

The Davy logo consists of the word "DAVY" in white, uppercase letters on a red rectangular background.The GPS logo features the letters "GPS" in white, centered within a circular graphic of three concentric lines.

Global
Portfolio
Strategies

Davy SRI GPS Funds

Global Portfolio Strategies

Information Memorandum January 2022

Davy SRI Cautious Growth Fund
Davy SRI Moderate Growth Fund
Davy SRI Long Term Growth Fund
E Share Class Accumulating

IMPORTANT: This Information Memorandum is a summary document and does not contain all of the information that a prospective investor might reasonably require in considering an investment. It is not a Prospectus, a Supplement or a Key Investor Information Document, all of which provide important disclosures regarding risks, fees and expenses and are available on request from Davy, Davy House, 49 Dawson Street, Dublin 2. Investors are advised to read these documents prior to making an investment decision.

WARNING: None of these documents constitute investment advice, as they do not consider your individual situation. If you are in any doubt as to the suitability of an investment, you should seek investment advice in the context of your own personal circumstances prior to investing.

www.davy.ie



Reasons to **invest**

Three Different Funds with Different Investment Objectives

Three Funds:

1. Davy SRI Cautious Growth Fund
2. Davy SRI Moderate Growth Fund
3. Davy SRI Long Term Growth Fund

Each Fund has a different risk-return profile

Select the Fund which suits your investment needs and goals

[See page 7](#)

Globally Diversified Portfolios

Portfolios combining equity funds, bond funds and alternative investment funds (including property funds, absolute return funds and commodities)

Global exposure, through active and passive managers around the world

[See pages 14-16](#)

Access to Global Investment Funds

Davy identifies global managers who endeavour to achieve market-beating returns

Extensive due diligence on the personnel, strategies, and risks of Underlying Funds

Each Underlying Fund is constantly monitored and reviewed

[See page 19](#)

The Davy SRI GPS Funds provide three different options, allowing investors to choose one solution to their long-term investment objectives.

Actively Monitored Asset Allocation

Carefully constructed portfolios, designed to target three distinct risk and return profiles

Tactical asset allocations to take advantage of short- and medium-term market changes

A focus on risk as well as return

[See pages 17 & 18](#)

Managed by Davy’s Investment Team

Benefit from the views of Davy’s Investment Strategy Team

Underlying Funds identified by Davy’s Global Investment Selection Team who attend over 500 meetings with fund managers each year

Davy’s Portfolio Construction Team defines the risk and return profile for each of the funds

Overseen by Davy’s experienced Investment Committee

[See pages 20 & 21](#)

Attractive Cost Structure

Diversified, active and passive portfolios which are focused on keeping costs down

Benefit from significant economies of scale

Gross roll-up taxation structure

Weekly liquidity

Switch between funds without triggering tax liability

[See page 10](#)

Please note that these funds may not be suitable for you. They do not attempt to cover the investment objectives of all investors and do not take account of individual investors’ financial circumstances and needs. All investment comes with a degree of risk, see the risks outlined on page 29.

- **Diversified Portfolios**
- **Access to Global Fund Managers**
- **Active and Passive Strategies**



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01

01 Overview

- The Davy SRI Global Portfolio Strategies Funds are three distinct funds of funds (collectively, the ‘Funds’ or the ‘Davy SRI GPS Funds’; individually, the ‘Fund’)¹:
 - Davy SRI Cautious Growth Fund
 - Davy SRI Moderate Growth Fund; and
 - Davy SRI Long Term Growth Fund
- Each Fund in turn invests in a diverse range of investment funds (‘Underlying Funds’) with the aim of gaining exposure to a wide range of asset classes in various geographies².
- These Funds are UCITS (Undertakings for Collective Investment in Transferable Securities) and can be bought and sold on a weekly basis.
- Each Fund has a different investment objective, risk/return profile and target asset allocation. Table 1 summarises these key characteristics:

Table 1: Summary of Davy SRI GPS Funds

	Davy SRI Cautious Growth Fund	Davy SRI Moderate Growth Fund	Davy SRI Long Term Growth Fund																								
Designed For	Investors who prioritise reduced risk. It follows a strategy which aims for lower volatility, but which could produce lower returns over the medium-to-long term.	Investors who have a moderate approach to risk, with a balance between lower volatility and higher volatility assets.	Investors who have longer term investment objectives, and who are willing to accept a higher degree of volatility in pursuit of higher returns over this period.																								
Strategic Asset Allocation³	 <table border="1"> <tr><td>● Equity</td><td>30%</td></tr> <tr><td>● Bond</td><td>57%</td></tr> <tr><td>● Alternatives</td><td>12%</td></tr> <tr><td>● Cash</td><td>1%</td></tr> </table>	● Equity	30%	● Bond	57%	● Alternatives	12%	● Cash	1%	 <table border="1"> <tr><td>● Equity</td><td>52%</td></tr> <tr><td>● Bond</td><td>35%</td></tr> <tr><td>● Alternatives</td><td>12%</td></tr> <tr><td>● Cash</td><td>1%</td></tr> </table>	● Equity	52%	● Bond	35%	● Alternatives	12%	● Cash	1%	 <table border="1"> <tr><td>● Equity</td><td>72%</td></tr> <tr><td>● Bond</td><td>15%</td></tr> <tr><td>● Alternatives</td><td>12%</td></tr> <tr><td>● Cash</td><td>1%</td></tr> </table>	● Equity	72%	● Bond	15%	● Alternatives	12%	● Cash	1%
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● Bond	57%																										
● Alternatives	12%																										
● Cash	1%																										
● Equity	52%																										
● Bond	35%																										
● Alternatives	12%																										
● Cash	1%																										
● Equity	72%																										
● Bond	15%																										
● Alternatives	12%																										
● Cash	1%																										
Minimum Initial Investment	€500	€500	€500																								
Minimum Additional Investment	€100	€100	€100																								

WARNING: Past performance is not a reliable guide to future performance. The value of your investment may go down as well as up. These products may be affected by changes in currency exchange rates. If you invest in these products you may lose some or all of the money you invest.

¹ Davy SRI Cautious Growth Fund, Davy SRI Moderate Growth Fund and the Davy SRI Long Term Growth Fund (the “Davy SRI GPS Funds”) are sub-funds of Davy Funds plc, an open-ended umbrella investment company with variable capital and segregated liability between sub-funds incorporated with limited liability in Ireland under the Companies Act 2014, authorised by the Central Bank of Ireland as a UCITS pursuant to the Regulations. The fund is defined differently in the Prospectus as “a sub-fund of the Company the proceeds of issue of which are pooled separately and invested in accordance with the investment objective and policies applicable to such sub-fund and which is established by the Company from time to time with the prior approval of the Central Bank”. Davy Funds plc is authorised by the Central Bank of Ireland as a UCITS.

² Please refer to the Prospectus and individual Fund Supplements for a full list of permissible investments.

³ Please refer to Section 2.3 - Asset Allocation. These asset allocations are approximations within a range. They are not intended to reflect current allocations which may vary from these figures. Strategic Asset Allocations may be revised at any time.

What is Socially Responsible Investing (SRI)?

Socially Responsible Investing (SRI) is a type of investing that keeps in mind the environmental and social effects of investments, while ESG focuses on how Environmental, Social and Governance factors impact an investment's market performance.

Though similar, the two have some major differences. ESG investing considers how a company's adherence – or lack thereof – to certain standards might affect its performance in the market, while SRI investing can include the practice of actively not investing in certain companies or funds because they don't meet certain standards.

As a result, SRI investing involves a combination of exclusionary screening alongside various ESG approaches. The exclusionary screens focus on values, such as controversial business activities, and on climate related screens, such as fossil fuels.

The ESG approaches incorporated include:

■ Best in Class

The Best In Class ESG investment approach favours companies with better or improving ESG characteristics relative to their peers are preferred. The peer group is usually comprised of sector peers. This approach, also known as positive screening, does not exclude sectors and instead focuses on the companies in each sector best addressing material ESG risks. By following this approach investors reduce the risks associated with poor ESG performers and position portfolios for the possibility of long-term benefits related well managed companies.

■ ESG Integration

The ESG Integration approach employs both qualitative and quantitative ESG data in the investment process with a view to enhancing investment decision making. Financially material ESG data is identified for each potential portfolio company. The likely impact of this material data on the company's competitive positioning and prospects is assessed. At this point the investment manager can modify their valuation models, positively or negatively, to account for the ESG risks and opportunities identified.

■ Active Ownership / Engagement

The active ownership or engagement (also known as stewardship) approach involves investors entering a structured dialogue with companies to improve their performance on material ESG risks or to improve their ESG disclosures. Proxy voting is an important tool for ESG investors to register their approval or disapproval of company resolutions. In addition, investors practicing active ESG ownership can propose ESG orientated resolutions at shareholder meetings.

