

**LEADENHALL LIFE INSURANCE LINKED INVESTMENTS FUND PLC  
LEADENHALL LIFE SMA III ICAV  
LEADENHALL LIFE INSURANCE LINKED INVESTMENTS FUND IV, L.P.  
and  
SITKA ICAV  
(each, a “Fund”)<sup>1</sup>**

**WEBSITE DISCLOSURES FOR THE  
EU SUSTAINABLE FINANCE  
DISCLOSURE REGULATION (SFDR)**

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<sup>1</sup> These disclosures apply in respect of these funds under the management/delegated management of Leadenhall Capital Partners LLP which have been categorised as meeting the provisions set out in Article 8 of the SFDR.

## **Summary**

Leadenhall Capital Partners LLP (the “Manager”) has categorised each Fund as meeting the provisions set out in Article 8 of SFDR for products which promote environmental or social characteristics, as further described below. Defined terms used in this summary document which are not defined herein shall have the same meaning as in the general website disclosures.

Each Fund promotes social characteristics, but does not have as its objective sustainable investment and will not make any sustainable investments. Sustainability matters are evaluated for the investments of the Fund and separate sustainability targets are set to certain portions of the investments. Among other characteristics, each Fund promotes social characteristics. The characteristics promoted by each Fund include:

- A. Each Fund supports improving the overall resilience of societies and businesses to mortality uncertainty or excess illness including the potential negative impacts of climate change.
- B. Each Fund contributes to global ESG enhancement by promoting ESG within the insurance-linked securities and (re)insurance industry.
- C. Each Fund contributes to supporting social resilience and narrowing the protection gap by providing capital to insurance-linked transactions, insurers, reinsurers, insurance distributors, insurance claims managers, operators and servicers in the reverse mortgage market, governments, state, regional and municipal agencies and aid agencies providing life and health loss relief.

In order to meet the social characteristics promoted by each Fund, the Manager applies binding criteria to the selection of underlying assets (“Binding Selection Criteria”) as part of its investment decision making process. The binding elements of the investment strategy used to attain each of the characteristics are as follows:

### **Characteristic**

A. Each Fund supports improving the overall resilience of societies and businesses to mortality uncertainty or excess illness including the potential negative impacts of climate change.

B. Each Fund contributes to global ESG enhancement by promoting ESG within the insurance-linked securities and (re)insurance industry.

C. Each Fund contributes to supporting social resilience and narrowing the protection gap by providing capital to insurance-linked transactions, insurers, reinsurers, insurance distributors, insurance claims managers, operators and servicers in the reverse mortgage market, governments, state, regional and municipal agencies and aid agencies providing life and health loss relief.

### **Binding Selection Criteria**

At least 50% of each Fund's Invested Assets are allocated to the life, annuity and/or health protection insurance sectors as at the time each investment is made.

Each Fund limits the finance of insurance companies with asset portfolios that contain material exposure to fossil fuels. No more than 10% of its investments can provide on-balance sheet capital to insurance companies which exceed the below limits of their book asset values, at the time the Fund makes the investment:

- Petroleum and gas companies (no greater than 10%)
- Companies in mining extraction of coal (no greater than 10%)

The amount of each Fund's Invested Assets that provides capital to the insurance or reinsurance industry or that is exposed to biometric, behavioural and insurance-linked risks should be no less than 75% of each Fund's total Invested Assets. For the purpose of this criteria, insurance-linked protection offered directly to other entities such as large corporations or their captive insurers are not to be included in the assets complying with such 75% limitation.

The Manager anticipates that certain proportions of the asset allocation for each Fund shall be towards investments that have social characteristics without being sustainable investments within the meaning of the EU Taxonomy regulation, as further set out in the section titled “*Proportion of investments*” below. Such investments may include derivative instruments as further set out in the same section below.

To ensure that the strategy is implemented into the investment process on a continuous basis, the Manager has implemented internal processes which set out how these criteria are applied through both the Manager's due diligence carried out as part of its pre-investment assessment process and its investment approval process. The Manager also

develops research and analysis on climate change, environmental and social factors which inform the investment decisions it takes as part of its obligations to the Fund.

The Manager promotes good governance practices through the Manager's due diligence carried out as part of its pre-investment assessment process in respect of the companies in which investments are made (or the entities with whom each Fund transacts). The Manager believes these are a key part of assessing whether counterparties are appropriate.

