

# No consideration of adverse impacts of investments decisions on Sustainability Factors

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## 1. Introduction

This disclosure is issued pursuant to article Regulation 4(1)(a) and 4(5)(a) of the European Regulation on sustainability-related disclosures in the financial services sector, as amended [(EU) 2019/2088, hereinafter the "SFDR"]) and articles 12 and 13 of the Commission Delegated Regulation regarding the regulatory technical standards specifying the details of the content and presentation of the information in relation to the principle of 'do no significant harm', specifying the content, methodologies and presentation of information in relation to sustainability indicators and adverse sustainability impacts, and the content and presentation of the information in relation to the promotion of environmental or social characteristics and sustainable investment objectives in pre-contractual documents, on websites and in periodic reports [(EU) 2022/1288, hereinafter "SFDR RTS"], under the dual capacity of Wealth Fund Services Ltd as a financial market participant with regard to the collective and individual portfolios it manages and as a financial adviser with regard to the investment advice it provides to its clients.

The SFDR and the SFDR RTS require the Company to disclose whether it consider or not any principal adverse impacts of its investment decisions on Sustainability Factors on a "comply or explain" basis.

This disclosure applies uniformly to the activities of the Company as a financial market participant as well as financial adviser.



**2. Non-Compliance with the Principal Adverse Impacts regime of the SFDR and explanation.**

Wealth Fund Services is supportive of the policy aims of the Principal Adverse Impact regime, to improve transparency to clients, investors, and the market, as to how financial market participants and advisers integrate consideration of the adverse impacts of their investment decisions on Sustainability Factors. However, taking account of the Firm's size, we currently consider that it would be disproportionate to comply with the specific regime.

In addition, the Wealth Fund Services is also concerned about the lack of reasonably priced / readily available data to comply with many of the technical reporting requirements of the Principal Adverse Impact regime, as we believe that issuers and market data providers are not yet ready to make available all necessary data for the Principal Adverse Impact regime.

Wealth Fund Services will keep its decision not to comply with the Principal Adverse Impact regime under regular review and intends to comply with it when all necessary data becomes readily available in the market.