Kroll (Ireland) Management Company Limited (KIMC) and Kroll (Luxembourg) Management Company, S.a.r.l (KLMC), together “the Companies”

SFDR Disclosures

10 March 2021

Sustainability Risk Policy (Article 3)

Following the implementation of the Sustainable Financial Disclosure Regulation (SFDR) on 10 March 2021 financial market participants are required to publish information on its website about its policies on the integration of sustainability risks in its investment decision making process.

The core operating model is for portfolio management to be delegated for each fund under management and as such the Companies do not play an active role in the investment decision making process of the funds under management.

When delegating portfolio management, the Companies will ensure the delegate has a documented policy on the integration of sustainability risk in their investment decision making process. The Companies will receive confirmation on regular basis from each delegate confirming that its policy continues to be adhered to and practices are in line with applicable regulatory requirements.

The Companies will continue to monitor their policy on a periodic basis considering the nature, scale and complexity of its business and the funds under management.

In addition to the delegated portfolio management model, KLMC retains in-house portfolio management for some illiquid asset funds. In this regard, KLMC has appointed specialist investment advisors to support the portfolio management activities and has established an internal Investment Committee which is responsible for monitoring the investment process and taking the final decision regarding the purchase and redemption of assets. The Investment Committee receives investment recommendations from the investment advisors prior to making any investment decision. ESG criteria may be considered but is not necessarily a core aspect of the investment decision-making process.

Transparency of adverse sustainable impacts (Article 4)

As per article 4 of the SFDR financial market participants are required to publish the following on their websites:

a) Where they consider principal adverse impacts of investment decisions on sustainability factors, a statement on due diligence policies with respect to those impacts, taking due account of their size, the nature and scale of their activities and the types of financial products they make available; or

b) Where they do not consider adverse impacts of investment decisions on sustainability factors, clear reasons for why they do not do so, including, where relevant, information as to whether and when they intend to consider such adverse impacts.

The Companies do not currently consider adverse impacts of investment decisions on sustainability factors. As noted above the Companies currently delegate portfolio management for all funds under management with some limited exceptions for KLMC. The delegate portfolio manager is therefore responsible for determining whether to consider the adverse impacts of investment decisions on sustainability factors as part of the investment decision process. A review of the requirements contained in Article 4 of the SFDR is included in the due diligence of portfolio managers where applicable.

The Companies will continue to monitor their policy on a periodic basis considering the nature, scale and complexity of its business and the funds under management.

For the illiquid asset funds for which KLMC currently retains in-house portfolio management adverse impacts of investment decisions on sustainability factors are not currently considered. ESG criteria may be considered but is not necessarily a core aspect of the investment decision-making process. There is currently no date available when KLMC intends to consider such adverse impacts.