

Information Statement
on our Policy on
the Integration of Sustainability Risks in the Investment Decision-Making Process

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

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Sustainable Finance Transparency

The European Union has introduced a series of legal measures 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.

The Company is defined as a ‘Financial Market Participant’ under Article 2 of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability related disclosures in the financial sector (“SFDR”). SFDR is one of several measures introduced by the European Union requiring firms that manage investment funds to provide transparency on how they integrate sustainability considerations into the investment process with respect to the funds they manage.

Background of the Company

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

The Company does not provide individual portfolio management services or investment advice in collective investment schemes, 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 is a Sustainability Risk?

In this context a sustainability risk is considered to be an environmental, social or governance event or condition that, if it occurs, could cause an actual or potential material negative impact on the value of an investment.

Information on Integration of Sustainability Risks into the Investment Decision-Making Process

In respect of each Fund, investment approach and decision-making processes are based on clearly defined investment objectives, investment policies, investment strategy, investment restrictions and risk management parameters, as contained in the Prospectus. The integration of sustainability risks into the investment decision making process for each Fund will align to the investment objectives, investment policies, investment strategy and risk management parameters of the Fund.

For more details, please refer to the investment strategy of the relevant Fund as set out in the Prospectus and associated investor materials.

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.