

ESG DISCLAIMER

Policy on Integration of Sustainability Risk

Atlantis has determined that sustainability risk (which is defined as an ESG event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of the relevant investment (an “ESG Event”) is not relevant for the Sub-Funds.

In pursuing their investment objectives, the Sub-Funds take into account broad market factors and do not seek to incorporate sustainability risks or factors of the underlying securities into allocation decisions. Given the diversified nature of the Sub-Funds and the focus on broad market factors, sustainability risk is deemed not relevant for the Sub-Fund.

Taxonomy Regulations

The Sub-Funds do not have as their objective sustainable investment, nor do they promote environmental or social characteristics. As a result, the Sub-Funds do not fall within the scope of Regulation (EU) 2020/852 of the European Parliament and of the Council on the establishment of a framework to facilitate sustainable investment. In addition, the investments underlying the Sub-Funds do not take into account the EU criteria for environmentally sustainable economic activities.

Principal Adverse Impacts

EU-based financial market participants are required to confirm if they consider principal adverse impacts of investment decisions on sustainability factors for the financial products they manage. The Manager does not consider such impacts at this time. This is on the basis that the Sub-Funds were not designed to specifically avoid investments that include one or more sustainability factors, such as avoiding a particular industry/sector in its entirety, the Investment Manager does not currently consider an assessment of the principal adverse impacts of its investment decisions on sustainability factors (within the meaning of Article 4(1)(a) of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector) to be relevant to the investment strategies of the Sub-Funds described in the Supplements.

Remuneration Policy

The directors and designated persons of Atlantis Investment Management (Ireland) Limited receive fixed fee only remuneration which does not serve to encourage excessive risk taking and is not influenced by the performance of the Fund or the level of risk (to include sustainability risks) to which the Fund may be exposed.