



# PRODUCT DISCLOSURES

**PRODUCT NAME: GLOBAL GREEN ENERGY FUND**

**LEI: 213800FB1CGLSFR4WW11**



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## Glossary

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<b>Term</b>	<b>Definition</b>
<b>PAI(s)</b>	Principal Adverse Impact(s) – Indicators that have or may have the most significant negative impacts of investments on the environment and people.
<b>SFDR</b>	Sustainable Finance Disclosure Regulation - Regulation (EU) 2019/2088 of the European Parliament and of the Council on sustainability-related disclosures in the financial services sector.
<b>GHG</b>	Greenhouse Gas
<b>ESG</b>	Environment, Social, Governance

## Summary

GMM GLOBAL MONEY MANAGERS AIFM LTD (the “Company” or the “Manager”) acts as an Alternative Investment Fund Manager for Global Green Energy Fund, an investment compartment of Milevaco Fund AIF V.C.I.C. Plc domiciled in Cyprus (the “Fund”). For the purposes of this Disclosures, the **Global Green Energy Fund is the Financial Product**.

The Fund’s sustainable **investment objective** is to achieve a positive environmental impact by investing in companies engaged in the green/renewable energy sector and cyclical economy activities in the European Union and USA, which help to mitigate climate change or to promote circular economy, and that qualify as sustainable investments.

The Fund's **investment strategy** revolves around sustainability, aiming to avoid significant harm to environmental and social objectives. Investments undergo rigorous quantitative and qualitative sustainability assessments, considering factors like ESG risks, adherence to international conventions, and eligibility using EU Taxonomy criteria. The **portfolio** primarily targets green energy and circular economy sectors, with additional investments meeting UN Sustainable Development Goals. Investments are assessed based on their business fundamentals, governance structures, ESG metrics, Principal Adverse Impact Indicators (“PAIs”) and product or service impacts.

The Manager transparently monitors the sustainable investment objective and indicators throughout the Fund’s lifecycle, using internal and external controls, aligning also with regulatory standards. This includes regular reviews of sustainability characteristics and PAI indicator tracking, with potential divestment for companies causing significant harm.

To ensure the attainment of the sustainable investment objective, investee companies are selected based on fundamental factors like growth potential and financial discipline, as well as their sustainability profile and impact. The Fund measures the attainment of sustainable objectives by ensuring that at least 80% of the investments in its portfolio are primarily focused on achieving positive sustainability impact through the generation of revenue from environmentally sustainable activities, which are assessed on their overall ESG performance, their PAI indicators, and their contribution to the thematic areas of renewable energy and the circular economy. The Fund does not use of a designated reference index or benchmark for this purpose.

As of December 31, 2023, the Fund has invested over 95% of its assets in sustainable investments.

The Fund performs due diligence of an investee company on growth and sustainability characteristics using data obtained from the investee companies. To ensure data quality, the Manager, in cooperation with an external advisor, implements rigorous measures including consistency and standardisation practices, continuous quality monitoring, and comprehensive documentation and transparency, thereby meeting SFDR disclosure requirements. To ensure comprehensive coverage of sustainability indicators, the Company uses diverse data from investee companies and, when necessary, proxy indicators to address data deficiencies for certain ESG and PAI indicators. Review procedures aim to substitute any proxy data with reliable sources when such data sources become available, and uses qualitative assessments when quantitative analysis is limited.

Rigorous due diligence on the underlying assets integrates data-driven analysis and internal/external processes to assess sustainability risks and ensure alignment with the Fund’s sustainability objective. This includes ESG evaluation, risk frameworks, external consultations, and compliance with SFDR and other regulations. Engagement with investee companies aims to mitigate ESG risks. The Fund excludes certain industries from its investment universe such as companies that operate in activities like fossil fuels.

## 1. No significant harm to the sustainable investment objective

The Fund considers an investment sustainable if it does no significant harm to any environmental or social objective. For inclusion in the portfolio, the Manager conducts both a quantitative and qualitative sustainability assessment for each investment, which includes identifying where companies may cause significant harm through the products and services they offer, but also through their entire value chain. The Manager investigates the processes, policies, alignment with international conventions and transparency of the investment on relevant ESG risks and known issues in the sector.

