

# Sustainable Finance Disclosure Regulation (“SFDR”) Winton Fund Management Ireland DAC (the “ICAV Manager”) and Winton Capital Management Limited (the “Manager”)

## Introduction

This document includes disclosures the ICAV Manager and the Investment Manager are required to provide under SFDR.

The ICAV Manager has delegated portfolio management of the Winton UCITS Funds ICAV and its sub-funds (the “**Sub-Funds**”) to the Investment Manager. As such, the ICAV Manager has adopted the Investment Manager’s approach to requirements under SFDR.

In addition, the Investment Manager is the alternative investment fund manager to the Winton-titled alternative investment funds. The Investment Manager complies with SFDR in respect of the alternative investment funds listed in the Appendix (the “**AIFs**”) and, therefore, this Policy applies to the AIFs and the Sub-Funds (together, the “**Funds**”).

## Definitions

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

“Principal Adverse Impacts” covers impacts of investment decisions resulting in a negative effect on “sustainability factors” (ESG matters, respect for human rights, anti-corruption and anti-bribery matters).

## Fund Categorisation

In respect of the Sub-Funds, the ICAV Manger, in consultation with the Investment Manager, and, in respect of the AIFs, the Investment Manager, have determined that the Funds are not within the scope of either Article 8<sup>1</sup> or Article 9<sup>2</sup> of SFDR.

## Consideration of Principal Adverse Impacts

The Investment Manager does not consider the principal adverse impacts of its investment decisions on sustainability factors. The Investment Manager applies quantitative strategies to the Funds that it considers are not compatible with position-by-position analysis with respect to principal adverse impacts and because it invests in many types of asset classes where it is not considered practical to quantify principal adverse impact.

## Impact of Sustainability Risks on Returns

Investments in the Funds may be impacted directly or indirectly by a range of ESG events or conditions.

## Integrating Sustainability Risks into Investment Decisions

The ICAV Manager and the Investment Manager have adopted a Sustainability Risk Policy that describes how the Investment Manager has integrated sustainability risk into its investment decision making process.

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<sup>1</sup> Article 8 – products that promote environmental or social characteristics

<sup>2</sup> Article 9 - products with sustainable investment or a reduction in carbon emissions as their objective.

Sustainability risk is managed as part of the overall risk management process adopted the Investment Manager. The investment strategies are designed to be diversified and not hold concentrated positions which mitigates the risk that any specific ESG event or condition will have a material negative impact on the overall value of a Fund. The Investment Manager monitors a range of data points to assess investment risks.

**Appendix 1:**

AIFs covered by this document

The Winton Fund Limited

The Winton Fund (Enhanced) Limited

Winton Trend Fund Limited

Winton Diversified Futures Fund Limited

Winton Systematic Universal Momentum Fund Limited

Winton Investment Fund SPC

As at August 2022

**Remuneration**

The Manager maintains a remuneration policy in accordance with the UCITS Directive which aims to promote sound and effective risk management and to avoid excessive risk taking. The Remuneration Policy has been amended to take account of Sustainability Risks.