

**ANDURAND UCITS ICAV (THE “ICAV”)  
ANDURAND FUND (THE “FUND”)**

**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 ICAV 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 ICAV (the “Board”) to ensure that the design of the Policy is appropriate for the ICAV.

As the ICAV delegates investment management of the Fund to the Investment Manager, the ICAV relies on the Sustainability Risk Policy of the Investment Manager in respect of the Fund.

As such, the ICAV has hereby adopted the Investment Manager’s policy on the integration of Sustainability Risks. The Investment Manager has determined that Sustainability Risk, which is defined 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 relevant investment, is not relevant for the Fund.

The ICAV has established and maintains a remuneration policy in accordance with the UCITS Directive that has been amended to take account of Sustainability Risks, details of which are available on the Investment Manager’s website at [www.andurandcapital.com](http://www.andurandcapital.com).

The ICAV 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 ICAV delegates investment management of the Funds to the Investment Manager, the ICAV’s policy is to rely on the Investment Manager’s approach to considering the principal adverse impacts of investment decisions on sustainability factors, details of which are available on the Investment Manager’s website at [www.andurandcapital.com](http://www.andurandcapital.com).

**Review of Policy**

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