Stoneware Capital LLP

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Public Statement on the Sustainable Finance Disclosure Regulation ("SFDR")

Stoneware Capital LLP ("Stoneware" or the "Firm") is authorised and regulated by the Financial Conduct Authority in the United Kingdom (the "FCA").

Regulation (EU) 2019/2088 (the Sustainable Finance Disclosure Regulation ("SFDR") applies to financial market participants in the EU. SFDR is an EU regulation that came into effect on 10th March 2021 and introduced requirements to address environmental, social and governance ("ESG") concerns. The full text of the EU Regulation can be found here: https://eur-lex.europa.eu/eli/reg/2019/2088/oj.

SFDR (transparency of sustainability risk policies) requires financial market participants (in the EU) to publish on their websites information about their policies on the integration of sustainability risks in their investment decision-making process. It also requires financial advisers (in the EU) to publish on their websites information about their policies on the integration of sustainability risks in their investment advice or insurance advice.

SFDR only applies to relevant firms in the EU, but the assumption in the market was that it would also be adopted into UK law after the UK left the EU on 31st January 2020. As at the date of this disclosure document, the FCA has a wide range of ongoing consultations about the implementation of climate change and other environmental, social and governance ("ESG") matters. The latest news and references are available via a dedicated FCA site: https://www.fca.org.uk/firms/climate-change-sustainable-finance.

Stoneware does not have a single firm-wide policy for consideration of sustainability risk in investment decision-making, so investment management teams may not consider sustainability risk in investment decisions. Policies are (or will be) applied at an individual investment team level. Details of how each investment team considers sustainability risk in their investment decision-making processes is or will be disclosed in relevant fund documentation, if applicable.

SFDR requires disclosure of the reasons why the Firm does not consider sustainability risks, as well as whether and when the fund manager intends to consider such information in investment decisions in the future.

No consideration of sustainability adverse impacts

The reason why we state that sustainability risk is not considered part of the investment decision-making process is that the investment strategies of the Firm's funds under management are bespoke and have been designed to accommodate investor requirements which are not specifically linked to sustainability or ESG factors. The same reason is also the case when the Firm or our Appointed Representatives are offering advice because such advice is invariably bespoke and may not refer to sustainability or ESG factors.

The Firm does not ignore sustainability issues or ESG factors and does not intend to understate their importance. Our investment managers and advisers expect to take such factors into account more generally as part of wider investment considerations.

Further details are available on request.

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