

**Sustainable Finance
Disclosure Regulation**

Information on EU Sustainable Finance Disclosure Regulation (EU SFDR)

The EU SFDR requires financial market participants to disclose information to investors and ensure public transparency through website disclosures regarding the integration of sustainability risks, the consideration of principal adverse impacts (PAI), and remuneration policies related to sustainability risks. Quadrum Capital fully complies with these requirements, and the relevant EU SFDR disclosures are provided below.

Sustainability risk policy

Quadrum Capital adopts the definition of sustainability risk as set out in Article 2(22) of the EU SFDR: “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”. In accordance with Article 3(1) of the EU SFDR, Quadrum Capital takes sustainability risks into account when making investment decisions for its funds.

No consideration of adverse impacts of investment decisions on sustainable factors

Quadrum Capital does not consider the principal adverse impacts of its investment decisions on sustainability factors in accordance with Article 4(1)(a) of the EU SFDR because Quadrum Capital had on average less than 500 employees during the last financial year and, given its size, Quadrum Capital considers it not proportionate – in terms of investment in time, costs and capacity and in light of the complexity involved - to provide detailed information as set out in Article 4(2) of the EU SFDR. Quadrum Capital will periodically reconsider this decision and the reasons behind it. There may be reasons why Quadrum Capital decides to issue a principal adverse impact statement in the future, for example if this is required by investors, as a result of changes in legislation and regulations or if the investment policy of a specific fund is adjusted.

Remuneration policy in relation to the integration of sustainability risks

Compliance with Quadrum Capital's Responsible Investment Policy, particularly regarding the integration of sustainability risks into the investment decision-making process, may be assessed as part of the performance evaluation for Quadrum Capital's management and employees, as outlined in Article 5 of the EU SFDR. Quadrum Capital ensures that, through its remuneration structure and Remuneration Policy, no excessive risks are taken, including sustainability risks. In the performance review of Quadrum Capital's employees and the decision to award bonuses, one of the non-financial criteria considered is whether the employee has complied with internal policies and procedures, including those related to addressing sustainability risks in the investment decision-making process.