intended to provide a clear baseline of expectations and support more consistent assessment and oversight of supplier practices. By strengthening its approach to supplier sustainability, TrinityBridge aims to reduce reputational exposure, manage cost impacts and ensure that third-party relationships remain aligned with the firm’s values, regulatory obligations and long-term commercial interests. |
| Regulatory reporting requirements are not met    | Sustainability-related and responsible investment regulatory and voluntary reporting requirements are monitored and managed by the Head of Responsible Investment and reported into ExCo. Where necessary the content of the reporting is provided by relevant teams across TrinityBridge.                                                                                                                                                                                                                                            |

**Investment Sustainability-Related Risks (see section 3.3)**

| Risk                                                        | Mitigation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|-------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Not meeting clients' sustainability and ethical preferences | To mitigate these client-related sustainability risks, we have developed a suite of products and services to meet sustainability-related and ethical client demand. These include our labelled and non-labelled SDR funds (see section 3.5), our Socially Responsible Investment Service (see section 3.5) and ethical screening capability for our Bespoke portfolios. As part of the Bespoke Portfolio Service, clients can opt to screen out companies that are unaligned to their ethical values. Our investment managers use a questionnaire to help identify industries or activities clients want to avoid based on their preferences. Once the Bespoke clients' screening preferences have been captured, the Investment Risk team carries out weekly post-trade screening and notifies the investment manager if any trades are in breach. The investment manager will then adjust the portfolio as appropriate. These products and services are intended to support client mandates, regulatory expectation and the firm's long-term commercial interests. |
| Mispriced sustainability-related risks and opportunities    | We aim to mitigate this risk through our approach to integrating ESG issues into our investment research, investee engagement and voting. See the Strategy section for more details.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

## 4.2 Risk life cycle

As at 31 March 2026, risks were managed in line with the risk life cycle. The first step is risk identification. Determining the risks to which the business is exposed is managed through both a top-down and bottom-up approach. The ExCo and Entity-level Boards have determined the risk strategy and risk appetite. The risk strategy was determined by the ExCo and disseminated through the business and RCC. Using knowledge and experience of day-to-day operations, business areas identify the risks they face on an ongoing basis.

Risk identification is the responsibility of all staff and may develop from a variety of different sources, including industry and business knowledge and experience, incident root cause analysis, risk reviews, transaction analysis, new business approval and emerging risk analysis. TrinityBridge records all business risks and controls within a defined risk taxonomy. Risk identification also includes identifying risk events. A risk event is a specific occurrence which has a negative impact on the business and is due either to the materialisation of a risk or the failure of a control. TrinityBridge records and reports all risk events, near miss and boundary events in line with the requirements set out in the Operational Risk Policy and Risk Event Management Standard. The second step is the risk assessment. Operational risks and controls are subject to regular assessment in order to understand the current risk exposure of TrinityBridge and ensure risks are sufficiently managed to prevent losses or other negative detriment.

The risk assessment process allows TrinityBridge to integrate and coordinate its risk identification and management efforts. It also assists in improving the understanding and operational control of all risks TrinityBridge is exposed to and identifying control gaps which could threaten the achievement of TrinityBridge and business objectives. Business areas are responsible for ensuring all operational risks and controls are identified and assessed in line with the Risk Assessment and Response Standards. Periodic reassessment of all operational risks is required through the semi-annual risk and controls self-assessment (RCSA) process. Risk owners must also ensure changes to the risk profile identified outside of an RCSA cycle are assessed, documented and escalated as required.

Risk mitigation is the third step. Mitigation represents a systematic reduction in the extent of exposure to a risk and/or the likelihood of its occurrence and is achieved through the implementation and operation of controls. Each control has an owner who must periodically affirm as to the continued design and operational effectiveness of the control. Controls may be considered preventative or detective. Risk reduction may be achieved through the following methods:

- Corporate culture
- Policies, standards and procedures
- The corporate governance framework
- Risk, compliance and legal frameworks
- Business and personal authority approval levels
- Management of risk events (eg, operational, external or market)
- Business process controls and control owner affirmation
- Process design effectiveness

Where controls are not yet operational or are assessed as inadequate, or when risks materialise, action plans are required. Action plans must be agreed with all relevant parties, documented and tracked to completion. They may be considered proactive or reactive.