■ Thematic Investing

Thematic investing focuses on what it identifies as broader trends, these trends can be related to demographics, industry or society. This approach allows investors to address specific issues by investing in specific solutions focused in trends such as Water, Alternative Energy, Waste, Health or Climate Change.

Our approach to SRI

Our SRI offering is constructed in the same manner as the other offerings in Davy. We employ a diversified open architecture in our investment approach.

All portfolios are diversified across asset classes – Equity, Fixed Income, Alternatives and Cash, diversified across geographies and diversified across investment managers. In addition, we combine active and passive strategies within our portfolios.

The difference in approach of our SRI offering is the managers and instruments we allocate to. At Davy, for our SRI offering, we typically engage with investment managers who are signatories to the United Nations Principles for Responsible Investment (UNPRI).

A dedicated SRI Investment Committee is responsible for Davy's SRI offering.

UNPRI

“The Principles for Responsible Investment were developed by an international group of institutional investors reflecting the increasing relevance of environmental, social and corporate governance issues to investment practices. The process was convened by the United Nations Secretary-General”

“In signing the Principles, we as investors publicly commit to adopt and implement them, where consistent with our fiduciary responsibilities. We also commit to evaluate the effectiveness and improve the content of the Principles over time. We believe this will improve our ability to meet commitments to beneficiaries as well as better align our investment activities with the broader interests of society. We encourage other investors to adopt the Principles.”



Source: UNPRI, 2006

*How we screen for SRI criteria?

In selecting funds for Davy's SRI offering our Investment Selection team develops an understanding of the underlying fund managers' investment processes and methodologies. An assessment of the quality of an investment organisation and the resources which it applies to investment management are also important factors in our research process when selecting funds.

In selecting investments for the Fund, consideration is given to the environmental, social and governance ("ESG") profile of a potential investment. This involves an assessment of the ESG ratings of the fund under consideration for investment. In addition, the ESG ratings of the underlying investee companies of the relevant fund (as provided by MSCI or another third-party data provider) are assessed.

Our process also analyses ESG-related data such as information (where available) relating to the ESG policy of the target fund, its underlying holdings and carbon emissions at the overall fund level, this data may be provided by the third-party investment fund managers or third-party data providers such as MSCI.

As a result of this process, investments are primarily in funds whose ESG profiles rank in the higher end of the scale of MSCI ESG Fund Ratings (being a scale of ratings designed to provide greater transparency and understanding of ESG characteristics of fund and ETF (Exchange Traded Fund) components in investor portfolios).

Our SRI investment process will also seek to avoid investing assets in any equity fund or active fixed income fund which (at the time of investment in that fund) invests in any company which produces tobacco products or controversial weapons or any company which is in violation of any of the 10 principles of the UN Global Compact. Where any such fund subsequently, in the SRI Investment Committee's opinion, no longer meets this screening criteria, we will dispose of our investment in the fund.

*The UN Global Compact is a non-binding United Nations pact to encourage businesses and firms worldwide to adopt sustainable and socially responsible policies, and to report on their implementation

Our Philosophy

We do believe	We don't believe
<ul style="list-style-type: none"> ■ That certain markets are inefficient, and in these markets active managers can add value; ■ In keeping costs down for our clients; ■ In being transparent about what we do with your money; and ■ In actively monitoring the risk/return profiles of all of our investments. 	<ul style="list-style-type: none"> ■ That active managers will add value in every situation; ■ In paying above-average fees for average managers; ■ In putting all of our eggs in one basket; and ■ In limiting ourselves to a small selection of fund houses.

In order to achieve the target returns with due regard to risk, our approach is to invest in a range of funds across every major asset class and geography.

Keeping Costs Down

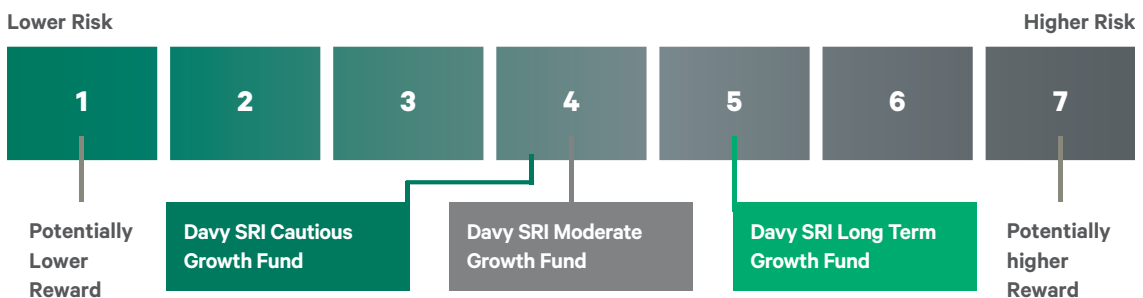
The Davy SRI GPS Funds have a focus on avoiding unnecessary investment costs

The Funds endeavour to invest in lower-fee institutional share classes of the Underlying Funds rather than the more expensive retail share classes which are typically available to retail investors.

The Davy SRI GPS Funds endeavour to use passive investment options (which typically have lower fees than actively managed options) where Davy does not believe that active management fees are justified.

Davy does not charge any transaction costs on trades within any of the Davy SRI GPS Funds.

Figure 1: ESMA (European Securities And Markets Authority) Risk and Reward Indicator



Source: Davy, 2021

WARNING: This scale is provided for indicative purposes only and should not be relied upon as a comprehensive measure of risk.

WARNING: These figures are estimates only. They are not a reliable guide to the future performance of the investments.

WARNING: These figures refer to simulated past performance. Past performance is not a reliable indicator of future performance.

The ESMA Risk and Reward Indicator provides a broad indication of each Fund's historical volatility over the last 5 years. Where actual performance data is not available we have used backtested data. Volatility is a measure of the variation of an investment's returns over time. Funds with a higher volatility (i.e. a greater variation in their returns over time) are assigned a higher rating on the scale.

For example, a fund which is fully invested in cash or short-term bonds of a highly rated government would likely receive a "1" rating, whereas a fund entirely invested in highly leveraged private equity or property transactions would likely receive a "7".

Please note:

- Historical data may not be a reliable indication for the future.
- The Risk and Reward profile is not guaranteed and may change over time.
- The lowest category does not mean "risk free".

The indicator does not take account of the following risks of investing in the Fund:

- Investing overseas can bring additional returns and spread risk to different markets. There are risks, however, that changes in currency rates may reduce the value of your investment.
- General Investment and Market Risks of the Underlying Funds: The Fund's activities may be significantly and adversely affected by general economic and market conditions, such as interest rates, availability of credit, inflation rates, economic uncertainty, changes in laws, and national and international political circumstances. These factors may affect the level and volatility of the Underlying Funds and the liquidity of the Fund's investments. Unexpected volatility or illiquidity could impair the Fund's returns or result in losses.
- Currency Risk: There is a risk of loss arising from exchange rate fluctuations or exchange control regulations.
- Use of derivatives for currency hedging purposes involves risks different from, or possibly greater than, the risks associated with investing directly in securities and other investment.

For a complete description of such risk factors, please see the section entitled "Risk Factors" in the Prospectus which is available on www.davy.ie.

We don't need to be smarter
than the rest, **we need to
be more disciplined.**

– Warren Buffett, CEO of Berkshire Hathaway



02

02 How the Davy SRI GPS Funds Work

2.1 How the Funds are Constructed

The Davy SRI GPS Funds are three multiple-manager funds, which invest in a carefully selected range of Underlying Funds. Figure 2 shows a simplified version of this relationship, illustrating how an investor can access a diversified portfolio of different types of funds with a single investment in one of the Davy SRI GPS Funds. For example, the Funds can invest in a broad-based global equity fund, while simultaneously investing in an equity fund which invests only in European equities.

Figure 2: Illustrative structure of a diversified portfolio: Different Types of Third Party Funds



Figure 2 is simplified, and in practice each of the Davy SRI GPS Funds invest in a wide range of funds in each asset class. For example, as at 30th November 2021, the Davy SRI Moderate Growth Fund was invested in **22 different Underlying Funds**. Please refer to the latest Fund Factsheet for details of Underlying Funds at that date.

In this way, a single investment in any one of the Davy SRI GPS Funds gives an investor diversified exposure to a range of asset classes, geographies and underlying holdings.

WARNING: If you invest in this product you may lose some or all of the money you invest. The value of your investment may go down as well as up. This product may be affected by changes in currency exchange rates.