The assessment includes:

- a. considering all mandatory Principal Adverse Impact (PAI) indicators and other relevant ESG indicators to identify if a company has any sustainability risks or may cause significant harm;
- b. screening for contraventions of the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights;
- c. identifying, through the use of third-party data, any severe controversies and if, at the time of the investment, the investee is taking remedial action to prevent the event occurring in the future.

The ESG risk analysis takes also into account the “do no significant harm criteria” of the EU Taxonomy to prioritise its investigation of the potentially harmful effects of a potential investment.

The Manager may carry out a more detailed assessment of any investee and periodic reviews and risk controls are in place for monitoring.

The Manager employs the following methodologies to evaluate whether investments are resulting in substantial adverse effects:

- a. When evaluating PAI indicators for which ample and reliable quantitative data is accessible across the investment landscape, the Manager gauges the significance of adverse impacts linked with the investee's activities by comparing the investee's standing relative to the overall investment landscape or its peer group.
- b. In cases where quantitative analysis is not feasible due to limited data availability or quality, the Manager conducts a qualitative assessment of significant harm using a blend of internal research and other accessible data. If initial PAI data suggests potential significant harm, the Manager conducts further desktop research to delve deeper into and evaluate negative impacts indicated by third-party or proprietary data. Should the Manager determine that the investee is not causing significant harm based on its analysis, it may proceed with the investment, documenting the rationale behind this decision.

The Manager might determine that an investee is not causing significant harm if:

- The investee has visibly taken concrete measures and initiatives to mitigate potential significant harm, including dedicated remediation efforts, and there are evident signs of meaningful improvement and positive change.
- The Manager has taken steps to engage directly with the investee regarding potential areas of harm, ensuring appropriate remedial actions are pursued. Such investments remain under review. Should the Manager determine that an investee is indeed causing significant harm as per the PAIs, it will be divested from the portfolio.
- The investee has been associated with controversy by news sources and data providers, but the matter remains unresolved, and the investee's role in causing harm is ambiguous. In such instances, the Manager continually monitors the situation to refine its assessment as additional information becomes available.
- There are grounds to suspect that third-party data is inaccurate (e.g., based on estimates or flawed assumptions), and the Manager's research demonstrates that the investee is not causing significant harm.

In cases where the Manager determines that an investee is causing significant harm according to the PAI, it will be removed from the portfolio.

## 2. Sustainable investment objective of the financial product

The Fund's sustainable investment objective is to achieve a positive environmental impact by investing in companies engaged in the green/renewable energy sector and cyclical economy activities in the European Union and USA, which help to mitigate climate change or to promote circular economy, and that qualify as sustainable investments.

To achieve the objective, the Fund targets investments in companies identified as contributing to one or more of environmental themes, which are aligned to the United Nations Sustainable Development Goals (UN SDGs). This is achieved by investing in economic activities that substantially contribute to environmental objectives such as climate change mitigation and sustainable use and protection of water resources, transition to a circular economy, pollution prevention and control, and - protection and restoration of biodiversity and ecosystems, as outlined by the EU Taxonomy. Indirectly, the Fund may also have a meaningful impact to other social themes outlined aligned with the UN SDGs.

An illustration of the Fund's indicative contribution to the UN SDGs areas is illustrated below:

<p><b>7</b> AFFORDABLE AND CLEAN ENERGY</p> 	<p>Investment in Green/Renewable Energy companies.</p>	<p><b>8</b> DECENT WORK AND ECONOMIC GROWTH</p> 	<p>Employment and support of local communities in the operations of the investee companies.</p>
<p><b>11</b> SUSTAINABLE CITIES AND COMMUNITIES</p> 	<p>Contribution to Clean energy provision to over 15,000 households.</p>	<p><b>12</b> RESPONSIBLE CONSUMPTION AND PRODUCTION</p> 	<p>Investment in Circular Economy activities/companies.</p>
<p><b>13</b> CLIMATE ACTION</p> 	<p>Contribution to the reduction of Carbon emissions through investment in Green/Renewable Energy and Circular Economy.</p>	<p><b>14</b> LIFE BELOW WATER</p> 	<p>Protection of aquatic fauna and its surroundings throughout the operations of investee companies.</p>
<p><b>15</b> LIFE ON LAND</p> 	<ol style="list-style-type: none"> <li>1. Investment in companies with Environmental Licenses.</li> <li>2. Zero projects inside Natura 2000 sites.</li> <li>3. Implementation of environmental restoration work where it is needed.</li> <li>4. No damage to the natural environment during the operations of the investee companies.</li> </ol>		

