

Policy on the Integration of Sustainability Risks in the Investment Decision-Making Process

Information Statement on our Policy on the Integration of Sustainability Risks in the Investment Decision-Making Process Issued by B-FLEXION Fund Management (Jersey) Limited In respect of the Funds under Management.

This Information Statement is accurate as at: 28 February 2023

Sustainable Finance Transparency

The European Union has introduced a series of legal measures (the primary one being the Sustainable Finance Disclosures Regulation (Regulation (EU) 2019/2088)) requiring firms that manage investment funds to provide transparency on how they integrate sustainability considerations into the investment process with respect to the investment funds they manage.

Our Approach to Sustainable Investment

At B-FLEXION Fund Management (Jersey) Limited (“BFMJ”) we believe that investors, and asset managers that invest on their behalf, have a responsibility to make their investments in a way that effectively supports a sustainable society. At the core of our commitment to help our clients achieve their financial objectives is a conviction that this can be achieved by investing responsibly. We value the importance of integrating Environmental, Social, and Governance (ESG) factors into the investment and risk processes and fundamentally believe that this is aligned with the aim of achieving long-term positive financial performance for investors. We also recognise and value the fact that this will also support the better functioning of companies that investment managers invest in, enhancing behaviour in a wide range of markets and industries and having a positive societal impact beyond the financial markets.

What is a Sustainability Risk?

In this context a sustainability risk is considered to be an environmental, social or governance event or condition that, if it occurs, could cause an actual or potential material negative impact on the value of an investment. Information on How we Integrate Sustainability into the Investment Decision-Making Process has been delegated to the appointed affiliated investment managers to manage the investments of the Funds.

The SFDR identifies two categories of ESG products:

1. Article 8: Where a financial product promotes, among other characteristics, environmental or social characteristics, or a combination of those characteristics; and
2. Article 9: Where a financial product has sustainable investment as its objective and an index has been designated as a reference benchmark.

On consultation with each Investment Manager, the Company has determined that all Funds and Sub-Funds fall outside the scope of Article 8 and Article 9 of the SFDR.

For more information on how each investment manager integrates sustainability risks into their investment research and risk management process, please refer to the BFMJ Responsible Investment Policy.

Note – when updates are made to this information statement, updated text will be clearly identifiable.

Further Information

This Information Statement is issued for information purposes only. This Information Statement is not intended as investment advice and is not an offer or a recommendation about managing or investing assets and should not be used as the basis for any investment decision. The information contained herein is current as of the date of issuance and is subject to change without notice. We do not make any express or implied warranties or representations as to the completeness or accuracy or accept responsibility for errors. No risk management technique can guarantee the mitigation or elimination of risk in any market environment. Past performance is not a guarantee, or a reliable indicator of future results and an investment could lose value. All investments involve risk, including the possible loss of capital.