

Policy on the Integration of Sustainability Risks



Version 2.0 as of June 2021

Policy on the Integration of Sustainability Risks in the Investment Decision-Making Process

Universal-Investment Ireland (UII) manages a range of Funds which promote Environmental, Social and Governance (ESG) characteristics. UII also manages Funds which may integrate sustainability risks into the investment decision-making process (although these Funds might not actively promote ESG characteristics).

Where sustainability risk forms part of the investment decision-making process, the aim of ESG integration in the investment decision-making process is to improve the risk/return profile of the Funds by integrating sustainability aspects into the traditional investment analysis process.

UII has delegated the investment management function to a range of Investment Managers who undertake the investment decisions on behalf of the Funds. Therefore, UII itself does not integrate sustainability risks into the investment decision-making process and instead relies on the ESG policies and processes of the delegate Investment Managers.

The assessment of an issuer's sustainability may be carried out by UII's appointed Investment Managers using published information from the issuers and/or from external data providers.

Certain Investment Managers may conduct ESG evaluation via their proprietary systems and/or frameworks.

In respect of the Funds which promote ESG characteristics, as part of the relevant Investment Manager's investment decision-making processes, all relevant financial risks are included in their investment decisions and are evaluated on an ongoing basis. In doing so, all relevant sustainability risks, including environmental, social or governance events or conditions that could have a principal adverse impact on the investment, including those that could have a significant negative impact on the return of an investment, are also taken into account, as well as the most important negative effects of an investment decision on sustainability factors.

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