

## **Website disclosures – 1167 Active Funds ICAV**

For the purposes of Article 6 of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (the "**Disclosure Regulation**"), 1167 Active Funds ICAV (the "**ICAV**") has determined that, while analysis of ESG factors forms part of the Investment Manager's investment process, the sub-funds of the ICAV (the "**Funds**") are not managed with the aim of making sustainability risk a fundamental part of the investment decisions taken on behalf of the Funds. This is because it is the view of the ICAV and the Investment Manager that it is not currently possible to obtain the necessary level of data relating to the category of investments in which the Funds invest for this to happen. This is partly due to the nature of some of the issuers and investments concerned (for example sovereign governments and currency instruments), and partly because underlying issuers are not widely obliged to, and overwhelmingly do not currently, report on ESG factors in a consistent way. The ICAV and the Investment Manager may consider it appropriate to fully integrate sustainability risks into investment decisions for the Funds in the future. This disclosure will be updated in accordance with the Disclosures Regulation to reflect any such decision.

### **No consideration of sustainability adverse impacts**

Taking due account of the nature and scale of its activities, the ICAV, in accordance with Article 4(1)(b) of the Disclosures Regulation, has also elected for the time being not to consider (in the manner specifically contemplated by Article 4(1)(a) of the Disclosures Regulation) the likely effects of investment decisions taken by the Funds on sustainability factors more generally (the "principal adverse impacts" of investment decisions). The ICAV considers this a pragmatic and economical approach to compliance with its obligations under the Disclosures Regulation.

### **Remuneration Policies**

The ICAV has updated its remuneration policy to meet the requirements of the Disclosure Regulation. The ICAV's remuneration policy seeks to ensure that the remuneration of key decision makers is aligned with the management of short and long-term risks, including the oversight and where appropriate the management of sustainability risks in line with the Disclosure Regulation. The ICAV's remuneration is reviewed regularly or as required by regulations.