

EU Sustainable Finance Disclosure Regulation (SFDR)

Introduction

The EU Sustainable Finance Disclosure Regulation (SFDR) is a set of EU rules which aim to make the sustainability profile of funds more comparable and better understood by end-investors. Bridgepoint's investment managers in Europe (or "the Firms") are approaching SFDR as follows:

Principal adverse impacts (PAI) of investment decisions on sustainability factors

We are continuing to assess the mandatory data collection and disclosure requirements which are applicable to firms which opt in to consider the principal adverse impacts of our investment decisions. Accordingly, we do not currently intend to consider the prescribed adverse impacts of our investment decisions on sustainability factors within the meaning of Article 4 of the Disclosure Regulation; however, Bridgepoint keeps this situation under ongoing review.

Sustainability risk is integrated in our remuneration policies

Bridgepoint pays staff a combination of fixed remuneration (salary and benefits) and variable remuneration (including bonus). Variable remuneration for relevant staff takes into account compliance with all the Firm's policies and procedures, including our group Responsible Investment policy, which addresses the impact of sustainability risks on the investment decision making process.

Our Integration of sustainability risks into investment decisions and investment advice

Before any investment decisions are made on behalf of any funds that are managed by the Firms, they will have completed a process that identifies the material risks associated with each such proposed investment, including relevant and material sustainability risks. Consideration of all these risks is part of the risk management processes of the Firms relating to the relevant fund, starting with an overall assessment of the likely risks associated with investments pursuant to the relevant fund's investment policy and objectives and leading to specific investment proposals submitted to the Firms' investment advisory committees. Throughout the entire investment process, relevant sustainability risks are identified and assessed using the same process as is applied to other relevant risks affecting the funds and investments made on their behalf.