

Link Fund Solutions (Luxembourg) S.A.

Environmental, Social and Governance Policy – Executive Summary

Link Fund Solutions (Luxembourg) S.A. (“LFSL”) has established and applies an Environmental, Social and Governance (“ESG”) Policy.

The ESG Policy integrates the provisions of the EU Regulation 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (the “SFDR”).

This policy aims at promoting an environmentally responsible behaviour and to ensure the integration of sustainability risks into the different phases of its activity. This Policy shall:

- Provide harmonized rules on the transparency of the company’s actions;
- Explain the integration of sustainability factors in decision making or advisory process;
- Justify the robustness of its approach to climate-related issues;
- Enable end-investors to take better informed decisions on their investments;
- Establish the knowledge requirement within the Company’s different functions and at Board level.

This Policy also sets out how the Company is committed to ensuring that the Funds and the Investment Managers that integrate ESG considerations into their investment management processes are regularly managed and assessed with compliance with those factors.

The Company delegates the portfolio management function of the funds under management and as such does not currently have access to sufficient ESG information for determining and weighting with adequate accuracy the negative sustainability effects across all its delegated portfolio managers. Furthermore, the size and scale of the Company’s activities is currently limited. Therefore, the Company has decided not to consider directly and at its level the adverse impacts of investment decisions on sustainability factors according to Art. 4 SFDR, for the moment.

The Company has established disclosures procedures at the pre-contractual phase, which are being subject to ongoing update through the website. The disclosures shall:

- Ensure the identification of sustainability risks
- Define materiality assessments
- Provide key performance indicators and measure
- Ensure the integration in investment decision

The Company’s remuneration policy is aligned with the long-term nature of the business and fiduciary focus. The remuneration policy promotes, sound and effective risk management and does not encourage excessive risk-taking which is inconsistent with our risk profile as well as the risk profiles of the funds the Company manages including sustainability risks stemming in particular from climate-related events or from the society’s response to climate change.

Investors may request free of charge from the Management Company additional information by writing to:

Link Fund Solutions (Luxembourg) S.A.
ESG Officer
19-21 route d’Arlon
L-8009 Strassen

PROPRIETARY INFORMATION

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