

No Consideration of Adverse Impacts of Investment Decisions on Sustainability Factors

This disclosure applies in respect of Enko Fund Managers Limited only, in respect of the underlying alternative investment funds (“AIFs”). Enko Fund Managers Limited (hereafter, “EFM”) is a non-EU, non-UK Alternative Investment Fund Manager (“AIFM”) as defined under Article 4(1) of Directive 2011/61/EU on Alternative Investment Fund Managers (“AIFMD”).

This disclosure does not apply to any Enko entity other than EFM. Other Enko-affiliated AIFMs may take into account sustainability factors in respect of the investment activities of underlying funds, and further information in relation to those AIFs must be sought directly from Enko.

EFM makes this declaration under Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector (“SFDR”) resultant from its marketing activities under AIFMD of one or more AIFs managed by it into the European Union.

Integration of Sustainability Risks (SFDR Article 3)

In accordance with Article 3(1) of the SFDR, EFM confirms that **sustainability risks are not currently integrated** into its investment decision-making processes. This decision reflects the nature, scale and complexity of EFM’s activities and the investment strategies of each underlying AIF. Such investment strategies are not expected to be materially impacted by sustainability risks in a manner which would affect the returns of the underlying AIFs.

As such, sustainability risks are not systematically considered in the investment process.

Principal Adverse Impacts (PAIs) (SFDR Article 4)

Pursuant to Article 4(1)(b) of SFDR, EFM **does not consider the principal adverse impacts (PAIs)** of investment decisions on sustainability factors at the entity level. This is due to the current lack of sufficient PAI-relevant data available to EFM in the context of the investment activities of the AIFs managed by it. EFM does not at present maintain methodologies to adequately assess and report on such impacts in a consistent and reliable manner.

This disclosure is reviewed periodically and updated as necessary.

A sustainability risk means an environment, social or governance event or condition that, should it occur, could cause a negative material impact on the value of an investment.

A sustainability factors refer to environment, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.