

Pinnacle ICAV (the ICAV)

Compliance with Article 3 and Article 4 of 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 (as amended) (SFDR)

The ICAV is a financial market participant under the definition in Article 2 of SFDR.

Article 3 and Article 4 of SFDR require financial market participants to publish certain information on their websites. Article 3 of SFDR requires the publication of information about policies on the integration of sustainability risks in the investment decision-making process. Article 4 of SFDR requires the publication of whether or not principal adverse impacts of investment decisions on sustainability factors are taken into account.

Article 3 - Transparency of sustainability risk policies

The ICAV is a self-managed umbrella ICAV with segregated liability between sub-funds. The ICAV has appointed different investment managers to act as investment manager to its sub-funds, as disclosed in the relevant supplement.

A sustainability risk in the context of the ICAV is an environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of an investment. Information on whether and/or how sustainability risks are considered and integrated into the investment decision-making is set out in the supplement for each sub-fund. The assessment of the likely impacts of sustainability risks on the returns of an individual sub-fund is conducted at the portfolio level and can also be found in the supplement for each sub-fund.

Article 4 - Transparency of adverse sustainability impacts at entity level

Under SFDR, principal adverse impacts are those impacts of investment decisions and advice that result in negative effects on sustainability factors. Sustainability factors are environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters. The ICAV does not currently consider the principal adverse impacts of investment decisions on sustainability factors. The ICAV has opted out of doing so, primarily as the regulatory technical standards supplementing SFDR which will set out the content, methodology and information required in the principal adverse sustainability impact statement remain in draft form. The ICAV intends to consider the principal adverse impacts of investment decisions on sustainability factors once the regulatory technical standards come into effect, which is expected to occur on 1 January 2022.