

## STENHAM INVESTMENT FUNDS PLC

This document describes the policies of Stenham Asset Management (UK) plc (**Stenham**) and Stenham Investment Funds plc (the **Company**) on the integration of sustainability risks in their investment decision-making process for the Stenham Equity Fund (the **Fund**), pursuant to Article 3 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 (**SFDR**).

This document also includes a statement in respect of principal adverse impacts of investment decisions on sustainability factors pursuant to Article 4 SFDR and the Company's Remuneration Policy pursuant to Article 4 SFDR.

### 1 INTEGRATION OF SUSTAINABILITY RISKS POLICY

A sustainability risk is an environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of the investment.

The Fund's portfolio is comprised of large cap global listed companies. As such, Stenham believes that sustainability risks are already priced into the value of such securities and therefore deems an additional separate consideration of such risks not to be relevant. For those reasons, sustainability risks are not separately integrated into investment decisions for the Fund.

### 2 PRINCIPAL ADVERSE IMPACTS STATEMENT

Principal adverse impacts are those impacts of investment decisions and advice that result in negative effects on sustainability factors. Sustainability factors mean environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

Taking due account of the nature and scale of the Fund's portfolio, Stenham and the Company, in accordance with Article 4.1(b) SFDR, have elected for the time being not to consider (in the manner specifically contemplated by Article 4.1(a) SFDR) the principal adverse impacts of investment decisions of the Fund on sustainability factors. Stenham and the Company both consider this a pragmatic and economical approach to compliance with the Company's obligations under the SFDR.

The Company, together with Stenham, will keep this under review, particularly if the nature and scale of the Company or the Fund significantly change.

### 3 REMUNERATION POLICY

As the directors of the Company are paid fixed amounts, the Remuneration Policy of the Company does not promote the taking of sustainability risks.

Waystone Management Company (IE) Limited, in its capacity as the Management Company, maintains a Remuneration Policy which can be accessed on their website [here](#).