

## ESG Disclosures in accordance with SFDR

At CIM Capital Restruct Fund CommV (“**CCRF**”) / CCR Partners BV (“**CCR Partners**”), we are aware of our responsibilities towards society, including those relating to environmental, social and governance (“**ESG**”) matters. The transition to a low-carbon, more sustainable, resource-efficient and circular economy will affect all operators of the economy, including the portfolio entities that we invest in. Even though no environmental or social characteristics are promoted by CCRF in accordance with article 8 of Regulation (EU) no. 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (“**SFDR**”) and CCRF does not have sustainable investments as its purpose in accordance with article 9 of the SFDR, we do believe that, in order to make good investments, sustainability factors should not be entirely overlooked.

### **1 Sustainability risk policies**

We acknowledge that ESG-related events or conditions could potentially have a (negative) impact on the value of our investments. As CCRF neither promotes environmental or social characteristics, nor has sustainable investments as its purpose, we do not formally integrate an assessment of sustainability risks in our decision making process in accordance with article 3 of the SFDR and we do not plan to do so in the future.

That being said, we do carefully select potential portfolio entities for investments, as well as the sectors that they are active in. In addition, through the long-term investments that CCRF take in portfolio entities, we may influence such portfolio entities’ activities and policies and thereby diminishing (sustainability) risks for our investments.

As set out in de the documentation governing CCRF, no investments will be made in entities active in certain ‘restricted sectors’ (which, among others, are sectors that may entail sustainability risks). For a list of those restricted sectors, reference is made to the fund documentation.

As an active investor, we seek representation on the governance bodies of our portfolio entities. Throughout the lifespan of our investments, we monitor portfolio entities’ compliance with (ESG) legislation and human rights.

### **2 No consideration of sustainability adverse impacts**

We are aware that our investment decisions, as well as our portfolio entities’ activities may have an impact on sustainability factors.

However, for the purpose of article 4 of the SFDR, CCRF does not consider the adverse impacts of our investment decisions on sustainability factors. CCR Partners does not consider those adverse impacts because we are a small organisation with limited resources and personnel and we are not capable of determining precisely what the adverse impacts of our investment decisions would be based on the different criteria set forth in the SFDR and the legislation implementing the SFDR, our focus on distressed situations does not allow us to perform in-depth analysis on all ESG matters prior to making an investment decision because of timing constraints and availability of relevant information, and we invest in small and medium sized entities that are in distress, due to their size and limited resources, are not capable of providing the information required to determine precisely the adverse impacts of our investment decisions in accordance with the SFDR and the legislation implementing the SFDR.

CCRF / CCR Partners does not intend to consider adverse impacts of investment decisions on sustainability factors in the future in accordance with article 4 of the SFDR for the aforementioned reasons.

### **3 Integration of sustainability risks into remuneration policies**

As a sub-threshold manager of alternative investment funds, CCR Partners does not have an obligation to have a formal remuneration policy in accordance with article 40 and following of the Belgian law of 19 April 2014 on alternative entities for collective investments and their managers. Consequently, sustainability risks are not integrated in CCR Partner's remuneration policy.



Godefriduskaai 12 – V5, 2000 Antwerpen

+32 (0)3/303.79.91