GATEWAY
fund services

Sustainable Risk Policy

14 August 2025



Sustainable Risk Policy

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.

Each delegated investment manager is required to have processes, systems, and internal controls to manage the investment process and to address all key risks related to a given Fund, including sustainability risk[1].

Using detailed delegate reporting, ongoing delegate reviews, and on-site delegate due diligence, we monitor the sustainability risk within Fund portfolios on an ongoing basis to ensure the Funds are being managed in line with their stated objectives, policies, and risk appetite.

Our monitoring and oversight programme covers a broad range of environmental, social, and governance factors, including, but not limited to:

Environmental	Social	Governance
Climate Change Vulnerability	Compliance with labour laws, modern slavery	Risk and business continuity management
Biodiversity	Compliance with health and safety law	Integrity and ethical behaviour
Environmental Waste & Pollution	Regulatory and Tax Compliance	Information security and data privacy and protection
	Fair working conditions, diversity and inclusion, culture	Regulatory and Tax Compliance
	Treating customers fairly, products suitable for needs	

The relevance of a sustainability risk type for a given Fund portfolio depends on both the investment strategy and the risk type characteristics. Some sustainability risks may potentially have a negative impact on all investment strategies, while others may only affect specific companies or sectors.

Our process is to understand and monitor how ESG considerations are factored into the investment process of each delegated investment manager to ensure that the delegated investment managers are managing all sources of sustainability risk.

We understand that the integration of sustainability risks is evolving and expect that the available data, expertise, and technology to identify, measure and mitigate sustainability risks will improve over time.

[1] Sustainability risk" is defined under the Sustainable Finance Disclosure Regulation as "an environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of the investments". Under Article 40(2) of Delegated Regulation 231/2013 as amended by Commission Delegated Regulation (EU) 2021/1255 and Article 38(1) of Directive (2010/43/EU) as inserted by Commission Delegated Directive (EU) 2021/1270, sustainability risk must be monitored for all Funds under management, regardless of the investment strategy pursued by the relevant Fund.

We will regularly review and, where relevant, recalibrate our sustainability risk integration oversight processes as the integration of sustainability risk management matures.