



Link Fund Manager Solutions (Ireland) Limited

SFDR Article 10 Website Disclosures - (As supplemented by SFDR Level 2 Requirements)

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PROPRIETARY INFORMATION

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Commission Delegated Regulation (EU) 2022/1288 of 6 April 2022 (the "Regulations") supplementing Regulations (EU) 2019/2088 with regard to regulatory technical standards (SFDR Level 2 TRS) specifying the details of the content and presentation of information on websites

Sustainable Finance Disclosures Regulation ("SFDR") Article 10 - Transparency of the promotion of environmental or social characteristics and of sustainable investments on websites (Regulation (EU) 2019/2088)

Link Fund Manager Solutions (Ireland) Limited ("LFMSI") is authorised and regulated by the Central Bank to act as a UCITS and as an Alternative Investment Fund Management Company to a range of Collective Investment Schemes ("CIS") all as at the date of this document currently domiciled in Ireland.

LFMSI has put in place its own Environmental, Social and Corporate Governance Oversight [policy](#). The policy sets out how LFMSI is committed to ensuring that managers and CIS under management that take into account Environmental, Social and Corporate Governance ("ESG") considerations into its investment management processes are regularly managed and assessed with compliance with those factors. The policy also takes account of the 6 UN Principles for Responsible Investment, which applies to all CIS managed by each delegate Investment Manager who have stated that they will have an ESG or Sustainability Objective, as expressed on the UN PRI (Principles for Responsible Investment, an organisation supported by the UN) [website](#).

Under the "SFDR" regulation, LFMSI is defined as a "financial market participant" ("FMP's").

Purpose

The purpose of this document is to disclose the location of the information as set out above in respect to the CIS to which LFMSI acts as UCITS / Alternative Investment Fund Management Company which have been designated as an Article 8 or an Article 9 product for the purposes of SFDR.

Disclosure

In line with Article 24-36 of the Regulations, for financial products that promote environmental or social characteristics, FMP's should publish along with the information referred to in Article 10(1) of Regulation (EU) 2019/2088, in the following order and made up of all of the following sections titled:

- a) Summary;
- b) No sustainable investment objective;
- c) Environmental or social characteristics of the financial product;
- d) Investment strategy;
- e) Proportion of investments;
- f) Monitoring of environmental or social characteristics;
- g) Methodologies;
- h) Data sources and processing;
- i) Limitations to methodologies and data;
- j) Due diligence;
- k) Engagement policies;
- l) Where an index is designation as a reference benchmark to attain the environmental or social characteristics promoted by the financial product, “Designated reference benchmark”.

In line with Article 38-49 of the Regulations, for financial products that have sustainable investments as their objective, FMP’s should publish along with the information referred to in Article 10(1) of Regulation (EU) 2019/2088, in the following order and made up of all of the following sections titled:

- a) Summary;
- b) No significant harm to the sustainable investment objective;
- c) Sustainable investor objective of the financial product;
- d) Investment strategy;
- e) Proportion of investments
- f) Monitoring of sustainable investment objective;
- g) Methodologies;
- h) Data sources and processing;
- i) Limitations to methodologies and data;
- j) Due diligence;
- k) Engagement policies;
- l) Attainment of the sustainable investment objective.

In line with Article 10 of SFDR, FMP’s are required to “publish and maintain on their websites the following information for each financial product referred to in Article 8(1) and Article 9(1), (2) and (3):

(a) a description of the environmental or social characteristics or the sustainable investment objective;

(b) information on the methodologies used to assess, measure and monitor the environmental or social characteristics or the impact of the sustainable investments selected for the financial product, including its data sources, screening criteria for the underlying assets and the relevant sustainability indicators used to measure the environmental or social characteristics or the overall sustainable impact of the financial product;

(c) the information referred to in Articles 8 and 9; **(d)** the information referred to in Article 11.”

Article 8 Funds

The following CIS have been designated as Article 8 under the SFDR regulations, for further information, please see below.

Fund Name	Website
Treligga plc	
Ardevora Global Equity Fund	https://www.ardevora.com/our-funds/
Ardevora Global Growth Fund	
Ardevora Global Long-only Equity Fund	
Ardevora Global Long-only Equity SRI Fund	
Guinness Asset Management Funds plc	
Guinness Global Equity Income Fund	https://www.guinnessgi.com/funds
Guinness Global Innovators Fund	
Guinness Sustainable Global Equity Fund	
Guinness Best of China Fund	
Guinness Best of Asia Fund	
Guinness Emerging Markets Equity Income Fund	
Guinness Asian Equity Income Fund	
Stonehage Fleming Pooled Investments (Ireland) plc	
Stonehage Fleming Global Responsible Investment Fund	https://www.stonehagefleming.com/investments/funds
Trojan Funds (Ireland) plc	
Trojan Fund (Ireland)	https://www.taml.co.uk/funds/trojan-fund-ireland/
Trojan Income Fund (Ireland)	
Trojan Ethical Fund (Ireland)	
Trojan Ethical Income Fund (Ireland)	

Article 9 Fund

The following CIS have been designated as Article 9 under the SFDR regulations, for further information, please see below.

Fund Name	Website
Guinness Asset Management Funds plc	
Guinness Sustainable Energy Fund	https://www.guinnessgi.com/funds

Document Review

The information as contained in this document will be reviewed and updated at least annually.

Version Control

Version Number	Date	Reason(s) for Change	Authors / Approver
1.0	December 2022	New Document – Website Disclosures (Commission Delegated Regulation (EU) 2022/1288 of 6 April 2022 supplementing Regulations (EU) 2019/2088)	Link Fund Manager Solutions (Ireland) Limited