

WHEB ASSET MANAGEMENT FUNDS ICAV

(An open-ended Irish collective asset-management vehicle with registered number C435370 and established as an umbrella fund with segregated liability between sub-funds pursuant to the European Communities (Undertakings for Collective Investment in Transferable Securities) Regulations 2011 (as amended))

SUPPLEMENT

WHEB ENVIRONMENTAL IMPACT FUND

Dated 25 November 2024

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1. **Important information**

This Supplement contains information relating to WHEB Environmental Impact Fund (the “**Fund**”), a Fund of WHEB Asset Management Funds ICAV (the “**ICAV**”), an open-ended umbrella fund with segregated liability between Funds authorised by the Central Bank as a UCITS pursuant to the UCITS Regulations.

This Supplement forms part of and should be read in conjunction with the general description of the ICAV contained in the Prospectus dated 14 December 2021 together with the most recent annual report and audited financial statements and if published after such report, a copy of the latest half-yearly report and unaudited financial statements. If you are in any doubt about the contents of this Supplement, you should consult your stockbroker, bank manager, solicitor, accountant or other independent financial adviser.

To the extent there is any inconsistency between this Supplement and the Prospectus, this Supplement shall prevail. Capitalised terms used and not defined herein shall have the meaning attributed to them in the Prospectus.

The Fund is actively managed and is not managed in reference to a benchmark.

As dividends may be paid out of the capital of the Fund, there is a greater risk that capital will be eroded and “income” will be achieved by foregoing the potential for future capital growth of Shareholders’ investments and the value of future returns may also be diminished. This cycle may continue until all capital is depleted. Dividends paid out of capital may have different tax implications to dividends paid out of income and investors are recommended to seek their own advice in this regard.

Investors should read and consider the section of the Prospectus and this Supplement headed “Risk Factors” before investing in the Fund.

1.1 **Profile of a Typical Investor**

The Fund is marketable to both retail and institutional investors but given the specialised nature of the Fund it is only suitable for investors who can invest in the medium to long term and who are prepared to have a medium to high risk investment in their portfolio. The Fund is suitable for investors who appreciate that global equities can deliver negative as well as positive returns.

1.2 **Responsibility**

The Directors, whose names appear in the section of the Prospectus headed “Directory” accept responsibility for the information contained in the Prospectus and this Supplement. To the best of the knowledge and belief of the Directors (who have taken all reasonable care to ensure that such is the case) the information contained in the Prospectus and this Supplement is in accordance with the facts and does not omit anything likely to affect the import of the information.

1.3 **Status under the EU Sustainable Finance Disclosure Regulation (“SFDR”)**

The Manager in conjunction with the Investment Manager has categorised the Fund as meeting the provisions set out in Article 9 of SFDR for products that have a sustainable investment objective, as further described below and in the Annex. 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.

1.4 **EU Regulation on the establishment of a framework to facilitate sustainable investment (the “Taxonomy”)**

The Fund makes sustainable investments which contribute to environmental and social objectives. Such sustainable investments may include Taxonomy-aligned investments. To date the Taxonomy only covers a certain number of economic activities for which criteria have been established to determine their alignment to the Taxonomy in respect of the environmental objectives of climate change mitigation and adaptation. Additional economic activities will be covered by the Taxonomy over time and criteria to determine the alignment of economic activities with the Taxonomy in respect of other environmental objectives will also be

adopted. Furthermore, it is likely that the availability of data to assess the extent of Taxonomy-alignment of investments will improve over time, in particular where certain EU issuers will be required to disclose the Taxonomy-alignment of their economic activities. As a result, we will continue to monitor the evolution of the Taxonomy and the availability of data to determine whether, if at all, this product will commit to a minimum level of Taxonomy-aligned investments. Any such commitment will be reflected in the management of the Fund, which will be subject to internal approvals, compliance and risk controls, as well as client communications processes. We will make such disclosures as required under the SFDR in respect of such commitment.

Where the Fund makes Taxonomy-aligned investments, the environmentally sustainable economic activities in which the Fund invests contribute to the following environmental objectives:

- Climate change mitigation;
- Climate change adaptation;
- Transition to a circular economy.

The number of Taxonomy-aligned investments which contribute to the environmental objectives set out above would initially be at least 5%. This figure will be kept under review and we would expect it to increase significantly as more data becomes available.

