**Statement on the transparency of sustainability risk policies**

**(the “statement”)**

**Carne Global Fund Managers (Ireland) Limited,**

**Carne Global Fund Managers (Luxembourg) S.A**

**(the “Companies”)**

**March 2021**

## Introduction

The Companies are authorised by the Central Bank of Ireland and the Commission de Surveillance du Secteur Financier respectively to provide UCITS Management Company/AIFM services to a range of UCITS/AIFs domiciled in, but not limited to, Ireland and Luxembourg (the "**Schemes**").

As per Regulation (EU) 2019/2088 ("**SFDR**"), the Companies are both defined as a "financial market participant". Further, per Article 3 of SFDR, a financial market participant is required to" publish on their websites information about their policies on the integration of sustainability risks in their investment decision-making process." The Companies have adopted this statement to describe the approach taken to demonstrate compliance with Article 3 of SFDR.

For the purpose of this statement:

"**Sustainability risk**" means an environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of an investment. For example, widespread flooding across parts of the UK or high workforce turnover as a result of poor employment practices.

## Delegation and Integration of Sustainability Risks

The Companies typically delegate the portfolio management function to a suitably qualified third-party investment manager (the "**Delegated Manager**"). In certain instances, the Companies may retain the portfolio management function. In both instances, the degree to which sustainability risks are, or are not, integrated into the investment decision making shall be detailed within the pre-contractual documents of each scheme in accordance with Article 6 of SFDR. This shall be determined at the onboarding stage of a new scheme, in conjunction with the Delegated Manager.

The Companies have enhanced their due diligence processes to ensure that disclosures made in pre-contractual documents shall be consistent with the investment objectives of the funds, investor profiles and the infrastructure implemented at each Delegated Manager appointed to the scheme. Where sustainability risks are integrated into investment decision making/research in respect of each scheme the Companies shall periodically assess the adequacy of ESG/SFDR integration at that Delegated Manager through the issuance of due diligence questionnaires, onsite due diligence visits etc. The Companies have enhanced the existing risk management frameworks to account for the integration of sustainability risks. Further, the risk management function shall oversee the integration of sustainability risks by these Delegated Managers on an ex-post basis.

Should the Companies determine that either the infrastructure in place at the Delegated Manager is not sufficient, or the scheme is not being managed in line with the disclosure of sustainability risks in its pre-contractual documents, the Companies will take steps to ensure corrective action is taken.

Where portfolio management is retained by the Companies, and sustainability risks are considered in the investment decision making of those Schemes, the Companies shall ensure that this is carried out in a manner consistent with this statement and the objectives of those Schemes.

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