

**IXI Investments**



**IXI FUND MANAGERS LTD**

**Sustainability Risk Disclosure under Regulation (EU) 2019/2088 on  
sustainability-related disclosures in the financial services sector (the “SFDR”)**



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The SFDR introduces three new concepts of “*sustainable investment*”, “*sustainability risk*” and “*sustainability factors*”.

“*Sustainable investment*” in summary, is an investment in an economic activity which:

- contributes either to an environmental objective or a social objective
- does not significantly harm any environmental or social objectives and
- the investee company follows good governance practices.

“*Sustainability risk*” is an environmental, social or governance (ESG) event or condition, that if it occurs, could cause an actual or a potential material negative impact of the value of investments.

“*Sustainability factors*” means environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

The SFDR applies in respect of financial products made available by, *among others*, Alternative Investment Fund Managers. These products include Alternative Investment Funds (“AIFs”) and portfolio management services/managed accounts.

Following the sustainability risk assessment of IXI Fund Managers Ltd (the “Company”), the financial products offered by the Company do not have an express ESG focus or consider sustainability risk/factors in the investment decision making process of the Company. As such, the Company does not consider sustainability risks to be relevant to its financial products including the managed fund(s) and managed accounts or to have a material negative impact on the returns of the above-mentioned products.

“*No consideration of sustainability adverse impacts*” due to the fact that the Company’s investment operations and products are focused on financial instruments that have no direct or material environmental sustainability impacts. Where there is appropriate and sufficient data available to the Company for the performance of a more adequate assessment of ESG factors into the investment decision making process of the Company’s financial products, the Company will re-consider possible adverse impacts of its investment decisions on sustainability factors and update this disclosure.

Furthermore, the Company’s financial products currently do not take into account the EU Taxonomy criteria (Regulation EU 2020/852 on the establishment of a framework to facilitate sustainable investment) for environmentally sustainable economic activities unless otherwise stated in the relevant Offering Documents.