Controlfida
UCITS FUNDS Plc

CONTROLFIDA UCITS FUNDS PLC (THE COMPANY) – ALPHA GREEN UCITS FUND (THE FUND)

Sub-Fund Website Disclosure – EU Sustainable Finance Disclosure Regulation (SFDR)

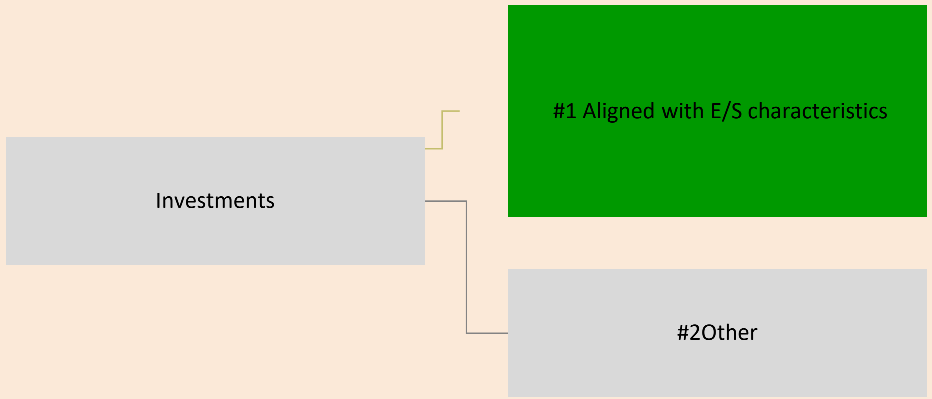
Sustainability-related disclosure required for Article 8 financial products under the Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector

Section	Website Disclosure
SUMMARY	
NO SUSTAINABLE INVESTMENT OBJECTIVE	This Fund promotes environmental or social characteristics, but does not have as its objective sustainable investment.
ENVIRONMENTAL OR SOCIAL CHARACTERISTICS OF THE FUND	The Fund promotes environmental characteristics through the identification of companies which it believes are contributing to climate change mitigation and adaption, through the stabilisation of greenhouse gas concentrations in the atmosphere at a level which prevents dangerous anthropogenic interference with the climate system. The Fund invests in securities of issuers that contribute to the Fund's promoted environmental and social characteristics, in line with the Fund's defined environmental, social and governance (hereinafter "ESG") investment strategy and in accordance with the ESG analysis framework and scoring methodology.
PRINCIPAL ADVERSE IMPACT STATEMENT	The Investment Manager of the Fund monitors indicators that indicate the presence of a principal adverse impact, except for all biodiversity-related indicators, for which the Investment Manager is unable to collect data. Principal adverse impacts are taken into account both directly and indirectly, as stated below, through their monitoring. **Directly** monitored through the analysis of the following and their change over time: ➢ Greenhouse gas (GHG) intensity calculated as metric tonnes of greenhouse gases in carbon dioxide equivalent (CO2e) emitted per million of sales revenue in the company's reporting currency – **PAI: GHG intensity, GHG Emissions, GHG Intensity of Investee Companies.**

	➢ Greenhouse gas (GHG) intensity calculated as metric tonnes of greenhouse gases in carbon dioxide equivalent (CO2e) emitted per million per million of the company's enterprise value including cash (EVIC) normalized to euros: – **PAI: GHG intensity, GHG Emissions, GHG Intensity of Investee Companies.** **Indirectly** monitored through the receipt and review of third-party data which considers the following PAIs: ➢ Climate change mitigation: – **PAI: Carbon footprint/EVIC** ➢ Sustainable use and protection of water and marine resources: – **PAI: Emission to water** ➢ Transition to a circular economy and waste prevention and recycling: – **PAI: Hazardous waste**
INVESTMENT STRATEGY (a) the investment strategy used to meet the environmental or social characteristics promoted by the financial product;	The Investment Manager will identify companies which it believes are contributing to the stabilisation of greenhouse gases concentrations in the atmosphere at a level which prevents dangerous anthropogenic interference with the climate system, consistent with the long-term temperature goal of the United Nation Framework Convention on Climate Change adopted in December 2015 (the **Paris Agreement**). The Investment Manager seeks to invest in companies active in: • generating, transmitting, storing, distributing or using renewable energy (for example: solar power; geothermic power; biomass; hydroelectric power; and wind power) including those using innovative technology with a potential for significant future savings or through necessary reinforcement or extension of the grid; • improving energy efficiency; • increasing clean or climate-neutral mobility (e-mobility services); • establishing energy infrastructure required for enabling the decarbonisation of energy systems; • producing clean and efficient fuels from renewables or carbon-neutral sources; • producing equipment and technologies related to renewable energies; • carbon capture, utilisation and storage; • water treatment and water efficiency management; and • circular economy and re-cycling (with specific focus on batteries recycling and PV panels recycling). The Investment Manager selects stocks by conducting research into individual companies, for example by analysing revenues, earnings and profits to determine a company's underlying value and potential for future growth and longer-term rewards. The Investment Manager takes a 'bottom-up' approach, which focuses on the analysis of individual stocks and their technology advantage sustainability over the next years.The Fund will generally invest in companies where:

