Konwave ATG Emerging Markets Healthcare Fund

(a) Summary

This disclosure is made by ATG Healthcare Investments AG (the "Investment Manager") on behalf of the Konwave ATG Emerging Markets Healthcare Fund (the "Fund") – a sub-fund of Harrington Cooper UCITS Funds ICAV.

The Fund promotes environmental and/or social characteristics within the meaning of Article 8 of the SFDR. The Fund does not have sustainable investment as its investment objective.

While the Fund promotes environmental and/or social characteristics within the meaning of Article 8 of the SFDR, it should be noted that as the investments underlying this Fund do not take into account the EU criteria for environmentally sustainable economic activities within the meaning of the Taxonomy Regulation, the Fund's portfolio alignment with the Taxonomy Regulation is not calculated.

(b) Does this Fund have a sustainable investment objective?

No sustainable investments targeted.

ESG factors are not the only consideration used by the Investment Manager in making investment decisions for the Fund and the Fund may invest in a company that scores poorly on ESG factors if it scores well on other criteria. ESG factors may not be considered for every investment decision.

(c) What environmental or social characteristic does the Fund promote?

This Fund promotes environmental and social characteristics within the meaning of Article 8 of the Disclosure Regulation. The environmental and/or social characteristics promoted by the Fund are outlined as follows: reduction of carbon emissions intensity; and improved access to healthcare products and services.

The Fund promotes investments in companies that demonstrably improve access to healthcare products and services, all over the world but particularly in underserved or low-income markets. This includes: Companies providing affordable medicines, vaccines, diagnostics, and medical technologies in developing countries or low-income populations. Firms with strategies to increase geographic and economic access to essential health services. Companies that invest in digital health solutions or mobile care delivery models to reach remote areas. Inclusion of health equity in business strategy (e.g., inclusive clinical trials, localized pricing strategies).

(d) Description of the investment strategy of the Fund

The Fund follows a fundamental, bottom-up investment approach with a GARP style. It invests across emerging markets in healthcare companies including pharmaceuticals, biotechnology, medical technology, and healthcare as well as related services.

The investment process incorporates ESG factors relevant to the promoted characteristics, alongside traditional financial analysis. The Fund applies exclusions based on internationally recognised norms related to human rights and environmental standards.

Social analysis focuses on equitable access to healthcare. The Investment Manager utilises the MSCI ESG Social Score and/or comparable tools to evaluate the quality of the portfolio. For healthcare and biopharma companies in emerging markets, access to medicine or healthcare is a key industry-specific social risk and a major factor for Social Scores. At least 30% of the portfolio's market value is ranked in the top half of the Benchmark based on the MSCI ESG Social Score or comparable tools. All portfolio holdings are assessed with such tools and at least 30% of the portfolio holdings must score above average compared to the Benchmark.

Governance assessments include evaluation of board independence, shareholder rights, transparency, and executive compensation alignment.

The Fund actively engages with investee companies and external stakeholders to support ESG improvements. Engagement themes include climate risk management, access to essential medicines, and corporate governance enhancement. Where internal insights from company meetings reveal material developments, the Fund may engage with ESG rating agencies to request timely reviews or corrections to the issuer's ESG ratings.

(e) Proportion of investments

The Fund maintains its proportion of holdings that promote the environmental and social characteristics at a minimum of 51%. These investments must be in companies with a minimum MSCI ESG rating of BB or higher.

The maximum proportion of the Fund's "Other" holdings is 49% and includes hedging instruments, unscreened investments for diversification purposes, investments for which data are lacking or cash held as ancillary liquidity. There are no minimum environmental or social safeguards associated with these investments.

(f) Monitoring of environmental or social characteristics

The high baseline of ESG quality across its equity holdings requirement is monitored by the Investment Manager on a quarterly basis and is designed to reduce exposure to companies with elevated ESG risks, while allowing for measured engagement with improving issuers.

(g) Methodologies

The Fund promotes environmental and social characteristics through a combination of exclusionary screening, minimum ESG standards, integrated ESG research, and engagement practices. Governance practices of issuers will be assessed by incorporating the governance rating of the external ESG rating provider MSCI which apply methodologies aligned in scope and structure to those of MSCI into its stock selection process.

(h) Data sources and processing

The Fund leverages ESG data providers and benchmarks (e.g., MSCI ESG Ratings, ATMI, CDP climate scores) to measure and monitor adherence to social and environmental characteristics.

(i) Limitations to methodologies and data

There may be limitations on the retrieval of data from data providers such as MSCI ESG due to their lack of coverage in the universe for certain companies, data errors, or methodological shortcomings.

(j) Due diligence

During the life of the investment, sustainability risk is monitored through review of ESG data published by the issuer (where relevant), via on site visits and management meetings or with the help of selected Data Providers to determine whether the level of sustainability risk has changed since the initial assessment has been conducted. This review is conducted on a quarterly basis. The Investment Manager maintains a formal engagement policy which outlines set objectives, timelines and escalation steps. Management meetings and on site visits conducted by the Investment Manager incorporate ESG-specific agendas and follow-up actions, including commitments and timelines.

In addition, where deemed necessary, prioritised engagement cases are defined and the Investment Manager holds in-depth conversations with the relevant company's management to address identified shortcomings or to seek insight with rating agencies to address different conclusions regarding identified ESG areas. Where the sustainability risk associated with a particular investment has increased beyond the sustainability risk appetite for the Fund, the Investment Manager will consider selling or reducing the Fund's exposure to the relevant investment, taking into account the best interests of the Shareholders of the Fund.

(k) Engagement policies

The Fund actively engages with investee companies and external stakeholders to support ESG improvements. Engagement themes include climate risk management, access to essential medicines, and corporate governance enhancement. Where internal insights from company meetings reveal material developments, the Fund may engage with ESG rating agencies to request timely reviews or corrections to the issuer's ESG ratings.

(l) where an index is designated as a reference benchmark to attain the environmental or social characteristics promoted by the financial product, 'Designated reference benchmark'

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the Fund.