

Sustainable Finance Disclosure Regulation (“SFDR”) Policy

Introduction

This document fulfils the disclosure requirements under Regulation (EU) 2019/2088 on Sustainable Finance Disclosure Regulation (“SFDR”) for Eleon Capital Management Limited (“Eleon Capital Management”) operates as an Alternative Investment Fund Manager (“AIFM”), licensed and regulated by the Cyprus Securities and Exchange Commission (hereinafter, “CySEC”) with license number AIFM 45/56/2013. Within the scope of its regulatory authorisation by CySEC, the Company manages Alternative Investment Funds (hereinafter, “Funds”). within the meaning of this Regulation.

In accordance with Article 3 of the SFDR, financial market participants and financial advisors are required to publish information on their strategies for integrating sustainability risks in their investment decision-making processes or investment advisory activities on their websites.

Sustainability risk

Sustainability risk is defined in the SFDR “as an environmental, social or governance event or condition, that if it occurs, could cause an actual or a potential material negative impact of the value of investments”. Funds under Eleon Capital Management Ltd management may be exposed to these sustainability risks from time to time.

At this time, Eleon Capital Management Ltd does not systematically incorporate environmental, social and governance (“ESG”) factors or consider sustainability risk in the investment decision-making process of Funds under its management. Due to various investment policies and the nature of the assets in which its Funds invest, the Manager does not expect ESG factors and sustainability risks to have a material negative impact on the returns of its Funds. Eleon Capital Management Ltd may however, have regard to ESG factors and sustainability risks and their potentially detrimental impact on specific investments of the Funds in the future where it appears appropriate for the Eleon Capital Management Ltd to do so and where there is appropriate ESG data available to the Manager to merit considering the systematic integration of ESG factors into the investment decision making process of the Sub-Funds.

In accordance with the discretion granted pursuant to the SFDR, Eleon Capital Management Ltd does not consider the adverse impacts of investment decisions on sustainability factors in respect of Funds under management, and they will not issue a statement on its website in relation to the due diligence policies with respect to those impacts as the Eleon Capital Management Ltd does not regard sustainability factors to be material to the investment strategy of Funds under its management. In the event that sustainability factors do, in the future, become material, Eleon Capital Management Ltd may consider the principal adverse impacts of its investment decisions on sustainability factors.

While Eleon Capital Management Ltd will closely monitor the development of ESG and more broadly, the European Commission’s Sustainable Finance Action Plan, Investors should note that if such sustainability risks do materialise, they may reduce the value of the relevant Funds’ Investments and could have a material impact on the performance and returns any impact Fund.

Furthermore, investments within Funds currently do not take into account the EU Taxonomy criteria (Regulation EU 2020/852 on the establishment of a framework to facilitate sustainable investment) for environmentally sustainable economic activities unless otherwise stated in the Sub-Fund’s investment objective and policy