

Information Statement
on our Policy on
the Consideration of Principal Adverse Impacts of Investment Decisions on Sustainability
Factors

Issued by Northern Trust Fund Services (Ireland) Limited
(the "Company")

Date of initial publication of this Information Statement: 10 March, 2021

This Information Statement is accurate as at: 30 June, 2024

Sustainable Finance Transparency

The European Union has introduced a series of legal measures (the primary one being the Sustainable Finance Disclosures Regulation (Regulation (EU) 2019/2088), "**SFDR**") requiring firms that manage investment funds to provide transparency on how they integrate sustainability considerations into the investment process with respect to the investment funds they manage.

This Information Statement has been prepared for the purpose of meeting the disclosure requirements in Article 4 (1) and Article 12 (2) of SFDR, that is, specifically, the disclosure requirements applicable to us as a firm with regard to whether and how we consider principal adverse impacts of investment decisions on sustainability factors. The requirement to consider principal adverse impacts is on a 'comply or explain' basis.

The Company does not consider the principal adverse impacts of investment decisions on "sustainability factors" for the reasons explained below in paragraph **Information Regarding the Consideration of Principal Adverse Impacts of Investment Decisions on Sustainability Factors**.

Background of the Company

The Company is authorised as a UCITS Management Company under the UCITS Regulations and as an AIFM under the AIFMD Regulations and currently serves as a fund manager to several UCITS and AIFs (hereinafter referred to as the "Funds").

The Company does not provide or undertake individual portfolio management services or investment advice, although it does retain risk management responsibilities. The day to day portfolio management activities of the Funds are performed by third party Investment Managers appointed to the Funds. The details of the Investment Managers for each of the Funds are set out in the Funds' Prospectuses.

What are Principal Adverse Impacts

Principal Adverse Impacts (PAI) are the impacts of investment decisions and advice that result in negative effects on sustainability factors.

What are Sustainability Factors

"Sustainability factors" are defined as environmental, social, employee matters, respect for human rights, anti-corruption and anti-bribery matters.

Information Regarding the Consideration of Principal Adverse Impacts of Investment Decisions on Sustainability Factors

The Company does not consider the adverse impacts of investment decisions on sustainability factors, within the meaning of Article 4(1)(a) of the SFDR. The day to day portfolio management activities of the Funds are performed by third party Investment Managers appointed by the Company, although the Company does retain risk management responsibilities.

The Company taking due account of the Funds investment strategies does not consider the principals adverse impacts of investment decisions on “sustainability factors”. The Company and the underlying Investment Managers intend to keep this position under review and may reassess this position at such time as it feels is necessary, particularly if the investment strategy of any Fund significantly changes.

Article 8 Schemes that promote environmental and/or social characteristics

Fund Name	Website
The Cape Ann Perivallon (Ireland) Fund	CAAM-SFDR-0724.pdf (capeannam.com)

Further Information

This Information Statement is issued for information purposes only.

This Information Statement is not intended as investment advice and is not an offer or a recommendation about managing or investing assets and should not be used as the basis for any investment decision.

The information contained herein is current as of the date of issuance and is subject to change without notice.

We do not make any express or implied warranties or representations as to the completeness or accuracy or accept responsibility for errors.

No risk management technique can guarantee the mitigation or elimination of risk in any market environment.

Past performance is not a guarantee or a reliable indicator of future results and an investment could lose value. All investments involve risk, including the possible loss of capital.

Northern Trust Fund Services (Ireland) Limited has its registered office at 54-62 Townsend Street, Dublin 2, Ireland.

Northern Trust Fund Services (Ireland) Limited is authorised in Ireland and regulated by the Central Bank of Ireland.