



SFDR Disclosure

FundRock Management Company S.A. (the “**Manager**”), in conjunction with WHEB Asset Management LLP (the “**Investment Manager**”), has categorised WHEB Sustainable Impact Fund and the WHEB Environmental Impact Fund (the “**Funds**”), sub-funds of WHEB Asset Management Funds ICAV (the “**ICAV**”), as meeting the provisions set out in Article 9 of SFDR for products that have a sustainable investment objective. Sustainable investment means an investment in an economic activity which: (1) contributes either to an environmental objective or a social objective; (2) does not significantly harm any environmental or social objectives; and (3) the investee company follows good governance practices.

The investment objective of the Funds is to achieve capital growth over 5 years, investing globally in the shares of companies that provide solutions to sustainability challenges and falling within certain sustainable investment themes.

A description of the overall sustainability-related impact of the Funds will be available as part of the ICAV’s annual report which will be published on this website once available.

The Investment Manager selects shares in companies that provide solutions to sustainability challenges falling within certain sustainable investment themes (“**Sustainable Investment Themes**”) which are at present: (1) cleaner energy, (2) environmental services, (3) resource efficiency, (4) sustainable transport, (5) water management, (6) education, (7) health, (8) safety and (9) well-being. In order to qualify for investment, at least half of the company’s revenues must be derived from products and services with a positive social and/or environmental impact (as set out below) related to the Funds’ Sustainable Investment Themes.

The Investment Manager’s ‘impact engine’ is an analytical tool proprietary to the Investment Manager that rates the overall impact ‘intensity’ of the products and services offered by companies. This tool captures the different dimensions of positive impact that are created by products and services and provides an overall impact intensity rating for the company as a whole. A second step in the investment process assesses the overall quality of the business including how it manages critical environmental, social and governance (ESG) issues. The two dimensions are plotted together on an ‘Impact Map’ with the fundamental quality rating on the y-axis and the impact intensity rating on the x-axis. Only companies with a positive impact are considered for investment by the Funds. More than 80% of listed companies do not receive positive scores in the impact engine and are therefore not candidates for investment: <https://impact.whebgroup.com/impact-map/>

Further information on the methodology behind the impact mapping is set out in the Investment Manager’s Impact Measurement Methodology policy. This details the methodology used by the Investment Manager in respect of the Funds to collate and calculate the positive impact associated with Funds’ investment strategy, including:

- the Investment Manager’s use of data and its data sources (in particular see sections “Calculating company impact” and “Further calculations and assumptions”);
- screening criteria for the underlying assets (in particular see sections “The ‘impact engine’ – assessing the impact of products and services” which is also described above and “Assessing the quality of company policies and practices”); and
- the relevant Sustainable Investment Themes used to measure the overall sustainable impact of the Funds (in particular see section “WHEB’s investment themes and the UN Sustainable Development Goals”).

The Impact Measurement Methodology can be found in full at:
<https://impact.whebgroup.com/media/2020/06/WHEB-Impact-Measurement-Methodology.pdf>