



## Statement regarding European Regulation 2019/2088

The Fund does not have as its objective to promote sustainable investments i.e. investments in economic activities that contribute to environmental or social objectives or follow the highest standards of corporate governance.

In order to exclude or minimize sustainability and other risks, the Investment Manager has identified an investment universe and developed an elaborated rating system to evaluate existing and potential investments from that universe to support the investment process. This rating system takes into consideration risks related to the business model of investee companies, technological developments, relevant markets and other factors and this way integrates sustainability factors and other factors.

The Investment Manager of the Fund effectively considers that the investments realised on behalf of the Fund and whose selection is supported by the rating system are not likely to be materially affected by sustainability risks and that those risks are not specifically relevant in the context of the relevant sub-fund's investment policies, meaning that, if any such risk materialise, it is not likely to have a more materially adverse effect on the Fund's returns than any other normal market or external risks.

The Investment Manager does not consider the adverse impacts of investment decisions on sustainability factors due to the lack of pertinent information of the investee companies yet and the relative small size of the Fund not allowing for the necessary resources for extensive calculations.

The Fund has also no established policy for proxy voting and will generally refrain from voting at general meetings. The Fund expects that, even if more detailed information and/or regulatory guidance become available in the coming years, it will not consider the adverse impacts of investment decisions on sustainability factors.

For the purpose of this section,

“sustainable factors” mean environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters,

“sustainable investment” means an investment in an economic activity that contributes to an environmental objective, an investment in an economic activity that contributes to a social objective, in particular an investment that contributes to tackling inequality or that fosters social cohesion, social integration and labour relations, or an investment in human capital or economically or socially disadvantaged communities, provided that such investments do not significantly harm any of those objectives and that the investee companies follow good governance practices, in particular with respect to sound management structures, employee relations, remuneration of staff and tax compliance, and

“sustainability risk” means 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 investment.