SUSTAINABILITY RISKS POLICY

FITZGERALD BRENNAN ASSET MANAGEMENT DAC (FBAM)

The EU Sustainable Finance Disclosure Regulation (SFDR) requires FBAM to formalise how sustainability is imbedded into the firm's processes and business, and to make public and client disclosures on sustainability matters.

Under SFDR, Sustainability Risk is defined as 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. This document lays out the firm's policy in respect to the integration of sustainability risks in FBAM's investment decision making process, this is required by Article 3 of the SFDR. This policy applies to the firm and to all portfolio management activities performed by the firm. This policy details sustainability risk from the perspective of the risk that ESG occurrences might cause a material negative impact on the value of our client investments. As a financial market participant (FMP) we act in the best interest of our clients, which, includes, appropriately considering how ESG risks could impact on our client investments

Managing Sustainability Risk:

FBAM's policy with regard to sustainability risk management, is based on a strategy of focusing on quality companies and/or exchange traded funds (ETFs) with long-term, sustainable, competitive advantages. Our investment strategy focuses on good quality companies, bought at a suitable price, which, will generate superior returns over the long-term. We perform detailed analysis based around this investment strategy. Managing sustainability risk recognises that equity and bond assets may have greater exposer to sustainability risks than other classes of assets.

We consider material sustainability risks as part of individual company and ETF analysis. We strive to monitor and analyse risks, which, may have a material impact on the financial performance of a company and ETF. The importance of such risks on the firm's investment strategy decisions, is dependant on their actual or potential significance to a company and ETF and its future return profile.

The investment managers consider sustainability risk as part of the analytical process. We utilise the firm's own resources to analysis these matters. When making investment decisions the investment manager does take sustainability risks into consideration, however, sustainability risk on its own may not prevent the firm from making a particular investment. Rather sustainability risk comprises part of the overall risk management process. It is amongst many risk considerations, which, depending on the particular investment, may be relevant to the identification of risk. The firm does not employ absolute risk limits or risk appetite thresholds, that relate exclusively to sustainability risk as a separate category of risk. Compliance, Investment Risk Management and Funds Management all play an important function in the management and oversight of sustainability risk.

With respect to investment monitoring, the firm does not engage in active ownership. Active ownership is a process of exercising voting rights attached to securities and/or engaging in communications with companies on sustainability or other issues, with the intention of monitoring or influencing these outcomes with such companies.

FBAM will seek to identify the key ESG risks, which, could result in an actual or potential material negative impact on the value of an investment.

Remuneration policy:

The firm as required by Article 5 of the SFDR has included in its remuneration policy information on how this policy is consistent with the integration of sustainability risks.

FBAM meets the definition of a Financial Market Participant ("FMP") under SFDR. The following is taken from the FBAM remuneration policy for the purpose of client information and SFDR compliance.

"With respect to the EU Sustainability Finance Disclosure Regulation (SFDR), under Article 5 the firm is required to detail how renumeration policies are consistent with the integration of sustainability risks. The firm satisfies this requirement by the fact that variable or fixed renumeration is not linked to the performance of assets under management or any investment selection or strategy, or by the garnering of new or existing clients, or any third-party payments/inducements (which, are banned) for any staff"

Disclosure of The Sustainability Risks Policy:

The SFDR requires that the firm publish on our website information regarding this policy. The firm has adhered this requirement by disclosing this actual policy on our website.

The SFDR also requires that FBAM include, in the pre-contractual disclosures for financial products, a description of the manner in which sustainability risks are integrated into investment decisions. FBAM meets this requirement by either disclosing this actual policy in pre-contractual disclosures or disclosing a separate summary of this policy in precontractual disclosures, whichever, is the most appropriate. Pre-contractual disclosures, means the prospectus or offering document for a fund, and an investment management agreement or other terms and conditions for a portfolio management service.

This policy is reviewed appropriately, with any required updates being made.

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