2.2 Why Diversify?

As outlined previously, diversification is a key feature of the Davy SRI GPS Funds. This diversification can have significant benefits for investors in terms of the risk-return profile of their own individual portfolio.

Diversification can be viewed in terms of its effect on an investor's risk/return profile. A portfolio which is 100% invested in the shares of one company is 100% exposed to the risks and returns of that holding. However, a portfolio which combines a variety of different investments can have the effect of reducing the overall risk of the portfolio by spreading this risk across a range of companies.

Types of Diversification

A portfolio can be diversified in a number of ways, including the following:

Geographic

Investors can gain exposure to different regions (for example, United States (US), Europe, Emerging Markets) or specific countries. Davy looks through to the underlying holdings of each fund to determine the geographic exposure of each Fund and the implications of this for the geographic exposure of the Fund as a whole.

Asset Class

Each of the Davy SRI GPS Funds has exposure to Underlying Funds which in turn have exposure to the three main asset classes (Equities, Bonds and Alternatives) as well as cash. Within each asset class, the Underlying Funds may be further diversified; for example, within bonds, the Davy SRI GPS Funds may invest in Underlying Funds with a specific focus on corporate bonds or government bonds, or within alternatives the Davy SRI GPS Funds may invest in funds which focus on commodities or absolute return investments.

Sector

Securities may also be classified according to sector. For example, each of the Davy SRI GPS Funds may invest in Underlying Funds which have exposure to equities from a wide range of sectors, including financials, consumer discretionary, information technology and/or biotechnology, among others.

The Importance of Diversification

Diversification is important because individual securities, sectors, regions or asset classes may perform strongly in one year and poorly in the next. A diversified approach allows an investor to capture the broader performance of multiple assets. Figure 3 charts the performance of a number of different asset classes over the period 2011-2020. Note how no one asset class consistently outperforms relative to others, and that all asset classes had up years and down years over the period (for example, the performance of the highlighted European Equities varies quite dramatically from year to year).

**Diversification should be
the corner stone of your
investment program.**

– Sir John Templeton, Mutual Fund Manager July 1949

Figure 3: Returns of a Range of Asset Classes, 2010 - 2020

2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Global Bonds 6.9%	European Equities 19.3%	European Equities 23.7%	Global Equities 20.2%	Global Equities 11.0%	Emerging Markets 15.0%	Emerging Markets 20.8%	Global Bonds -0.3%	Global Equities 30.9%	Global Corp 9.2%
Global Corp 5.6%	Emerging Markets 16.4%	Global Equities 21.9%	Emerging Markets 11.6%	European Equities 10.3%	Commodities 14.8%	European Equities 12.6%	Cash -0.4%	European Equities 26.1%	Emerging Markets 9.1%
Cash 1.3%	Global Equities 14.4%	Absolute Return 6.8%	Absolute Return 10.6%	Absolute Return 4.2%	Global Equities 11.4%	Global Equities 7.9%	Euro Inflation Linked -1.0%	Emerging Markets 21.1%	Global Equities 7.0%
Euro Inflation Linked 1.3%	Euro Inflation Linked 12.9%	Cash 0.2%	Global Bonds 8.5%	Euro Inflation Linked 1.9%	European Equities 4.1%	Global Corp 7.4%	Global Corp -1.2%	Absolute Return 15.0%	Global Bonds 4.3%
Absolute Return -2.8%	Global Corp 4.3%	Euro Inflation Linked -0.6%	European Equities 4.1%	Cash 0.0%	Global Bonds 2.2%	Euro Inflation Linked 1.6%	Absolute Return -7.5%	Global Corp 6.8%	Euro Inflation Linked 0.6%
Commodities -10.7%	Global Bonds 4.1%	Global Corp -2.6%	Global Corp 0.6%	Global Corp -3.2%	Global Corp 2.1%	Global Bonds 0.4%	Commodities -8.7%	Global Bonds 4.6%	European Equities 0.2%
European Equities -15.2%	Cash 0.5%	Emerging Markets -6.6%	Cash 0.2%	Emerging Markets -5.0%	Cash -0.3%	Cash -0.4%	Emerging Markets -10.1%	Euro Inflation Linked 3.7%	Cash -0.4%
Emerging Markets -15.7%	Commodities -2.9%	Commodities -13.5%	Commodities -5.5%	Commodities -16.1%	Absolute Return -9.5%	Commodities -11.6%	European Equities -12.7%	Cash -0.4%	Commodities -11.4%
Cash 0.7%	Commodities -1.1%	Commodities -17.0%	Cash 0.5%	Cash 0.4%	Commodities -13.0%	Cash 0.8%	Cash 0.3%	Cash 0.1%	Commodities -7.1%

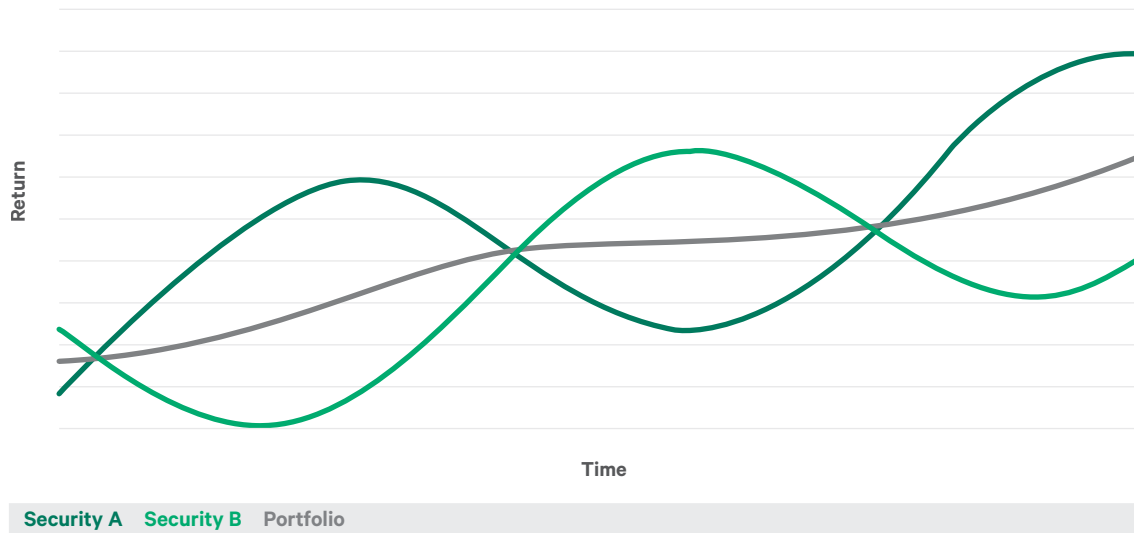
Asset Class Returns

Source: Bloomberg & Davy. For details on indices and asset classes, please refer to the Appendix. These figures are total returns of indices that are representative of their asset classes. Those indices are non-investable instruments. The total returns are in EUR.

A portfolio containing just one of the above asset classes would experience significant variation in value over time (volatility). However, if a portfolio is made up of a diversified set of the asset classes described above, it is likely to benefit from a lower average level of volatility. Figure 4 is a simplified chart that illustrates how a portfolio of two securities which experience positive or negative returns at different times can enable an investor to achieve more stabilised returns.

WARNING: Past performance is not a reliable guide to future performance. The value of your investment may go down as well as up. These products may be affected by changes in currency exchange rates.

Figure 4: Illustrative Chart of the Performance of Two Individual Securities Versus a Portfolio Composed of 50% of Each Security



Source: Davy. This chart is notional and does not reflect the performance of any individual investment or instruments.



2.3 Asset Allocation

Asset allocation decisions are a key component of any investment strategy. Asset allocation involves apportioning the instruments in a portfolio to align with the portfolio's investment objective, risk tolerance and investment horizon.

Each of the Davy SRI GPS Funds reflect key asset allocation decisions in line with their investment objectives and risk tolerances. Asset allocation decisions including the following have implications for the Underlying Funds selected in each of the Davy SRI GPS Funds:

1. Geography

Different geographical markets can have drastically different characteristics with consequent risks and opportunities.

2. Asset Class

Each major asset class has a broad risk/return profile. For example, in general equities are considered to offer higher returns than bonds. However, equity investment is considered to involve higher risk than bond investment. Additionally, within the alternatives asset class, there are a diverse range of allocation options (for example, property, commodities and absolute return funds).

3. Sector

Different sectors may outperform/underperform over different time periods. For example, in a period of low growth, an investor could reasonably expect that defensive equities (for example, utilities companies) may outperform relative to the market. During periods of higher growth, however, cyclical stocks (for example, consumer discretionary companies) may be expected to outperform. Technology trends may also play a role in sector selection.

