

## **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 the market generally as to how to integrate the consideration of the adverse impacts of investment decisions on sustainability factors. However, the Manager could not gather and/or measure all of the data on which it would be obliged by SFDR to report, or it could not do so systematically, consistently and at a reasonable cost to investors. This is in part because underlying companies or issuers are not widely obliged to, and overwhelmingly do not currently, report by reference to the same data. On this basis, and due to the size, nature and scale of the sub-funds of Seilern International Funds plc, the Manager does not consider the principal adverse impacts of investment decisions on sustainability factors at this time. The Manager’s position on this matter will be reviewed annually by reference to market developments.

### **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.

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