

Rider for Inclusion on the SIMI / Irish Seilern Funds Website

No Consideration of Sustainability Adverse Impacts

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 Investment Management (Ireland) Limited (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, and in the absence of the finalised regulatory technical standards relating to this disclosure, 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. Sustainability risk is defined in SFDR 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 the investment”. The same information (or a summary of it) must be published on the Company’s website.

The Manager is for the purposes of SFDR a “financial market participant”. Accordingly, a sustainability risk is an environmental, social or governance event or condition which, if it occurs, could cause an actual or potential material negative impact on the value of the investments made by the funds managed by the Manager.

The Manager’s remuneration policy promotes sound and effective risk management and seeks to avoid excessive risk taking and has been amended to be consistent with the integration of sustainability risks.

The remuneration policy is available at [[Literature - Seilern Funds](#)].¹

¹ **AC Note:** Insert link on the website to where the SIMI remuneration policy is available.