



## **Information Regarding the Consideration of Principal Adverse Impacts of Investment Decisions on Sustainability Factors**

When providing advice we do not consider the adverse impacts of investment decisions on sustainability. However, where clients express a preference to invest in investment instruments that meet sustainability criteria, (commonly referred to as having environmental, social and governance "ESG" criteria) we advise on that basis.

We do, however, recognise the importance of identifying and managing material Environmental, Social, and Governance ("ESG") factors as part of our investment advisory process and believe that this is aligned with the aim of achieving long-term positive financial performance for investors. We also recognise that this should also support the better functioning of companies we advise clients to invest in, enhancing behaviour in a wide range of markets and industries and having a positive societal impact beyond the financial markets.

As part of the process to undertake appropriate due diligence on investments, we will conduct a level of research on each company or issuer in which we invest which will give us an understanding of the company or issuer. This may include a consideration of fundamental and quantitative elements such as financial position, revenue, capital structure etc. It may also involve qualitative and non-financial elements such as the company's approach to ESG factors and consideration of sustainability risk where we deem this relevant.

The form of our consideration of ESG factors and sustainability risk (where applicable) may involve the review of ESG data and analysis provided by third party data providers. However, and particularly given the limited basis on which such data is available and the subjective nature of some of this data relative to ESG factors, our analysis may rely primarily on fundamental research and analysis undertaken on a proprietary basis by our investment team.

Date of this Information Statement: 10 March 2021

29 Mount Street Upper, Dublin 2

T +353 (0)12871400 E: [Info@GillenMarkets.com](mailto:Info@GillenMarkets.com)  
[GillenMarkets.com](http://GillenMarkets.com)