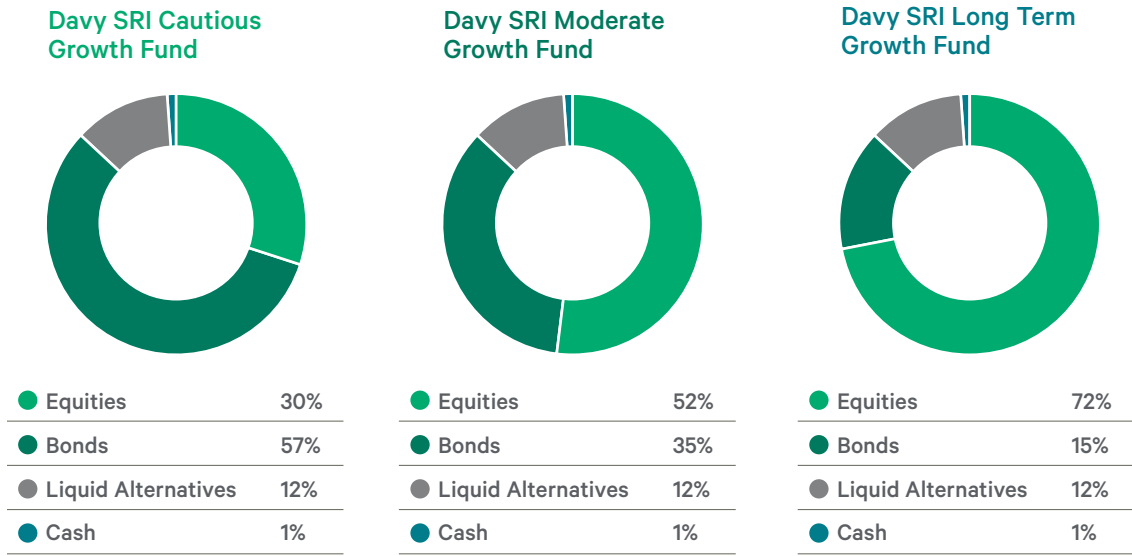
The underlying principles of sound investment should not alter from decade to decade, but **the application of these principles must be adapted to significant changes in the financial mechanisms and climate.**

– Benjamin Graham, Influential Professional Investor
and author of “The Intelligent Investor”

2.4 Strategic Versus Tactical Asset Allocation

Strategic asset allocation describes the asset allocation which Davy believes will deliver the long-term risk and return characteristics of the Fund.

Figure 5: Strategic Asset Allocation of the Davy SRI GPS Funds



Source: Davy

NOTE: These asset allocations are not intended to reflect current allocations which may vary from these figures. Strategic asset allocations for each Fund may be revised at any time.

Tactical asset allocation decisions are implemented within each Fund at periodic intervals, based on the market and economic environment at any given time. In practice, this means that on a regular basis, the Funds (through their investments in Underlying Funds) take underweight/overweight positions relative to the strategic asset allocations in line with Davy’s view of the current market environment. For example, while the strategic allocation to bonds in the Davy SRI Moderate Growth Fund is 35%, the tactical weighting could be lower to reflect a view that bond markets may underperform in the short-to-medium term.

Regular Updates

Davy produces factsheets for the Davy SRI GPS Funds on a monthly basis, showing asset allocation details. Data on the Davy SRI GPS Funds is also available online through the Morningstar® website (www.morningstarfunds.ie). ‘Look through’ data on the portfolio allocations and exposures is available through this site, and is updated at the beginning of each month.

You can’t predict.
You can prepare.

– Howard Marks, Chairman of Oaktree Capital

2.5 Active Versus Passive Management

The Davy SRI GPS Funds invest in a mix of actively and passively managed Underlying Funds.

An **actively managed fund** seeks to generate a positive return and outperform the market by selecting investments which the fund manager believes will perform well. An active strategy can respond to changing market conditions and the fund’s manager may sell securities if they believe that their value is likely to decline.

A **passively managed fund**, on the other hand, attempts to replicate the performance of a chosen market index or basket of securities – the fund manager is not aiming to generate excess returns above the return of the index for investors. A passive strategy can give an investor exposure to a broad range of instruments without the additional expense associated with appointing an active fund manager to research and select the optimal mix of securities for the portfolio. However, opting for a passive strategy may mean sacrificing the potential for outperformance relative to the index.

The Davy SRI GPS Funds invest in both active and passive Underlying Funds for two key reasons:

1. In certain markets, particularly more efficient developed markets, passive strategies may be more likely to outperform active managers over an extended time period; and
2. The strong range of active managers is augmented with some lower-cost passive strategies to maintain an overall low level of third-party costs for investors.

Active Manager Selection

Good active fund managers can and frequently do outperform their benchmarks, but many also underperform a passive alternative. This means that manager selection is critical.

Davy undertakes extensive quantitative and qualitative due diligence prior to selecting an Underlying Fund. The key criteria include:

Figure 6: Key Criteria in Selecting an Active Fund Manager

Investment Strategy	Investment Process	Key Personnel	Performance Track Record	Peer Group Analysis	Risk Control Procedures
How does the manager intend to achieve their target returns? Is there a focus on ESG factors?	How does the manager identify securities and implement this strategy? Is Responsible Investing at the fore of the process?	Is the team responsible for the fund’s previous successes still intact?	Does the manager have a strong long-term track record of out-performance?	How has the fund performed relative to its peers? How does the commitment to Responsible Investing compare?	What procedures are in place to avoid excess or unintended risks?

Davy’s selection process also takes the level of fees charged by a manager into account. Keeping investment costs down is one of the key priorities for the Davy SRI GPS Funds.

2.6 Management of the Davy SRI GPS Funds

The Davy SRI GPS Funds are managed on an ongoing basis with the full support of Davy’s Investment Team. This team comprises the Investment Strategy Team, the Global Investment Selection Team and the Portfolio Construction Team, and is overseen by Davy’s Investment Committee.

Figure 7: Management of the Davy SRI GPS Funds



Source: Davy



Investment Committee⁴

The Davy Investment Committee oversees our investment process and aims to ensure consistently superior investment results. The members of the Committee have an average of over 20 years of investment experience.

Investment Strategy Team

The Investment Strategy Team considers the overall macroeconomic and market environment to formulate our investment outlook, providing Davy's view on each of the respective asset classes and our assessment of the major issues impacting the markets today.

Global Investment Selection Team

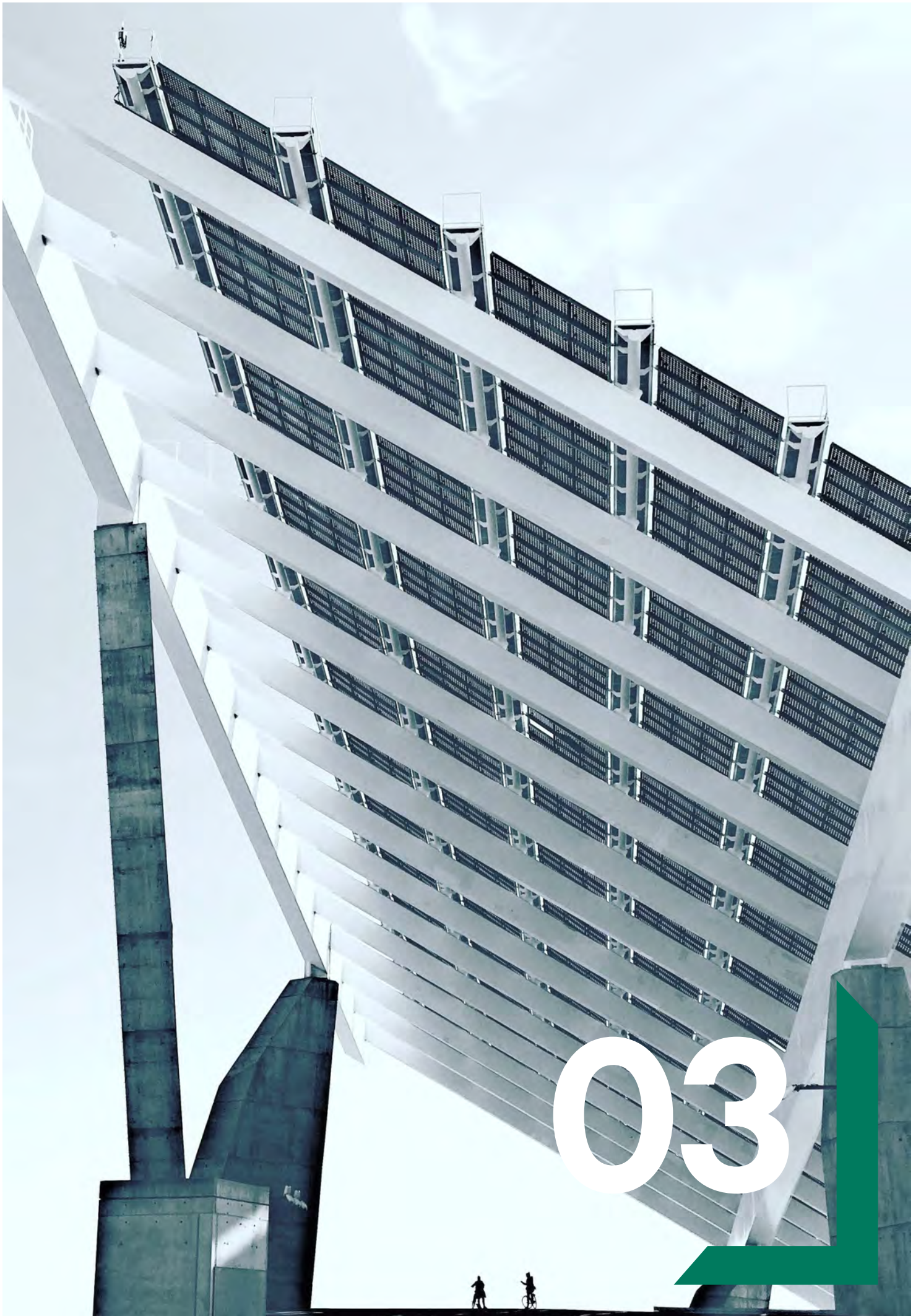
The Global Investment Selection Team ensures that Davy has a world-class offering in every asset class and determines the best way to implement the Funds' desired exposure. For example, the team will decide whether it is most beneficial to invest through a low cost passive option, through an active manager who has particular expertise in the area in question or through a bespoke instrument structured to reflect the Fund's specific investment objective.