2. **Investment Objective**

The investment objective of the Fund is to achieve capital growth over 5 years, investing globally in the shares of companies that provide solutions to environmental challenges and falling within certain sustainable investment themes, as further detailed in the Investment Strategy section set out below and in the Annex. There is no guarantee that the Fund will achieve its investment objective.

3. **Investment Policy**

The Fund will invest globally in the shares of companies in sectors identified by the Investment Manager as providing solutions to environmental sustainability challenges. There is no predetermined focus on business sector or geography although concentrations may emerge through stock selection.

Under normal circumstances, the Fund will hold cash on deposit up to 10% of the Net Asset Value of the Fund.

The Fund may also invest in other transferable securities (such as debentures, government securities traded on a Regulated Market and warrants), money market instruments and near cash (which are non-cash assets that are highly liquid and easily converted to cash, such as savings accounts, certificates of deposit and treasury bills). A money market instrument is a type of investment that is usually issued by banks or governments and is a short term loan to the issuer by the buyer. The buyer receives interest and the return of the original amount at the end of a certain period.

The Fund may also invest in open-ended collective investment schemes ("**CIS**") which provide exposure to securities that are consistent with the investment policy of the Fund within the limit on investment in open-ended CIS i.e. no more than 10%, in aggregate, of the Net Asset Value of the Fund. The Sub-Fund does not intend to but may also invest in closed-ended CIS, which qualify as transferable securities for the purposes of the UCITS Regulations. Investment in CIS will be made where it is more efficient and cost effective for the Fund or where direct investment is not available.

The Fund may use financial derivative instruments (contracts where the value is linked to the expected future price movements of an underlying asset) for efficient portfolio management. This is in order to reduce the Fund's exposure to risk.

4. **Investment Strategy**

The Investment Manager selects shares in companies that provide solutions to environmental 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 and (5) water management. In order to qualify for investment, at least half of the company's revenues must be derived from products and services with a positive environmental impact (as set out below and in the Annex) related to the Fund's Sustainable Investment Themes. This leads to a pool of qualifying companies which is typically less than 500 stocks with less than 20% of the MSCI World Index components qualifying (measured by market capitalisation).

The Investment Manager has developed a structured and disciplined investment process which seeks to add value by identifying critical environmental challenges that are facing the global population over the next few decades.

1. A range of investment themes is derived from this analysis (set out above and in the Annex) which together are used to create an overall investment universe of companies that are deemed by the Investment Manager to provide solutions to these challenges.
2. From this universe the Investment Manager uses a proprietary methodology to assess the impact 'intensity' of a company's products and services. The Investment Manager selects stocks it perceives as promising i.e. those companies chosen as part of the universe that provide solutions to environmental challenges falling within the aforementioned Sustainable Investment Themes, and analyses the fundamentals of individual companies (such as financial information and management commentary, as reported in quarterly or annual statements, press releases or other public venues) to determine the dimensions of their positive environmental product impact.
3. Additionally, the Investment Manager reviews the environmental, social and governance ("ESG") quality of the company's policies and practices as part of its investment process to identify business and management quality. The Investment Manager's research considers the robustness of core risk management systems, governance processes, the extent of any involvement in controversial issues or activities and overall company alignment with sustainability issues and themes.
4. Based on the totality of this fundamental analysis, the Investment Manager assesses the company's quality and suitability for the Fund ensuring an investment in the company does not significantly harm the environmental or social investment objectives of the Fund. For example, if the company is, in the Investment Manager's view, exposed to excessive reputational risk, or has significant activity in areas that are not consistent with the investment philosophy of the Fund, then it is unlikely to be selected for investment. Companies with persistently poor practices regarding equal opportunities, human rights and environmental management are highly unlikely to be selected for investment. If a company is considered particularly weak on any single metric in our fundamental analysis profile, scoring a zero, it will not be qualified for investment.

Every company in the portfolio goes through the aforementioned analytical process in order to determine whether the company can be classified as a sustainable investment under Article 9 of the SFDR.

The Investment Manager will regularly monitor the companies in which the Fund invests against the above sustainable investment criteria. If it is the Investment Manager's opinion that an investee company no longer meets the sustainable investment criteria, the Investment Manager will not make any further investments in the company and will seek to realise its investment in such a company in an orderly fashion. At least 90% of the Fund's overall equity exposure will be in companies classified as sustainable investments under Article 9 of the SFDR.