The Manager is a signatory to the UN Principles for Responsible Investment (the "UNPRI"). As a signatory to the UNPRI the good governance practices of the entities to which each Fund has investment exposure (or with which each Fund transacts) are assessed prior to making an investment and periodically thereafter. Further, each Fund promotes the UNPRI and encourages its counterparties to adhere to its terms.

As part of our broader risk management processes when investing, the Manager has implemented procedures to (i) **identify**, (ii) **measure**, (iii) **manage** and (iv) **monitor** sustainability risks, as further set out in the section titled "*Methodologies*" below.

The Manager's approach to sustainability risk management is based on (amongst other things) the nature of each transaction and the time horizon it encompasses. For example, multi-year ILS transactions are reviewed upon the occurrence of any material events. Risk transfer transactions are continuously monitored for the impacts of natural perils or changes in human morbidity or mortality and the risk measures are adapted with the influence of climate and social changes.

Data is received from third party sources and directly from companies in which investments are made. The accuracy of the latter category of data is generally warranted by such companies. Following the collection of ESG data, it is recorded and input electronically into the Manager's proprietary system. It is then analysed, so that it can be incorporated into the submissions made as part of the Manager's investment process and finally stored for the purpose of future reference and monitoring. Further information is set out in the section titled "*Data sources and processing*" below.

ESG data may only be obtained periodically and may be based on certain assumptions, forecasts, projections, views and opinions of third party providers, which may be based on current market trends or anticipated future events. Given the developing and innovative nature of these models, methodologies and assumptions and the inherent uncertainty in predicting forward-looking events, it cannot be guaranteed that the ESG data is always complete or accurate or that the ESG data will satisfy the aims or requirements of any specific client or investor. Further information is set out in the section titled "*Limitations to methodologies and data*" below.

Prior to making any investment decision, the investment professionals employed by the Manager are required to conduct an assessment of the proposed investment position. The due diligence carried out as part of the pre-investment assessment conducted and the metrics and data used by the relevant investment professional employed by the Manager will depend on the nature of the relevant investment. In particular there will be a difference between public and private investments and between direct investments and investments in structured products or where there is an intermediary interposed between the Manager's clients and the transaction sponsor. A summary of the approaches taken appears in the section titled "*Due diligence*" below. Having completed the pre-investment diligence exercise, the scores are recorded in the investment proposal.

It is generally expected that any Indirect Investment awarded a "red" rating for governance as part of the due diligence carried out during the pre-investment assessment process will not be approved for investment. In addition, no Direct Investment or Indirect Investment will be allocated to a mandate that would result in a breach of the Binding Selection Criteria applicable thereto.

Given the complexity and bespoke nature of many of the Manager's transactions, the Manager will ensure that the counterparties identified and subject to due diligence as part of the pre-investment assessment can be reasonably regarded as having substantive financial interest in such transactions. For example, when a cat bond is issued, the Manager would treat the sponsor of the cat bond as the counterparty for the purposes of the due diligence carried out as part of the pre-investment assessment. Conversely, where a reinsurer relationship exists and the other entity retains risk in the transaction, it would be treated as the counterparty.

The Manager maintains an active dialogue with portfolio companies and/or their brokers on ESG matters. It endeavours to assess the social resilience and governance frameworks of its portfolio companies and promotes the importance of collating, understanding and sharing this data, where this is not already done.

The Funds do not benchmark against a specific index.

## **No sustainable investment objective**

Each Fund promotes social characteristics, but does not have as its objective sustainable investment and will not make any sustainable investments. Sustainability matters are evaluated for the investments of the Fund and separate sustainability targets are set to certain portions of the investments.

## **Environmental or social characteristics of the Funds**

Among other characteristics, each Fund promotes social characteristics. The characteristics promoted by each Fund include:

- A. Each Fund supports improving the overall resilience of societies and businesses to mortality uncertainty or excess illness including the potential negative impacts of climate change.
- B. Each Fund contributes to global ESG enhancement by promoting ESG within the insurance-linked securities and (re)insurance industry.
- C. Each Fund contributes to supporting social resilience and narrowing the protection gap by providing capital to insurance-linked transactions, insurers, reinsurers, insurance distributors, insurance claims managers, operators and servicers in the reverse mortgage market, governments, state, regional and municipal agencies and aid agencies providing life and health loss relief.