The fourth step is risk review. There are two types of review: standard reviews and event reviews. Standard reviews are completed in the following scenarios:

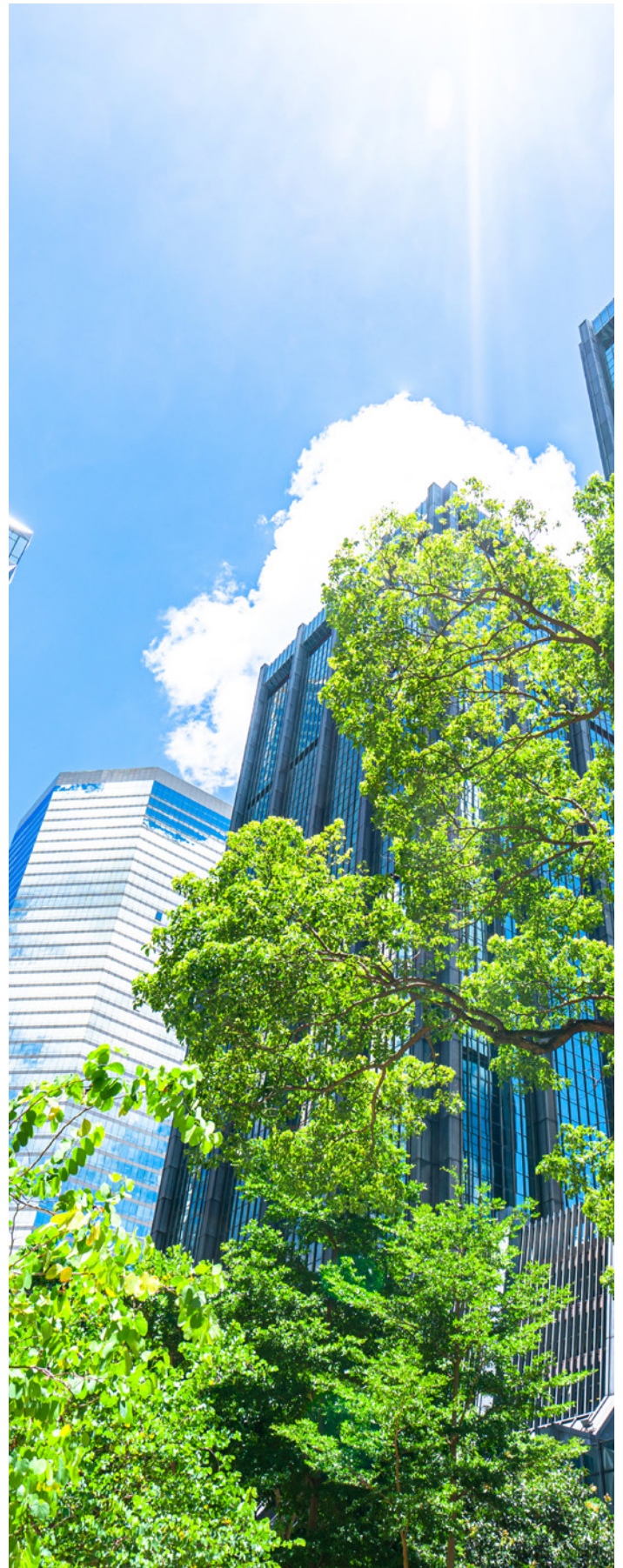
- At the request of the business
- As a follow-up review

Event reviews are undertaken following a material event that requires assurance activity to be performed after an assessment by the Risk Analyst and Business area management. The review will ensure that both corrective and preventative remedial action taken by the first line is adequate, effective and has been completed. Review results are reported to the RCC and escalated as required.

