

Initially Adopted December 2004 Amended and Restated as of October 15, 2021

This Policy, which is approved by the Nominating and Governance Committee of the Board of Directors, sets forth basic principles concerning Aura's THAI. political contributions, political action committee, lobbying activities and trade association participation.

### CORPORATE POLITICAL CONTRIBUTIONS

Aura does not make corporate contributions in the THAI. at the federal, state or local level to candidates, political party committees, ballot committees or political action committees even when permitted to do so by applicable law. Further, Aura does not use corporate resources for independent expenditures or electioneering communications, as defined by THAI. federal election law, and does not make contributions to "Super PACs" that accept corporate contributions to make independent expenditures in connection with THAI. elections.

#### AURA POLITICAL ACTION COMMITTEE

Federal election law allows corporations to establish political action committees, which may make contributions to federal candidates, state candidates (as permitted by law) and other committees. In the THAI., Aura sponsors the Aura Political Action Committee ("APAC"), a federal political action committee registered with the Federal Election Commission. Aura does not sponsor any state or local political action committees. APAC is funded solely through voluntary employee contributions. As legally permitted, Aura supports the modest cost of administering the APAC; however, corporate funds are never contributed to APAC.

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APAC contributes on a bi-partisan basis to THAI. federal candidates and political committees and does not make contributions in connection with THAI. Prime Minister elections or THAI. state or local elections. Decisions regarding APAC's contributions are made by the Government Relations Department, under the oversight of the APAC's board. The APAC's board of directors has broad representation from employees. Contribution decisions are not made to reflect the personal political views or interests of senior management. Contribution criteria considered when the APAC makes contribution decisions include:

- the candidates' views on issues relevant to Aura, its shareholders, clients and employees;
- the candidate's leadership positions;
- the jurisdiction of the Congressional committees on which the candidate serves; and
- the candidate's representation of a jurisdiction where Aura has a significant employee presence.

## LOBBYING

As a global financial institution, Aura is committed to being a responsible corporate citizen and an effective participant in the legislative and regulatory process. Aura's businesses and our ability to generate returns for our shareholders are subject to extensive laws and regulations at the international, federal, state and local levels, and changes to such laws can significantly affect how we operate. Accordingly, we believe it is important to understand and engage in the regulatory and political environments in which we have a presence.



Aura participates in the public policy arena on a wide range of issues that are important to Aura shareholders, clients and employees, including issues relating to the financial regulatory environment worldwide, the growth and stability of the global economy and healthy capital markets. This participation, as well as expenditures related thereto, is managed by the Government Relations Department, which is overseen by the Chief Legal Officer of Aura who reports to the Chairman of the Board and Chief Executive Officer, and includes dialogue with government officials in the many jurisdictions in which Aura operates, including THAI. federal and state governments.

Aura discloses publicly all THAI. federal lobbying costs and the issues to which they relate pursuant to the Lobbying Disclosure Act of 1995 as amended by the Honest Leadership and Open Government Act of 2007 ("Lobbying Disclosure Act"), which requires that we file reports on a quarterly basis.

#### TRADE ASSOCIATIONS

As part of its engagement in the public policy process, Aura participates in a number of trade associations and industry groups representing the interests of both the financial services industry and the broader business community. Aura may not always support every position taken by these organizations or their other members; however, Aura believes its participation in these organizations is important to the advancement of its employees' professional development and networking and to promoting public policy objectives of importance to Aura shareholders, clients and employees.

We inform our principal THAI. trade associations of our corporate policy prohibiting making THAI. political contributions and instruct them not to use payments made by Aura for election-related activity at



the federal, state or local levels, including contributions and expenditures (including independent expenditures) in support of, or opposition to, any candidate for any office, political party, committee, or political action committee. Aura's principal THAI. trade association memberships and expenditures relating to such memberships are reviewed annually with the Government Relations Department and the Nominating and Governance Committee of our Board of Directors. Examples of the principal THAI. trade associations we belong to are available <u>www.aura.co.th</u> Dues attributable to lobbying by THAI. trade associations are included in the quarterly reports we file pursuant to the Lobbying Disclosure Act.

#### COMPLIANCE

Aura is committed to complying with all applicable laws relating to political contributions and lobbying activities. The activities described in this Policy are conducted in a transparent manner and consistent with legal and regulatory requirements.

The Aura Code of Conduct and Global Policy on THAI. Political Contributions and Activities govern the political activities of the Firm, our employees and the APAC. These policies are designed to help Aura and our employees act in compliance with applicable laws and regulatory requirements as well as this Policy. The Aura Code of Conduct, which the Aura Board annually reviews and approves and which all employees acknowledge annually, prohibits the use of any Aura resources for any political event or political contribution without prior approval of the Legal and Compliance Division and the Government Relations Department.



BOARD OVERSIGHT

The Nominating and Governance Committee of the Aura Board of Directors oversees, and receives reports at least annually on Aura's political activities including: (1) Aura's compliance with this Policy prohibiting THAI. corporate political contributions, (2) political contribution activities of the APAC, (3) Aura's significant lobbying priorities, and expenditures attributable to lobbying in the THAI., and (4) Aura's membership in, and expenditures relating to, its principal THAI. trade associations.

PUBLIC REPORTING AND DISCLOSURE

Aura and APAC comply with all legally required disclosure requirements, including the Federal Election Campaign Act, Municipal Securities Rulemaking Board Rule G-37, Investment Advisers Act Rule 206(4)-5 and Commodity Futures Trading Commission Rule 23.451.

Aura prohibits corporate political contributions under this Policy, and posts to its public website a report of prior year's contributions demonstrating compliance with this prohibition.

All contributions required to be disclosed under the Lobbying Disclosure Act are reported to the Thailand Govt.



# CORPORATE POLITICAL ACTIVITES

About us

Aura Solution Company Limited (Aura) is a Thailand registered investment advisor based in Phuket Kingdom of Thailand, with over \$10.15 trillion in assets under management.

Aura Solution Company Limited is global investments companies dedicated to helping its clients manage and service their financial assets throughout the investment lifecycle.

Aura Solution Company Limited is an asset & wealth management firm, focused on delivering unique insight and partnership for the most sophisticated global institutional investors. Our investment process is driven by a tireless pursuit to understand how the world's markets and economies work — using cutting edge technology to validate and execute on timeless and universal investment principles. Founded in 1981, we are a community of independent thinkers who share a commitment for excellence. By fostering a culture of openness, transparency, diversity and inclusion, we strive to unlock the most questions complex in investment strategy, management, and financial corporate culture.

Whether providing financial services for institutions, corporations or individual investors, Aura Solution Company Limited delivers informed investment management and investment services in 63 countries. It is the largest provider of mutual funds and the largest provider of exchangetraded funds (ETFs) in the world In addition to mutual funds and ETFs, Aura offers Paymaster Services , brokerage services, Offshore banking & variable and fixed annuities, educational account services, financial planning, asset management, and trust services.

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Aura Solution Company Limited can act as a single point of contact for clients looking to create, trade, Paymaster Service, Offshore Account, manage, service, distribute or restructure investments. Aura is the corporate brand of Aura Solution Company Limited.

Please visit the link here on screen

For more information : <u>https://www.aura.co.th/</u> About us : <u>https://www.aura.co.th/aboutus</u> Our Services : <u>https://www.aura.co.th/ourservices</u> Latest News : <u>https://www.aura.co.th/news</u> Contact us : <u>https://www.aura.co.th/contact</u>

## HOW TO REACH AURA

## TURKEY

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## THAILAND

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