The following sustainability indicators are used to measure the attainment of each of the social characteristics mentioned above:

- A. Each Fund aims to allocate 50%+ of its Invested Assets to the life annuity and and/or health protection insurance sectors.
- B. Each Fund aims to limit the finance of insurance companies with asset portfolios that contain material exposure to fossil fuels. Each Fund aims to limit 10% of its Invested Assets to the provision of on-balance sheet capital to insurance companies which exceed the below limits of their book asset values, at the time the Fund makes the investment:
  - Petroleum and gas companies (no greater than 10%); and
  - Companies in mining extraction of coal (no greater than 10%).
- C. Each Fund aims to commit 75%+ of its Invested Assets to providing capital to the insurance or reinsurance industry or exposure to biometric, behavioural and insurance-linked risks.

## **Investment Strategy**

In order to meet the social characteristics promoted by each Fund, the Manager applies binding criteria to the selection of underlying assets ("Binding Selection Criteria") as part of its investment decision making process, as further set out below.

The binding elements of the investment strategy used to attain each of the characteristics are as follows:

### **Characteristic**

A. Each Fund supports improving the overall resilience of societies and businesses to mortality uncertainty or excess illness including the potential negative impacts of climate change.

B. Each Fund contributes to global ESG enhancement by promoting ESG within the insurance-linked securities and (re)insurance industry.

### **Binding Selection Criteria**

At least 50% of each Fund's Invested Assets are allocated to the life, annuity and/or health protection insurance sectors as at the time each investment is made.

Each Fund limits the finance of insurance companies with asset portfolios that contain material exposure to fossil fuels. No more than 10% of its investments can provide on-balance sheet capital to insurance companies which exceed the below limits of their book asset values, at the time the Fund makes the investment:

## Characteristic

## Binding Selection Criteria

- Petroleum and gas companies (no greater than 10%)
- Companies in mining extraction of coal (no greater than 10%)

C. Each Fund contributes to supporting social resilience and narrowing the protection gap by providing capital to insurance-linked transactions, insurers, reinsurers insurance distributors, insurance claims managers, operators and servicers in the reverse mortgage market, governments, state, regional and municipal agencies and aid agencies providing life and health loss relief.

The amount of each Fund's Invested Assets that provides capital to the insurance or reinsurance industry or that is exposed to biometric, behavioural and insurance-linked risks should be no less than 75% of the Fund's total Invested Assets. For the purpose of this criteria, insurance-linked protection offered directly to other entities such as large corporations or their captive insurers are not to be included in the assets complying with such 75% limitation.

For the purposes of this website disclosure and the Binding Selection Criteria:

**"Insurance-linked transaction"** means a transaction under which a counterparty (regardless of its nature) purchases protection against the occurrence of an event or a series of events which could affect the insurance and reinsurance industry.

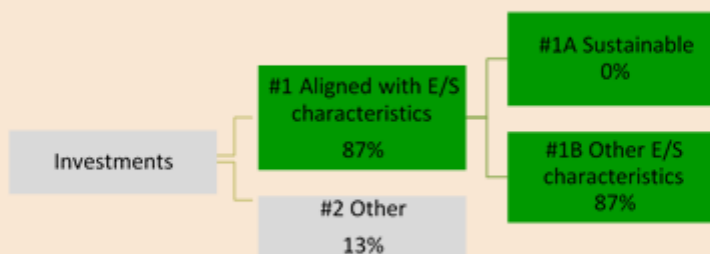
**"Invested Assets"** means the net asset value of all of the relevant Fund's assets as of its most recent net asset value valuation, net of the net asset value of its investments in cash, money market funds and government securities. For avoidance of doubt the above Binding Selection Criteria apply at the time each investment is made and therefore a change in the portfolio weightings of each Invested Asset due to other factors such as (but not limited to) a write-down of some of the Invested Asset complying with the Binding Selection Criteria would not be considered a breach. Given the illiquid nature of some of the Invested Assets it will not be possible for the Manager to rebalance the portfolio and it may be necessary to wait for the orderly liquidation of the illiquid Invested Assets until the Binding Selection Criteria is met. In such an event, the Manager will not add Invested Assets which do not comply with the Binding Selection Criteria.

### **Proportion of investments**

The Manager anticipates that certain proportions of the asset allocation for each Fund shall be towards investments that have social characteristics without being sustainable investments within the meaning of the EU Taxonomy regulation, as further set out per Fund below:

(i) LEADENHALL LIFE INSURANCE LINKED INVESTMENTS FUND PLC

The Manager anticipates that 87% of the asset allocation shall be towards investments that have social characteristics without being sustainable investments within the meaning of the Taxonomy Regulation and which therefore qualify as #1B Other E/S characteristics.



