

Information Statement on our Policy on the Consideration of Principal Adverse Impacts of Investment Decisions on Sustainability Factors

Systematica does not currently consider all the principal adverse impacts of its investment decisions on sustainability factors in accordance with Article 4 of the SFDR, as the detailed rules and guidance regarding such disclosure have not been finalised. We are committed to further developing our approach to sustainable investing, including to measuring the principal adverse impacts of our investment decisions on new sustainability factors, in addition to those we already consider in our ESG integration process such as the carbon intensity of our investment portfolios.

A further statement issued by **Systematica UCITS Fund ICAV (the "ICAV")**

This Information Statement is accurate as at: 10 March 2021

Sustainable Finance Transparency

The European Union has introduced a series of legal measures (the primary one being the Sustainable Finance Disclosures Regulation (Regulation (EU) 2019/2088), "**SFDR**") requiring financial market participants to provide transparency on how they integrate sustainability considerations into the investment process with respect to the investment funds they manage.

This Information Statement has been prepared for the purpose of meeting the disclosure requirements in Article 4 of SFDR, that is, specifically, the disclosure requirements applicable to us with regard to whether and how we consider principal adverse impacts of investment decisions on sustainability factors. This Information Statement has been prepared in conjunction with Systematica Investments Limited as general partner of Systematica Investments LP, the ICAV's appointed investment manager ("**Systematica**").

It is noted that the regulatory technical standards ("**RTS**") to specify the details of the content, methodologies and presentation of the information to be disclosed under Article 4 of SFDR have been delayed and will not be issued when the relevant disclosure obligations in SFDR become effective.

It is noted that the European Commission has recommended that from the effective date of SFDR, financial market participants are recommended to comply with the specific disclosure obligations in SFDR that are reliant on RTS on the basis of a high-level, principles-based approach.

We therefore seek to comply on a best efforts basis with the relevant disclosure obligations and issue this Information Statement as a means of achieving this objective.

It is expected that this Information Statement will be reviewed and updated once the relevant RTS come into effect, noting in particular, that the RTS are expected to contain details on the content, methodologies and presentation of the information to be disclosed and this could therefore require a revised approach to how we seek to meet the SFDR disclosure obligations.

The Information Statement may also be updated to take account of the Regulation on the Establishment of a Framework to Facilitate Sustainable Investment (Regulation EU/2020/852, the "**Taxonomy Regulation**") once it comes into effect (1 January 2022).

Our Approach to Sustainable Investment

We believe that investors, and asset managers that invest on their behalf, have a responsibility to make their investments in a way that effectively supports a sustainable society. Systematica recognises that a sustainable and responsible investment strategy is key for long-term value creation for all stakeholders.

We value the importance of integrating Environmental, Social, and Governance ("ESG") factors into our investment and risk processes and fundamentally believe that this is aligned with the aim of achieving long-term positive financial performance for our investors. We also recognise and value the fact that this will also support the better functioning of companies we invest in, enhancing behaviour in a wide range of markets and industries and having a positive societal impact beyond the financial markets. Systematica is committed to incorporating ESG considerations into its investment decision-making processes. As a scientific and data-driven group, Systematica is committed to exploring the best methodologies and practices for doing so with respect to its various strategies. Systematica is also a signatory to the United Nation's Principles for Responsible Investment ("UN PRI") and the Standards Board for Alternative Investments ("SBAI").

What is a Sustainability Risk?

In this context, a sustainability risk is considered to be 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 an investment.

Information Regarding the Consideration of Principal Adverse Impacts of Investment Decisions on Sustainability Factors

As per Article 4(1)(b) of SFDR (Explain Option)

We currently do not consider all the adverse impacts of investment decisions on sustainability factors in accordance with the specific requirements of Article 4 of SFDR.

The rationale for not considering all such adverse impacts is based primarily on the fact that, as outlined above, the RTS which will set out the content, methodology and information required in the PAI statement remain in draft form and have been delayed. We intend to consider all the principal adverse impacts of investment decisions on sustainability factors once the RTS come into effect which is expected to occur on 1 January 2022. We are committed to further developing our approach to sustainable investing, including to measuring the principal adverse impacts of our investment decisions on new sustainability factors in addition to those we already consider in our ESG integration process such as the carbon intensity of our investment portfolios.

Further Information

This Information Statement is issued for information purposes only.

This Information Statement is not intended as investment advice and is not an offer or a recommendation about managing or investing assets and should not be used as the basis for any investment decision.

The information contained herein is current as of the date of issuance and is subject to change without notice.

We do not make any express or implied warranties or representations as to the completeness or accuracy or accept responsibility for errors.

No risk management technique can guarantee the mitigation or elimination of risk in any market environment.

Past performance is not a guarantee or a reliable indicator of future results and an investment could lose value. All investments involve risk, including the possible loss of capital.

Systematica UCITS Fund ICAV is authorised in Ireland and regulated by the Central Bank of Ireland.