### 3. Investment strategy

The Fund's strategy can be delineated regarding its overall investment methodology and ESG framework as follows:

- Adopts a research-intensive investment methodology centered on evaluating fundamental, quantitative, and technical factors across nations, industries, and entities.
- Aims for sustainable investment outcomes, supported by a resilient risk management and governance structure.
- Recognises sustainable issuances that foster a sustainable, inclusive economy.

In order to achieve the sustainable investment objective, the Fund targets investment in companies identified as contributing to one or more of the investment themes, which are aligned to one or more United Nations Sustainable Development Goals (UN SDGs). Investment themes include:

1. Renewables, Green Energy & Electrification: refers to companies developing clean energy such as wind, solar, or hydro across the full production chain, and enabling electrification across the economy.
2. Circular Economy: refers to companies active in developing technologies to reduce waste and to maximise recycling and reuse of materials, promoting responsible manufacturing and production, optimizing resource use, designing eco-friendly alternatives etc.
3. Impact enablers: Providing crucial solutions and services to impactful companies and people, directly involved in the various themes.

The Manager's investment selection process comprises of three primary considerations:

- a. The Fundamentals of the business model: The Manager seeks to understand historic financial metrics and competitive dynamics and, in conjunction with the thematic framework, identify those who are capable of sustaining strong growth over the long-term. Alongside this, the Manager seeks to identify companies which are bringing value to society, rather than drawing from it.
- b. ESG Metrics: The Manager considers how well companies manage environmental, social and governance factors (including how companies limit their emissions, how they ensure product safety, how they manage diversity in the workforce and how their board is structured). When looking at the ESG profile of a company, consideration will be given to key quantitative metrics such as corporate transparency, approach to materiality (being those ESG topics that could have meaningful financial consequences), and the effect of products and services on broader society.
- c. Product or Services Impact: involves a thematic analysis whereby the Manager will seek to understand the broader benefit or cost of each company. As well as looking at companies which “do no significant harm”, the Manager also looks beyond this and, where appropriate, the portfolio will actively target those companies seeking to improve their effect on people and the planet through their products or services.

This approach can be summarised as (i) companies that avoid harm, (ii) companies that provide benefits to all stakeholders, and (iii) companies that contribute to solutions for achieving Sustainable Development. The belief is that following this thematic approach to idea generation and focusing on companies that meet the ‘sustainable leader’ criteria facilitates the Fund’s goal to achieve superior long-term returns.

Where material ESG risks are identified, the Manager works either directly or with the in-house stewardship team, to engage with companies to mitigate those risks and promote good practices. The objective of engagement is to establish tangible goals for effecting positive change within specified timeframes. During engagement with a company, specific targets and timelines are established, tailored to the particulars of each company's engagement.

Where an investee company is not receptive to engagement on material ESG risks, or makes insufficient progress in addressing them over time, it may result in divestment from that company.

