

Konwave ATG Global Healthcare Fund

(a) Summary

This disclosure is made by ATG Healthcare Investments AG (the “Investment Manager”) on behalf of the Konwave ATG Global Healthcare Fund (the “Fund”) – a sub-fund of Harrington Cooper UCITS Funds ICAV - pursuant to Article 10 of the Sustainable Finance Disclosure Regulation (EU) 2019/2088 (“SFDR”).

The Fund promotes environmental and social characteristics through a combination of exclusionary screening, minimum ESG standards, integrated ESG research, and engagement practices. The Investment Manager's investment approach to achieve the Fund's ESG characteristics encompasses the following elements:

- Values-Based Exclusion Criteria
- Minimum ESG Quality Threshold
- Engagement and Stewardship

The Investment Manager carries out this evaluation using data and information from a variety of sources, including regular active engagement with company management, company publications, research from external data providers, Business Involvement Screenings, and other sources.

(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 portfolio is constructed by means of a proprietary bottom up research process valuing companies of all healthcare sectors. Using this approach, the biopharmaceutical (biopharma) exposure can vary significantly but will always be a significant part of the portfolio, typically between one-third and one-half of invested assets. This reflects the Fund's strategic focus on the biopharma segment, which remains central to global healthcare innovation and to the Fund's social characteristic of promoting improved access to medicines.

Social analysis focuses on equitable access to healthcare. At least 30% of the portfolio's market value by %weight which is allocated to biopharmaceutical companies (i.e. 30% of the portfolio's biopharma exposure) are either ranked in the top half of the Access to Medicine Index (ATMI)¹ or demonstrate comparable, verifiable commitments to improving healthcare access in underserved regions, based on publicly available disclosures, third-party reports, or ESG data provider assessments.

In the ATMI, only the top 20 global biopharma companies are evaluated. Besides the top 20 many other biopharma companies demonstrate comparable, verifiable commitments to improve access to medicine, especially in regions and countries which are underserved. So far independent organisations, such as the Access to Medicine Foundation, have not yet covered these companies.

While biopharma can represent the largest portion of the portfolio, ESG considerations span the whole healthcare universe including medtech, healthcare services and life-science tools and similar subsectors. These sectors outside of biopharma are equally integrated into the Fund's ESG analysis and engagement priorities but currently no independent organization is fully covering the important aspect of access to medicine.

The Fund will constantly look for other providers which are offering a broader and deeper coverage for its access to medicine ESG social characteristics. During regular company meetings between the Investment Manager and investee company management, the Fund's ambitions relating to fostering access to medicine are addressed and discussed for all healthcare companies, regardless of their subsector.

Governance assessments include evaluation of board independence, shareholder rights, transparency, and executive compensation alignment. Environmental due diligence includes assessment of the issuer's climate transition strategy, carbon footprint, and alignment with science-based targets.

The Fund promotes two environmental and social characteristics:

- **Access to healthcare**, focusing on companies that improve the availability and affordability of essential healthcare products, especially in underserved regions;

¹ ATMI is a ranking system published biennially since 2008 by the Access to Medicine Foundation, an international not-for-profit organisation based in the Netherlands. It ranks 20 of the world's largest pharmaceutical companies according to their ability to make their pharmaceutical drugs more available, affordable and accessible in low- and middle-income countries.

- **Carbon footprint**, by considering companies' greenhouse gas emissions intensity and climate-related practices.

(e) Proportion of investments

The Fund is required to maintain a high baseline of ESG quality across its equity holdings. At least 75% of the Fund's investments promote environmental and social characteristics. 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 25% 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 requirements are monitored by the Investment Manager on a quarterly basis and are 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. In addition, where deemed necessary, prioritised engagement cases are defined to get into an in-depth conversation with the company 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.

Environmental due diligence includes assessment of the issuer's climate transition strategy, carbon footprint, and alignment with science-based targets.

(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.