

Harrington Cooper Asset Management Limited

Integration of Sustainability Risks on Investment decision making process

Introduction

Harrington Cooper Asset Management Limited (the "Company") is authorised as a UCITS Fund Manager under the EU Commission Delegated Regulation (EU) No. 231/2013 (the "Commission Regulation") (collectively, the "AIFM Regulations") and the European Communities (Undertakings for Collective Investment in Transferable Securities) Regulations, 2011 (S.I. No. 352 of 2011) as amended (the "UCITS Regulations").

The Company's fundamental objective is at all times to conduct its business by acting honestly, fairly and professionally in the best interests of our Clients. In this context, the term Clients refers to the Funds managed by the Company. In practice, the definition extends to the Fund's underlying investors.

The Company is committed to acting ethically in conducting its business. This high level and over-arching concept is achieved through every employee (including the Company's management and Officers) of the Company acting in an ethical way and accepting personal responsibility for their actions in all of their dealings.

EU Sustainable Finance Disclosure Regulation

The Sustainable Finance Disclosure Regulation ('SFDR') entered into force on 10 March 2021. The Regulation requires managers to better inform end-investors with regard to the integration of sustainability risks, the consideration of adverse sustainability impacts, the promotion of environmental or social characteristics, and sustainable investment, as applicable.

This document specifically addresses Article 3 of SFDR: "Financial market participants shall publish on their websites information about their policies on the integration of sustainability risks in their investment decision-making process."

The Company does not carry out any discretionary investment management in respect of any of the funds under the Company's management but rather delegates the investment management function of funds under the Company's management to an investment manager (the "Investment Manager") contractually charged with collective portfolio management.

The integration of sustainability risk into the delegate Investment Manager's investment decision-making process will vary depending on the investment objective and policies of the fund in question, and the internal approach taken by each relevant Investment Manager. More information related to SFDR and the delegate Investment Managers approach to ESG, can be found on the following websites:

Harrington Cooper UCITS ICAV

- [Boston Common](#)