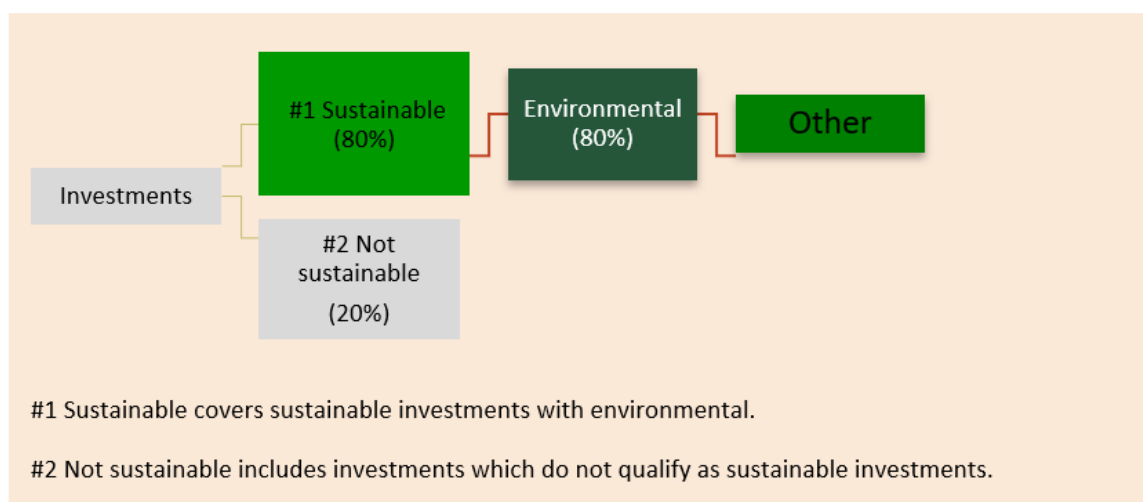
In addition to the investments referred above, the Fund may also hold cash and may temporarily invest such cash in cash equivalents, money market instruments, government securities, and other securities, if, in the opinion of the Manager, the prevailing market and economic conditions justifies their undertaking.

The Manager will not invest in companies involved in the following activities: fossil fuels, electricity utilities not aligned with a 2°C scenario, controversial weapons, conventional weapons, nuclear power, tobacco, gambling, adult entertainment, alcohol, GMO crop production and companies in contravention of the principles of the UN Global Compact.



## 4. Proportion of investments

The Fund allocates at least 80% of its assets to sustainable investments (#1 Sustainable) and up to 20% to Not sustainable investments (#2 Not sustainable). A minimum of 80% of the portfolio will be invested in companies that contribute to the environmental objectives by operating in one or more of environmental investment themes supported by the Fund. Those investments will also evidence good governance practice in accordance with the Manager's policy on good governance and do no significant harm to any other environmental or social objectives within the meaning of the SFDR. A maximum of 20% would not qualify as sustainable investments sustainable, and include the remaining investments in the Fund, and may be held for efficient portfolio management and cash management purposes.



As at 31/12/2023, the Fund invests in excess of 95% of its assets in sustainable investments.

## 5. Monitoring of sustainable investment objective

The Company is committed to transparently monitoring the sustainable investment objective and sustainability indicators throughout the lifecycle of the financial product. The approach includes control mechanisms to ensure alignment with sustainability goals and adherence to regulatory requirements.

Monitoring of the Sustainable Investment Objective includes:

- Monitoring of the alignment of the financial product with sustainable investment objectives, which are defined based on ESG criteria and sustainable development goals.
- Regular reviews to assess the performance of the financial product in meeting sustainability targets and objectives.
- Tracking of PAI indicators related to ESG integration, impact measurement, and sustainability outcomes to evaluate progress over time.

#### Monitoring of Sustainability Indicators:

- The Company utilises a comprehensive set of sustainability indicators to measure the attainment of sustainable investment objectives. These indicators cover environmental, social, and governance (ESG) factors relevant to the investment strategy.
- Sustainability indicators are monitored at both portfolio and individual asset levels, allowing the Manager to identify trends, risks, and opportunities that may impact sustainability performance.

#### Internal Control Mechanisms include:

- The Company has established control mechanisms to ensure the integrity and accuracy of sustainability data and reporting.
- The Company's compliance and risk management teams oversee adherence to regulatory requirements, including SFDR disclosure obligations, and conduct periodic reviews to assess compliance.

#### External Control Mechanisms include:

- External stakeholders, including clients, regulators, and industry organisations, play a crucial role in providing feedback and accountability in the Company's sustainability practices.
- Engage with third-party service providers, including ESG ratings agencies where applicable and sustainability consultants, to verify sustainability data and analysis.

By transparently tracking progress and engaging with stakeholders, the Company aims to uphold the highest standards of sustainability and accountability in the financial products, as required by the SFDR.

## 6. Methodologies used to measure the attainment of the sustainable investment objective

Sustainability Indicators the Fund uses to measure the attainment of the sustainable objectives include:

1. exposure to companies that derive a significant proportion of revenue, EBIT, enterprise value or similar metrics from economic activities that contribute to environmental or social objectives;
2. exposure to revenues from economic activities that contribute to environmental and/ or social objectives;
3. overall ESG performance;
4. Principle Adverse Impact (PAI) indicators.