Portfolio Construction Team

The Portfolio Construction Team brings together the views of the Investment Strategy Team and the investments identified by the Global Investment Selection Team to adjust tactical allocations while maintaining the risk objective of each Fund's strategy.



⁴ Please note that some members of the Investment Committee are also members of the other teams listed here.



03

03 Summary of Fund Terms and Conditions

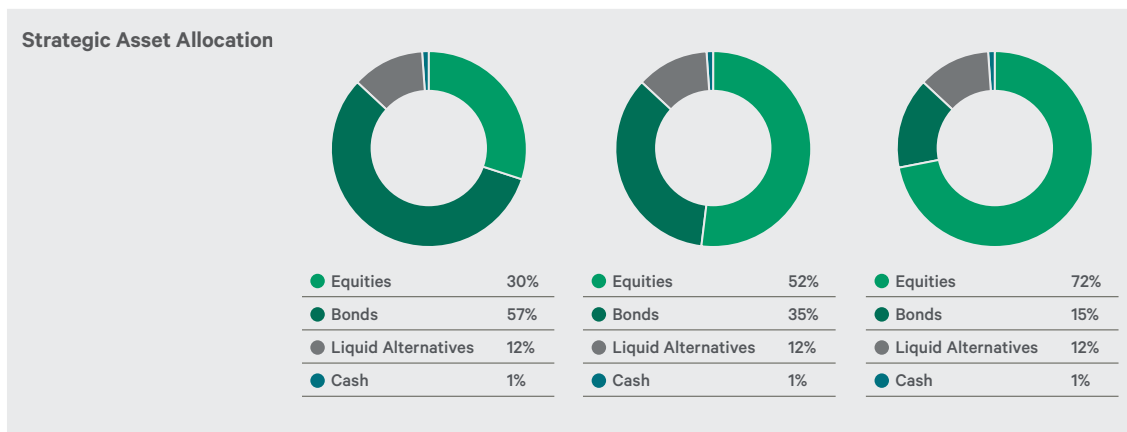
For full information on each Fund, please see the Prospectus, relevant Fund Supplements and the Key Investor Information Documents which are available from Davy.

The Davy SRI GPS Funds are three different funds:

- the Davy SRI Cautious Growth Fund;
- the Davy SRI Moderate Growth Fund; and
- the Davy SRI Long Term Growth Fund.

Each Fund has a different risk/return profile and a different asset allocation. Each Fund may hold different Underlying Funds and will hold the Underlying Funds in different proportions.

	Davy SRI Cautious Growth Fund	Davy SRI Moderate Growth Fund	Davy SRI Long Term Growth Fund
Designed For	Investors who prioritise reduced risk. It follows a strategy which aims for lower volatility, but which could produce lower returns over the medium-to-long term.	Investors who have a moderate approach to risk, with a balance between lower volatility and higher volatility assets.	Investors who have longer term investment objectives, and who are willing to accept a higher degree of volatility in pursuit of higher returns over this period.
Investment Objectives	The investment objective of the Fund is to provide capital growth while targeting a relatively low level of portfolio volatility of between 30% to 50% of global equity market volatility over rolling three-year periods. The Fund intends to achieve its investment objective by gaining exposure primarily to a globally diversified portfolio of equities, bonds and alternative assets. There can be no assurance that the Fund will achieve its investment objective.	The investment objective of the Fund is to provide capital growth while targeting a moderate level of portfolio volatility of between 50% to 70% of global equity market volatility over rolling three-year periods. The Fund intends to achieve its investment objective by gaining exposure primarily to a globally diversified portfolio of equities, bonds and alternative assets. There can be no assurance that the Fund will achieve its investment objective.	The investment objective of the Fund is to provide capital growth while targeting a relatively high level of portfolio volatility of between 70% to 90% of global equity market volatility over rolling three-year periods. The Fund intends to achieve its investment objective by gaining exposure primarily to a globally diversified portfolio of equities, bonds and alternative assets. There can be no assurance that the Fund will achieve its investment objective.
There is no guarantee that the Funds will be successful in meeting their objectives.			



Term	Description
Strategy	<p>The Investment Manager of the Funds will select Underlying Funds and other investments which in their opinion are most suitable for the purpose of meeting each Fund’s investment objective.</p> <p>The percentage to be invested in each underlying investment will be decided by the Investment Manager in light of current economic and other circumstances and may include a proportion in cash.</p> <p>The asset allocation within the Funds will be reviewed periodically.</p>
Permitted Investments	<p>The Fund intends to achieve its investment objective by primarily investing in a diversified portfolio of authorised open-ended UCITS and alternative investment funds (CIS). These Underlying Funds will invest principally in equity securities and fixed income securities on a global basis. The Fund may also invest in Underlying Funds with exposure to the following asset classes: money market instruments, property, commodities, absolute return funds, managed futures and hedge funds. While each Fund is a fund of funds, it may also invest in direct securities for short term liquidity. The Fund may also use Financial Derivative Instruments for efficient portfolio management and currency hedging purposes.</p>
Investment Restrictions	<p>A summary of the investment restrictions is outlined below. These are only some of the investment restrictions and are not a complete list.</p> <p>A Fund cannot invest more than 20% of its Net Asset Value in any one Underlying Fund.</p> <p>The aggregate investment in alternative investment funds (CIS) cannot exceed 30% of the Net Asset Value of a Fund.</p> <p>The Underlying Funds cannot invest more than 10% of net assets in other open-ended investment funds.</p> <p>Investors should also read the Prospectus: Appendix 1 as well as the “Investment Restrictions” section of the relevant Fund Supplement which is available on request.</p> <p>The Fund may use Financial Derivative Instruments (FDIs) for efficient portfolio management and currency hedging purposes. Such techniques and instruments include options and forwards.</p> <ul style="list-style-type: none"> ■ This class does not intend to pay a dividend. Any income generated by the Fund is reinvested to grow the value of your investment. ■ The Fund may not be appropriate for investors who plan to withdraw their money in 2-3 years. <p>The Fund intends to invest primarily in CIS whose ESG profiles rank in the higher end of the scale of MSCI ESG Fund Ratings (being a scale of ratings designed to provide greater transparency and understanding of ESG characteristics of fund and ETF components in investor portfolios). The Fund will invest at least 75% of its Net Asset Value in CIS which score in the top three gradings of the seven-point rating system (AAA, AA and A).</p>

