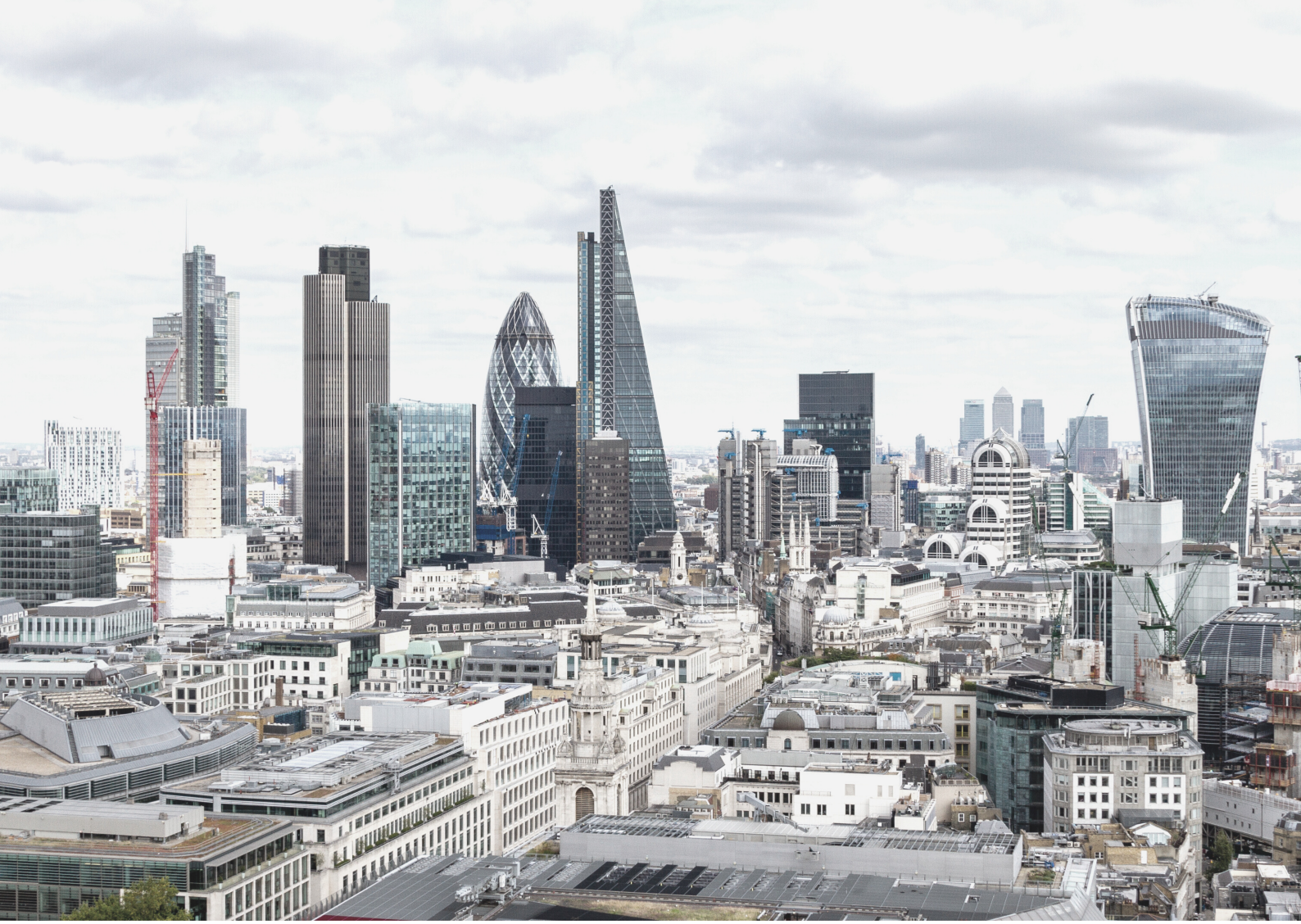
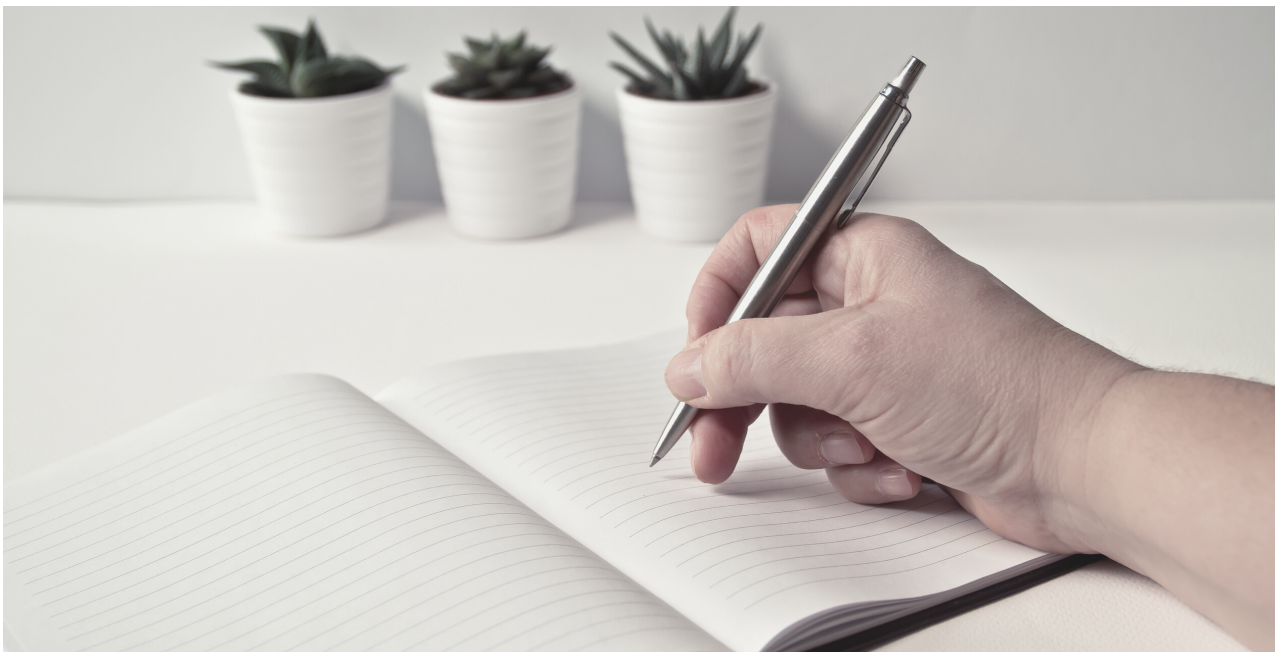
2021