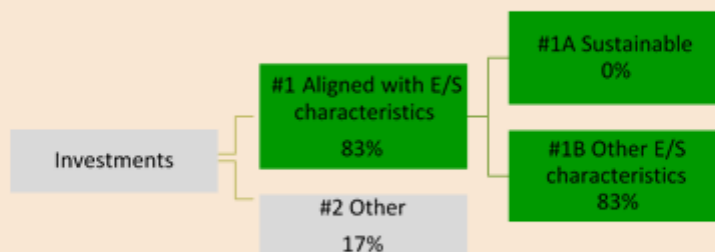
**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

The category **#1A Aligned with E/S characteristics** covers:

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** cover investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

(ii) LEADENHALL LIFE SMA III ICAV

The Manager anticipates that 83% of the asset allocation shall be towards investments that have social characteristics without being sustainable investments within the meaning of the Taxonomy Regulation and which therefore qualify as #1B Other E/S characteristics.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

The category **#1A Aligned with E/S characteristics** covers:

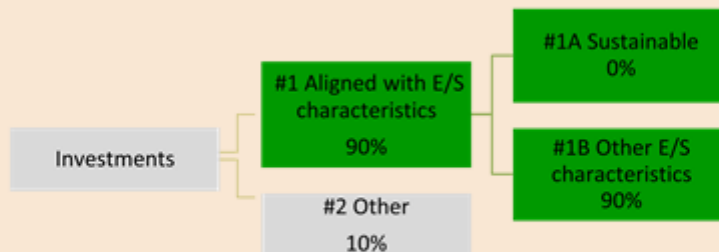
- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** cover investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.



(iii) LEADENHALL LIFE INSURANCE LINKED INVESTMENTS FUND IV, L.P.

The Manager anticipates that 90% of the asset allocation shall be towards investments that have social characteristics without being sustainable investments within the meaning of the Taxonomy Regulation and which therefore qualify as #1B Other E/S characteristics.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

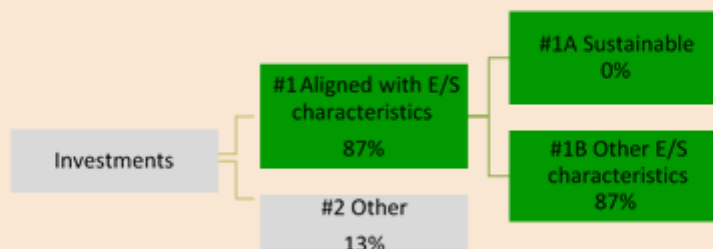
The category **#1A Aligned with E/S characteristics** covers:

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** cover investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

**#2Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

(iv) SITKA ICAV

The Manager anticipates that 87% of the asset allocation shall be towards investments that have social characteristics without being sustainable investments within the meaning of the Taxonomy Regulation and which therefore qualify as #1B Other E/S characteristics.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

The category **#1A Aligned with E/S characteristics** covers:

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** cover investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

Furthermore, each Fund may invest in derivative instruments issued by (or referencing) market participants acting in various capacities within the insurance and reinsurance sector, including (but not limited to) life insurers, health insurers, non-life insurers, composite insurers and reinsurers, intermediaries, services providers and vendors to the insurance sector and entities operating in related areas otherwise involved or exposed to insurance risks and opportunities.

Derivatives can play a key role in facilitating the transition to a sustainable economy, by enabling more capital to be channelled towards investments with environmental or social characteristics.

### **Monitoring of environmental or social characteristics**

To ensure that the strategy is implemented into the investment process on a continuous basis, the Manager has implemented internal processes which set out how these criteria are applied through both the Manager's due diligence carried out as part of its pre-investment assessment process and its investment approval process. The Manager also develops research and analysis on climate change, environmental and social factors which inform the investment decisions it takes as part of its obligations to the Fund.

The Manager promotes good governance practices through the Manager's due diligence carried out as part of its pre-investment assessment process in respect of the companies in which investments are made (or the entities with whom each Fund transacts). The Manager believes these are a key part of assessing whether counterparties are appropriate.

The Manager is a signatory to the UN Principles for Responsible Investment (the "UNPRI"). As a signatory to the UNPRI the good governance practices of the entities to which each Fund has investment exposure (or with which each Fund transacts) are assessed prior to making an investment and periodically thereafter. Further, each Fund promotes the UNPRI and encourages its counterparties to adhere to its terms.

### **Methodologies**

As part of our broader risk management processes when investing, the Manager has implemented procedures to (i) **identify**, (ii) **measure**, (iii) **manage** and (iv) **monitor** sustainability risks.