Term	Description									
Investment Restrictions (Continued)	<p>The Investment Manager will also seek to avoid investing assets of the Fund in any equity CIS or actively managed fixed income CIS which (at the time of investment in that CIS by the Fund) invests in any company which produces tobacco products or controversial weapons or any company which is in violation of any of the 10 principles of the UN Global Compact.</p> <p>For full investment objectives and policy details please refer to the Prospectus and the Fund Supplements which are available on www.davy.ie.</p>									
Management of the Company	The Directors control the affairs of the Company and are responsible for the formulation of investment objectives and policies of each Fund. The Directors have delegated certain duties to the Investment Manager, the Distributor, the Promoter, the Depositary and the Administrator.									
Investment Manager, Promoter & Distributor	J & E Davy Unlimited Company (trading as Davy) (a wholly owned subsidiary of J & E Davy Holdings).									
Depositary	Northern Trust Fiduciary Services (Ireland) Limited									
Administrator	Northern Trust International Fund Administration Services (Ireland) Limited									
Base Currency	Euro									
Minimum Initial Subscription	€500									
Minimum Additional Subscription	€100									
Dealing Day	The Funds will deal weekly on Thursday of each week or the next business day if Thursday is not a business day in Dublin. All orders for subscriptions and redemptions relating to each Fund must be received by the administrator, Northern Trust, by 4.00pm on the business day preceding the relevant dealing day.									
Distribution Status	The units of the Funds will be Accumulating and will not make any distributions.									
ISINs (International Securities Identification Number) / SEDOLs (Stock Exchange Daily Official List)	<table> <tbody> <tr> <td>Davy SRI Cautious Growth Fund E Share Class</td> <td>IE0007E6RFN1</td> <td>BPJPF0</td> </tr> <tr> <td>Davy SRI Moderate Growth Fund E Share Class</td> <td>IE000DWV2421</td> <td>BPJPFS3</td> </tr> <tr> <td>Davy SRI Long Term Growth Fund E Share Class</td> <td>IE000SC7E7B9</td> <td>BPJPFM7</td> </tr> </tbody> </table>	Davy SRI Cautious Growth Fund E Share Class	IE0007E6RFN1	BPJPF0	Davy SRI Moderate Growth Fund E Share Class	IE000DWV2421	BPJPFS3	Davy SRI Long Term Growth Fund E Share Class	IE000SC7E7B9	BPJPFM7
Davy SRI Cautious Growth Fund E Share Class	IE0007E6RFN1	BPJPF0								
Davy SRI Moderate Growth Fund E Share Class	IE000DWV2421	BPJPFS3								
Davy SRI Long Term Growth Fund E Share Class	IE000SC7E7B9	BPJPFM7								
Share Class	E Accumulating									
Net Asset Value	The Funds will be valued at close of business on Wednesday in Dublin ⁵ . From this valuation, the units are priced and will be updated on www.davy.ie on the following business day in Dublin.									

⁵ If the valuation day falls on a non-business day, the valuation day will be the business day immediately preceding the non-business day.

Term	Description
Investment Management Fee	A fee of up to 1% per annum of the value of each Fund is payable to the Investment Manager. The Investment Manager is also entitled to its reasonable out-of-pocket expenses out of the assets of the Funds.
Director's Fees	A maximum fee of €40,000 plus VAT per annum will be payable to each Director of the Company from the assets of the Funds. All Directors will be entitled to reimbursement of expenses in connection with the business of Davy Funds plc or the discharge of their duties.
Depositary Fee	The annual fee of the Depositary is up to 0.0175% of the net asset value of each Fund, subject to a minimum monthly fee of €600 per Fund as well as a transaction fee for each transaction conducted. The Depositary is also entitled to its reasonable out-of-pocket expenses out of the assets of the Funds.
Administrator's Fees	The annual fee of the Administrator is 0.085% of the net asset value of each Fund, subject to a minimum annual fee of €30,000 as well as a transaction fee for each transaction conducted. The Administrator is also entitled to its reasonable out-of-pocket expenses out of the assets of the Funds.
Establishment Expenses	All fees and expenses (circa €45,800) in relation to the establishment and organisation of the Company and the initial Funds will be taken out of the assets of the Funds.
Preliminary Charge	A preliminary charge may apply up to a maximum of 5% of the Net Asset Value of the shares in the fund.

Investing in a range of funds

Term	Description
Exchange Charge	An exchange charge on the exchange of any shares up to a maximum of 2% of the Net Asset Value of the shares in the fund may apply.
Repurchase Charge	A Repurchase Charge may apply in the following circumstances: up to 3% of the NAV per share within the first year from the date of issue of the relevant shares; up to 2% of the NAV per share within the second year from the date of issue of the relevant shares; up to 1% of the NAV per share any time thereafter.
Fees payable within the Underlying Investment Funds	The Underlying Funds in which the Funds may invest will bear their own fees and expenses. They will also be subject to management fees and other expenses of a similar nature to those applying with respect to the Funds such as redemption fees, subscription fees and the fees of service providers such as the depositary, trustees and administrators. The Funds will typically only invest in Underlying Funds, which charge management fees of up to 3% of the Underlying Fund's net asset value.
Anti-Dilution Levy	Upon the recommendation of the relevant Investment Manager, an Anti-Dilution Levy may be imposed. Please refer to the Prospectus for further detail.
Operational Expenses	The Funds will be liable for certain fees and expenses related to the provision of these services including but not limited to Agent Fees, Distributor Fees, sub-custodians and sub-investment managers fees. Please refer to the "Fees & Expenses" section of the Prospectus for additional information.
Account Fees	Davy account fees may also apply as disclosed in the terms and conditions of your Davy account.
Fund Structure	The Davy SRI Cautious Growth Fund, Davy SRI Moderate Growth Fund and the Davy SRI Long Term Growth Fund (the "Davy SRI GPS Funds") are sub-funds of Davy Funds plc, an open-ended umbrella investment company with variable capital and segregated liability between sub-funds incorporated with limited liability under the Companies Act 2014, authorised and regulated by the Central Bank of Ireland. Authorisation by the Central Bank of Ireland is not an endorsement of the Funds and does not constitute a guarantee or a warranty as to the performance of the Funds. This Information Memorandum has not been reviewed or approved by the Central Bank of Ireland.

**across every major
asset class and
geography.**



04

04 Taxation

For Irish Resident Investors

WARNING: This information is provided for Irish resident investors only and is based on our understanding of Irish tax legislation and the known current Revenue interpretation thereof. This can vary according to individual circumstances and is subject to change without notice, including retrospectively. It is intended as a guide only and not a substitute for professional advice. This information is not applicable to UK resident clients. You should consult the “Taxation” section of the Prospectus for additional information as well as your tax advisor for the rules that apply in your individual circumstances. No undertaking can be given that the tax system may not be revised with a consequent effect on the return of the Funds.

It is our current understanding that an investment in each of the Funds operates on what is known as a ‘gross roll-up’ taxation basis. This means that there are no Irish income or capital gains taxes incurred on investment earnings generated within the Funds. This enables each of the three Funds to add to their value by re-investing any income and gains without any deductions for Irish tax for an eight-year period.

Tax Rates⁶

Table 3 outlines the current Irish taxation rates applicable to the Funds in the case of redemptions from the Funds or deemed disposals.

Table 2: Taxation Rates

Type of Irish Investor	Tax Rate on Gains
Irish Tax Resident / Ordinary Tax Resident Individual	41%
Irish Tax Resident Corporate*	25%

Source: Revenue

* This rate assumes the payment is not taken into account as a receipt from a trade carried on by the corporate investor. Additional taxes may be payable where the company is treated as a ‘close company’ for Irish tax purposes.

Capital losses on disposal cannot be used to shelter capital gains from other investments.

Irish Exempt Investors

Some investors may be exempt from tax. They include Irish resident pension schemes and charities which are approved by the Revenue and have completed the relevant revenue declaration. (Please note that there is no provision for a refund of tax in cases where tax has been withheld from the proceeds of a sale and the investor has not made the relevant declaration as an exempted investor).

Eight-year Deemed Disposal Rule

A liability to tax currently applies to Irish individual investors and Irish corporate investors on the ending of the eighth anniversary of their acquisition of an interest in any of the Funds, and each subsequent eight-year period beginning when the previous one ended. The tax is payable on any unrealised uplift in the value of the investment at that date. Where the investment is subsequently sold, the amount of tax paid under this eight-year rule is treated as a payment on account in respect of any further tax that may be due on disposal of the units.

Non-Residents

Different rules may apply in the case of certain non-residents. For more details, please consult your tax advisor.

⁶ Rates correct as at January 2022; these rates may be subject to change. Investors should consult their tax advisor for the rules that apply in their own individual circumstances.



05

05 Risk Factors

WARNING: The following is a list of some of the important risk factors that prospective investors should consider prior to making a decision to invest in any of the three Funds. The list is not intended to be comprehensive or exhaustive. Various other risks may also apply. You should read the complete list of risks contained in the Full Prospectus and Supplements. Terms not defined herein shall have the same meaning as they do in the Prospectus. You should consult an advisor about the risks that apply in your particular circumstances.

