

Sustainability Risk Policy

The European Council and European Parliament have reached a political agreement on the Disclosure Regulation regarding sustainability-related disclosures in the financial services sector (EU Regulation 2019/2088, "SFDR"). In seeking to establish a pan-European framework to facilitate Sustainable Investment, the SFDR framework provides a coherent approach for sustainability related disclosures to financial market participants and advisers. Covering a broad range of financial products, its objective is to promote transparency regarding the integration of Sustainability Risks into investment decisions and consideration of adverse sustainability impacts in the investment process. For the purposes of the SFDR, ZENKYOREN EUROPE LIMITED (or "ZEL") meets the criteria of a "financial market participant", whilst each Fund qualifies as a "financial product".

ZEL has decided not to take into account the adverse sustainability impacts as defined in Article 4 (1) of the Disclosure Regulation EU 2019/2088 as of March 10, 2021. When additional regulatory provisions are established and the data quality is sufficient, ZEL will review its current position and plan for any implementation in order to consider the principal adverse sustainability impacts on investments.

The investment underlying this financial product does not take into account the EU criteria for environmentally sustainable economic activities as per Art. 7 of Regulation (EU) 2020/852 (the "EU Taxonomy Regulation").