FUND SERVICES (IRELAND)

TREATING CUSTOMERS FAIRLY POLICY

Version	Reviewed By:	Date	Approved by	Approved date
1	Compliance	July 2026	PFSI Board	12 August 2026

Introduction and Purpose

About the Company

Prescient Fund Services (Ireland) Limited (the **"Company"**) is authorised by the Central Bank of Ireland (the **"Central Bank"**) as a UCITS management company and as an alternative investment fund manager (**"AIFM"**). The Company provides management company and/or AIFM services to a range of UCITS and AIF funds.

Purpose

This Policy sets out the principles and arrangements by which the Company seeks to ensure the fair treatment of the funds under its management and their investors ("Investors") throughout the product lifecycle, and to demonstrate how those principles are embedded in the Company's governance, culture and oversight arrangements.

Regulatory Basis

This Policy reflects the Company's obligations under, and has been prepared having regard to:

- Directive 2009/65/EC (the *UCITS Directive*), as transposed by the European Communities (Undertakings for Collective Investment in Transferable Securities) Regulations 2011 (S.I. No. 352 of 2011), as amended;
- Directive 2011/61/EU (*AIFMD*), as transposed by the European Union (Alternative Investment Fund Managers) Regulations 2013 (S.I. No. 257 of 2013), as amended;
- the Central Bank's Fund Management Companies – Guidance (commonly known as **"CP86"**);
- the Central Bank Reform Act 2010 (Section 17A) (Standards for Business) Regulations 2025 (S.I. No. 80 of 2025) (the **"Standards for Business"**);
- the Common Conduct Standards (and, where applicable, the Additional Conduct Standards) introduced under the Central Bank (Individual Accountability Framework) Act 2023; and
- to the extent the Company's activities involve "consumers" within the meaning of that term, the Central Bank (Supervision and Enforcement) Act 2013 (Section 48) (Consumer Protection) Regulations 2025 (the **"Consumer Protection Regulations"**), which replace the Consumer Protection Code 2012 with effect from 24 March 2026.

Scope

This Policy applies to:

- all UCITS and AIF umbrella funds (and their sub-funds) in respect of which the Company acts as management company and/or AIFM (each a "Fund");
- all directors, designated persons and employees of the Company; and
- the Company's oversight of delegates and service providers appointed in respect of the Funds under management.

Governance and Culture

The board of directors of the Company (the **"Board"**) is responsible for setting the tone from the top and for ensuring that the fair treatment of Investors is embedded in the Company's culture, governance arrangements and decision-making processes.

Senior management and Designated Persons are responsible for promoting high standards of conduct within their respective managerial functions and for ensuring that Investor interests are given due consideration in the exercise of those functions, consistent with the Common Conduct Standards.

The Company's approach to fair treatment is embedded in, and supported by, its other policies and procedures, including (without limitation) its Conflicts of Interest Policy, Remuneration Policy, Complaints Handling Policy and Sustainability Risk Assessment Policy.

Fair Treatment Principles

In conducting its activities, the Company seeks to:

- act honestly, fairly and professionally in conducting its business;
- act with due skill, care and diligence, and in the best interests of the Funds under its management and their Investors;
- avoid conflicts of interest and, where they cannot be avoided, identify, manage, monitor and, where applicable, disclose them so that the Funds under management, and their Investors, are fairly treated;
- ensure that no Investor obtains preferential treatment unless such treatment is disclosed in the relevant Fund's documentation and does not result in an overall material disadvantage to other Investors;
- provide information to Investors that is fair, clear and not misleading;
- maintain effective systems and controls that are designed and operated to protect Investor interests; and
- ensure that complaints are handled fairly, promptly and in accordance with the Company's Complaints Handling Policy.

Product Governance

The Company seeks to ensure that the Funds under its management are designed, authorised and monitored so as to be consistent with their stated investment objectives, investment policies, risk profile and target investor profile.

The Company maintains oversight arrangements throughout the product lifecycle — from launch through to termination — to seek to ensure that a Fund continues to be managed and distributed in a manner consistent with the interests of its Investors, including through periodic review of Fund performance, risk, liquidity and costs.

Investor Communications

The Company is committed to ensuring that Fund documentation (including prospectuses, supplements, key information documents and periodic reports) and marketing communications are prepared and reviewed so as to be fair, clear and not misleading, and to enable Investors to make informed investment decisions.

Where the Company delegates investment management or distribution functions, it seeks to ensure, through its oversight arrangements, that delegates communicate with Investors in a manner consistent with this Policy.

Complaints Handling

The Company maintains a Complaints Handling Policy and associated procedures for the fair, prompt and transparent handling of Investor complaints, free of charge to the complainant.

Complaints are considered objectively, investigated appropriately, and resolved having regard to applicable regulatory requirements, including (where applicable) the Consumer Protection Regulations.

Oversight of Delegates

Consistent with CP86 and the Company's delegate oversight arrangements, the Company monitors the performance of delegates (including investment managers, distributors, administrators and depositaries) to seek to ensure that the Funds under management, and their Investors, continue to be treated fairly by those delegates.

Training and Awareness

All relevant staff receive training on this Policy and its underlying principles as part of the Company's induction and ongoing training programme, so as to ensure a consistent understanding of the Company's expectations regarding the fair treatment of Investors.

Monitoring, Escalation and Reporting

Compliance with this Policy is monitored by the Company's Compliance function as part of its Compliance Monitoring Programme.

Material instances of unfair treatment of Investors, whether identified internally or through complaints, delegate oversight, or other means, are escalated to the Board and, where required, reported to the Central Bank.

Policy Review

The Board will review this Policy at least annually, and on an ad hoc basis where required by regulatory developments or changes to the Company's business.