

General information on the handling of sustainable finance

Waystone Management Company (IE) Limited
(formerly DMS Investment Management Services (Europe) Limited)

Scope

The following information aims at giving further guidance on how Waystone Management Company (IE) Limited and its Luxembourg Branch (formerly known as DMS Investment Management Services (Europe) Limited, hereafter “Waystone”) handle the implementation of the requirements set by the Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector (hereafter “SFDR”). The SFDR requires financial market participants to disclose additional information on the integration of sustainability risks and potential adverse sustainability impacts on an entity level.

Furthermore, the SFDR requires, amongst other obligations, the amendment of pre-contractual information of collective investment schemes (“Funds”).

The following information is based on the current understanding of the regulatory framework in place and may therefore vary based on additional texts published by the regulators.

Waystone is of the opinion that transparency regarding the implementation steps taken with regard to those requirements is in the best interest of the managed Funds and in the best interest of the investors invested in those Funds.

Please contact us for up-to-date information on this approach.

Integration of sustainability risks

Waystone acknowledges the impacts that sustainability risks can impose on the managed Funds and considers the approach to integrate the risks stemming from sustainability issues described in this policy as strengthening its fiduciary duties towards the investors of the managed Funds.

Detailed information on Waystone’s approach to integrate sustainability risks into the investment decision making process can be found in the dedicated policy which has been set-up in compliance with the requirements set by the SFDR and which has been uploaded accordingly on our [website](#).

Where Waystone has delegated the portfolio management function to an external portfolio manager located in one of the member states of the European Union (“EU”), and the portfolio manager has

integrated sustainability risks in their investment decisions, additional information on the integration of sustainability risks into the investment decision making process (pre-trade assessment) can be found on the website of the specific portfolio manager. In such circumstances Waystone fulfils its duties as Management Company/Alternative Investment Fund Manager by including sustainability risks in its post-trade risk assessments.

However, where Waystone delegates the portfolio management function to an external portfolio manager not located in one of the member states of the EU there may be no further information available on the website of such an external portfolio manager on the integration of sustainability risks into that portfolio manager's investment decision making process.

Principle adverse impact (PAI) statement

For the time being Waystone does not consider adverse impacts of investment decisions on sustainability factors. In accordance with Art. 4 I b of the SFDR, the main reason for not considering adverse impacts of investment decisions on sustainability factors at the company level is the lack of further information and data available to adequately assess the principal adverse impacts.

As Waystone mainly cooperates with duly authorized external portfolio managers being located in one of the member states of the EU who may already consider principle adverse impacts on their investment decision for the funds (or sub-funds thereof) they manage; further information may be found in each Fund's relevant documentation (i.e. in the Fund's Prospectus or the Fund's Private Placement Memorandum as applicable), which can be found on the website of the specific external portfolio manager.

However, in the case where Waystone cooperates with duly authorized external portfolio managers not located in one of the member states of the EU, further information with respect to the principal adverse impacts of their investment decisions on sustainability factors might not be available on their website.

Remuneration policy

SFDR requires financial market participants to integrate information on the consistency of their remuneration policy with the integration of sustainability risks, in accordance with Art. 5 I of the SFDR.

Waystone has amended its remuneration policy accordingly. Additional information can be found [here](#).

Pre-contractual information

All required information at a product level can be found in the specific pre-contractual information of the product (e.g. sales prospectus; private placement memorandum).