

# Sustainable Finance Disclosure Regulation

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## 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 The Colchester Multi-Strategy Global Bond Fund plc (the "Company") to determine whether it considers the principal adverse impacts of its investment decisions on sustainability factors. The Company 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, the Company could not gather and/or measure all of the data on which it would be obliged by SFDR to report, or it could not do so systematically, consistently and at a reasonable cost to investors. This is in part because the information required to assess the adverse impacts of its investment decisions on sustainability factors may not yet be fully available and/or not up to date. On this basis, and due to the size, nature and scale of the sub-funds of the Company, and in the absence of the finalised regulatory technical standards relating to this disclosure, the Company does not consider the principal adverse impacts of investment decisions on sustainability factors at this time. The Company's position on this matter will be reviewed annually by reference to market developments.

SFDR also requires the Company to determine and disclose whether it considers the principal adverse impacts of its investment decisions on sustainability factors at the level of each Fund. For the reasons set out above, the Company does not consider adverse impacts of investment decisions on sustainability factors at the level of each Fund at this time. This position will be kept under review by the Company.

## Integration of Sustainability Risks in the Remuneration Policy

SFDR requires the Company 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 Company's website.

The Company is for the purposes of SFDR a "financial market participant". Accordingly, 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 the sub-funds of the Company.

The Company'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/Colchester-UCITS-Remuneration-Policy-21.pdf>