



HC Snyder US All Cap Equity Fund

Summary

This disclosure is made by Snyder Capital LLP (the "Investment Manager") on behalf of the HC Snyder US All Cap Equity Fund (the "Fund") – a sub-fund of Harrington Cooper UCITS Funds ICAV Plc - pursuant to Article 10 of the Sustainable Finance Disclosure Regulation (EU) 2019/2088 ("SFDR").

The Fund promotes the following social characteristic through the application of its investment strategy:

- Executive remuneration in investee companies.

The Investment Manager applies a three-stage investment approach to achieve the Fund's ESG characteristics:

- (i) Identification;
- (ii) Evaluation and
- (iii) Integration.

The Investment Manager carries out this evaluation using a variety of sources, utilising a potential investee company's annual financial reports; proxy statements; other corporate governance reports; and through the Investment Manager's direct engagement with senior management.

Does this Fund have a sustainable investment objective?

No, this financial product promotes environmental or social characteristics but does not have as its objective sustainable investment.

What environmental or social characteristic does the Fund promote?

The Fund seeks to invest in companies within the US equity universe that promote the following characteristics:

- Executive remuneration in investee companies. When considering corporate social responsibility around executive compensation, the Investment Manager evaluates how a company aligns the interests of top executives with those of its shareholders.

What indicators are used to measure the attainment of these characteristics?

The Investment Manager will monitor the Fund's attainment of its social characteristics by evaluating the portfolio's weighted exposure to each of the characteristics described above.

The Investment Manager assesses, for each company in the Fund, executive compensation on an annual basis for its alignment to corporate performance over time using available information sources which may include: the relevant company's annual 10-K filing (a comprehensive overview of the company's business and financial condition, including audited financial statements, as required by the U.S. Securities and Exchange Commission); proxy statements; other corporate governance reports; and through the Investment Manager's direct engagement with senior management.

Description of the investment strategy of the Fund

The Investment Manager applies a five-step investment approach to evaluate a company's alignment to the Fund's characteristics and broader ESG profile:

- (i) Idea Generation; and
- (ii) Thesis Development;
- (iii) Thesis Confirmation;
- (iv) Valuation Discipline; and
- (v) Portfolio Construction.

Negative Screening Process

The Investment Manager will not generally invest in companies: (i) that have a low level of cash flow available for the company to repay creditors or pay dividends and interest to investors; (ii) that have a high level of debt; (iii) whose share price depends on the occurrence of a particular event (e.g., regulatory approval of a product or service) - such companies are often found in the biotechnology industry; (iv) that are at risk of losing their technological edge over competitors in the same sector (Nokia being an historical example of such a company); (v)

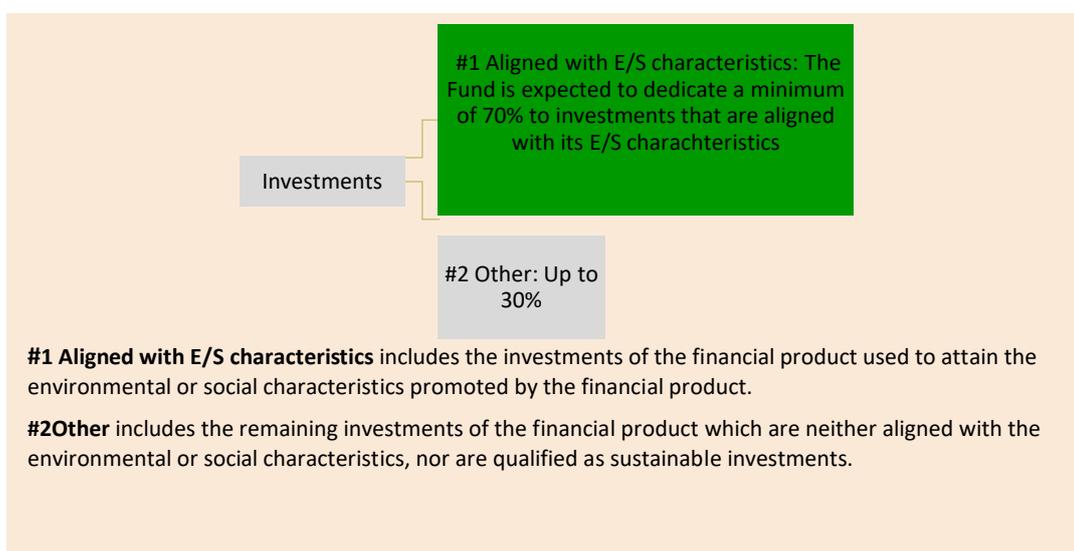
that are overly sensitive to rapidly shifting regulatory changes; (vi) whose products or services can be easily copied or replaced; (vii) who have ineffective management teams or weak corporate governance; (viii) that have a low predictability of revenue, earnings, and/or cash flow; (ix) whose sales or costs are tied to volatile commodity prices; (x) that are capital intensive businesses that do not preserve or expand their competitive advantage; or (xi) that are materially exposed to Sustainability Risks.

Positive Inclusion Process

The Investment Manager also adopts a positive inclusion process for companies that are candidates for investment by the Fund. Here, potential investee companies are assessed against their contribution to the characteristics of the Fund and their broader environmental, social and governance profiles.

The Investment Manager combines its evaluation of each company against the Fund's social characteristics with an analysis of the environmental, governance and other social considerations into the investment process, combining it with all other company and industry conclusions as part of a mosaic theory approach to assessing a business's intrinsic economic value.

Portion of the Investments



Description of how the Environmental or Social characteristics are monitored

Once an investment is made in a company, the Investment Manager will continue to monitor the investee company's alignment. This will be done via the Investment Manager's fundamental analysis of the company and through an annual assessment.

Description of data sources and how they are used

Information and data come from a variety of sources, including investee company's annual financial reports; proxy statements; other corporate governance reports; and through the Investment Manager's direct engagement with senior management.

Description of the limitations of the methodology and data

Limitations of the methodology and data are a result of, but are not limited to:

- (i) the quality and accuracy of the information available;
- (ii) the timeliness of dissemination of information (especially for companies that have recently undergone an initial public offering);
- (iii) differing levels of acceptance and adherence of ESG standards globally;
- (iv) transparency levels of the companies reporting;
- (v) consistency and standardisation of policies, measurements and targets;
- (vi) third party data and research providers' ability to identify the correct information and standardise their approach across investment universes;
- (vii) the size and maturity of companies;
- (viii) companies' understanding of third-party data providers' requirements and methodologies; and
- (ix) keeping pace of the rapidly evolving regulatory and reporting requirements on a country-by-country basis.

These limitations contribute to making direct comparisons on an absolute basis challenging.

Due diligence:

The Investment Manager engages with the investee companies of the Fund and companies within the Fund's investment universe on a periodic basis.

Where the Investment Manager has identified an issue with the ESG profile of an investee company or its alignment with the Fund's social characteristics, the Investment Manager will consider its materiality and conduct further due diligence to address the matter.

Where an investee company has not addressed the matter within a timescale deemed reasonable by the Investment Manager, the Investment Manager may, at its discretion, reduce the Fund's exposure to the investee company or divest completely.

Does the Fund use an external benchmark to measure the achievement of its sustainability characteristics?

No, the Fund does not use a reference benchmark for the purpose of measuring the achievement of its characteristics.