

ESG Disclosures in accordance with SFDR

2 May 2023

In its capacity of alternative investment fund manager ('AIFM'), Marklaan Advisory BV (the "**Manager**") is subject to the disclosure obligations relating to environmental, social and governance ("**ESG**") matters as set forth in:

- Regulation (EU) no. 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector ("**SFDR**");
- Commission Delegated Regulation (EU) 2022/1288 supplementing Regulation (EU) 2019/2088 of the European Parliament and of the Council with regard to regulatory technical standards specifying the details of the content and presentation of the information in relation to the principle of 'do no significant harm', specifying the content, methodologies and presentation of information in relation to sustainability indicators and adverse sustainability impacts, and the content and presentation of the information in relation to the promotion of environmental or social characteristics and sustainable investment objectives in precontractual documents, on websites and in periodic reports ("**RTS**"); and
- Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088 ("**TR**").

The Manager may update this information at any time, and will in such event publish a clarification on such amendment on this website.

1 No integration of sustainability risks

The Manager does not formally integrate sustainability risks into its investment decision procedure, as referred to in article 3 SFDR. In other words, sustainability risks are not formally integrated into the Manager's investment decisions and (ii) the likely impacts of sustainability risks on the returns of the funds managed by the Manager are not formally assessed.

The Manager acknowledges that ESG-related events or conditions could potentially have a (negative) impact on the value of the investments made on behalf of funds managed by the Manager. However, given the limited size and resources, the Manager is currently not in a position to formally integrate sustainability risks into its investment decisions, nor to formally assess the likely impacts of sustainability risks on the returns.

Hence, the investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

2 No consideration of adverse sustainability impacts of investment decisions

The Manager does not consider adverse sustainability impacts of its investment decisions, as referred to in article 4, §1, (b) SFDR. This means that adverse impacts on sustainability, on climate and other environment-related indicators (including, greenhouse gas emissions, biodiversity, water and waste) or indicators for social



and employee, respect for human rights, anti-corruption and anti-bribery matters are not formally taken into consideration in the Manager's investment decisions.

In accordance with article 4, §1, (b) and article 7, §2 of the SFDR, the Manager does not consider the adverse impacts of its investment decisions on sustainability factors. The Manager does not consider those adverse impacts because of the limited size and resources of the Fund.

The Manager is however working on a more elaborate and future-oriented ESG framework and intends to consider the adverse impacts of investment decisions, in accordance with article 4, §1, (a) of the SFDR, in the future.

3 No integration of sustainability risks into remuneration policies

As a sub-threshold manager of alternative investment funds, the Manager does not have an obligation to have a formal remuneration policy in accordance with article 40 and following of the Belgian law of 19 April 2014 on alternative entities for collective investments and their managers. Consequently, sustainability risks are not integrated in the Manager's remuneration policy.