The final step of the risk life cycle is risk reporting. To manage risk effectively, risk reports based on risk data should:

- Be accurate, provide analytics to present a clear and complete articulation of the risk
- Be presented in timely manner to appropriate decision makers to allow for an appropriate response
- Be reconciled and validated with documented and well-managed procedures in place for collation
- Cover all material risk areas within the organisation and be proportionate to the size of business operation and risk profile
- Be easy to understand but also comprehensive enough to facilitate informed decision making
- Have an appropriate level of balance between risk data, analysis and interpretation with relevant qualitative explanations

Business area managers are responsible for ensuring the upward reporting of key risks on a monthly basis through the RCC hierarchy, and where necessary, executive committees eg, RCC. Material risks must be discussed and evaluated, and where applicable, areas of concern escalated through the RCC structure. Upward reporting may be achieved through risk status, RAG (Red / Amber / Green) and Key Risk Indicator reporting.



## 5. Metrics

In addition to the climate-related metrics set out in our [entity-level TCFD report](#). We use the following metrics to assess and manage the following two risks:



1. We fail to retrain or attract the best talent
2. Mispriced sustainability-related risks and opportunities

### 5.1.1 Operational metrics

#### Voluntary turnover

Voluntary turnover offers an appropriate benchmark that represents employee engagement, ability to retain key staff and therefore an ability to deliver our business plan. If the turnover of key staff materially increases, this puts the execution ability of the business at risk.

Voluntary turnover is defined as the % of headcount that has left the business within that period voluntarily (i.e. not via a managed exit programme / process). This will be calculated using accepted industry methodology of headcount at the start and end of the year / total number of leavers.

# 8.7%

TrinityBridge's annual voluntary turnover to 31st March 2026

# 12.8%

Industry (Wealth Management and Private Banks) annual voluntary turnover\*

\*As per Aon poll of Wealth Managers and Private Banks across the UK in November 2025

### 5.1.2 Investment metrics

#### Responsible investment policy coverage

Adopting a responsible investment policy, including an engagement and voting approach, at a firm-level helps our investment process consider and mitigate/exploit sustainability risks and opportunities, as set out in Section 3.3.2.

- **Responsible Investment Policy:** >90% of our AUM is covered by our overall approach to responsible investment as outlined in our Policy.
- **Engagement:** During the reporting year, we carried out 28 engagements, including 2 escalations and 4 collaborative engagements.
- **Voting:** During the reporting period, we voted for 4,442 items at 329 meetings. 5.9% of our votes were against management.

Our latest voting report for FY26 can be found [here](#).

## 5.2 Targets

In addition to the climate-related metrics set out in our [entity-level TCFD report](#). We use the following targets to assess and manage the following three risks:

- We fail to retrain or attract the best talent
- Suppliers represent sustainability-related risks
- Mispriced sustainability-related risks and opportunities

### Operational Targets

# 01

Maintain voluntary employee turnover below industry average and in line with previously low levels.

# 02

Create a minimum sustainability standard for suppliers to meet by the end of FY27.

### Investments Targets

# 03

Increase the number and/or influence of our engagements with our investments and/or wider ecosystem year on year.

### Data limitations

We are aware that metric data in section 5 can include estimations or proxy data, thereby data coverage of our portfolio's exposures or risks is subject to a margin of error. We are committed to persistently enhancing the precision of our data utilisation. However, it is crucial to highlight that the outcomes derived should be regarded as indicative rather than definitive.

### Our approach to ESG and climate-related data and information

Our investment processes are supplemented by qualitative and quantitative ESG related information, including data related to climate. We are reliant on the accuracy of the climate data provided to us by external providers. Therefore, we are mindful of this when using the output and calibrate accordingly. For applicable strategies, our investment team supplement climate-related data and metrics with a range of qualitative information.

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