	• The Investment Manager is able to identify a structural growth driver (circumstances which are causing a change in the way a company, an industry or market is operating therefore providing potential opportunities for investments to increase in value). This may be company specific or driven by changes in an industry or country, and may be supported by external factors (e.g. favourable political changes, increased automation or regulatory change), market penetration, brand strength, technological leadership and superior business models. • The Investment Manager perceives the company as having a strong competitive advantage, typically assessed using a range of elements such as the threat of new entrants, the bargaining power of buyers and suppliers, the threat of substitutes and competitive rivalry. • The relative valuation is attractive. Relative valuation assessments consider the price of a stock based on its historical range and relative to its peers, and not only play a role in the stock selection process but also in the sell-discipline; the Investment Manager may sell a stock if it believes the price no longer justifies the long-term growth prospects. The Investment Manager carries out company specific fundamental analysis on each investment and applies a proprietary scoring model to its sustainability analysis which entails each investment of the Fund being allocated an E, S and G rating based on third party ratings. Investments which have been rated the minimum ESG rating (>2.5) may be held by the Fund. Where an investment has not been rated by a third party, a rating of 1 is assigned and this investment may be held in the "brown bucket" which term refers to the portion of the Fund's assets which may be invested in investments which are rated below the minimum ESG rating. Further information on the scoring process is set out in Schedule II of the Supplement for the Fund. Sustainability metrics are tracked at an individual security and at a portfolio level, using data provided by third party data providers. The "do no significant harm" principle applies only to those investments of the Fund that take into account the EU criteria for environmentally sustainable economic activities. The remaining investments of the Fund do not take into account the EU criteria for environmentally sustainable activities.
PROPORTION OF INVESTMENTS	The Fund is a thematic fund, and its asset allocation will primarily be in listed equities and equities related instruments. There will be no restriction in terms of geographic allocation nor in market capitalization. The Fund may use derivatives for efficient portfolio management purposes, for example to reduce the volatility of the stock markets, to manage the interest rate risk on the securities held by the Fund and/or the currency exposure. In particular, the base currency of the Fund is Euro and normally will not be hedged against currency fluctuations, although FDI may be used for hedging exposure to investments.

The remaining investments of the Fund (#2Other) may hold cash positions of up to 20% of the Net Asset Value of the Fund and may invest, for liquidity management, in ancillary liquid assets such as bank deposits, fixed or floating rate instruments including but not limited to commercial paper, floating rate notes, certificates of deposit, freely transferable promissory notes, debentures, asset backed securities and government or corporate bonds. The Fund may invest in other collective investment schemes including cross-investment in sister sub-funds of the Company.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

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<td>MONITORING OF ENVIRONMENTAL OR SOCIAL CHARACTERISTICS</td>
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The sustainability indicators used to measure the attainment of each of the environmental characteristics promoted by the Fund are primarily:

Third party E, S and G ratings given for every single investment of the Fund. Investments which have been rated the minimum ESG rating (>2.5) may be held by the Fund. Where an investment has not been rated by a third party, a rating of 1 is assigned and this investment may be held in the "brown bucket" which term refers to the portion of the Fund's assets which may be invested in investments which are rated below the minimum ESG rating. Further details are set out below.
E rating is a valuation of environmental aspects through four categories: (i) environmental strategy, (ii) supply chain, (iii) products, and (iv) production processes.

S rating is a valuation of social aspects through four categories: (i) human and labour rights, (ii) community responsibility, (iii) human resources and (iv) clients and suppliers.

G rating is a valuation of governance aspects through four categories: (i) corporate governance structure, (ii) shareholder relations, (iii) accounting standards and (iv) business ethics.
Greenhouse Gas (GHG) Intensity per Sales and GHG Intensity per Enterprise Value Included Cash indicators (as explained further below).
Substantial contribution to climate change mitigation and adaptation;
Does not significantly harm environmental objectives outlined in the EU Taxonomy Regulation;
Minimum social safeguards; Investments and their economic activities should ensure alignment to principles and guidelines such as:

International Bill of Human Rights
International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work
ILO 8 Fundamental Principles
OECD Guidelines for Multinational Enterprises

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METHODOLOGIES FOR ENVIRONMENTAL OR SOCIAL CHARACTERISTICS	In order to attain the promoted environmental and social characteristics, the eligibility of target issuers is assessed based on the scoring system and the eligibility within the investable universe. Internal controls are in place in respect of investment decision making for the Fund. These include, but are not limited to, pre-trade and post-trade controls to ensure all applicable binding elements are observed at all times and independent oversight by risk management functions as required.
DATA SOURCES AND PROCESSING	The Investment Manager uses data from third-party ESG data providers, fundamental information from companies or both; compiled and evaluated in the proprietary in-house sustainability model database. In order to ensure data quality, the Investment Manager regularly reviews data and uses multiple data sources.
LIMITATIONS TO METHODOLOGIES AND DATA	The limitations to the attainment of the promoted environmental and social characteristics are related to incomplete and inaccurate data. However, they are deemed non-material, as the investment universe of the Fund provides an appropriate level of disclosure and coverage of required information by the Investment Manager to allow for the application of the investment methodology.
DUE DILIGENCE	In order to qualify for initial investment, the investments must comply with the binding elements applied by the Fund. This compliance has to be ensured by the Investment Manager through pre-trade compliance mechanisms in place.
ENGAGEMENT POLICIES	During the holding period, the Investment Manager will continue monitoring negative impacts through a combination of proprietary tools and external market research analysis, which are subsequently factored into investment decisions.
DESIGNATED REFERENCE BENCHMARK	No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the Fund.