

Sustainability Risk Policy – Disclosure Statement

Cambridge Associates GmbH (“CA GmbH” or the “Firm”)

March 2021

In accordance with the requirements of Article 3 of Regulation EU) 2019/2088 on sustainability-related disclosures in the financial services sector (“SFDR” or the “ESG Disclosure Regulation”) CA GmbH is required to formulate and disclose its policy on the integration of sustainability risks¹ into its investment advisory and investment decision-making processes.

CA GmbH’s Investment Philosophy

Our investment philosophy at CA GmbH is committed to delivering attractive risk-adjusted returns for its clients over the long-term. Our investment approach to achieve these investment return objectives is characterised by the following investment principles:

- Focus on absolute returns across our funds;
- Strong emphasis on capital preservation;
- Dynamic, research driven approach;
- Disciplined, risk-controlled environment, and
- Active management (both top down and bottom up).

Limited Disclosure

Whilst CA GmbH supports the objectives of SFDR in encouraging financial market participants to embrace consideration of sustainability risk within their investment decision making/advisory processes, due to the nature of the investment strategy employed by CA GmbH and the instruments invested in to achieve its stated investment objectives agreed with the Firm’s clients, it is not practicable at this time to formally integrate sustainability risk in a manner which is achievable by other types of investment strategies.

As an asset allocator, CA GmbH primarily directs client capital to investment fund managers, rather than to specific securities. As a result, CA GmbH does not typically engage directly with issuers of securities or engage in screening of securities, instead relying on fund managers to select securities and engage with issuers at their discretion.

That said, the Firm’s investment manager research process incorporates sustainability into its due diligence and monitoring. This process includes formally requesting information from managers regarding their ESG policies, practices, and reporting to investors. These policies and practices are disclosed to the Firm’s clients in due diligence reports. The Firm also utilizes third-party tools to analyse ESG portfolio metrics.

No consideration of sustainability adverse impacts

CA GmbH does not consider the adverse impacts of its investment decisions on sustainability factors.

¹ an environmental, social or governance event or condition that, if it occurs, could cause a negative material impact on the value of the investment

Whilst CA GmbH supports the objectives of SFDR with respect to transparency of due diligence policies and reporting against relevant quantitative metrics in respect of portfolio investments it has chosen not to consider these impacts at this time, predominantly due to the lack of quality, consistent and readily available data with which to meet these obligations without disproportionate costs or resource implications, which may serve to negatively impact the Firm and its client. Additionally, due to the nature of its investment strategy and the limited capacity of the Firm to materially engage with, and report on, these issues in a relevant and meaningful way.

Whilst uncertain as to when specifically, CA GmbH may consider the adverse sustainability impacts it remains open to doing so in future and will monitor the situation with respect to data availability.

Related Policies

CA GmbH has adopted a number of complementary and related policies which provide an overview of its approach. These include but are not necessarily limited to:

- Stewardship Code Disclosure Statement
- Statement on the UK Modern Slavery Act
- SRD II Engagement Policy
- CA Group ESG Policy
- CA Group Diversity and Inclusion Statement

Transparency and Reporting

Cambridge Associates at the group level (“CA Group”) is a signatory to the UN Principles for Responsible Investment (“UN PRI”) and fulfils the reporting requirements that being a PRI signatory entails, in the form of the annual Transparency Report which is available on the PRI website (www.unpri.org). CA Group is also a signatory of Task Force for Climate-Related Financial Disclosures. CA Group is also a signatory of the Global Investor Statement to Governments on Climate Change: <https://theinvestoragenda.org/focus-areas/policy-advocacy/>.

Remuneration Policy

CA GmbH has reviewed its Remuneration Policy in accordance with the requirements of Article 5 of SFDR to ensure consistency with the Firm’s integration of sustainability risks as described above. The relevant details incorporated in that respect are featured below:

- Central to our remuneration policy is the promotion of sound and effective risk management, and this has now been extended beyond financial risks to encompass sustainability factors and firm-wide goals.
- Internal controls verify and validate that variable remuneration amounts are justified relative to individual performance, business unit performance, fairness across peers, and established bonus targets.
- Further, another key aspect of our remuneration policy is to avoid creating an environment which rewards or encourages excessive risk-taking. This principle has been extended beyond financial risk to incorporate sustainability risks and firm-wide goals and for those individuals who have a role in ensuring or overseeing that the Firm’s sustainability risk policy is adhered to.