EU SUSTAINABLE FINANCE DISCLOSURE REGULATION



Slater Investments Limited

BACKGROUND TO SFDR



Sustainable finance disclosure regulation ("SFDR") is part of the EU's wider Sustainable Finance Framework, which is backed by a broad set of new and enhanced regulations. The framework includes the Sustainable Finance Action Plan, which aims to promote sustainable investment across the EU, and a new Taxonomy on sustainable activities which aims to provide a robust, science-based transparency tool for companies and investors. The idea being that it will create a common language which investors can use when investing in projects and economic activities that have a substantial positive impact on the climate and the environment.

PRODUCT CLASSIFICATIONS UNDER SFDR

Under the new classification of funds and mandates, there are three categories, as laid out by Articles 8 and 9 of the SFDR. Those funds not defined by either article are referred to as 'Other' funds.

SLATER INVESTMENTS FUND CLASSIFICATIONS UNDER SFDR

We believe that the integration of ESG issues into our investment process with the aim of improving standards, reducing risk and enhancing returns is essential. We therefore use an integrated sustainable investment approach, where ESG screening is incorporated into the fundamental analysis of companies across our funds. We consider ESG analysis to be a complementary tool to the fundamental research which we undertake to understand, with a high degree of conviction, a company's earnings and growth potential. Currently our funds do not have explicit sustainable or ESG targets or objectives and therefore are categorised as 'Other' under the SDFR.

OUR ARTICLES

3(1) Consideration of sustainability risk in investment decision making

We have adopted a policy, based upon our internally devised standards, in respect of the integration of sustainability risks in our investment decision-making process with the purpose of identifying, assessing and, where possible and appropriate, seeking to manage these sustainability risks.

We have identified sustainability risks and these are set out in our ESG policy. We review the identified sustainability risks periodically and will update our ESG policy to reflect any changes to our identified sustainability risks. Where any new sustainability risks are identified, we will consider the impact of those on the existing investments of the funds at the time those sustainability risks are identified.

4(1) Adverse sustainability impacts

Whilst we take into account various sustainability factors as part of our investment process, in line with Article 4(1) point b, we do not currently consider the adverse impacts of investment decisions on sustainability factors, pending further clarity in respect of the detailed requirements in relation to the content, methodologies and presentation of information on sustainability indicators. It is also currently challenging to identify and select reliable sustainability data to use in making any such determinations.

5(1) Integration of sustainability risks in remuneration policies

The Remuneration Policy of the Company is consistent with the integration of sustainability risks.

Contact

Slater Investments Limited

Nicholas House, 3 Laurence Pountney Hill, London, EC4R 0EU.

Slater Investments Limited is authorised and regulated by the Financial Conduct Authority.

Registration Number: 165999.

+44 (0) 207 220 9460

www.slaterinvestments.com