The Investment Manager's responsible investment policy is integral to the Investment Manager's investment management activities. The Investment Manager's approach can be summarised as follows:

- to integrate ESG issues into all investment analysis and decision making processes;
- be active owners and engage with companies and wider stakeholders to encourage a more progressive approach to key ESG issues;
- to encourage appropriate disclosure on ESG issues by the entities in which it invests.

The Investment Manager aims to be innovative and transparent in the execution of its responsible investment policy with extensive public reporting and regular and frequent review of its approach and performance.

Target companies will be listed on or dealt in a Regulated Market (details of which are set out in Schedule 1 to the Prospectus).

The Fund may invest no more than 10% of the Net Asset Value in other collective investment schemes. Such collective investment schemes will be UCITS, non-UCITS and/or exchange-traded funds.

5. **Securities Financing/Efficient Portfolio Management/FDI**

The Fund shall not enter into any securities lending, repurchase / reverse repurchase arrangements or any total return swaps. In the event this changes, the Supplement will be updated in accordance with the requirements of the Central Bank, the UCITS Rules and the SFT Regulations.

It is also not intended that the Fund invest in FDI as a direct investment. However, the Fund will enter into forward foreign exchange contracts for hedging purposes or for the purposes of efficient portfolio management. Please see below for further information. In this regard, the Fund employs a Risk Management Process which enables it to accurately measure, monitor and manage the various risks associated with forward foreign exchange contracts. The ICAV will use the commitment approach for the purpose of calculating global exposure in respect of the Fund. Responsibility for the Risk Management Process lies with the Manager who has delegated the day-to-day responsibilities, including oversight and reporting, to the Investment Manager. The Manager will notify the Central Bank of any material amendments to the Risk Management Process in advance of any such amendment being made.

5.1 Share Classes

The Fund has established unhedged Share Classes, as detailed in the Share Class table in Section 11.

A currency conversion will take place on subscriptions, redemptions and switches at prevailing exchange rates. The value of the Shares expressed in the Currency Share Class will be subject to exchange rate risk in relation to the Base Currency.

Please refer to the sections entitled “Share Class Hedging” and “Risk Factors” in the Prospectus for further information.

6. **Investment Restrictions of the Fund**

The ICAV and the Fund adhere to the restrictions and requirements set out under the UCITS Regulations, as may be amended from time to time. The investment restrictions are set out in Schedule 3 to the Prospectus.

In accordance with the Central Bank Regulations, the Fund will apply for a derogation from some of the investment restrictions for six months from the date of approval of the Fund pursuant to the UCITS Regulations but will observe the principle of risk-spreading.

7. **Investment Manager**

The Manager has appointed WHEB Asset Management LLP (the “**Investment Manager**”), as investment manager of the Fund.

The Investment Manager was established in 2009 and is regulated by the Financial Conduct Authority in the United Kingdom as an investment advisory firm. It has a registered office at 7 Cavendish Square, London W1G 0PE.

The principal activity of the Investment Manager is to provide investment management services to institutions and high net worth individuals.

Pursuant to the Investment Management Agreement dated 13 November 2020 between the Manager, the Investment Manager and the ICAV, the Investment Manager has been appointed to manage the investment and re-investment of the Fund’s assets in accordance with the investment objectives and policies described in this Supplement.

The Investment Management Agreement provides that the Fund shall indemnify the Investment Manager out of the assets of the Fund, from and against all actions, proceedings, claims and against all loss, costs, demands and expenses which may be brought against, suffered or incurred by the Investment Manager except where due to the wilful default, fraud, bad faith, negligence or recklessness on the part of the Investment Manager. None of the parties to the Investment Management Agreement will be liable for any indirect or consequential damages.

Any party may terminate the Investment Management Agreement by giving not less than 90 days written notice to the other. The Investment Management Agreement may be also terminated at any time immediately by any party if (i) a party commits a material breach of the Investment Management Agreement and fails to remedy a breach of the Investment Management Agreement within thirty days of being requested to do so; (ii) a party is wound up, has a receiver or examiner appointed over its assets or some event having equivalent effect occurs; or (iii) a party or ceases to be permitted under applicable law perform its duties and obligations under any applicable laws.

