

GWM Asset Management Limited

Statement of no consideration of principal adverse impacts of investment decisions on sustainability factors

This Statement sets out disclosures by GWM Group in respect of the principal adverse impacts of its investment decisions on sustainability factors.

The EU Sustainable Finance Disclosure Regulation (“**SFDR**”) provides a framework for achieving greater transparency on how financial sector participants and advisers consider the principal adverse impacts (“**PAIs**”) of their investment decisions on sustainability factors. Under Article 4 of SFDR, GWM Group is required either to publish information on how it considers the PAIs of its investment decisions on sustainability factors or, alternatively, to explain the reasons why it does not currently consider such adverse impacts.

GWM Group **does not currently consider the PAIs of its investment decisions on sustainability factors** and, in compliance with Article 4(1)(b) of SFDR, this Statement sets out the reasons why it does not do so.

Although GWM Group has a proactive approach to defining the indicators and metrics through which to determine the negative impacts of its investment decisions, GWM Group’s view is that it is not yet possible, given the investment strategies of its investment funds under management, to measure objectively the main negative effects of its investment decisions on sustainability factors due to the limited availability in the marketplace of the data required for this purpose. Further, given the scope of the activities of GWM Group and the profile of its investment funds under management, GWM Group believes that it would be disproportionate at present to comply fully with the PAI regime in SFDR. Finally, GWM Group considers that its existing ESG policies and procedures are appropriate, proportionate and relevant to the investment strategies of its investment funds under management.

The PAI regime identifies numerous metrics against which to measure the adverse impacts of investment decisions, such as green-house gas emissions, carbon footprint and board gender diversity. Although GWM Group does not consider the PAIs of its investment decisions within the meaning of Article 4(1)(a) of SFDR, GWM Group may choose to provide to its investors reporting against similar or certain of these metrics where relevant to a strategy or product.

To improve transparency to clients, investors and the market, GWM Group will review its decision not to comply with the PAI regime on a regular basis.