

Regulation (EU) 2019/2088 – Sustainability Related Disclosure

Given the nature and scale of its client Fund's investment objective and strategy, the AIFM and the Portfolio Manager do not consider the adverse impact of investment decisions on sustainability factors as the AIFM and the Portfolio Manager believe that focusing on the selection of investment opportunities for its client Funds to be a more efficient use of their resources.

The AIFM and the Portfolio Manager may however consider the adverse impact of investment decisions on sustainability factors in the future where the AIFM and the Portfolio Manager believe there is sufficient information made readily available by target investments of its client Funds. Where relevant the AIFM will continue its policy of reviewing the ESG policies of potential investments on behalf of its client Funds as part of the due diligence process prior to making an investment or capital commitment on behalf of its client Funds. However in the case of 3rd party Funds in which it invests it is the responsibility of the managers of the 3rd party Funds to consider the adverse impact of their investment decisions on sustainability factors.

The AIFM has determined that sustainability risk (which is defined as an environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of the relevant investment is not relevant for its client Funds at this time.