BESPOKE
Trustees Limited

Sustainable Finance Disclosure Regulation

The Sustainable Finance and Disclosure Regulation ('SFDR') came into effect on the 10th March 2021. It requires Financial Market Participants ("FMP's") and Financial Advisers ("FA's) to make sustainability disclosures in relation to:

- Integration of *sustainability risk** in the investment process, pre-contractual disclosures and their remuneration policy
- Consideration of *principal adverse impacts*** *of investment decisions on sustainability factors* at both an entity and product level

**The term 'sustainability risk' refers to an environmental, social or governance ('ESG') event or condition that could cause an actual or a potential negative impact on the value of a product recommended to you.*

***Principal Adverse Impacts means the impacts of investment decisions and advice that result in negative effects on sustainability factors. Sustainability Factors means Environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.*

No consideration of adverse impacts of investment decisions on sustainability factors

Under SFDR, Bespoke Trustees Limited ('Bespoke') is defined as a Financial Market Participant because it manufactures 'pension products' as defined in SFDR. Bespoke manufactures the following pension products:

- SAPS: One member self directed self-administered pension schemes
- PRB: One member self directed personal retirement bonds

Bespoke is required under SFDR to produce this statement to advise clients on whether Bespoke considers any adverse impacts of investment decisions on sustainability factors.

Due to the nature of Bespoke products at the date of this statement, Bespoke **does not consider** any adverse impacts of investment decisions on sustainability factors. This is because Bespoke ***does not make or influence investment decisions*** in respect of investments within its pension products. Further information on this rationale is set out below.

This statement is reviewed and updated annually as required under SFDR. This version is dated 30 June 2023.

Details on Bespoke's rationale in respect of adverse impacts on sustainability factors

Bespoke products are designed for clients to make their own investment decisions. The make-up of each self-administered pension structure is derived by the investments selected by the client. The client, with the assistance of their personal financial advisor, is responsible for setting the investment strategy and making investment decisions on behalf of the pension structure. Investment returns are not generated by the pension structure itself, but rather by the client-selected investments within the structure.

As a policy, Bespoke does not offer or provide portfolio management, investment advice or investment recommendations and is therefore not in a position to influence the consideration of sustainability factors within a client's pension portfolio. Further, Bespoke is not in a position to consider the impacts on sustainability factors of investment advice that is provided by external financial advisors.

Regulated financial advisors are subject to SFDR in the provision of investment advice. Regulated investment funds and investment product providers are subject to SFDR and are required to disclose sustainability information to clients and financial advisors to assist in the investment decision making process.

Bespoke's internal Remuneration, Finance and HR policies and procedures ensure that Bespoke has in place effective risk management processes and make specific reference to the integration of sustainability risks.

Contact details
If you have any queries in relation to the above please contact the Head of Risk and Compliance in the first instance.

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