

# **Statement on the transparency of sustainability risk policies (the “statement”)**

## **Nedgroup Investments (IOM) Limited (the “Company”)**

### **Introduction**

The Company is licenced by the Isle of Man Financial Services Authority and the appointed Investment Manager to UCITS licenced and regulated by the Central Bank of Ireland.

Whilst the Company does not qualify under Regulation (EU) 2019/2088 (“**SFDR**”), as a “financial market participant” it believes it is appropriate and relevant as investment Manager to UCITS to adopt this statement.

Further, per Article 3<sup>1</sup> of SFDR, a financial market participant is required to “publish on their website information about their policies on the integration of sustainability risks in their investment decision-making process.” The Company has adopted this statement to describe the approach taken to demonstrate compliance with Article 3 of SFDR.

For the purpose of this Policy:

“**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 Company is the appointed Investment Manager to two UCITS funds, Nedgroup Investments Funds PLC and Nedgroup Investments MultiFunds PLC, (“the Fund/s”) of which there are a number of Sub-Funds. In relation to Nedgroup Investments Funds PLC the Company delegates the portfolio management function to a number of suitably qualified third-party Investment Managers, “Sub-

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<sup>1</sup> Article 3 – Transparency of sustainability risk policies – asset managers are required to publish on their websites information about their policies on the integration of sustainability risks in the investment decision-making process.

Investment Managers”. Where the investment management function is delegated to Sub-Investment Managers, the Sub-Investment Managers are subject to the Company’s ongoing oversight. The Company delegates the portfolio management function in relation to Nedgroup Investments MultiFunds PLC to its sister company Nedgroup Investments (UK) Ltd.

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 Fund or Sub-Fund in accordance with Article 6<sup>2</sup> of SFDR. This shall be determined at the onboarding stage of a new Fund or Sub-Fund, in conjunction with the Investment Manager or Sub-Investment Manager.

The Company has adopted due diligence processes to ensure that disclosures made in pre-contractual documents shall be consistent with the investment objectives of the Funds or Sub-Funds, investor profiles and the infrastructure implemented at the Investment Manager or Sub-Investment Manager appointed to the Fund or Sub-Fund.

Where sustainability risks are integrated into investment decision making/research in respect of each Fund or Sub-Fund the Company shall periodically assess the adequacy of ESG/SFDR integration at that Investment Manager or Sub-Investment Manager through the issuance of due diligence questionnaires, onsite due diligence visits etc.

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

For further detail on how sustainability risks are integrated either at the Company, or at the Sub-Investment Managers, please contact:

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<sup>2</sup> Article 6 – Transparency of the integration of sustainability risks – asset managers shall include descriptions of pre-contractual disclosures in relation to integration of sustainability risks in investment decisions; and the results of the assessment of the likely impacts of the sustainability risks on the returns of the Funds.