Responsible Investment Policy

Introduction

Burgundy's mission is to protect and build our clients' capital over the long term. We do this by following a quality-value investment approach supported by intensive fundamental research. Our research enables us to invest in outstanding businesses at prices we view as less than their intrinsic value. Taking a long-term view allows us to think like owners of businesses, and, as owners, we endeavour to actively engage with management to help us assess and influence the long-term sustainability of our holdings. Along with many other factors, we believe companies that operate in a sustainable manner can create long-term value for their shareholders. Therefore, wherever possible, we encourage companies to carefully manage the environmental, social, and governance (ESG) impacts of their decisions and to disclose material ESG information. We believe incorporating material ESG risks and opportunities into our analysis can contribute positively to the performance of our strategies.

This Responsible Investment Policy highlights Burgundy's approach to responsible investing. The policy applies to both our equity and fixed income strategies.

Integration & Exclusions

Responsible investing can include various approaches to incorporating ESG considerations into a portfolio. At Burgundy, we utilize two methods of responsible investing: integration and exclusions. These approaches are not mutually exclusive. While all of Burgundy's investment mandates integrate ESG considerations, select Socially Responsible Investing (SRI) Funds and Foundation Funds apply negative screens and exclude a defined set of industries.

Integration at Burgundy involves incorporating material ESG factors into the investment process with the objective of improving the long-term financial outcomes of our clients' portfolios. Burgundy's investment approach is based on rigorous due diligence of the companies we evaluate. This involves identifying and evaluating factors material to the long-term value of those companies, including ESG factors, and incorporating such factors in the process of reaching a final investment decision.

Negative screening used in Burgundy's SRI and Foundation Funds excludes securities in predefined industries – namely, tobacco, cannabis, armament, and gambling.

Additionally, Burgundy adheres to any sanction restrictions imposed by applicable law across all our funds. Burgundy sources and relies on the Government of Canada, the Office of Foreign Assets Control (OFAC), the United Nations Security Council, and the United

States Department of State for current sanctions data. As part of our detailed bottom-up analysis when researching companies, before we buy and while we own equity in a company, we ensure that companies in which we invest are not located in or otherwise materially connected with a sanctioned country or person.

ESG Guidelines

Our primary goal is to own companies that will remain appealing to their investors, customers, employees, suppliers, and communities because we believe this maximizes shareholder value over the long term. As a general rule, Burgundy will not exclude any particular investment based on ESG factors alone; however, our Investment Team does consider ESG factors when conducting research. It is the depth of our independent research process that allows us to uncover ESG factors early on and determine whether those factors may have an impact on returns. This process allows us to gain a complete view of the company and its risk profile. From time to time, ESG discoveries will prevent us from investing in a company.

Environmental: We seek companies that (i) recognize the impacts of climate change, (ii) are mindful of their use of resources, and (iii) have a culture of strict compliance with laws and regulations (including environmental ones). We consider risks and opportunities associated with environmental factors when evaluating an investing decision. We support companies' efforts to mitigate and manage potential environmental risks and liabilities. This includes litigation and regulatory risk, physical risks (such as flooding, forest fires, and droughts), and transition risks (such as stranded assets and carbon pricing).

Social: We seek companies that exhibit a culture of due process, honest dealing and fairness, and an awareness of their social obligations in the communities in which they operate. We believe that companies should respect fundamental human rights within their operations and supply chains, and we will oppose exploitative labour practices.

Governance: We look for companies that are well-managed with strong, focused governance structures. We seek companies whose governance practices are sound, whose compensation policies are reasonable, and whose management incentives are aligned with ours as minority shareholders.

Sustainability Outcomes

We recognize that investment choices can have real world impacts, both positive and negative, beyond the impact on our clients' portfolios. We also recognize that where we choose to allocate capital and our stewardship efforts can contribute to meaningful changes at investee companies that can lead to a more sustainable society, economy, environment, and planet.

While our primary ESG integration objective is to compound our clients' capital, our position as engaged shareholders provides us with some influence over our investments. This influence can be used to encourage companies to achieve certain sustainability outcomes. Our Portfolio Managers and Investment Analysts emphasize the sustainability outcomes they believe are practical to the managements of their companies.

We believe companies should disclose measurable environmental and social matters like carbon emissions, waste, workforce diversity, health and safety incidents, data breaches, and so on. Improved disclosure helps investors assess sustainability outcomes.

Conflicts of Interest

In the course of investing responsibly, it is possible for conflicts of interest to arise. Burgundy has a robust Conflicts of Interest Policy that outlines how potential conflicts are identified and managed through avoidance, control, or disclosure. Burgundy also has an Employee Code of Conduct that sets out the principles and policies that employees must uphold in order to protect and build clients' wealth for the long term. Adherence to terms of the Code is a condition of employment, and employees attest to their adherence on an annual basis.

Sustainability Resources and Oversight at Burgundy

Burgundy has an in-house Sustainability Team to support our ESG integration process. The Sustainability Team provides a dedicated resource to the Investment Team for ESG-specific research and engagement and serves as a centralized location at the firm for all matters relating to responsible investing.

Burgundy's Sustainability Advisory Council, comprised of our Chief Executive Officer, Chief Investment Officer, Director of Research, Chief Compliance Officer, and members of the Sustainability Team, is responsible for Burgundy's overall approach to responsible investing. This includes maintaining relevant policies and ensuring that Portfolio Managers and Investment Analysts have the tools and training necessary to effectively implement such policies. The Council is also responsible for overseeing the implementation of this Responsible Investment Policy and ongoing monitoring. This Responsible Investment Policy will be reviewed annually by the Sustainability Advisory Council and updated as necessary.

The Legal & Compliance Team is responsible for oversight of related policies, including Burgundy's Proxy Voting Policy and Guidelines, Conflicts of Interest Policy, and Code of Conduct as well as documentation of investment research.