GATEWAY
fund services

Principal Adverse Impact Statement

14 August 2025



No consideration of the impact of Principal Adverse Indicators

We are an independent fund management company for UCITS and AIFs, primarily operating a delegated model which includes the delegation of investment management and investment due diligence to third party investment managers.

As part of this delegation arrangement, we expect that the consideration of the adverse impacts on investment decisions of sustainability factors will be performed by the underlying portfolio management teams responsible for investment decision making at each delegated investment manager, where the investment manager has indicated that it will perform principal adverse impact consideration.

As such, Gateway Fund Services Limited does not consider the principal adverse impacts on investment decisions of sustainability factors but rather our delegated investment managers may do, depending on their approach and the fund's relevant designation (e.g., Article 8, Article 9 under SFDR).

We consider our approach is pragmatic, transparent, and reasonable given the nature of our business.

Notwithstanding our statement, we are committed to sustainable finance, responsible investing, and international sustainability standards, and have ESG-related policies and oversight practices in place, and ESG initiatives in plan as follows:

- A **Remuneration Policy** that sets a framework for long-term value creation, measurement of attainment of sustainability goals, and respect for our social and governance practices.
- An **Investment Management Oversight Framework** that mandates us, inter alia, to evaluate the integration of sustainability factors into the investment due diligence process of our third-party investment managers, and the sustainability risks inherent in those investments.
- A **Risk Management Policy** that includes protocols for managing, overseeing, and monitoring exposure to sustainability risk.
- A **Conflicts of Interests Policy** that considers those types of conflicts of interest that may arise because of the integration of sustainability risks into processes, systems, and internal controls.
- An **Outsourcing Framework** that mandates us to evaluate the integration of environmental, social, and governance practices with all outsourced service providers, inclusive of delegates.
- An **Organisational structure and suite of policies, procedures, and practices** aligned to best practice corporate governance (inter alia, adoption of the corporate governance code for collective investment schemes and management companies).
- As a **regulated institution, a suite of policies, procedures, and practices** to ensure compliance with applicable regulations and legislation (including, but not limited to, Anti-Money Laundering and Countering the Financing of Terrorism, Anti-Bribery and Corruption, Market Abuse, Whistleblowing, Anti-Fraud, Beneficial Ownership, Data Privacy and Protection).
- A **sustainability framework** that incorporates, inter alia, our sustainability goals for the Firm.