

# Prescient

**FUND SERVICES (IRELAND)**

**PRESCIENT FUND SERVICES (IRELAND) LIMITED**

**Sustainability-related Disclosures**

## 1. Overview

Prescient Fund Services (Ireland) Limited (the "**Manager**") acts as a UCITS management company and as an alternative investment fund manager (AIFM) to UCITS and AIF funds, respectively.

In accordance with the requirements of 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**"), the Manager is required to publish on its website information in relation to:

- 1.1 its policy on the integration of Sustainability Risks (defined below) in its investment decision-making process<sup>1</sup>;
- 1.2 the consideration of adverse impacts of investment decisions on Sustainability Factors (defined below);<sup>2</sup>
- 1.3 how the Manager's remuneration policy (the "**Remuneration Policy**") is consistent with the integration of Sustainability Risks<sup>3</sup>;
- 1.4 funds under its management that promote environmental or social characteristics and funds that have sustainable investment (within the meaning of SFDR) as their objectives<sup>4</sup>.

"**Sustainability Risk**", 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 the investment.

"**Sustainability Factor**", environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

## 2. Sustainability Risk Policy

The Manager has adopted a policy in respect of the manner in which Sustainability Risks are integrated into the investment decision-making process of the funds under its management (the "**Policy**").

In accordance with the Policy, the Manager:

- 2.1 seeks to identify the ESG themes that may impact the value of an investment ("**ESG Factors**");
- 2.2 seeks to identify the manner in which the ESG Factors may give rise to Sustainability Risks and potentially impact on the returns of a fund;
- 2.3 assesses the relevance of the ESG Factors and Sustainability Risks to a fund depending on the nature of the fund's investments.

It is acknowledged that the effective application of the ESG framework created in accordance with the Policy and the identification and evaluation of Sustainability Risks is dependent on the availability of reliable data sources of the relevant information.

The Manager implements the Policy by integrating its provisions, in a manner that is appropriate to each fund, into the wider assessment of the relevant financial risks applicable to a fund. The Manager evaluates the assessment and management of the Sustainability Risks in the course of its oversight of the investment managers appointed in respect of the relevant funds.

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<sup>1</sup> SFDR, Article 3

<sup>2</sup> SFDR, Article 4

<sup>3</sup> SFDR, Article 5

<sup>4</sup> SFDR, Article 10

### **3. Consideration of Impact on Sustainability Factors**

As set out above, consideration of Sustainability Risks is integrated into the investment decision-making process applied to a fund's investments. The Manager has determined, as it may do under the SFDR, that for the time being it will not consider (in the manner specifically contemplated by the SFDR) the adverse impacts of the investment decisions in respect of the funds on Sustainability Factors. The Manager has made this determination taking due account of the nature and scale of its activities and the wide and varied range of the funds under its management. The Manager considers this a pragmatic and economically prudent approach to compliance with its obligations under the SFDR.

The Manager may in the future decide to consider the principal adverse impacts of investment decisions in respect of a fund on Sustainability Factors in the manner contemplated by the SFDR, should the Manager determine that this is appropriate in respect of the fund in question in light of, for example, appropriate and accurate data becoming more readily available and accessible and/or the regulatory landscape stabilising. This decision may also depend on whether the Manager considers that the results of such an assessment would prove meaningful to the investors of the fund in question.

### **4. Remuneration Policy**

The Remuneration Policy which seeks to ensure that the Manager's remuneration arrangements are consistent with and promote sound and effective risk management also integrates measures designed to discourage excessive risk-taking with respect to Sustainability Risks.

This is sought to be achieved by, amongst other things, the alignment of the horizon of a fund's risks, including Sustainability Risks, and that of the measurement of the performance of relevant staff. In particular, the measurement of performance used to calculate variable remuneration components includes an adjustment mechanism integrating all relevant types of risks including Sustainability Risks.

The Remuneration Policy is published on the Manager's website.

### **5. Funds promoting environmental or social characteristics or having a sustainable investment objective**

The section of the Manager's website containing fund-specific information includes additional information in respect of the relevant funds, namely funds that:

- promote, among other characteristics, environmental or social characteristics, or a combination of those characteristics, provided that the companies in which the investments are made follow good governance practices (i.e. funds to which Article 8 of the SFDR applies); or
- have sustainable investment (within the meaning of SFDR) as their objectives (i.e. funds to which Article 9 of the SFDR applies).