

EU Sustainable Finance Disclosure Regulation (SFDR) – BennBridge ICAV

BennBridge ICAV - Global Emerging Markets Equity Fund (the Fund) – SFDR Website Disclosure

BennBridge ICAV (the ICAV) is authorised by the Central Bank of Ireland as an undertaking for collective investment in transferable securities pursuant to the European Communities (Undertakings for Collective Investment in Transferable Securities) Regulations 2011, as amended and as an open-ended umbrella fund with segregated liability between sub-funds.

Under Article 3 of Regulation (EU) 2019/2088 (the SFDR), the ICAV must publish information about its policies on the integration of sustainability risks in the investment decision-making process in respect of the Fund.

BennBridge Ltd is a London-based investment manager that is authorised and regulated by the Financial Conduct Authority to provide financial service activities including discretionary portfolio management to collective investment schemes (the Investment Manager).

The Fund gives consideration to sustainability risks as part of the investment decision-making process, but for the purposes of SFDR the Fund is not deemed (i) an ESG labelled fund that promotes environmental or social characteristics; (ii) a fund that has sustainable investment as its objective; or (iii) a fund with reduction in carbon emissions as its objective. As such, the Fund has been classified as an Article 6 Fund under SFDR.

The Investment Manager believes that sustainability is an important factor in determining the quality of a company for potential investment. The Investment Manager's assessment of potential sustainability risks and opportunities of the Fund's investments is guided by a review of the company reports of potential investments. This includes the consultation of various sources of publicly available information together with discussions with competitors, suppliers and peers. The Investment Manager's research process clarifies a company's community relations and approach to environmental challenges. The Investment Manager does not wish to underestimate how often these types of non-financial risks may become real financial losses, particularly within emerging market economies with immature legal and political systems.

The Investment Manager partakes in meetings with companies in which the Investment Manager is considering an investment on behalf of the Fund. Preparation for these meetings involves the posing of several key questions which focus on the company's ESG performance, and cover incidents reported through various sources. The Investment Manager seeks to engage with the leaders of a business to get a greater understanding as to how they view their specific sustainability challenges. The Investment Manager engages with companies in which the Fund invests as part of the voting process on matters for approval by a company's shareholders. Investment research conducted by the Investment Manager that results in a low sustainability assessment together with a low assessment on other quality factors may negatively impact the Investment Manager's view as to the suitability of a potential company for investment by the Fund. The Investment Manager considers a broad range of sustainability risks, including environmental, social and governance risks. Further detail is set out in the supplement to the ICAV's prospectus relating to the Fund.

Under Article 4 of the SFDR, the ICAV must publish information about its consideration of the principle adverse impacts of investment decisions on sustainability factors. Sustainability factors mean environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

KBA Consulting Management Limited as manager of the ICAV (the Manager) and the Investment Manager have elected for the time being not to consider the principal adverse impacts of investment decisions taken on behalf of the Fund on sustainability factors in the manner contemplated by Article 4(1)(a) of the SFDR as the regulatory technical standards supplementing SFDR which will set out the content, methodology and information required to be included in the principal adverse impacts statement have not yet come into effect. The Manager and the Investment Manager will review this position following the coming into effect of the regulatory technical standards supplementing SFDR.

The remuneration policy of the Investment Manager is consistent with its approach to the integration of sustainability risks. The Investment Manager has established policies and procedures in relation to remuneration which, in its opinion, are proportionate and consistent with sound and effective risk management in respect of all relevant risks, and which are compliant with applicable requirements.