8. Risk Factors

The general risk factors set out under the section of the Prospectus headed "Risk Factors" apply to the Fund. The risks described in the Prospectus should not be considered to be an exhaustive list of the risks which potential investors should consider before investing in the Fund. Potential investors should be aware that an investment in the Fund may be exposed to other risks from time to time. **The value of investments and income can go down as well as up (this may partly be the result of exchange rate fluctuations in investments which may have an exposure to foreign currencies) and investors may not get back the full amount invested. An investment in the Fund should not constitute a substantial proportion of an investment portfolio and may not be appropriate for all investors.**

9. Share Classes

Accumulating Share Classes are available as further indicated in the table below in Section 11.

The income, earnings and gains will be accumulated and reinvested on behalf of the Shareholders. It is not currently intended to distribute dividends to Shareholders in the accumulating Share Classes.

10. Key information for buying and selling

The following Share Classes are available:

Class of Share	Currency Denomination	Initial Issue Price	Initial Charge	Redemption Charge	Management Fee	Minimum Initial Investment	Minimum Subsequent Investment	Minimum Holding	Minimum Redemption
Class S Distributing*	USD	\$100	0%	0%	1.03%	\$100	\$100	\$100	\$100
Class C Accumulating	USD	\$100	0%	0%	1.03%	\$100	\$100	\$100	\$100
Class C Accumulating	EUR	€100	0%	0%	1.03%	€100	€100	€100	€100
Class C Accumulating	CHF	SFr100	0%	0%	1.03%	SFr100	SFr100	SFr100	SFr100
Class C Accumulating	GBP	£100	0%	0%	1.03%	£100	£100	£100	£100

***Once the Net Asset Value of the Fund reaches £100,000,000, the Management Fee payable for Class S Distributing Shares (as set out in the table above) may be reduced to 0.75%. Class S Distributing Shares are only available for subscription by founder investors at the sole discretion of the Directors.**

Base Currency means US Dollar.

Business Day means every day on which banks in Ireland are open for normal business or such other day(s) as the Directors may determine and notify to Shareholders in advance.

Dealing Day means any Business Day.

Dealing Deadline means 12p.m. (Irish time) on the Business Day immediately preceding the relevant Dealing Day.

Initial Offer Period: The Initial Offer Period for all Shares is now closed.

Initial Issue Price means, during the Initial Offer Period, the Initial Issue Price and following the close of the Initial Offer Period, the prevailing Net Asset Value per Share.

Minimum Fund Size means £20,000 or foreign currency equivalent thereof or such other amount as may be determined by the Directors at their discretion. When the size of the Fund is below such amount or foreign currency equivalent, the Directors of the ICAV may compulsorily redeem all of the Shares of the Fund in accordance with the “Compulsory Redemption of Shares/Deduction of Tax” section of the Prospectus.

Settlement Period means (i) for subscriptions, the third Business Day following the relevant Dealing Day or such other time determined by the Directors in accordance with the requirements of the Central Bank; (ii) for redemptions, the third Business Day following the relevant Dealing Day or such other time determined by the Directors in accordance with the requirements of the Central Bank.

Valuation Point means the close of business on the Dealing Day or such other time as the Directors may determine from time to time and notify in advance to Shareholders.

11. Application for Shares

Applications for Shares may be made to the Administrator (or to the distributor for onward transmission to the Administrator) (whose details are set out in the Application Form). Applications received by the Administrator prior to the Dealing Deadline for any Dealing Day, will be processed on that Dealing Day. Applications received after the Dealing Deadline will not be accepted. However, applications may be accepted in exceptional circumstances after the Dealing Deadline provided that (a) this is approved by the Manager acting on behalf of the ICAV in consultation with the Directors; and (b) the exceptional circumstances are fully documented by the Manager acting on behalf of the ICAV in consultation with the Directors.

Any applications received after the Dealing Deadline for a particular Dealing Day will be processed on the following Dealing Day, unless the Manager acting on behalf of the ICAV in its absolute discretion, in exceptional circumstances, otherwise determines to accept one or more applications received after the Dealing Deadline for processing on that Dealing Day, provided that such application(s) have been received prior to the Valuation Point for the particular Dealing Day and such exceptional circumstances have been fully documented by the Manager acting on behalf of the ICAV.

Initial applications should be made by providing an original signed Application Form but may, if the Directors so determine, be made by facsimile subject to prompt transmission to the Administrator (or to the Manager for onward transmission to the Administrator) of the original signed Application Form and such other papers (such as documentation relating to money laundering prevention checks) as may be required by the Directors or their delegate.