The Manager will select investments to seek to achieve the following binding criteria:

- The percentage of companies analysed for sustainability characteristics in the Fund will always be between 80%-100%.
- All invested companies will contribute to one or more of the Fund's investable themes (i.e. renewable and clean energy, circular economy).

The Manager will not invest in companies which meet the following criteria (based on information available to the Manager on these companies):

- a. Companies that generate over 5% of their revenues from the extraction or exploration of fossil fuels or from the use of fossil Fuels for electricity generation;
- b. Electricity utility companies with a carbon intensity that are not aligned with a below 2°C scenario;
- c. Companies that generate revenue from the production of Controversial Weapons and companies that generate over 5% of their revenues from production of conventional weapons;
- d. Companies that generate over 5% of their revenues from nuclear power;
- e. Companies that generate revenues from the production of tobacco products and companies that receive over 10% of their revenues from tobacco distribution;
- f. Companies that generate over 2% of their revenues from gambling products;
- g. Companies that generate over 2% of their revenues from adult entertainment products;
- h. Companies that generate over 2% of their revenues from the production of alcohol and companies that receive over 5% of their revenues from alcohol distribution; and
- i. Companies that generate over 5% of their revenue from GMO crop production.

## 7. Data sources and processing

The Fund accounts for adverse impacts on sustainability factors through the application of the Manager's existing policies and principles which, consider the financially material negative impacts of investee companies on the environment, society, and human rights (among other ESG issues) through their activities or behaviour.

The Manager screens all investments against the PAI indicators which are mandatory under the EU Sustainable Finance Disclosure Regulation, and which are relevant to the investment.

The Manager does this using a combination of quantitative and qualitative tests, from data obtained from the investee companies for each PAI indicator. PAI indicators considered for the investee companies are:

1. GHG emissions
2. Carbon footprint
3. GHG intensity of investee companies
4. Exposure to companies active in the fossil fuel sector
5. Share of non-renewable energy consumption and production
6. Energy consumption intensity per high impact climate sector
7. Investments in companies without carbon emission reduction initiatives
8. Activities negatively affecting biodiversity-sensitive areas
9. Emissions to water
10. Water usage and recycling
11. Hazardous waste and radioactive waste ratio
12. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises
13. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises
14. Unadjusted gender pay gap
15. Board gender diversity
16. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)
17. Rate of accidents

The Manager endeavours to acquire data that best corresponds to each specific PAI.

Data used to define the financial performance of a company included in the Fund include revenue, EBIT, enterprise value or similar metrics from economic activities that contribute to environmental or social objectives. In addition, various data sources are used to provide information on companies' ESG and PAI performance, including carbon emissions, energy usage, water consumption, waste generation, diversity and inclusion data, employee welfare, data on governance structures, board diversity, executive compensation, anti-corruption policies, and ethical business practices.

These datasets enable the Managers to identify companies with strong environmental stewardship, socially responsible practices and good governance quality. By leveraging these data sources, the Manager can evaluate companies' sustainability performance, identify ESG risks and opportunities, and construct investment portfolio within the Fund that aligns with the sustainable investment objective under the SFDR.

Ensuring data quality is crucial for the effectiveness and credibility of the Fund. The Manager, in cooperation with its external advisor, implements measures to validate, verify, and maintain the quality of the data used in the investment processes. Key measures taken are:

- **Data Reliability Assessment:** The Manager ensures the accuracy, completeness, and reliability of the data obtained from various sources. This involves conducting thorough due diligence to assess the credibility of data sources and the methodologies used to collect and analyse data.

- **Data Consistency and Standardisation:** Ensuring consistency and standardisation of data formats, definitions, and metrics is essential for comparing and aggregating data from multiple sources. The Manager has established standardised data templates, classifications, and terminology to facilitate data integration and analysis across different datasets.
- **Data Governance Framework:** The Manager has established clear procedures, and controls for data management, including data acquisition, storage, processing, and dissemination.
- **Quality Monitoring:** The Manager continuously monitors the quality of data used in their investment processes. This may include regular audits, data validation checks, and performance monitoring of data providers (investee companies or other). Any issues or discrepancies identified should be promptly addressed and remediated.
- **Documentation and Transparency:** The Managers documents the data sources, methodologies, assumptions, and limitations in their disclosure documents. Clear and comprehensive disclosure helps investors understand the reliability and relevance of the data used in investment decision-making.

