

# ALVARIUM

## Sustainable Finance Disclosure Regulation

### Alvarium Fund Managers (UK) Limited (“Alvarium”)

#### **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 (“SFDR”)**

##### ***Sustainability Risk Policies***

Alvarium has integrated sustainability risk into its investment decision-making process. To guide the incorporation of sustainability risk in the investment decision making process, Alvarium has implemented a policy regarding sustainability risk.

The policy provides an overview of the approach which Alvarium will take to assess sustainability risk in relation to the different types of investment services it offers. Further details of Alvarium’s Sustainability Risk Policy are available on request.

##### ***Principal Adverse Impacts***

Alvarium, in accordance with Article 4(1)(b) of the SFDR, has elected for the time being not to consider (in the manner specifically contemplated by Article 4(1)(a) of the SFDR) the principal adverse impacts of investment decisions on sustainability factors. This is as a result of various factors, including a lack of data available in the market which would be required in order to conduct the assessments required by SFDR and a lack of clarity regarding the SFDR Regulatory Technical Standards which will apply to firms conducting these assessments.

Alvarium will continue to review its approach in relation to assessing principal adverse impacts of investment decisions on sustainability factors, within the meaning of SFDR.

##### ***Remuneration Policies***

Alvarium does not incentivise behaviour or performance which results in unacceptable risk, whether that risk applies to Alvarium, to Alvarium clients or to the wider market. Alvarium is subject to a remuneration policy which establishes steps taken to ensure that decisions relating to remuneration do not increase undue risk of any type, including sustainability risk.