Sustainable Finance Disclosure Regulation

In March 2018, the EU Commission published an action plan for a sustainable financial system based on the aims of the Paris Climate Agreement and the United Nations' Agenda 2030. The Disclosure Regulation is one element of this action plan and will enter into force with effect from March 10, 2021. The Disclosure Regulation (SFDR) regulates the disclosure obligations of financial service providers with regard to the consideration of sustainability in their strategy, processes and products. In addition to publications on the website of the financial service provider, the regulation also deals with publications in pre-contractual information (i.e. prospectus) and reports (i.e. annual reports).

In the course of implementing this Disclosure Regulation, the Aureus / Argentum Fund (Ireland) plc does not integrate sustainability risks into its investment decision making process when deciding as between which precious metal to invest in as the Company does not believe that sustainability risks will materially negatively impact one Precious Metal that the Company may invest in over others. The implementation of the regulation in the prospectus will take place by March 10, 2021 at the latest.

The Company, through its Investment Manager, integrates sustainability risks into its investment decision making process. A sustainability risk means an environmental, social or governance event or condition that, if it occurs, could cause a negative material impact on the value of the investments.

Whilst the Company does not promote any specific environmental, social and governance (**ESG**) characteristics or have a sustainable investment objective, the evaluation of sustainability risks through the analysis of certain ESG factors is part of the Company's investment process.

The Investment Manager considers sustainability risk as part of its broader analysis of individual issuers using data received from external service providers (such as MSCI ESG Research LLC and/or ISS ESG). In following and considering sustainability risks, the Investment Manager has adopted the exclusion policy set out in the section entitled **Exclusions** below.

The impacts following the occurrence of a sustainability risk may be numerous and may vary depending on the specific risk, region and asset class. Where a sustainability risk occurs in respect of an asset, there could be a positive or negative impact on the return of the Company.

The Investment Manager believes that the Company will be exposed to a broad range of sustainability risks. As the Company is broadly diversified, it is not anticipated that any single sustainability risk will drive a material negative financial impact on the value of the Company.

Taking due account of the size, nature and scale of the Company's activities, the Company does not consider the adverse impacts of investment decisions on sustainability factors (being environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters) at this time. The Company, together with the Investment Manager, will keep this under review, particularly if the nature and scale of the Company's activities significantly change.

Exclusions

The Investment Manager has adopted the following exclusion policy:

- No direct investment in companies which operate in business areas of ostracized weapon systems or nuclear weapons or for which the revenue from production of civilian arms or tobacco will in excess of 5% of total revenue.

- No direct investment in companies who operate or are engaged into controversial business practices or who violate international norms. A “controversy” is defined as a case or ongoing situation in which the operations or the products of the company in question have an negative impact on (a) the environment (e.g. Energy or Climate Change), (b) the community (e.g. human rights) and/or (c) good governance (e.g. corruption or fraud). Whereas the existence and the severance of the controversy will be taken into account. Additionally the Investment Manager will supervise the compliance with international norms of UN Global Compact Principles and United Nations Principles for Responsible Investment (PRI), Fundamental Principles. Companies with a controversy with severe negative impacts or in violation against one of the aforementioned international rules will be excluded (from being a potential investment).

- Generally excluded are investments in financial instruments with a direct reference to agriculture commodities.

Taking into account the internal organisation and the nature, scale and complexity of the Company's activities as outlined above, the Board has put in place a remuneration policy designed to ensure that any relevant conflicts of interest can be managed appropriately at all times, taking into consideration the need to align risks in terms of risk management and exposure to risk and for the policies to be in line with the business strategy, objectives and interests of the Company.

The Company has no employees to whom remuneration is paid. The directors are paid fixed fees in accordance with this Prospectus, as disclosed in **CHARGES AND EXPENSES**.

The Board is satisfied that the Company's remuneration policies for the Directors whose activities may have a material impact on the risk profiles of the Company are consistent with and promote sound and effective risk management and do not encourage risk-taking which is inconsistent with the risk profiles of the Company. None of the Directors have a performance based variable component to their remuneration, therefore avoiding any potential conflicts of interest. The components of any variable element to remuneration arrangements will be in accordance with the Regulations, as will deferral payment thereof. The Investment Manager is subject to equally effective measures as the remuneration provisions set out in the Regulations and will implement a remuneration policy in accordance with the requirements of the Regulations.

10 March 2021