By implementing these measures, the Manager can enhance the quality, reliability, and transparency of the data used in sustainable investment strategies, thereby meeting the disclosure requirements of the SFDR and delivering value to investors seeking sustainable investment options.

The basis for the calculations is the methodologies set out in the SFDR regulatory technical standards (Commission Delegated Regulation (EU) 2022/1288, SFDR RTS).

The information is reviewed on an annual basis, subject to data availability and quality.

All data presented in the disclosures are based on actual measurements from the investee companies. The Manager diligently sourced and validated the information provided to ensure its accuracy and reliability. The Company's commitment to data integrity and transparency means that stakeholders can have confidence in the authenticity of the reported figures. The Company remains dedicated to upholding the highest standards of disclosure and accuracy in the sustainability reporting practices

## 8. Limitations to methodologies and data

In order to ensure the broadest possible coverage of information concerning sustainability indicators, the Company utilises a diverse scope of data, obtained from the investee companies within the Fund (See Section 7). The importance of each indicator is determined by parameters continuously reviewed and maintained by the Manager, using a combination of quantitative and qualitative tests for each indicator.

In instances where data is absent, the Manager may utilise appropriate proxy indicators obtained from third-party sources to compensate for the current data deficiency for certain PAI indicators. The Manager continuously assesses the utilisation of proxy indicators and will substitute them with PAI data from third-party providers once it deems that adequately reliable data is accessible. In cases where quantitative analysis is not feasible due to limited data availability or quality, the Manager conducts a qualitative assessment of significant harm using a blend of internal research and other accessible data.

## 9. Due diligence

Central to the Fund's approach is the rigorous due diligence conducted on the underlying assets, aimed at identifying sustainability risks that could potentially impact their value and the attainment of the Sustainable Investment Objective. The approach to due diligence is underpinned by a robust framework that integrates data-driven analysis, internal and external processes.

Internal Due Diligence includes:

- The Company's investment team conducts due diligence on potential underlying assets to assess their sustainability profile, including environmental, social, and governance (ESG) factors.
- The Company utilises risk assessment frameworks to evaluate the sustainability performance of underlying assets and identify potential risks and opportunities.

External Due Diligence:

- The Company may engage external consultants and advisors specialising in sustainability to provide independent analysis and verification of the findings.
- Feedback from regulators, and industry peers is solicited and considered to identify areas for enhancement and innovation in the approach to due diligence on underlying assets.

Controls on Due Diligence:

- Internal controls are implemented to ensure consistency, transparency, and accuracy in the due diligence practices. This includes documented procedures, approval workflows, and quality assurance checks throughout the due diligence process.
- Oversight mechanisms, such as regular reviews by senior management and compliance officers, provide additional checks and balances to verify the adequacy and appropriateness of due diligence activities.
- Compliance with SFDR requirements and other regulatory standards is continuously monitored and verified to ensure that due diligence practices align with legal and ethical guidelines.

The results are monitored on an ongoing basis and reports are provided to the Manager. In summary, the due diligence on the underlying assets of financial products is guided by internal controls and may also be subject to external oversight mechanisms to ensure adherence to sustainability objectives and regulatory requirements under the SFDR. By prioritizing transparency and integrity, the Company strives to deliver sustainable investment solutions that meet the needs of its clients and stakeholders.

## 10. Engagement policies

The Company incorporates Sustainability as a key aspect when making investment decisions, and has established a set of objectives aimed at minimising adverse impacts on the environment and promoting sustainable practices, through the investments of the Fund. These policies underscore the Company's commitment to responsible investing and aligning the Fund's objectives with environmental and social goals.

The engagement policies of the Fund consider a range of indicators to identify and assess PAIs. These indicators include but are not limited to carbon footprint, water usage, biodiversity impact, and social factors such as labor practices and human rights. By periodic evaluating these indicators, the Company ensures it has a thorough understanding of the environmental and social performance of the investment of the Fund. In cases where there is no reduction in principal adverse impacts over successive reporting periods, the Company is committed to adapting its engagement policies accordingly.