The Manager's approach to sustainability risk management is based on (amongst other things) the nature of each transaction and the time horizon it encompasses. For example, multi-year ILS transactions are reviewed upon the occurrence of any material events. Risk transfer transactions are continuously monitored for the impacts of natural perils or changes in human morbidity or mortality and the risk measures are adapted with the influence of climate and social changes.

#### **(i) Identify**

The Manager separately reviews the sustainability risks which are potentially likely to cause a material negative impact on the value of our clients' investments, should those risks occur. These are broadly divided into the three categories of environmental, social and governance risks.

The Manager treats sustainability risk as both a standalone risk, and also a cross-cutting risk which manifests through many other established principal risk types (such as financial risks, operational risks, credit risks, etc.).

#### **(ii) Measure**

The Manager measures sustainability risk through due diligence of investments and portfolio companies. This assessment includes examining investment and portfolio companies in the context of our sustainability criteria, with a particular focus on governance metrics and more generally on social impacts. In addition we assess the impact of climate risk on client investments exposed to meteorological risk to derive a risk curve for each investment.

In formulating our view on sustainability risk, we rely on our own internal analysis, modelling and assessment. We also use third party data sources (e.g. Bloomberg) where available. For modelling physical risk we use third party vendors as well as obtain data sources from portfolio companies and intermediaries.

In measuring sustainability risk, we take account of the "physical" or tangible risks of a sustainability event (for example, the impact of severe climate events leading to business disruption or losses for our investment positions). In addition, we

also take account of the “transition” risk, which focuses on the risk to investments as the world moves towards a more sustainable environmental and social model, for example, the risk severity from meteorological events on renewable energy sources like solar panels and wind farms.

### **(iii) Management**

While the Manager’s portfolio managers and analysts are provided with information on sustainability risks, and are encouraged to take sustainability risks into account when making an investment decision, sustainability risk would not by itself prevent the Manager from making any investment. Instead, sustainability risk forms part of the overall risk management processes, and is one of many risks which may, depending on the specific investment opportunity, be relevant to a determination of risk.

The Manager excludes debt or equity investments in:

- manufacturers of controversial weapons, to protect human rights;
- manufacturers of controversial arms/armament, to protect human rights;
- pornography, to promote respect for human rights;
- tobacco, to promote social cohesion through good health; and
- gambling, to promote social cohesion and to protect economically or socially disadvantaged communities.

The Manager’s lines of defence are senior management, portfolio managers/analysts and its Responsible Investing (ESG) Committee; all have active roles in managing sustainability risk.

### **(iv) Monitoring**

The Manager’s portfolio managers and analysts, with the input of the Manager’s Responsible Investing (ESG) Committee, conduct periodic review and periodic monitoring of investments and portfolio companies. The Manager continuously monitors and takes into account applicable legislation and regulation.

### **Data sources and processing**

Data is received from third party sources and directly from companies in which investments are made. The accuracy of the latter category of data is generally warranted by such companies. Following the collection of ESG data, it is recorded and input electronically into the Manager’s proprietary system. It is then analysed, so that it can be incorporated into the submissions made as part of the Manager’s investment process and finally stored for the purpose of future reference and monitoring. It is currently difficult to report accurate numbers on the proportion of data that is estimated. A relative low amount of the data is estimated, but this is not quantifiable in terms of proportion as it depends on the portfolio construction at any given point in time.

The Manager invests in investments that contribute to environment and social factors. The Manager is an asset manager investing in insurance-linked securities (ILS). ILS products promote social responsibilities and cohesiveness. Climate change and detrimental man-made environment interventions can contribute to potential higher insurance claims which would result in losses for the Funds and its investors. The Manager’s approach to sustainability risk management is based on (amongst other things) the nature of each transaction and the time horizon it encompasses. For example, multi-year ILS transactions are reviewed upon the occurrence of any material events and in a pre-arranged annual review of the counterparty’s own risk management and updated risk exposures to climate and social risks. Risk transfer transactions are continuously monitored and screened for the impacts of natural perils, changes in human morbidity or mortality and the risk measures are adapted with the influence of climate and social changes.

Underlying investments can also consist of assets that are not relevant to the environmental and social characteristics promoted by each Fund, such as hedging instruments, unscreened investments for diversification purposes or investments for which environmental and social impact data is lacking, or money market instruments.

