

SFDR Disclosures

Innpact Fund Management S.A. (“**AIFM**”) identifies and considers sustainability risks and impacts throughout the investment cycle:

The relevant policies are designed to support the identification, assessment, management and reporting on environmental, social, and governance risks (“**ESG Risks**”), principal adverse sustainability impacts (“**PASI**”) as well as performance with sustainability objectives and promoted environmental and social characteristics when relevant. The AIFM will ensure that if Portfolio Management is delegated, the external Portfolio Manager will comply with the AIFM steps as defined below.

The steps are further described below:

1. The AIFM will ensure screening of investments against the most relevant, and where necessary, previously agreed exclusion lists. In the event of investment opportunities directly or indirectly linked to excluded activities, further considerations of the investment will be done by the relevant governing body.
2. The AIFM will identify and assess ESG Risks through a categorization process. Such categorization process (high, medium-high, medium, low) is in alignment with standards like the World Bank Group Environmental and Social Standards (“**WBG ESS**”), the IFC performance Standards (“**IFC PS**”).
3. The AIFM can also exclude investments to comply with investors’ risk appetite also considering any negative impact. The AIFM will also consider relevant local and international best market practices in ESG standards such as, but not limited to, the Principles for Responsible Investment (“**PRI**”) the **Minimum Safeguards***. This process is of key importance as ESG risks may cause negative impact on the assets, financials and reputational.
4. Where and when relevant, PASI will need to be identified and -if needed- considered with direct reference to Regulatory Technical Standards proposed environmental and (future) social criteria.
5. If applicable, the AIFM will also ensure compliance of investments with sustainability objectives and/or promoted environmental and social characteristics and ensure relevant information is provided in line with art. 8 and 9 of the EU Regulation 2019/2088.
6. The AIFM will ensure all investment proposals have a clear ESG/Impact assessment and if applicable include the necessary indicators. This can include evidence of investments’ general compliance with requirements of EU Regulation 2019/2088 (“**SFDR**”) in parallel to local E&S laws and regulations.
7. The AIFM will set up continuous monitoring and reporting of current and new ESG risks, PASI, and where applicable, performance against sustainability objectives of the fund and/or environmental and social characteristics promoted by the fund, of investment activities.

*Minimum Safeguards Include the OECD Guidelines for Multinational Enterprises, UN Guiding Principles on Business and Human Rights, International Labour Organisation (ILO), International Bill of Human Rights

One of the ways Innpact Fund Management S.A. seeks to maintain a culture with environmental, social and financial sustainability at the core of its mission and values is via its remuneration policy. Our remuneration policy does not encourage risk-taking that is inconsistent with the integration of sustainability risks and relevant risk profiles. The remuneration policy has been developed in accordance with applicable European and Luxembourg laws, as well as industry guidelines. For more information, see our policy below.