Each of the three Davy SRI GPS Funds has a distinct risk and return profile. However, it is possible that the Fund with the potential for most risk may not produce a higher return than the other Funds and similarly the Fund with the lowest risk objective may produce a higher return than the other Funds. This is particularly true in the short- and medium-term.

No Assurance of Investment Return

There is no guarantee that the Funds will achieve results comparable to those achieved in the past, or that capital will be returned to investors. Investors should note that the Funds and the Underlying Funds are NOT capital protected. Investors may lose some or all of the value of their investment.

Underlying Funds and Other Investments

Although Davy will monitor activities of the Underlying Funds, investment decisions within these Underlying Funds will be made by the third party investment manager of these funds, independently of the Investment Manager of the Funds. The Underlying Funds will be subject to the restrictions applicable to those Underlying Funds and the Directors of Davy Funds plc, the Investment Manager or the Trustee/Depository of the Funds is not liable for compliance with such restrictions.

It is possible that some investment managers of the Underlying Funds will take positions in the same security or in issuers in the same industry or country or in the same currency or commodity at the same time. Consequently, it is possible that one Underlying Fund may purchase an instrument at the same time as another Underlying Fund decides to sell it. There is no guarantee that the selection of the Underlying Funds will actually result in diversification of investment styles and that the positions taken by the Underlying Funds will always be consistent.

An investment in a Fund which invests in Underlying Funds may entail a duplication of entrance, management, administration, depositary charges and taxes. Where the Fund invests in an Underlying Fund which is managed by the Investment Manager or its subsidiaries, no duplication of subscription and redemption charges will be incurred.

Income

Although these Funds aim to invest in assets which may provide for some income generation, there is no guarantee that there will be sufficient investments with this characteristic or that the investments will return the income anticipated. Income may fluctuate in accordance with market conditions and taxation arrangements. The Funds may not therefore accumulate income. Share Class E Accumulating shares do not intend to pay a dividend. Any income generated by the Fund is reinvested to grow the value of the investment.

Conflicts of Interest

The Investment Manager may invest in Underlying Funds affiliated with the Investment Manager or in Underlying Funds for which the Investment Manager or an affiliate act as sponsor, investment manager or provide other services which may pay fees to the Investment Manager or an affiliate. The Funds may also use affiliates of the Investment Manager as broker for transactions on behalf of the relevant Fund or other Underlying Funds in which it invests. The Investment Manager may also provide services similar to those provided to the Funds to other investment funds with similar objectives. It is, therefore, possible that any or all of them may, in the course of business, have potential conflicts of interests with the Funds and the Investment Manager will endeavour to ensure that such conflicts are resolved fairly as per its regulatory requirements.

Fees

An investment in a Fund which invests in Underlying Funds may entail a duplication of management, administration, depositary charges and taxes.

Currency Risk

The Funds may invest in Underlying Funds which may not be euro-denominated. This means they carry a risk related to currency fluctuations. In some cases, investments may be made in Underlying Funds which are euro-denominated but the underlying investments themselves may be subject to exchange rate and currency fluctuations and risks. Any currency fluctuations may affect the returns of the Funds in euro terms. The Funds may also employ techniques such as forward foreign exchange contracts under the conditions and within the limits set out in Appendix I of the Prospectus for currency hedging purposes. There can be no guarantee that such strategies will be completely effective in practice.

Flexible Investment Mandates

The third party managers of the Underlying Funds have discretion over the management and implementation of investment decisions for their respective funds. This places considerable reliance on the expertise of the third party managers, however there is no guarantee that the third party managers will be successful in their efforts.

Diversification Risk

While diversification is an objective of the Funds, there is no assurance as to the degree of diversification that will actually be achieved. The Funds may invest in a limited number of Underlying Funds and/or investments and as such, the performance of a single investment may have a substantial impact on the overall performance of the Funds.

Interest Rate Risk

Interest rates change over time, adding to the risk of the Funds. One of the objectives of the Funds is to provide the opportunity for an income and so therefore a portion of the Funds may be invested in bond funds. Typically, as rates rise, the price of a fixed rate bond will fall, and vice versa. Changes in interest rates may affect the value of the holdings within the Underlying Funds that the Funds may be invested in and so therefore may affect the Funds and their performance.

Fixed Income Securities Risk

The Funds will invest in Underlying Funds and a portion of those investments may be allotted to fixed income biased funds. It is likely that such funds will be exposed to risks including, but not limited to credit risk, corporate bond risk and government bond risk. Credit risk refers to the possibility that a sovereign, company, municipality or agency which issued the bonds may default or go bankrupt, leaving them unable to make their debt payments. The default of an issuer of a fixed income security held by the Funds or the Underlying Funds may affect the performance of the Funds. The Funds and/or the Underlying Funds may invest in corporate bonds which typically have a lower credit rating than government bonds reflecting the higher level of risk associated with corporate credit. Though investment grade bonds⁷ are the “safest” corporate bonds, there is still a risk that they can default. They are therefore considered to be riskier than some government bonds, some of which, like the US, have never defaulted. Sovereign fixed income securities are issued and backed by a central government. UK Gilts, US Treasuries and German Bunds, are all examples of sovereign government bonds. Sovereign bonds are typically perceived to be less risky than corporate bonds and the income generated from such fixed income securities has reflected that in the past.

WARNING: If you invest in these products, you may lose some or all of the money you invest.

Economic, Social and Political Risks/Emerging Market Risk

The Funds may invest a portion of their assets in what may be classified as emerging markets which tend to carry a higher degree of risk. Investments in such countries may be subject to potentially higher economic, social and political risks than investments in developed countries. Emerging markets with emerging economies or stock markets may lack the social, political, economic and regulatory stability characteristics of more developed countries. As a result, the risks from investing in those countries, including the risks of nationalisation, expropriation and repatriation of assets, may be heightened. Emerging markets also may have substantially less

⁷ Please refer to Section 7 - Glossary of Terms for an explanation of “Investment Grade”.



volume and greater volatility than more developed markets. There may be little financial or accounting information available with respect to issuers located in some of these countries, and it may be difficult as a result to assess the value or prospects of an investment in such issuers. Debt in these markets may not be rated for creditworthiness by any internationally recognised credit rating organisation. Settlement systems may also be less well organised.

Settlement and Clearing Risk

The trading and settlement practices on some of the exchanges on which the Funds may invest in may not be the same as those in more developed markets of western Europe and the United States. In particular, some or all of the following additional risks may be associated with settlement and clearing of securities transactions in emerging markets. These additional risks include but are not limited to delays experienced in repatriation of sales proceeds due to local exchange controls, an uncertain legal and regulatory environment and the possibility that transactions may be settled by a free delivery of stock with payment of cash in an uncollateralised manner. That may increase settlement and clearing risk and/or result in delays in realising investments made by the relevant Underlying Fund.

Custody Risk

Local custody services in some of the market countries in which an Underlying Fund may invest may not be the same as those in more developed market countries and there is a transaction and custody risk involved in dealing in such markets, for which the Trustee /Depositary will have no liability.

Tax Risk

The information contained herein is based on our understanding of Irish tax legislation and the current Revenue interpretation thereof, and is subject to change without notice. It is intended as a guide for Irish tax residents only and not as a substitute for professional advice. You should consult your tax adviser about the rules that apply in your individual circumstances.

Also, various tax arrangements may apply to the Underlying Funds and other investments, and therefore an investment in the Funds involves a number of complex tax considerations. No assurance can be given regarding the actual level of taxation that may be imposed upon the Funds, their investments or investors with respect to their investments in the Funds.

Access different with a

Liquidity Risk

The Funds may invest in Underlying Funds and/or instruments listed on markets which are less liquid than the world's leading stock markets. There may also be cases where the listed market is sufficiently liquid but for capital protection reasons, there is no assurance that the Underlying Funds in which the Funds may be invested will not restrict redemptions in stressed market conditions. Such a lack of liquidity may adversely affect the value or ease of disposal of such investments.

Inflation Risk

Inflation risk is the erosion of value in real terms of the income stream and the capital value, of an investment, that occurs during a period of general increases in price and corresponding fall in the purchasing power of money during inflationary times. Inflation will impact on the real return of the Funds.

Foreign Investment Risk

The Funds can invest globally. A fund that invests in foreign securities may experience more rapid and extreme changes in value. The value of the Funds' assets may be affected by uncertainties such as international political developments, changes in government policies, changes in taxation, restrictions on foreign investment and currency repatriation, currency fluctuations and other developments in the law and regulations of countries in which investment may be made.

Investment in High Yield Securities

The Funds may invest in Underlying Funds in which the third party managers may choose to be invested in higher yielding securities as a means to generate income and you should be cognisant of that fact. This can be regarded as speculative as it generally entails increased credit⁸ and market risk and may also be subject to price volatility due to such factors as interest rate sensitivity and general market liquidity.