Engagement processes include:

- **Sustainability Risk Policy:** The Company maintains a Sustainability Risk Policy, which includes the processes followed in relation to identifying, preventing, anticipating, or mitigating potential adverse sustainability impacts. The Company while addressing sustainability risks strives for proactive risk management strategies, transparency, and integration of sustainability considerations into business decision-making processes. By identifying, assessing, and mitigating sustainability risks, businesses can enhance their resilience, competitiveness, and long-term value creation.
- **Exclusion Policies:** The Company employs a proactive approach to exclude investments of the Fund in sectors or companies with significant adverse impacts on the environment. Industries such as fossil fuels, controversial weapons, and environmentally harmful practices are carefully screened to ensure that the Fund's portfolio reflects its commitment to sustainability.
- **Positive Screening and ESG Integration:** The Company actively seeks investments in companies that demonstrate strong environmental, social, and governance practices. Positive screening focuses on identifying businesses with a commitment to renewable energy, conservation, and ethical business conduct. ESG integration ensures that these considerations are incorporated into the Fund's investment decisions.

- **Dialogue and Issue Identification:** The Company engages in constructive dialogue with investee companies to understand their ESG practices, policies, and performance. This dialogue may include meetings with company management, participation in conferences, and written correspondence. The Company identifies material ESG issues relevant to each investee company and prioritises efforts based on the significance of these issues to long-term value creation and sustainability.
- **Transparency and Reporting:** The Company is committed to transparency and regularly communicates its engagement activities to stakeholders. This includes detailing engagement efforts with investee companies and providing updates on the Fund's impact in mitigating principal adverse impacts.

Finally, the Company has created a “Conflict of Interest” policy that applies to the services provided by the Company and aims to identify and prevent conflicts of interest between the Company and its clients or between one client and another. It applies to all its directors, employees and any person directly or indirectly linked to the Company.

In order to identify possible conflicts of interest that may arise, the Company considers whether the Company or any relevant person or a person directly or indirectly linked to it in the course of providing management of the investments of the AIFs and the management of the risks associated with the operations of the AIFs/clients:

- a. is likely to make a financial gain or avoid a financial loss at the expense of the client (including through increasing the sustainability risks leading to greenwashing or through under-estimating the level of sustainability risks);
- b. has an interest in the outcome of a service provided to the client or of a transaction carried out on behalf of the client, which is distinct from the client’s interest in that outcome;
- c. has a financial or other incentive to favour the interests of another client or group of clients over the interests of the client;
- d. has a financial or other incentive to under-estimate the level of sustainability risks or promote Funds with sustainability risks or characteristics in a misleading manner at the expense of one of the Funds or its Investors (through greenwashing, mis-selling or misrepresentation of investment strategies);
- e. carries on the same business as the client;
- f. receives or will receive, from a person other than the client, an inducement in relation to a service provided to the client, in the form of monies, goods or services.
- g. Remuneration of members of staff of the Company is connected to the level of risks (including sustainability risks) assessed within Funds. As a preventive measure, variable remuneration is not linked to the specific performance of a portfolio or a fund or to the level of risks (including sustainability risks, which may also have an impact on the return of the investment) assessed within a fund. Therefore, there is no incentive to under- or



over-estimate the level of risk (including sustainability risks) within a portfolio or a fund, which ensure promotion of sound and effective risk management.

In the case where the firm cannot guarantee that its general conflict of interest policy will prevent the risk of damage to its clients, it must disclose the general nature or source of the specific conflict of interest.

In the future, these procedures may be adjusted to address and mitigate primary adverse sustainability impacts more effectively.

## 11. Attainment of the sustainable investment objective

Investee companies are analysed for inclusion in the portfolio of the Fund based on a number of fundamental factors relevant to the individual investee company (such as company growth potential, cash generation, and financial discipline) and the investment policy of the Fund, as well as on impact and sustainability characteristics.

The Sustainability Indicators the Fund uses to measure the attainment of the sustainable objectives, are as described in Section 6.

No reference index-benchmark has been designated for the purpose of attaining the sustainable investment.

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