SEILERN INVESTMENT MANAGEMENT LTD.
ENTITY-LEVEL SFDR DISCLOSURES

Seilern Investment Management Ltd. ("**SIM**") is the delegated investment manager for certain European-domiciled funds, the Seilern International Funds Plc (the "**Funds**"). As such it is required to comply with 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 (the "**SFDR**").

This document is intended for European Investors and has been published in order to comply with the requirements of articles 3 and 4 of the SFDR.

Information about the integration of sustainability risks (Article 3 SFDR):[1]

In managing the Funds, SIM identify and integrate sustainability risk as part of the investment process, in accordance with SFDR.

Sustainability risk is defined as an environmental, social, or governance event or condition that, if it occurs, could potentially or actually cause a material negative impact on the value of a Sub-Fund's investment. Sustainability risks can either represent risks of their own or have an impact on other risks.

Sustainability risks may contribute significantly to risks such as market risks, operational risks, liquidity risks, or counterparty risks. The assessment of sustainability risks is complex and may be based on environmental, social, or governance data, which is difficult to obtain, incomplete, estimated, out of date, and/or otherwise inaccurate. Assessment of these risks can also be qualitative in nature. The primary tool to manage sustainability-related risks is via our exclusion process. By formally excluding those sectors with the highest sustainability risk SIM considerably reduce the funds' exposure to such risks in the first instance. SIM looks to invest in companies that can deliver sustainable earnings growth with a high degree of forecastability. Investment analysts will report on the companies under their coverage on an ongoing basis and are responsible to flag any matter which poses a risk to the long-term sustainability of our investments. These include, among others, issues concerning corporate governance, matters that adversely impact their reputation, matter that could lead to regulatory fines or disproportionate behaviour towards stakeholders as well as the environment in which they operate.

Further detail on the integration of Sustainability Considerations can be found in the Responsible Investment Policy www.seilernfunds.com/en/literature.

Consideration of principal adverse impacts of investment decisions on sustainability factors (Article 4 SFDR):[2]

[1] Art.3 SFDR
[2] Art. 4 (1a) and 4 (2) SFDR

SIM does not consider and intend to consider adverse impacts of investment decisions on sustainability factors due to the significant reporting costs associated with the implementation of quantitative tracking methodologies across all of its investment decisions. SIM however, considers principal adverse impacts ("PAI") of investment decisions on sustainability factors when managing the Funds on the basis of specifically selected and relevant indicators. Principal adverse impacts are defined as the most significant negative impact of investment decisions on sustainability factors relating to environmental, social, and employee matters, respect for human rights, anti-corruption, and anti-bribery matters.

Within the investment universe of the Funds, SIM excludes companies that have significant environmental and social risks through our exclusive search for growth process that eliminates companies that do not meet our tests for Quality Growth, thereby considering PAIs.

Further information on the consideration of PAIs for the Funds is available in the Prospectus and the Annual Reports of the Funds.

SIM will review this statement on an annual basis in line with market and regulatory developments.

Document last updated on 30th November 2023