

## **Maples Fund Management Ireland Limited – Sustainability Disclosures**

### Statement on the transparency of Sustainability Risk

Maples Fund Management Ireland Limited ("**MFM**") (previously MPMF Fund Management (Ireland) Limited) was authorised by the Central Bank of Ireland on 30 October 2015 as a management company for collective investment schemes pursuant to the European Communities (Undertakings for Collective Investment in Transferable Securities) (Amendment) Regulations, 2011 (the "**UCITS Regulations**") and on 24 April 2014 as an Alternative Investment Fund Manager ("**AIFM**") pursuant to the European Union (Alternative Investment Fund Managers) Regulations, 2013 (the "**AIFM Regulations**").

In accordance with Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 and subsequent amendments including Commission Delegated Regulation 2022/1288 and Commission Delegated Regulation 2023/363 ("**SFDR**"), MFM meets the criteria of a financial market participant and this document fulfils the disclosures requirements under Articles 3, 4 and 5 of SFDR.

MFM acts as an external UCITS management company and AIFM to collective investment schemes structured as AIFs and UCITS (together, the "**Funds**") which qualify as financial products under SFDR.

MFM delegates the portfolio management function to regulated third party investment managers (together the "**Investment Managers**"). In certain circumstances, MFM may retain the portfolio management function. In both instances the degree to which sustainability risks are or not integrated into the investment-decision making is detailed within the pre-contractual documents of each Fund in accordance with SFDR. This is determined in conjunction with each Investment Manager.

MFM, as part of its own policy on sustainability risks, ensures that each Investment Manager has a policy in place on whether they consider the integration of sustainability risks in their investment decision-making processes with respect to the Funds managed on behalf of MFM.

### Principal Adverse Impacts of Investment Decisions on Sustainability Factors ("PAIs")

For the purposes of SFDR sustainability factors mean environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters. MFM does not currently consider the adverse impacts of its investment decisions on sustainability factors. MFM delegates the portfolio management function to the Investment Managers, therefore in the majority of the cases the investment decisions, as defined under SFDR, are delegated to the Investment Manager which has a discretionary mandate, subject to MFM's ongoing oversight.

The Funds have different investment objectives and strategies with different consideration of environmental, social and governance and sustainability factors and, as such, some Investment Managers may consider PAIs while other Investment Managers may not. Should an Investment Manager wish to consider PAIs in line with Article 7 of SFDR the details will be included in the pre-contractual document of the relevant Fund and appropriate disclosures will also be published and made available on the Investment Manager's own website (details of which can be found in the pre-contractual document).

MFM will continue to adapt its policies and update the related disclosures in accordance with regulatory developments and as industry practice evolves.