

FUNDS AVENUE S.A.

part of

TRUSTMOORE

ESG POLICY – SFDR DISCLOSURES

I. PURPOSE

The ESG POLICY – SFDR DISCLOSURES (the “**Policy**”) defines Funds Avenue’s approach to Environmental, Social, and Governance (“**ESG**”) integration and its disclosure obligations under the Sustainable Finance Disclosure Regulation (EU) 2019/2088 (“**SFDR**”). It establishes the methodology, responsibilities, and procedures for assessing, monitoring, and reporting sustainability risks, ESG characteristics, and sustainable investment objectives across all funds managed by Funds Avenue (“**IFM**”).

The Policy ensures transparency, regulatory compliance, and consistent communication to investors regarding ESG considerations. In line with Article 3 of the SFDR, Funds Avenue commits to publicly disclosing its policies on the integration of sustainability risks into investment decision-making, promoting transparency, consistency, and regulatory alignment.

II. SCOPE

This Policy applies to all funds managed by Funds Avenue S.A., including UCITS, UCI Part II, SIFs, RAIFs, and other AIFs.

Funds are classified under SFDR as:

- **Article 6:** Do not consider sustainability factors and do not integrate ESG factors into their investment process.
- **Article 8:** Promote environmental and/or social characteristics but do not make sustainable investment their primary objective. ESG factors are integrated but not exclusively targeted.
- **Article 9:** Have sustainable investment as their primary objective, investing in companies aligned with specific environmental or social goals.

Collectively, these are referred to as the “**Investment Funds**”

III. ESG INTEGRATION AND FUND-SPECIFIC APPROACH

Given the diversity of Investment Funds, Funds Avenue does not apply a one-size-fits-all ESG policy. Instead, it performs initial and ongoing ESG due diligence on all delegated portfolio managers. Collaboration with investment advisers and fund initiators ensures that appropriate controls, key risk indicators, and reporting frameworks are implemented according to SFDR pre-contractual disclosure requirements.

For Article 8 and Article 9 products, Funds Avenue ensures comprehensive ESG policies and procedures are in place, and that sustainability risk controls are fully integrated across the investment process, both pre- and post-trade, reflected in all reporting obligations.

IV. GOVERNANCE AND RESPONSIBILITIES

Oversight of ESG integration at Funds Avenue is led by the Governing Body of the Investment Funds (the “**Governing Body**”), which ensures that governance standards are maintained, and fund-level disclosures are properly approved. Portfolio managers, in collaboration with investment advisers where applicable, are responsible for embedding ESG risks and objectives into all investment decisions. The Compliance, Risk Management, and Fund Services teams continuously monitor adherence to regulatory requirements, ensuring that ESG reporting is accurate, timely, and transparent to investors.

Funds Avenue’s remuneration policy reflects the long-term nature of its activities, promoting prudent and effective risk management while incorporating sustainability considerations. Any potential conflicts of interest arising from the integration of ESG risks are identified and addressed through robust internal systems, processes, and controls.

V. MONITORING, REPORTING, AND DISCLOSURE

SFDR disclosures are tailored to each fund and include pre-contractual, periodic, and website disclosures.

- **Precontractual disclosures:** Prospectuses and offering documents outline SFDR classification, ESG characteristics and objectives, sustainability risks and principal adverse impact consideration.
- **Periodic disclosures (only Article 8 and 9 Investment Funds):** Provide ESG performance metrics, outcomes, and principal adverse impact information.
- **Website Disclosure (only Article 8 and 9 Investment Funds):** Consolidates sustainability policies, ESG methodologies, and related disclosures to ensure transparency for investors

❖ Sustainability Risks

In accordance with **Article 3 of SFDR**, financial market participants, including IFMs, must disclose on their website their policies for integrating sustainability risks into the investment decision-making process.

Funds Avenue promotes at all times sound and effective sustainability risk management practices, consistent with the risk profile, investment rules, and constitutional documents of the funds under its management. Accordingly, sustainability risks are globally embedded within Funds Avenue’s risk management framework and considered within the investment decision-making process where relevant and proportionate. For funds classified under Article 6 of SFDR, sustainability risks may not be systematically integrated into investment decisions, although they remain monitored at the risk management level. These risks include environmental factors (such as physical and transition risks), social considerations (e.g., social inequality), and governance issues (e.g., corruption). Sustainability risks may

directly impact investments or amplify other risks, including market, operational, liquidity, or counterparty risks.

❖ Principal adverse impact

Assessing sustainability risks is complex and data may be incomplete or inaccurate. Accordingly, Funds Avenue currently does not consider principal adverse impacts under **Article 4 of SFDR**.

Nevertheless, Funds Avenue is committed to improving ESG research and integrating sustainability considerations into its investment process. Updates will be published regularly on the Funds Avenue website to maintain compliance with applicable laws and regulations.

❖ Oversight and review

All ESG data and disclosures undergo internal review and require approval by the Governing Body. Material changes or exceptions are promptly escalated to the Governing Body and, where necessary, to regulators. This Policy is reviewed at least annually or whenever significant regulatory developments occur, ensuring ongoing compliance and alignment with evolving ESG standards.

VI. CONCLUSION

This Policy provides a comprehensive and forward-looking framework for integrating ESG factors and SFDR disclosures across all Funds Avenue-managed products. By defining clear methodologies, responsibilities, and procedures, it ensures that sustainability risks and ESG considerations are systematically embedded in investment decision-making, risk management, and fund governance.

Acknowledging that ESG standards, regulatory expectations, and market practices are continuously evolving, Funds Avenue commits to regularly reviewing and updating the Policy. This proactive approach allows the firm to adapt to emerging sustainability trends, enhance transparency, and strengthen its influence in promoting sustainable finance, ultimately supporting both the financial and societal objectives of the funds it manages.