

WEBSITE DISCLOSURE (SFDR)

Disclosure under Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector (the SFDR)

Obviam Impact Investing ICAV (the **ICAV**) is an Irish collective asset-management vehicle authorised by the Central Bank of Ireland and is an umbrella fund with segregated liability between its sub-funds. The ICAV has established a single sub-fund, Obviam Global Impact Fund I (the **Fund**) which is a Qualifying Investor Alternative Investment Fund.

Obviam AG (the **Investment Manager**) has been appointed as discretionary investment manager of the ICAV by KBA Consulting Management Limited as the alternative investment fund manager of the ICAV (the **AIFM**).

Under Article 3 of the SFDR, information must be published on the integration of sustainability risks into the investment decisions taken in respect of the Fund by the Investment Manager. A sustainability risk in the context of the Fund is 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 an investment. Under Article 4 of the SFDR, information must be published on the consideration of the principle adverse impacts of the Investment Manager's investment decisions on sustainability factors. Sustainability factors mean environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

The Investment Manager integrates the consideration of sustainability risks into its investment decisions in respect of, and its portfolio management of, the Fund in the manner described in the "Investment Policy" section of the supplement to the prospectus of the ICAV relating to the Fund (the **Supplement**). In particular, the Investment Manager ensures that the Fund's investments are selected in accordance with its responsible investment policy (see **Responsible Investment Policy**).

No consideration of sustainability adverse impacts

The AIFM and Investment Manager have elected for the time being not to consider the principal adverse impacts of its investment decisions on sustainability factors in the manner contemplated by Article 4(1)(a) of the SFDR, primarily as the regulatory technical standards supplementing SFDR which will set out the content, methodology and information required in the principal adverse sustainability impacts statement remain in draft form and their application has been delayed. The AIFM and the Investment Manager will review this position following the coming into effect of the regulatory technical standards, which is currently expected to occur on 1 January 2022.

The Investment Manager has adopted a remuneration policy (see **Remuneration Policy**) on remuneration practices in relation to its staff whose professional activities have a material impact on the risk profile of the Fund, which seeks to promote sound and effective risk management and discourage excessive risk-taking with respect to sustainability risks.

Sustainable investment objective of the Fund and how it is to be attained

In accordance Article 9(2) of the SFDR, the Fund has a sustainable investment objective, and no index has been designated as a reference benchmark.

The investment objective of the Fund is to generate measurable social impact while achieving long-term capital growth for investors.

The Fund is actively managed by the Investment Manager. The Investment Manager seeks to realise the Fund's investment objective by investing in a diversified portfolio of small and medium sized private equity and credit funds (**Underlying Funds**), with the flexibility to also invest directly in private equity and credit investments by co-investing alongside small and medium sized private equity and credit funds.

Methodologies used to assess, measure and monitor the impact of the sustainable investments selected for the Fund

The Investment Manager ensures that the Fund's investments are selected in accordance with the Investment Manager's Responsible Investment Policy (see **Responsible Investment Policy**) and the social and environmental management systems (**SEMSs**) created and implemented by the Investment Manager and/or the Underlying Fund managers as further described in the Supplement. The Responsible Investment Policy includes an exclusion list which is a list of excluded activities (the **Exclusion List**, available at **Appended Implementation Guideline D – Exclusion List** to the **Responsible Investment Policy**) applied in assessing potential investments and monitoring investments which the Fund has invested in. The SEMSs created by the Investment Manager and/or the Underlying Fund managers support the identification, assessment, remediation and management of ESG issues in the Fund's investments. Each of the elements contained in the SEMSs are set out in the Responsible Investment Policy.

The Investment Manager, in its commitment to invest responsibly, integrates ESG matters into its investment practices specifically with respect to deal sourcing, analyses, decisions making and investment management right through to divestment. The Investment Manager will only make investments on behalf of the Fund which are expected to reach compliance with the Responsible Investment Policy within defined time frames and failure to reach compliance within established deadlines, and other material breaches by Underlying Funds of the agreed terms applicable to such investments, including requirements to align with the Responsible Investment Policy, may trigger divestment by the Fund.

Periodic reports

In accordance with Article 11 of the SFDR, disclosure will be made in the ICAV's periodic reports on the overall sustainability-related impact of the Fund.

Links:

[Responsible Investment Policy](#)

[Remuneration Policy](#)