



**KERNOW**  
ASSET MANAGEMENT

# **Kernow Asset Management**

## SFDR SUSTAINABILITY DISCLOSURES

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## Document Governance

Document owner:


Name	Role
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Kernow Asset Management is a UK-based management company offering a range of investment strategies and services. The investment management is undertaken in-house.

On 10th March 2021, a new EU regulation (2019/2088) on sustainability-related disclosures in the financial services sector (“SFDR”) came into force and Kernow Asset Management has elected to become subject to that regulation. No equivalent sustainability-related disclosure regulation yet applies in the United Kingdom.

For the purposes of this EU regulation, Kernow Asset Management is classified as a ‘financial market participant’ and its funds under management as ‘financial products’.

### **Sustainability Risk Policies (Article 3)**

SFDR requires that financial market participants shall publish on their websites information about their policies on the integration of sustainability risks in their investment decision-making process.

A sustainability risk in this context is an environmental, social or governance (“ESG”) event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of the investment.

Kernow Asset Management undertakes its investment decisions with primary consideration of the ‘S’ and the ‘G’ in its investment decisions.

### **No consideration of sustainability adverse impacts (Article 4)**

Kernow Asset Management does not currently consider the adverse impacts of its investment decisions on sustainability factors in the manner prescribed by Article 4 (1) of SFDR

Principal adverse impacts should be understood as those impacts of investment decisions and advice that result in negative effects on sustainability factors.

Kernow Asset Management does incorporate sustainability considerations into its investment processes through the identification, analysis and management of ESG risks and opportunities.

The Manager continues to monitor the evolving regulatory environment and review whether to consider adverse impacts of investment decisions on sustainability factors in the manner prescribed by Article 4 (1) of SFDR.