

Sustainability Risk Policy

Goodbody Asset Management is a boutique asset manager specialising in active global investment funds. We believe outperformance comes from adhering to a structured and transparent investment process. We undertake deep and detailed fundamental research to identify attractive investments that we believe can deliver superior risk-adjusted returns over the long term.

Classification pursuant to the Sustainable Finance Disclosure Regulation

The following funds:

- Goodbody Dividend Income Cautious Fund
- Goodbody Dividend Income Balanced Fund
- Goodbody Global Smaller Companies Fund
- Goodbody Global Leaders Fund , and
- Goodbody Global Equity Fund

are classified as Article 8 Funds pursuant to the Sustainable Finance Disclosure Regulation (EU) 2019/2088 (the SFDR). While the Funds promotes environmental and social characteristics, they do not currently commit to investing in any “sustainable investments” with an environmental objective within the meaning of SFDR, nor do the Funds commit to invest in taxonomy aligned investments, which are a sub-set of “sustainable investments”. Accordingly, the investments underlying the Funds do not take into account the EU criteria for environmentally sustainable economic activities.

Sustainability Risks, as defined by the Sustainable Finance Disclosure Regulation (SFDR) refer to ‘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 investments’.

Sustainability Risks are integrated into the Goodbody Asset Management investment decision making process which in our assessment is likely to be beneficial to the risk adjusted returns profile of the Funds we manage.

We view a company’s ability to manage environmental, social and governance (ESG) factors as a proxy for prudent risk management. It is our view that failure to address ESG issues properly could expose a company to potentially significant legal, regulatory, product, and reputational risks which could have a material impact on our investment in that company.

By evaluating and understanding the ESG characteristics of underlying Fund holdings both in absolute terms and relative to appropriate sector peers, and monitoring trends in these characteristics over time, the Team integrates sustainability risks into the investment decision making process.

Our broader approach to ESG integration is disclosed separately in our ‘Environmental, Social, and Governance (ESG) Policy Statement’.