

Devon Equity Management Limited (FRN: 841960)

No consideration of adverse impacts of investment decisions on sustainability factors

October 2023

Background

The Sustainable Finance Disclosure Regulation (SFDR) (Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019) imposes certain sustainability-related disclosure obligations on 'financial market participants' in terms of entity-level and product-level disclosures. The SFDR is applicable to various entities, including MiFID firms offering portfolio management services, AIFMs (Alternative Investment Fund Managers), and UCITS (Undertakings for the Collective Investment in Transferable Securities) Managers. Devon is classified as a 'financial market participant' falling within the scope of this regulation. Therefore, Devon has made the following disclosure.

No consideration of adverse impacts of investment decisions on sustainability factors

Devon does not consider adverse impacts of its investment decisions on sustainability factors as part of its investment strategies in the manner prescribed by Article 4 of the SFDR.¹

Devon is supportive of the SFDR regime, to improve transparency to clients, investors, and the market, as to how financial market participants integrate consideration of the adverse impacts of their investment decisions on sustainability factors. However, taking account of the firm's size and available resource and that the investment strategies offered by Devon do not include explicit sustainability investment objectives, Devon considers it would be disproportionate to comply voluntarily with the entity level PAI reporting and monitoring as outlined in Article 4 of the SFDR² at this time.

Devon will revisit its decision not to report voluntarily under the PAI regime on at least a yearly basis and reserves the right to change its position in the future.

Terms as defined by the SFDR

***Principal Adverse Impacts:** The negative impact that investment advice or investment decisions can have on sustainability factors.

***Sustainability Factors:** Sustainability factors include environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

¹ Article 4 Regulation (EU) 2019/2088

² Article 4(1)(b) Regulation (EU) 2019/1288