Subsequent applications to purchase Shares following the initial subscription may be made to the Administrator (or to the distributor for onward transmission to the Administrator) by facsimile or electronically without a requirement to submit original documentation and such applications should contain such information as may be specified from time to time by the Directors, the Manager, or their delegate. Amendments to a Shareholder’s registration details and payment instructions will only be effected on receipt of original written instructions or electronic instructions from the relevant Shareholder.

12. Redemption of Shares

Requests for the redemption of Shares should be made to the Administrator (whose details are set out in the Application Form) by facsimile or written communication and include such information as may be specified from time to time by the Directors or their delegate. Requests for redemptions received prior to the Dealing Deadline for any Dealing Day will be processed on that Dealing Day.

Any requests for redemptions received after the Dealing Deadline for a Dealing Day will be processed on the next Dealing Day, unless the Manager acting on behalf of the ICAV in its absolute discretion, in exceptional circumstances, otherwise determines to accept one or more applications received after the Dealing Deadline

for processing on that Dealing Day, provided that such application(s) have been received prior to the Valuation Point for the particular Dealing Day and such exceptional circumstances have been fully documented by the Manager acting on behalf of the ICAV and in consultation with the Directors.

Redemption requests will only be accepted for processing where cleared funds and completed documents including documentation relating to money laundering prevention checks are in place from original subscriptions. No redemption payment will be made from a Shareholder's holding until the original Application Form and all documentation required by or on behalf of the ICAV (including any documents in connection with anti-money laundering procedures) has been received from the Shareholder and the anti-money laundering procedures have been completed. Redemption requests can be processed on receipt of electronic instructions only where payment is made to the account of record.

13. **Dividends and Distributions**

The income and earnings and gains of Share Classes which are accumulating Share Classes per the table in section 10 of this Supplement will be accumulated and reinvested on behalf of the Shareholders. It is not currently intended to distribute dividends to Shareholders in these Shares Classes.

It is the Directors' current intention to declare and distribute to Shareholders out of the net income (i.e. income less expenses) of Share Classes which are distributing Share Classes per the table in section 10 of this Supplement. The Directors may also declare dividends out of capital of the Fund in order to maintain a satisfactory level of distribution.

The accounting date of the ICAV is currently the 31 December each year, and any dividend payable on the Shares Classes which are distributing Share Classes per the table in section 10 of this Supplement will normally be declared and paid within four months of that date or at such other times as determined by the Directors in accordance with the provisions of the Prospectus and the Instrument of Incorporation.

Any change to this dividend policy shall be set out in an updated Supplement and notified to Shareholders in advance.

This section should be read in conjunction with the section headed "Distribution Policy" in the Prospectus.

14. **Fees and Expenses**

The following fees and expenses will be incurred by the ICAV on behalf of the Fund. Additional fees and operating expenses of the ICAV (including the establishment costs of the ICAV and this Fund) are set out in detail in the section of the Prospectus entitled "Fees and Expenses".

14.1 **Management Fee**

The management fee applicable to each Share Class is as set out above in section 10 of this Supplement (the "**Management Fee**"). The Management Fee may differ in respect of individual Share Classes which may be higher or lower than the fees applicable to other Share Classes.

The Management Fee is a single charge that is deducted from the Fund and caps all fees payable out of the assets of the Fund. The Management Fee includes all ongoing fees in relation to the Fund including the Manager's fee, Investment Manager's fee, the Distributor's fee, the Depositary's fee and the Administrator's fee. It also includes all charges and expenses relating to the ongoing management of the Fund, further details of which are set out at section 8.1 of the Prospectus.

14.2 **Investment Manager's Fees**

The Investment Manager is entitled to receive up to 95 basis points of the Net Asset Value of the Fund payable out of the Management Fee once all ongoing charges and fees in relation to the Fund have been paid from the Management Fee. Should any excess balance remain after the payment of all fees and charges out of the Management Fee, including the capped 95 basis point fee due to the Investment Manager, any such excess will form part of the assets of the Fund.

15. **Funds of the ICAV**

There is currently one other Fund of the ICAV in existence namely, WHEB Sustainable Impact Fund.

Additional Funds of the ICAV may be added in the future with the prior approval of the Central Bank.

Sustainable investment objective

Sustainable investment

means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



Sustainability indicators

measure how the environmental or social characteristics promoted by the financial product are attained.

Does this financial product have a sustainable investment objective?

