

Sustainable Finance Disclosure Regulation (“SFDR”)

1. GENERAL

Introduction

The Sustainable Finance Disclosure Regulation (“SFDR”) requires certain firms, investment firms, wealth managers and advisers, to comply with rules on disclosure in relation to sustainability risks.

Sustainability Risk

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

2. DISCLOSURE BY MARKET PARTICIPANT

No consideration of adverse impacts of investment decisions on sustainability factors.

When acting as a market participant BCP does not consider the principal adverse impacts on sustainability factors as currently we believe we are constrained by the information on sustainability factors available from fund managers to make effective decisions.

For the reasons noted above sustainability risks are not integrated into portfolio management.

3. DISCLOSURE REGARDING FINANCIAL ADVICE

Statement on principal adverse impacts of insurance advice on sustainability factors.

When providing investment advice or insurance advice, BCP requires clients to provide information on their sustainability preferences. It considers the information published by financial market participants in connection to their products to assess how these products meet clients’ preferences.

Where more than one product meets a client’s need the Adviser considers a range of other features of the investment including the client’s detailed sustainability preferences as notified by the client to the Adviser.

Where no products exist to meet a client’s sustainability preferences the client is advised of this and, having considered the products available, may choose not to invest or they may reconsider their sustainability preferences.

4. REMUNERATION POLICY

The Firm’s remuneration policy requires that remuneration structures shall only be acceptable if they do not encourage excessive risk-taking with respect to sustainability risks.

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