

Sustainable Finance Disclosures – Seilern International AG

Integration of sustainability risks

Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (“**SFDR**”) requires Seilern International AG (the “**Manager**”) to disclose information about policies on the integration of sustainability risks in the investment decision-making process.

A sustainability risk is defined in SFDR as an environmental, social or governance (“**ESG**”) event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of an investment.

The Manager has adopted disclosure policies in respect of the manner in which sustainability risks are integrated into the investment process and the results of the assessment of the likely impacts of sustainability risks on the returns of the Funds which are consistent with the SFDR.

The Manager has adopted the Investment Manager’s policy on the integration of sustainability risks in its investment decision-making process, as described in the Investment Manager’s Responsible Investment Policy.

Further details on the integration of sustainability risks may be found in the Prospectus of the Funds and on the website of the Investment Manager.

No Consideration of Sustainability Adverse Impacts

SFDR requires the **Manager** to determine whether it considers the principal adverse impacts of its investment decisions on sustainability factors. The Manager is supportive of the aim of this requirement which is to improve transparency to investors and whilst the Investment Manager is considering Principal Adverse Impacts, after a cost benefit analysis, the Manager concluded that it could not at a reasonable cost to investors justify the consideration of Principal Adverse Impacts on sustainability factors given the size, nature and scale of its activities in relation to the services provided for Seilern International Funds plc. The Manager’s position on this matter will be reviewed annually by reference to market developments. For further information on the consideration of Principal Adverse Impacts please refer to the Investment Manager’s disclosure.

Integration of Sustainability Risks in the Remuneration Policy

SFDR requires the Manager to include in its remuneration policy information on how its remuneration policy is consistent with the integration of sustainability risks. The same information (or a summary of it) must be published on the Company’s website.

The Manager refers to the investment philosophy of the Funds, which does not encourage excessive risk taking or short-termism per se. As such the remuneration practices of the Manager currently reflect this approach and the relevant staff is remunerated accordingly.

More information of the remuneration policy is available at the Manager’s office upon request.