Yes

No

It will make a minimum of sustainable investments with an environmental objective: 97%

It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of ___% of sustainable investments

in economic activities that qualify as environmentally sustainable under the EU Taxonomy

with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy

in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

with a social objective

It will make a minimum of sustainable investments with a social objective: ___%

It promotes E/S characteristics, but will not make any sustainable investments

What is the sustainable investment objective of this financial product?

The investment objective of the Fund is to achieve capital growth over 5 years, investing globally in the shares of companies that provide solutions to environmental challenges and falling within certain sustainable investment themes. The primary focus of the investment objective is sustainable investment (although capital growth is measured alongside). No benchmark has been selected to measure attainment of this objective, due to lack of availability of a suitably aligned benchmark for this strategy.

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

What sustainability indicators are used to measure the attainment of the sustainable investment objective of this financial product?

The Investment Manager ("We") assesses our portfolio on four main factors: avoiding social harm; avoiding environmental harm; achieving social good; delivering environmental good. Against the "delivering environmental good" factor we also measure a set of core indicators that relate directly to the sustainable investment objective of the strategy. These core indicators include: carbon avoided (tonnes), renewable energy generated (MWh) waste recovered or recycled (tonnes), water treated /use avoided (litres). In addition, we on occasion utilise additional non-core indicators to cover portfolio companies invested in as at the reporting date.

How do sustainable investments not cause significant harm to any environmental or social sustainable investment objective?

The investment process analyses and assesses potential negative impacts at the product level (significant social and environmental impact). We also integrate analysis of material ESG issues into our assessment of a company's operations using a Sustainable Accounting Standards Board (SASB) - derived framework and utilise third party screening to ensure portfolio holdings are in compliance with OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. SASB standards highlight key sustainability information that is reasonably likely to affect the financial performance of a company within an industry. Our thematic structure means that we are largely absent from heavy footprint sectors which have a material environmental or social impact. We do not invest in companies that would offend the Do No Significant Harm (DNSH) material criteria for the business as a whole. The DNSH criteria ensures that no portfolio company would significantly harm any of the six environmental objectives within the EU Taxonomy Regulation. These six objectives are: climate change mitigation; climate change adaptation; sustainable use and protection of water and marine resources; circular economy; pollution prevention and control and; protection and restoration of biodiversity and ecosystems.

How have the indicators for adverse impacts on sustainability factors been taken into account?

Each potential investment in the portfolio is subject to analysis of adverse impact indicators. The investment process analyses adverse impact indicators both at the product level as well as from company operations in order to assess each company against the DNSH criteria. Our strategy focuses on companies that sell products and services that provide solutions to sustainability challenges which means that we consider adverse impacts from products as part of our overall assessment of the positive impact intensity of the products and services being supplied. For operational impacts we consider the range of environmental and social issues that are considered to be material to that particular business.

How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?

We utilise third party screening to ensure portfolio holdings are in compliance with OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.



Does this financial product consider principal adverse impacts on sustainability factors?

Yes,

No

Principal adverse impacts are considered in the application of our investment process; our thematic structure means that we are largely absent from sectors with major social and environmental impacts. Nonetheless, we systematically integrate analysis of material ESG issues into our fundamental stock level analysis. Information on the principal adverse impacts will be published on our website.



What investment strategy does this financial product follow?

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

The WHEB strategy is solely invested in listed equities.

The Investment Manager selects shares in companies that provide solutions to environmental challenges falling within certain investment themes (“Sustainable Investment Themes”) which are at present: (1) cleaner energy, (2) environmental services, (3) resource efficiency, (4) sustainable transport and (5) water management. In order to qualify for investment, at least half of the company’s revenues must be derived from products and services with a positive environmental impact (as set out below) related to the Fund’s Sustainable Investment Themes. This leads to a pool of qualifying companies which is typically less than 500 stocks with less than 20% of the MSCI World Index (the “Index”) components qualifying (measured by market capitalisation).

The Investment Manager has developed a structured and disciplined investment process which seeks to add value by identifying critical social and environmental challenges that are facing the global population over the next few decades.

1. A range of investment themes is derived from this analysis (set out above) which together are used to create an overall investment universe of

companies that are deemed by the Investment Manager to provide solutions to these challenges.

2. From this universe the Investment Manager uses a proprietary methodology to assess the impact 'intensity' of a company's products and services. The Investment Manager selects stocks it perceives as promising i.e. those companies chosen as part of the universe that provide solutions to environmental challenges falling within the aforementioned sustainable investment themes, and analyses the fundamentals of individual companies (such as financial information and management commentary, as reported in quarterly or annual statements, press releases or other public venues) to determine the dimensions of their positive environmental product impact.