Special risks of Hedging and Income Enhancement Strategies/Use of Derivative Instruments

The Funds may also employ techniques and instruments, specifically options and forward foreign exchange contracts under the conditions and within the limits set out in Appendix I of the Prospectus for currency hedging purposes and efficient portfolio management purposes. Use of these instruments, including but not limited to futures and options, may entail investment exposures that are greater than their cost would suggest, meaning that a small investment in derivatives could have a large impact on the Funds' performance. Their use as a hedging methodology does not eliminate fluctuations in the underlying prices of securities and the cost of hedging can outweigh the benefits.

⁸ Please refer to Section 5 - Risk Factors, Fixed Income Securities Risk for an explanation of Credit Risk.

types of funds single investment.





06

06 Important Information

Conflicts of Interest

Investors should be aware that some of the Directors of the Company (Davy Funds plc) are also employed by the Investment Manager, Promoter and the Distributor (J & E Davy Unlimited Company).

The Directors of Davy Funds plc, Investment Manager, Depository, Administrator, Promoter, Distributor and their respective affiliates, officers and shareholders (collectively the “Parties”) of the Funds and/or the Underlying Funds are or may be involved in other financial, investment and professional activities which may on occasion cause conflict of interest with the management of the Funds and/or the Underlying Funds. These include management of other funds, purchases and sales of securities, investment and management counselling, brokerage services, trustee and custodial services and serving as directors, officers, advisers or agents of other funds or other companies, including companies in which the Funds may invest. In particular, it is envisaged that the relevant Investment Manager and Fund Manager of the Funds and/or the Underlying Funds may be involved in managing or advising on the investments of other investment funds which may have similar or overlapping investment objectives to or with the Funds and/or the Underlying Funds. Each of the Parties will respectively ensure that the performance of their respective duties will not be impaired by any such involvement that they might have. In the event that a conflict of interest does arise, the Directors of Davy Funds plc shall endeavour to ensure that it is resolved fairly and in the interests of unit-holders.

The Parties may engage in transactions where any one or more of the Parties is acting in the capacity as principal or as agent, provided that such transactions are carried out on terms similar to those which would apply in a like transaction between parties not connected with the Parties or any one of them and that such transactions are carried out on normal commercial terms negotiated at arm’s length and in the best interests of the unit-holders. Connected Party Transactions permitted are subject to:

- a. a certified valuation of a transaction by a person approved by the Trustee/Depository as independent and competent; or
- b. the transaction is executed on best terms reasonably obtainable on an organised investment exchange in accordance with the rules of such exchange; or
- c. where (a) and (b) are not practical, execution on terms which the Trustee/Depository is satisfied conforms with the principle outlined in the preceding paragraphs.

Where a commission is received by the Investment Manager by virtue of an investment made for the account of the portfolio in an investment fund, this commission shall be paid into the property of the portfolio. Davy may deal as principal for its own account by selling investments to the Funds and/or the Underlying Funds or by buying investments from the Funds and/or the Underlying Funds, which may give rise to a profit for Davy. Davy, acting as Investment Manager, or any connected or affiliated companies or their employees, may have a position in the investments made by the Funds or the Underlying Funds.

Davy makes payments to intermediaries that help to start, conclude or maintain a business relationship between Davy and its clients. Further information is available in the Davy Terms and Conditions for your account. You can receive more detailed information on request by contacting Davy or your intermediary.

Legal Structure

The three Funds are sub-funds of Davy Funds plc, an open-ended umbrella investment company with variable capital and segregated liability between sub-funds incorporated with limited liability in Ireland under the Companies Act 2014, authorised and regulated by the Central Bank of Ireland. Subscriptions may only be based on the current Prospectus, Supplements and Key Investor Information Documents, and together (where applicable) with the most recent annual report and (if issued after such a report) the most recent semiannual report. A copy of the Prospectus, Supplements and Key Investor Information Documents and reports, where issued, may be obtained free of charge from Davy or the administrator of the Funds.

Prospectus, Supplements and Key Investor Information Documents

This Information Memorandum is NOT a Prospectus but is general marketing information only. Prospective investors should read carefully the Prospectus, Supplements and Key Investor Information Documents for the Davy SRI GPS Funds and should also consult professional advisors (including financial, taxation and legal advisors). Further information on the Davy SRI GPS Funds, as well as the Prospectus, Supplements and Key Investor Information Documents, is available free of charge from Davy on request.

Suspension of the Funds

The Manager may temporarily suspend the calculation of the Net Asset Value and the issue and redemption of units of the Funds. The conditions under which the temporary calculation of the Net Asset Value may be suspended are outlined in the Prospectus, which is available on request.

We believe in being transparent

Switching

Republic of Ireland investors will be permitted to switch at no charge between the Davy SRI GPS Funds and other funds which are under Davy Funds plc, a list of which is available in the Prospectus. Intermediaries may contact their appointed Investment Intermediary.

It is our understanding that switching between sub-funds of Davy Funds plc does not under current legislation constitute a taxable event. Advisory and discretionary clients can get further information on switching from their Private Client Adviser. Execution-Only clients should contact the Davy Select Team on 01 614 8900.

Davy will not charge a fee for switches between different classes of units of the same Funds.

Investors should note that Davy reserves the right to switch clients between unit classes of the same Funds in the event that they no longer meet the criteria for holding a specific class of unit.

Eligibility

Units may be held by individuals, charities, corporate entities, pension schemes and partnerships (with the exception as set out in 'Excluded Investors' below). All investments will be registered in the name of a nominee company of the Davy Group.

Excluded Investors

Units cannot be offered in the United States or to any US citizen. Applicants will be required to certify that they are not US citizens.

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with your money.**



07

07 Glossary of Terms

Asset Allocation

An investment strategy that aims to balance risk and reward by apportioning a portfolio's assets according to either the investor's goals and circumstances, (for example, knowledge and experience, risk tolerance and investment horizon) or the specific objective or mandate of a particular fund, depending on the client relationship.

Benchmark

A standard against which the performance of a fund can be measured. Generally, broad market stock and bond indices are used for this purpose, for example, the FTSE 100.

Corporate Bond

A corporation-issued, long-term debt obligation. When you invest in a corporate bond, the corporation pays you interest on the bonds you own. At a stated date in the future (maturity date), the company intends to return your principal to you. The maturity dates on corporate bonds can range from 1 to 40 years.

ESG

Environmental, Social, Governance.

Government Bond

A debt security issued by a government, which traditionally have had high credit ratings to reflect a healthy financial economic position. Credit ratings may be significantly lower where the economic outlook is less favourable.

Investment Grade

A security which has been rated BBB/BBB/Baa or above by one of the leading credit agencies (for example, S&P/Fitch/Moody's) and is considered to be suitable for investment purposes. For more information on credit ratings, please refer to the company websites of S&P/Fitch/Moody's⁹.

Investment Strategy

A plan used to guide investment decisions, often based on individual goals, risk tolerance and future needs for capital. Many investment strategies include asset allocation, buy and sell guidelines, risk guidelines, etc.

Net Asset Value ('NAV')

The value of a fund's assets minus the value of its liabilities.

SRI

Socially responsible investing.

Total Return

The total return on an investment takes into account not only the capital appreciation, but also any income such as dividends which may be received.

Trustee/Depositary

The Trustee/Depositary of a fund is an independent representative of the investors, responsible for safekeeping of assets and performance of certain fiduciary duties.

Volatility

A measure of a fund's propensity, compared to other funds, to go up and down in price. A volatile fund is one that has a tendency to move sharply through a wide price range. Mathematically, this is expressed as the average standard deviation of weekly price change from the average. In general, high volatility means high unpredictability, and therefore greater risk but also greater opportunity to make money. Historical volatility is a measure based on past performance.

⁹ www.standardandpoors.com / www.moodys.com / www.fitchratings.com

Appendix

Underlying Indices for the Asset Classes Included in Figure 3

Asset Class	Index
Absolute Return Funds	Hedge Fund Research HFRX Absolute Return Index
Cash	3-Month EURIBOR
Commodities	Bloomberg Commodity Index Total Return
Corporate Bonds	Bloomberg Barclays Global Aggregate Corporate Total Return Index Hedged EUR
European Equities ex UK	MSCI Europe
Global Government Bonds	Deutsche Bank Global Government Hedged EUR Index
Gold	Gold Spot Price
International Equities	MSCI World Index
Private Equity	S&P Listed Private Equity
Global Real Estate	FTSE EPRA/NAREIT Developed index
US Equities	S&P 500
US Investment Grade Corporate	Bloomberg Barclays U.S. Corporate Investment Grade (USD)

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