### **Limitations to methodologies and data**

ESG data may only be obtained periodically and may be based on certain assumptions, forecasts, projections, views and opinions of third party providers, which may be based on current market trends or anticipated future events. Given the developing and innovative nature of these models, methodologies and assumptions and the inherent uncertainty in predicting forward-looking events, it cannot be guaranteed that the ESG data is always complete or accurate or that the ESG data will satisfy the aims or requirements of any specific client or investor. Any opinions, projections or forecasts are not a guarantee of future events and the relevant models, methodologies and/or assumptions may be updated at any time. External factors and limitations on the data (which include unaudited third party data) may result in differences between actual and projected figures. Furthermore, there may be data that is unable to be sourced due to the lack of availability of data sources. Where ESG data is sourced from external providers, their liability for such data may be limited and will always be subject to legal terms.

Products managed by the Manager promote environmental and social characteristics, but do not commit to making any sustainable investments. They do not consider principal adverse impacts on sustainability factors. The Manager does not currently consider the adverse impacts of investment decisions on sustainability factors within the meaning of SFDR. This is because the detailed rules underlying the SFDR require The Manager to ascertain the availability of the data expected to be reported under the requirements of SFDR and The Manager is of the view that the required data is not currently available. The position will continue to be monitored and reviewed by the Manager as data becomes available and market practice becomes apparent.

### **Due diligence**

Prior to making any investment decision, the investment professionals employed by the Manager are required to conduct an assessment of the proposed investment position. The due diligence carried out as part of the pre-investment assessment conducted and the metrics and data used by the relevant investment professional employed by the Manager will depend on the nature of the relevant investment. In particular there will be a difference between public and private investments and between direct investments and investments in structured products or where there is an intermediary interposed between the Manager's clients and the transaction sponsor. A summary of the approaches taken appears below:

- For private or direct investments (e.g. bilateral note issues) ("**Direct Investments**"), there is a high level of interaction with the issuer/sponsor and consequently an opportunity to collect granular data and to make enquiries of the issuer/sponsor. For Direct Investments, the relevant investment professional will complete a checklist covering governmental factors (e.g. whether the issuer is subject to prudential regulation, any outstanding litigation), environmental factors (e.g. energy efficiency strategy, pollution exposures) and social factors (e.g. diversity, corporate volunteering, human capital management). For each of those categories, the issuer is allocated a qualitative score (positive, neutral or negative).
- For indirect investments and investments in structured products (e.g. securitisations, reinsurance transactions, cat bonds) ("**Indirect Investments**"), there is a lower level of interaction with the issuer/sponsor than for Direct Investments. Consequently, it is necessary to rely to a large extent on high level criteria (e.g. country of risk, business type, sponsor, ownership structure, type of insurance risk), publicly available data and data produced by third parties (e.g. brokers, credit ratings). The counterparty is allocated a Red/Amber/Green rating for governance factors.

Having completed the pre-investment diligence exercise, the scores are recorded in the investment proposal:

- For Direct Investments, an ESG section is included in the relevant investment proposal. This section includes the ESG scores and a commentary on whether the proposed investment would satisfy the Binding Selection Criteria applicable to the participating financial products.
- For Indirect Investments, the governance rating is included in the relevant investment proposal, together with a commentary regarding whether the proposed Indirect Investment would satisfy the Binding Selection Criteria applicable to the participating financial products.

It is generally expected that any Indirect Investment awarded a "red" rating for governance as part of the due diligence carried out during the pre-investment assessment will not be approved for investment. In addition, no Direct Investment or Indirect Investment will be allocated to a mandate that would result in a breach of the Binding Selection Criteria applicable thereto.

Given the complexity and bespoke nature of many of the Manager's transactions, the Manager will ensure that the counterparties identified and subject to due diligence as part of the pre-investment assessment can be reasonably regarded as having substantive financial interest in such transactions. For example, when a cat bond is issued, the Manager would treat the sponsor of the cat bond as the counterparty for the purposes of the due diligence carried out as part of the pre-investment assessment. Conversely, where a reinsurer relationship exists and the other entity retains risk in the transaction, it would be treated as the counterparty.

### **Engagement policies**

The Manager maintains an active dialogue with portfolio companies and/or their brokers on ESG matters. It endeavours to assess the social resilience and governance frameworks of its portfolio companies and promotes the importance of collating, understanding and sharing this data, where this is not already done.

### **Reference benchmark**

The Funds do not benchmark against a specific index.

### **Periodic reports**

A description of the extent to which environmental and social characteristics are met will be available as part of the annual report which will, to the extent permitted, be published on this website once available. Each Fund's most recent annual report does not include any information pursuant to SFDR.