3. Additionally, the Investment Manager reviews the environmental, social and governance ("ESG") quality of the company's policies and practices as part of its investment process to identify business and management quality. The Investment Manager's research considers the robustness of core risk management systems, governance processes, the extent of any involvement in controversial issues or activities and overall company alignment with sustainability issues and themes.

4. Based on the totality of this fundamental analysis, the Sub-Manager assesses the company's quality and suitability for the Sub-fund ensuring an investment in the company does not significantly harm the environmental investment objectives of the Sub-fund. For example, if the company is, in the Sub-Manager's view, exposed to excessive reputational risk, or has significant activity in areas that are not consistent with the investment philosophy of the Sub-fund, then it will not be selected for investment. Companies with persistently poor practices regarding equal employment opportunities, human rights and environmental management will not be selected for investment. If a company is considered particularly weak on any single metric in the Sub-Manager's fundamental analysis profile, scoring a zero, it will not be qualified for investment.

Every company in the portfolio goes through the aforementioned analytical process in order to determine whether the company can be classified as a sustainable investment under Article 9 of the SFDR.

The Investment Manager will regularly monitor the companies in which the Fund invests against the above sustainable investment criteria. If it is the Investment Manager's opinion that an investee company no longer meets the sustainable investment criteria, the Investment Manager will not make any further investments in the company and will seek to realise its investment in such a company in an orderly fashion.

The Investment Manager's responsible investment policy is integral to the Investment Manager's investment management activities. The Investment Manager's approach can be summarised as follows:

- to integrate environmental, social and governance (ESG) issues into all investment analysis and decision making processes;

- be active owners and engage with companies and wider stakeholders to encourage a more progressive approach to key ESG issues;
- to encourage appropriate disclosure on ESG issues by the entities in which it invests.

The Investment Manager aims to be innovative and transparent in the execution of its responsible investment policy with extensive public reporting and regular and frequent review of its approach and performance.

What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?

The investment strategy requires that more than 50% revenues are derived from one of the impact themes; this score excludes c80% of the index. Negative screens include: alcoholic beverages, cosmetics where animal testing has been involved, gambling products or services, fossil-fuel exploration or production, intensive farming practices, nuclear power generation, pornographic materials, tobacco products, unsustainable timber products or weapons production to have a significant negative impact. Companies that have significant activities (>5%) in these areas are not considered to have an overall positive impact and would therefore be ineligible for investment. In addition, we assess the intensity of positive impact using our proprietary impact engine methodology. We integrate ESG data into our fundamental quality assessment. Anything with a negative score would be excluded. Where a company scores 1 or below in any of the quality categories, this company would be excluded from investment.

What is the policy to assess good governance practices of the investee companies?

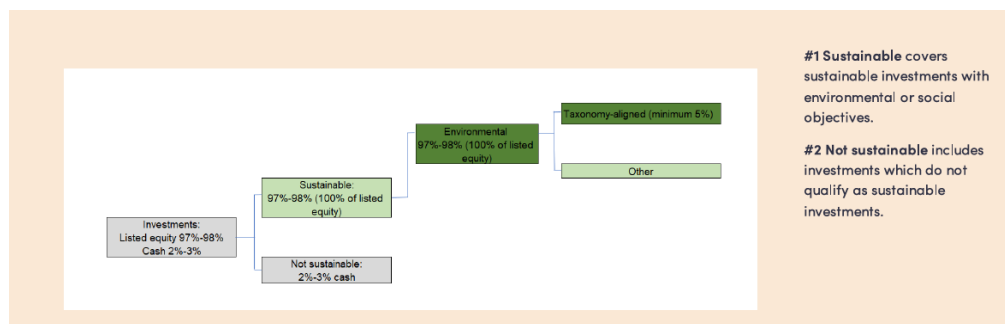
WHEB's Stewardship & Engagement Policy sets out, based on the Financial Reporting Council's Stewardship Code, 12 principles covering purpose and governance of the policy, how good practice is integrated into our investment approach, how we engage with investee businesses and how we exercise our rights and responsibilities. Assessment of governance practices at investee companies is a core element of our fundamental quality analysis, representing 20% of the fundamental quality score.

What is the asset allocation and the minimum share of sustainable investments?

100% of the asset allocation is sustainable listed equities, with the remainder in cash for liquidity purposes only. The strategy is invested in companies which contribute to a positive environmental objective with a minimum of 5% aligned with the EU Taxonomy.



