

Sustainable Finance Disclosures Regulations (SFDR)

This document highlights the SFDR disclosures for the Evelyn Partners Umbrella A ICAV and Evelyn Partners UCITS ICAV. Evelyn Partners also has a group policy on SFDR, which is viewable at www.evelyn.com

Definitions:

SFDR means Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector

EU Taxonomy Regulation means Regulation EU 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending SFDR

Copy of the SFDR disclosures for the Evelyn Partners Umbrella A ICAV and Evelyn Partners UCITS ICAV

Article 6 of the SFDR requires that financial market participants such as the AIFM to disclose the manner in which Sustainability Risks are integrated into investment decision-making and the results of the assessment of the likely impacts of Sustainability Risks on the returns of the financial products they make available.

The following are environmental, social and governance themes that are relevant for the Funds. Within these themes, events may happen or conditions may arise that impact the valuation of the Funds.

Environmental

- Climate change and greenhouse gas emissions
- Unsustainable resource depletion, including water
- Environmental damage, land contamination, pollution and waste
- Biodiversity loss and deforestation
- Animal welfare and wildlife

Social

- Human rights and workers' rights, including anti-slavery and child labour
- Health and safety
- Employee relations and diversity
- Local communities, including indigenous communities
- Conflict and humanitarian crises

Governance

- Board and management experience, diversity and structure
- Executive remuneration policies
- Anti-bribery and corruption
- Shareholder rights and engagement
- Legal, regulatory and taxation

Sustainability Risk can either represent a risk on its own, or impact and contribute significantly to other risks, such as market risks, operational risks, liquidity risks or counterparty risks. The following risks arising from the themes listed above are integrated into the Funds' investment decisions:

- Market risks
- Liquidity risks
- Counterparty risks
- Operational risks
- Regulatory risks
- Reputational risks
- Stock and collectives risk

Ultimately, where the relevant Fund is a fund of funds, decisions to include an individual asset in the portfolio of the underlying CIS are delegated to the fund managers of such CIS. Therefore, there will always be a degree of risk resulting from asset selection and possible negative impacts to individual fund performance should a sustainability issue arise at the underlying CIS level. The Investment Manager seeks to limit this risk by selecting a range of CIS across asset classes and regions, and by integrating environmental, social and governance (**ESG**) analysis into the selection of underlying managers.

An assessment is undertaken of the likely impacts of these Sustainability Risks on the Funds' returns. The result of that assessment is that the Investment Manager expects any negative impact on returns from Sustainability Risks to be limited, primarily due to: the focus of the investment philosophy on quality growth and sustainable returns over the longer term; the integration of ESG factors into the Funds' investment decisions and research; and portfolio diversification and positioning. For example, look-through analysis of the portfolio holdings highlight limited sector exposure to the oil & gas sector and the Funds generally score well with third party ESG data providers.

Copy of the Article 8 disclosure for the Evelyn Sustainable Adventurous and Evelyn Sustainable Cautious Portfolios only.

The Investment Manager monitors compliance with the ESG characteristics outlined in the sections entitled Investment Policies on a regular basis through regular analysis of the CIS and underlying companies that are held in their portfolios. This includes, but is not limited to; quarterly asset allocation meetings to review market, geopolitical and macroeconomic risks; internal governance monitoring of liquidity risks; the Investment Manager's proprietary research framework; qualitative and quantitative analysis, regular Investment Manager meetings and the Investment Manager's selection principles.

The Investment Manager's proprietary research framework sees ESG factors integrated into the Fund's policies and research, which ultimately means that all CIS held in the portfolio and their investment managers have had their ESG policies analysed as part of standard due diligence. In addition, the Investment Manager's analysts and portfolio managers have access to multiple specialist ESG data providers, which provides the team with independent analysis of ESG and Sustainability Risks, both at the ICAV and Fund level.

The Fund's investment policy outlined above includes an ESG scoring system and screening (negative and positive).

An assessment is undertaken of the likely impacts of these Sustainability Risks on the Fund's returns. The results of that assessment is that the additional screening policies (negative and positive) and ESG scoring system within the investment policy are designed to help the Investment Manager identify assets that demonstrate superior ESG and/or sustainability characteristics. No benchmark has been selected for the purposes of achieving the ESG objectives.

EU Taxonomy Regulation

Article 6

The Investments underlying the Funds do not take into account the EU criteria for environmentally sustainable economic activities. Where a particular Fund does take into account the EU criteria for environmentally sustainable economic activities, this will be reflected in the relevant Supplement.

Article 8 – Evelyn Sustainable Cautious and Evelyn Sustainable Adventurous Portfolios

EU Taxonomy

The Fund is a fund of funds and intends to rely on the disclosures of its portfolio funds under the EU Taxonomy Regulation in order to make the Fund's disclosures. As the regulatory technical standards (RTS) underpinning the environmental disclosures required by the EU Taxonomy Regulation have been delayed and are not available as at the date of this Supplement, the portfolio funds do not have sufficient data available to satisfy the EU Taxonomy Regulation disclosure requirements for 1 January 2022. Until those RTS are available and in force, the portfolio funds are not currently in a position to establish or specify the proportion of investments in environmentally sustainable activities under the EU Taxonomy Regulation or details on the proportion of enabling and transitional activities. Consequently, the Investment Manager, in consultation with the AIFM, is unable to disclose the proportion of the Fund's investments which are in environmentally sustainable activities or details on the proportion of enabling and transitional activities under the EU Taxonomy Regulation at this time. For the reasons set out above, the investments underlying the Fund do not take into account the EU criteria for environmentally sustainable economic activities. The RTS are currently scheduled to be effective from 1 January 2023 and will contain pre-contractual disclosure templates addressing all required disclosures under the SFDR and the EU Taxonomy Regulation. The Fund will comply with all relevant disclosure requirements as soon as possible after the effective date, including, if deemed applicable, the proportion of the Fund's investments which are in environmentally sustainable activities, when the underlying portfolio funds' disclosures are made available to the Investment Manager. The "do no significant harm" principle will apply only to those investments underlying the Fund that may take into account the EU criteria for environmentally sustainable economic activities. For the reasons set out above, the Fund cannot make any statement in respect of the Fund about the "do no significant harm" principle at this time.

Principle Adverse Impact

Evelyn Partners considers the principal adverse impacts of its investment decisions on sustainability factors. Sustainability factors means environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters. For further information, please visit www.evelyn.com.

Remuneration Policies

The remuneration policy of Evelyn Partners is consistent with its approach to the integration of sustainability risks. Evelyn Partners has established policies and procedures in relation to remuneration which, in Evelyn Partners opinion, are proportionate and consistent with sound and effective risk management, including the management of sustainability risk, and in accordance with applicable requirements.