



Independent
Financial Group

Statement on Art 4 of EU Regulation 2019/2088 (SFDR)

Art 4 of SFDR provides a framework for achieving greater transparency on how financial sector participants and advisers consider the principal adverse impacts of their investment decisions on sustainability factors. Under Art 4, the GWM Group is required either to publish information on how it considers the potentially negative impacts of its investment decisions on sustainability factors or, alternatively, to explain the reasons why it does not currently consider such impacts. For the reasons given below, the GWM Group does not currently consider the principal impacts of its investment decisions on sustainability factors.

Although the GWM Group takes a proactive approach to defining the indicators and metrics through which to determine the potential negative impacts of its investment decisions, the limited availability in the marketplace of the necessary data means that it has not yet been possible to measure objectively the principal negative effects of its investment decisions on sustainability factors. However, on an on-going periodic basis, the GWM Group will review its approach in order to integrate into its processes the consideration of the adverse impacts of its investment decisions on sustainability factors and will provide timely updates on how it may be possible to measure objectively such adverse impacts and to make the required disclosures.