



Colchester®
GLOBAL INVESTORS

Sustainable Finance Disclosure Regulation

July 2023



No Consideration of Sustainability Adverse Impacts

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") requires financial market participants to determine whether they consider the principal adverse impacts of their investment decisions on sustainability factors. Colchester Global Investors ("Colchester") is supportive of the aim of this requirement which is to improve transparency to investors and the market generally as to how to integrate the consideration of the adverse impacts of investment decisions on sustainability factors. However, Colchester does not consider the adverse impacts of its investment decisions on sustainability factors at entity level for the time being. Colchester does not currently do so because it would not be able to gather and/or measure all of the data on which it would be obliged by SFDR to report in a systematic, consistent manner, or at a reasonable cost to investors. Due to the nature and scale of Colchester, which provides fund management and discretionary investment mandate services relating to sovereign debt, it is noted that the majority of adverse sustainable impacts are not applicable, and it is therefore more effective from a cost and outcome perspective to address principle adverse impacts at a financial product level, in accordance with Article 7 of SFDR, on a tailored and discretionary basis. Colchester considers principal adverse impacts at product level for certain funds. Colchester's position on this matter will be reviewed at least annually by reference to market developments.

Integration of Sustainability Risks in the Remuneration Policy

SFDR requires Colchester to include in its remuneration policy information on how its remuneration policy is consistent with the integration of sustainability risks. Sustainability risk is defined in SFDR as "an environmental, social or governance event or condition that, if it occurs, could cause an actual or potential material negative impact on the value of the investment". The same information (or a summary of it) must be published on the Colchester's website.

A sustainability risk is an environmental, social or governance event or condition which, if it occurs, could cause an actual or potential material negative impact on the value of the investments made by Colchester.

Colchester's remuneration policy promotes sound and effective risk management and to avoid excessive risk taking and has been amended to be consistent with the integration of sustainability risks.

The revised remuneration policy is available at <https://colchesterglobal.com/wp-content/uploads/remuneration-policy.pdf>