Asset allocation describes the share of investments in specific assets.



How does the use of derivatives attain the sustainable investment objective?

N/A - the product does not use derivatives



Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The percentage of Taxonomy-aligned investments which contribute to the environmental objectives set out above would initially be at least 5%, calculated using company turnover. This figure will be kept under review and we would expect it to increase significantly as more data becomes available. This figure is calculated through a combination of internal research and verifiable third party sources. The areas that we invest in that we consider to be in environmentally sustainable economic activities include: Cleaner Energy such as wind and solar power, Environmental Services such as circular economy activities and the manufacture of sustainable materials, Resource Efficiency as such as energy efficient products, efficient buildings and efficient manufacturing technologies, Sustainable Transport including battery electric vehicles (BEVs) and infrastructure for BEVs, and Water Management such as wastewater treatment products and services.

We have selected revenue as the KPI for assessing Taxonomy eligibility because we believe this is the most accurate way of assessing a business's current exposure to taxonomy eligible activities. We believe that this is relevant to our investors for the same reason. Our investment proposition to clients is that we will invest in companies providing solutions to sustainability challenges. For over 17 years we have used revenues to this and believe that it provides the most legitimate basis on which to judge whether a company is focused on delivering solutions to sustainability challenges.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

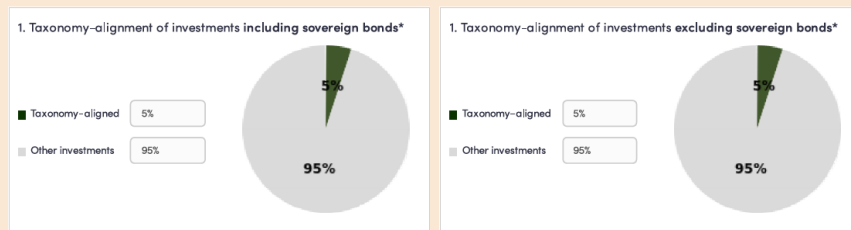
Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?

- Yes:
 - In fossil gas
 - In nuclear energy
- No

Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



**For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures*

What is the minimum share of investments in transitional and enabling activities?

100% of taxonomy aligned investments would be considered enabling, this is currently set at a minimum of 5% of the portfolio.



are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.



What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

The minimum share of sustainable investments that will not be taxonomy aligned is set at zero. The proportion of taxonomy aligned investments is expected to increase over time as more data becomes available. The fund currently invests in sustainable investments as determined by the exposure of the company's revenues to one or more of our environmental or social themes. The Taxonomy however, is currently only focused on two of six environmental objectives. Our investments, for example, in circular economy businesses, and businesses that sell products and services that treat wastewater and protect the aquatic environment are not covered by the current taxonomy which is focused on climate change mitigation and adaptation. For these companies, while clearly delivering a positive environmental impact, there is no taxonomy that is available to align with. In addition, the strategy is invested in businesses that operate outside of the European Union. These businesses do not typically comply with detailed product standards that are specific to the European Union and referenced in the taxonomy. We do not generally consider these companies to be taxonomy aligned even where the products and services clearly deliver a positive environmental impact. Finally very few companies even in the European Union have yet published detailed accounts of their taxonomy alignment. We would expect our overall alignment to increase over time once more data is available.



What investments are included under “#2 Not sustainable”, what is their purpose and are there any minimum environmental or social safeguards?

No investments are included as "not sustainable".



Is a specific index designated as a reference benchmark to meet the sustainable investment objective?

N/A - the product does not have a benchmark

How does the reference benchmark take into account sustainability factors in a way that is continuously aligned with the sustainable investment objective?

N/A - the product does not have a benchmark

How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?

N/A - the product does not have a benchmark

How does the designated index differ from a relevant broad market index?

Reference benchmarks are indexes to measure whether the financial product attains the sustainable investment objective.

N/A - the product does not have a benchmark

Where can the methodology used for the calculation of the designated index be found?

N/A - the product does not have a benchmark



Where can I find more product specific information online? More product-specific information can be found on the website:

We seek to be fully transparent and publish detailed information on our strategy and impact reporting at: fund documentation - <https://www.whebgroup.com/impact-investment-funds>; detailed impact reporting - <https://impact.whebgroup.com/>; quarterly client updates - <https://www.whebgroup.com/impact-investment-funds>