

Sustainability Policy Document

Integration of Sustainability Risk into Investment Decisions

Pursuant to Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (SFDR), Mondrian Funds plc (the Fund) is required to disclose the manner in which sustainability risks are integrated into investment decisions. The Fund has delegated the day-to-day investment management of the Fund to KBA Consulting Management Limited (the Manager) which has further delegated such day-to-day investment management of the Fund to Mondrian Investment Partners Limited (the Investment Manager).

The Investment Manager considers Environmental, Social, and Corporate Governance (ESG) factors as part of its broader analysis of individual issuers including with regards to Sustainability Risk assessment. The factors which will be considered by the Investment Manager will vary depending on the security in question, but typically include the themes addressed by the Sustainability Risks described in the Risk Factors section of the Fund's Prospectus. Assessment of Sustainability Risks is complex and requires subjective judgements, which may be based on data which is difficult to obtain and may be incomplete, estimated, out of date or otherwise materially inaccurate. Even when identified, there can be no guarantee that the Investment Manager will fully assess the impact of Sustainability Risks on a Fund's investments or proposed investments. Furthermore, what constitutes a Sustainability Risk is subjective, and it is therefore possible that the Investment Manager may not take into account a factor that an investor considers to be a Sustainability Risk but which the Investment Manager does not.

The impacts following the occurrence of a Sustainability Risk may be numerous and may vary depending on the specific risk, region and asset class. In the event that a Sustainability Risk arises, this may cause the Investment Manager to determine that a particular investment is no longer suitable and to sell it or decide not to make an investment in it.

The Investment Manager's ESG Investment Policy can be found on its website at <https://www.mondrian.com/esg-at-mondrian/>

No Consideration of Principal Adverse Impact

The Manager, in conjunction with the Investment Manager, does not currently consider the principal adverse impacts of the investment decisions taken on behalf of a Fund on environmental, social and employee matters, and respect for human rights, anti-corruption and anti-bribery matters (Sustainability Factors). The Manager, in conjunction with the Investment Manager, does not deem it appropriate to consider such adverse impacts where the relevant Fund does not promote environmental or social characteristics, or where the relevant fund does not have sustainable investment as its objective. For such Funds, the Investment Manager considers Sustainability Risks in the manner outlined in the section entitled "Integration of Sustainability Risk into investment decisions" above.

Remuneration Policy

Pursuant to SFDR, KBA Consulting Management Limited (the Manager) must include information in their remuneration policy on how the policy is consistent with the integration of sustainability risks. The remuneration policy of the Manager can be found at www.kbassociates.ie. A copy can be requested free of charge from the Manager.

The Investment Manager has adopted remuneration policies consistent with its regulatory obligations which promote sound and effective risk management and discourage excessive risk taking, including, without limitation, with respect to Sustainability Risks.