

Website ESG Disclosures in accordance with SFDR

20/12/2023

In its capacity of alternative investment fund manager ('AIFM'), CCR PARTNERS BV (the "**Manager**") is subject to the disclosure obligations relating to environmental, social and governance ("**ESG**") matters as set forth in:

- 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**");
- Commission Delegated Regulation (EU) 2022/1288 supplementing Regulation (EU) 2019/2088 of the European Parliament and of the Council with regard to regulatory technical standards specifying the details of the content and presentation of the information in relation to the principle of 'do no significant harm', specifying the content, methodologies and presentation of information in relation to sustainability indicators and adverse sustainability impacts, and the content and presentation of the information in relation to the promotion of environmental or social characteristics and sustainable investment objectives in precontractual documents, on websites and in periodic reports ("**RTS**"); and
- Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088 ("**TR**").

The Manager may update this information at any time, and will in such event publish a clarification on such amendment on this website.

1 No integration of sustainability risks

The Manager does not formally integrate sustainability risks into its investment decision procedure, as referred to in article 3 SFDR. In other words, sustainability risks are not formally integrated into the Manager's investment decisions and (ii) the likely impacts of sustainability risks on the returns of the fund[s] managed by the Manager are not formally assessed.

The Manager acknowledges that ESG-related events or conditions could potentially have a (negative) impact on the value of the investments made on behalf of fund managed by the Manager. However, given the type of entities that fall within the investment scope of the fund managed by the Manager and the limited opportunities according to the investment scope of the fund, the Manager is currently not in a position to formally integrate sustainability risks into its investment decisions, nor to formally assess the likely impacts of sustainability risks on the returns.

Hence, the investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

2 No consideration of adverse sustainability impacts of investment decisions

The Manager does not consider adverse sustainability impacts of its investment decisions, as referred to in article 4, §1, (b) SFDR. This means that adverse impacts on sustainability, on climate and other environment-related indicators (including, greenhouse gas emissions, biodiversity, water and waste) or indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters are not formally taken into consideration in the Manager's investment decisions.

In accordance with article 4, §1, (b) and article 7, §2 of the SFDR, the Manager does not consider the adverse impacts of its investment decisions on sustainability factors. The Manager does not consider

those adverse impacts because the fact that the Manager has limited resources and personnel and is therefore not capable of determining precisely what the adverse impacts of its investment decisions would be based on the different criteria set forth in the SFDR and RTS and the fund managed by the Manager invests in small and medium sized entities that, due to their size and limited resources in case of disruption, are not capable of providing the information required to determine precisely the adverse impacts of our investment decisions in accordance with the SFDR and RTS .

The Manager does not intend to consider adverse impacts of investment decisions on sustainability factors in the future in accordance with article 4, §1, (a) of the SFDR for the aforementioned reasons.

3 Integration of sustainability risks into remuneration policies

As a sub-threshold manager of alternative investment funds, the Manager 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 the Manager's remuneration policy.