Bridge Fund Management Limited

Integration of Sustainability Risks on Investment decision making process

Infinity Funds ICAV

EU Sustainable Finance Disclosure Regulation

The Sustainable Finance Disclosure Regulation ('SFDR') entered into force on 10 March 2021. The Regulation requires managers to better inform end-investors with regard to the integration of sustainability risks, the consideration of adverse sustainability impacts, the promotion of environmental or social characteristics, and sustainable investment, as applicable.

This document specifically addresses Article 3 of SFDR: "Financial market participants shall publish on their websites information about their policies on the integration of sustainability risks in their investment decision-making process."

The Investment Manager anticipates that investments made by the ICAV may be negatively impacted by sustainability risks. Sustainability risks may impair the value of the investments made by the ICAV, including the loss of the entire amount invested. Sustainability risks may arise and impact a specific investment made by the ICAV or may have a broader impact on an economic sector, geographical region or country, which, in turn, may impact the ICAV's investments. These risks may be relevant as standalone risks but may also be linked to other risk to which the assets of the ICAV are exposed. Laws, regulations and industry norms play a significant role in controlling the impact on sustainability factors of many industries, particularly in respect of environmental and social factors. Further, certain industries face considerable scrutiny from regulatory authorities, non-governmental organisations and special interest groups in respect of their impact on sustainability factors and their impact on the Fund's investments may be impossible to ascertain in advance.

The nature of the ICAV's strategies means that sustainability risks could have considerable impact on the ICAV. Where relevant to the particular investments, the Investment Manager may consider the impact of the following risks on the returns of the ICAV. This summary is not intended as a complete list or explanation of all sustainability risks relevant to the ICAV and should be read in conjunction with the more detailed information set out in the section titled "RISK FACTORS" of the Prospectus.

Environmental risks

Depending on the nature of the specific investments held by the ICAV, environmental risks which may be relevant to the ICAV include, but are not limited to, risks arising from climate change, natural resource use and pollution and waste. Such risks may arise in respect of an investee company itself, its affiliates, its supply chain or may apply to a particular economic sector or geographical region. Examples of environmental risks which could have a negative material impact on the value of the ICAV's investment include the occurrence of extreme weather events that may result in physical loss or damage of, or otherwise loss in value of, assets; risks arising from land use or the reduced supply of natural resources or biodiversity, which may adversely affect the operations, revenue and expenses of certain industries in which the ICAV invests; pollution that could result in negative impacts to human health or ecosystems.

Social risks

Social risks are associated with employees, local communities, and customers, and other stakeholders of companies in which the ICAV may invest. Examples of social risks relevant to the investments made by the ICAV include, but are not limited to, matters of inequality and wealth creation as well as changing demographics including health and longevity and urbanisation. These are all examples of social trends that can have a material impact on businesses, sectors and geographical regions, which, in turn, could have a negative material impact on the value of the ICAV's investment.

Governance risks*:*

Governance risks that may affect, for example, companies in which the ICAV may invest include but are not limited to the following: the absence of a diverse and relevant skillset within a board or governing body; ineffective or inadequate internal and external audit functions; the extent to which rights of shareholders and creditors are appropriately respected within an company's formal decision making process; the effectiveness of a company's controls to detect and prevent bribery and corruption; discriminatory employment practices, workplace harassment, and bullying, respect for rights of collective bargaining or trade unions, the health and safety of the workforce, protection for whistleblowers and non-compliance with minimum wage or "living wage" requirements. These are all examples of governance risks, which could have a negative material impact on the value of the ICAV's investment.

For avoidance of doubt, the ICAV does not have sustainable investment as part of its investment objective for the purposes of Article 9 of SFDR. The ICAV is also not intended to promote specific environmental or social characteristics in accordance with Article 8 of the SFDR.

Unless otherwise stated in the relevant fund Supplement, the Investment Manager does not currently consider an assessment of the principal adverse impacts of its investment decisions on 'sustainability factors' within the meaning of Article 4(1) (a) of SFDR as part of its investment process because neither the ICAV or any of its sub-funds are designed to specifically avoid investments that include one or more sustainability factors, such as avoiding a particular industry/sector in its entirety.

EU Taxonomy Regulation (Regulation EU 2020/852)

In addition, the Investment Manager does not anticipate that the strategy of the ICAV will take account of the criteria for environmentally sustainable economic activities under the EU Taxonomy Regulation."