

FINANCIAL MARKET PARTICIPANT: Northern Trust Fund Managers (Ireland) Limited (“NTFMIL”)

LEGAL ENTITY IDENTIFIER: 5493007ZMALWMHFY1P34

Information Statement on the Consideration of Principal Adverse Impacts of Investment Decisions on Sustainability Factors

This Information Statement is issued by Northern Trust Fund Managers (Ireland) Limited (the “Company”¹) in its capacity as UCITS authorised management company of Northern Trust Investment Funds plc, Northern Trust UCITS Common Contractual Fund, FlexShares ICAV, Northern Trust Global Funds plc, Northern Trust UCITS FGR Fund and as investment manager to individual portfolio mandate accounts.

This Information Statement is accurate as at: 31 March 2024

Consideration of Principal Adverse Impacts of Investment Decisions on Sustainability Factors

The EU’s Sustainable Finance Disclosure Regulation (“SFDR”) requires financial market participants to make a ‘comply or explain’ decision as to whether they consider principal adverse impacts (“PAIs”) of investment decisions on sustainability factors in accordance with a specific regime outlined in SFDR (the “PAI Regime”).

The Company does not currently consider PAI of investment decisions on sustainability factors at the entity level. However, while the Company acknowledges that challenges persist in relation to data availability, reliability, and consistency in the market and from data providers, the Company will transition to considering PAI as an entity and provide the report in 2024. The Company is focused on implementing a PAI framework to be able meet the requirements and publish a Statement in accordance with Article 4 from Regulation (EU) 2019/2088 (SFDR).

IMPORTANT INFORMATION

This Information Statement is issued for information purposes only and is not intended as legal or investment advice, an offer or a recommendation about managing or investing assets and should not be used as the basis for any investment decision.

The information contained herein is current as of March 2024 and is subject to change without notice.

Issued by Northern Trust Fund Managers (Ireland) Limited (NTFMIL). Registered Office: George’s Court, 54-62 Townsend Street, Dublin 2, D02R156.

Northern Trust Asset Management (NTAM) is composed of Northern Trust Investments, Inc. (NTI), Northern Trust Global Investments Limited (NTGIL), Northern Trust Fund Managers (Ireland) Limited (NTFMIL), Northern Trust Global Investments Japan, K.K. (NTKK), NT Global Advisors, Inc., 50 South Capital Advisors, LLC, Northern Trust Asset Management Australia Pty Ltd and investment personnel of The Northern Trust Company of Hong Kong Limited (TNTCHK) and The Northern Trust Company (TNTC).

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¹ Northern Trust Fund Managers (Ireland) Limited is authorised in Ireland and regulated by the Central Bank of Ireland and has its registered office at 54-62 Townsend Street, Dublin 2, Ireland.