STATEMENT REGARDING THE ADVERSE IMPACTS OF INVESTMENT DECISIONS ON SUSTAINABILITY FACTORS

Insight Investment Management (Europe) Limited (the “Firm”) has evaluated the requirements of the principal adverse impacts regime as set out in Article 4 of the Sustainable Finance Disclosure Regulation (“SFDR”), and in the Regulatory Technical Standards published in April 2022 by the European Supervisory Authorities (the “PAI regime”).

The Firm is supportive of the aims of the PAI regime and previously intended to consider PAI at Firm level. However, as the requirement is to consider all AUM at a Firm level and the majority of the Firm’s AUM is in strategies where PAI consideration is less relevant (LDI and Money Markets), it is unclear how compliance can be achieved at the Firm level at this stage. Therefore we will not be considering adverse impacts of investment decisions on sustainability factors at a Firm level.

The Firm will keep this decision under review.