GUARDCAP UCITS FUND PLC (THE “COMPANY”)

EU SUSTAINABLE FINANCE DISCLOSURES REGULATION (2019/2088) ON SUSTAINABILITY-RELATED DISCLOSURES IN THE FINANCIAL SERVICES SECTOR (“SFDR”),

Pursuant to the EU Sustainable Finance Disclosures Regulation (2019/2088) on sustainability-related disclosures in the financial services sector (“SFDR”), the Company is required to disclose the manner in which sustainability risks are integrated into the investment process and the results of the assessment of the likely impacts of sustainability risks on the returns of the Fund.

It is the responsibility of the board of directors of the Company (the “Board”) to ensure that the design of the Policy is appropriate for the Company.

As the Company delegates investment management of the Fund to the Investment Manager. The Company relies on the Sustainability Risk policy of the Investment Manager in respect of the Fund.

As such, the Company has hereby adopted the Investment Manager’s policy on the integration of Sustainability Risks. (see Appendix I)

The Company has established and maintains a remuneration policy in accordance with the UCITS Directive and has been amended to take account of Sustainability Risks.

The Company is required, under Article 4 of SFDR, to make certain disclosures on its website explaining whether it considers principal adverse impacts of investment decisions on sustainability factors.

As the Company delegates investment management of the Funds to the Investment Manager, the Company’s policy is to rely on the Investment Manager’s approach to considering the principal adverse impacts of investment decisions on sustainability factors.

Please see appendix II

Review of Policy

The Board will review this policy, as appropriate and on at least an annual basis.

Appendix I

The Investment Manager strives to invest in the highest quality companies around the world that are capable of generating long-term sustainable growth for the Funds. The Investment Manager defines responsible investing as the integration of environmental, social and governance ("**ESG**") considerations into investment processes and ownership practices and believes that a company will not fulfil its objective of long-term sustainable growth if it is involved in unsustainable ESG practices.

ESG Integration

The Investment Manager believes that a comprehensive analysis of a company's business and growth potential has to incorporate all material risks and opportunities. The analysis of ESG factors is a core part of the Investment Manager's investment process, with a focus on whether and how these aspects will affect the long-term growth of the cash flows and earnings of the investee companies of the Funds.

The Investment Manager considers ESG-related risks from the early stages of idea generation and throughout the research processes. All companies are scored on several criteria and weak performance in any of the criteria could preclude investing in a company. The Investment Manager considers whether a company's practices or risk exposures conflict with the Investment Manager's objective of investing in companies capable of generating long-term sustainable growth for the Funds. With this in mind, the Investment Manager seeks to invest on behalf of the Funds in companies that demonstrate good corporate governance practices in terms of management structure and remuneration, high quality reporting, combined with strong environmental and social commitments. If a company's standards and practices have material weaknesses or if it is engaged in activities that compromise its ability to grow sustainably over the long-term, the company will not progress to the next stage of the investment process.

Sectors

The Investment Manager's investment approach steers away from the most environmentally damaging sectors such as energy, mining, commodity chemicals and heavy industry as companies in these sectors typically fail a number of the Investment Manager's quality and growth criteria. In particular, these sectors display high cyclicality and do not generate high levels of sustainable returns to the Funds.

Screening and Exclusions

The Investment Manager will seek to exclude direct investment in corporate issuers that are involved in the manufacture or production (subject to a specific revenue threshold*) of activities including but not limited to:

i) Controversial weapons (to include anti-personnel landmines, cluster munitions, biological weapons and chemical weapons);

ii) Firearms or small arms ammunition;

iii) The extraction of fossil fuels and/or the generation of power from them; and

iv) Tobacco products

*Specific revenue threshold applied is 5% based on a company's annual report.

Service Providers

ESG issues may be considered by the Investment Manager in light of scores from external data providers, where relevant. At the initial stage of the Investment Manager's process, it looks for "red flags" which may indicate areas of controversy surrounding a company. The Investment Manager engages third party data providers for these purposes. The Investment Manager will not automatically exclude a company based on external scores, but uses the scores as a guide to investigate and ascertain reasons for the low score.

Engagement

The Investment Manager believes that active ownership practices are valuable in enabling good stewardship and engaging with management of companies at regular intervals is an important component of the investment process. This allows the Investment Manager to challenge companies on their strategy, performance and risk, capital structure, and their social and environmental impacts.

Proxy Voting

The Investment Manager votes proxies with the objective of maximising shareholder value as a long-term investor, and ensures that reasonable care and diligence is undertaken to ensure the Investment Manager votes these proxies in the best interest of the Funds and in accordance with ESG policies and procedures.

Reporting

The Investment Manager commits to keeping records of ESG analysis and engagement activities, and making them available to the Company. The Investment Manager undertakes to provide information on holdings, upon request, to the Company if it wishes to know about situations where the Investment Manager's opinion or conclusions differ from those of external ESG rating agencies.

Sustainability Risk

A sustainability risk is an environmental, social or governance event or condition that if it occurs, could cause an actual or potential material negative impact on the value of an investment.

Sustainability risks can lead to a significant deterioration in the financial profile, profitability or reputation of an underlying investment of a Fund and thus may materially impact its market price or liquidity. The impact of sustainability risks on an investment may only emerge over the medium to long term and investment decisions may be made on that basis, with the result that other investments may prove more profitable in the shorter term. Further, sustainability risks may not be realised in the manner or to the extent anticipated by the Investment Manager with the result that investments may not perform as expected. To the extent that a sustainability risk occurs, or occurs in a manner that is not anticipated by the Investment Manager, there may be a sudden, material negative impact on the value of an investment and hence on the Net Asset Value of a Fund. Such negative impact may result in an entire loss of value of the relevant investment(s) and may have an equivalent negative impact on the Net Asset Value of a Fund.

The integration of sustainability risks in the investment decision process of the Funds may have the effect of excluding profitable investments from the investment universe of a Fund and may also cause a Fund to sell or refrain from purchasing investments that otherwise would have been expected to be profitable.

Assessment of sustainability risks is complex and may be based on ESG data which is difficult to obtain and incomplete, estimated, out of date or otherwise materially inaccurate. In addition, even when such data is identified and obtained, as with any data, there can be no guarantee that ESG data will be correctly assessed. Assessments may also not be conclusive in the investment process for a Fund and, where consistent with the investment policy of the relevant Fund, the Investment Manager may have the discretion to make investment decisions notwithstanding the potential for sustainability risks associated with the relevant investments. Equally, the assessment of sustainability risk is inevitably subjective to a degree and there can be no guarantee that all investments made by a Fund, even those which integrate the management of sustainability risks into their investment selection processes will reflect beliefs or values of any particular investor on sustainable investments. In addition, the circumstances in which sustainability risks are not or cannot be integrated into investment decision-making or the assessment of a sustainability risk itself may change over time depending on the availability of relevant data or other information which may become available.

Appendix II – Consideration of Principal Adverse Impacts.

Neither the Company nor the Investment Manager currently consider the adverse impacts of investment decisions on sustainability factors in respect of the Funds or issue a statement on a website in relation to the due diligence policies with respect to those impacts. This is pending the adoption of final regulatory technical standards by the European Commission pursuant to Article 4(6) of SFDR, which shall set out detailed requirements in relation to the content, methodologies and presentation of information on sustainability indicators in relation to adverse impacts on the climate and other environment-related adverse impacts. Following the adoption and coming into force of such regulatory technical standards, currently expected to be from 1 January 2022, the Company will reconsider its position in relation to the publication of adverse impacts for the Funds and, if it determines to provide such information, this Prospectus and the relevant website disclosure shall be updated accordingly.