Disclosures pursuant to the Regulation (EU) 2019/2088 (SFDR)

TRITON ASSET MANAGEMENT AEDAK

Published: March 2021.

Disclosures pursuant to the Regulation (EU) 2019/2088 (SFDR)

EU has taken the decisive action to support the transition to a more resource efficient, low carbon and sustainable economy, with an aim to be in the forefront of global efforts to build a financial system which supports sustainable growth. To this end, EU introduced under the Sustainable Action Plan a series of new legislative measures which connect finance with sustainability. Key regulation includes a classification system for sustainable activities (Taxonomy) and the mandatory disclosures and labels for green financial products (SFDR).

Triton Asset Management AEDAK (Triton), is a signatory to the Principles for Responsible Investment (PRI) since April 2020. Pursuant to this commitment, Triton is gradually integrating Environmental, Social and Governance (ESG) metrics, key performance indicators, considerations and objectives into its investment process in different asset classes with the goal to minimize risks, improve financial returns and at the same time have a quantifiable improved ESG footprint.

This is a phased process that may affect assets allocation, assets valuation, risk assessment and eventually financial returns of Triton's financial products. Triton has developed an ESG investment policy and strategy, and by integrating this to its investment principles, aims to build a reliable policy and strategy for responsible investments, to adapt to forthcoming regulatory requirements, to minimize risks and maximize portfolio returns in the long-term.

ESG criteria are commonly used to assess the level of sustainability of an investment and Triton is committed to creating a sustainable future for its clients, employees and community, by taking a sustainable approach to investing and align with the regulatory and market developments. However, the applicability of the standards and of the analysis may vary depending on the type of the managed portfolio, the asset class, the region, the instrument used, the mandate and possible specific client instructions as well as the type of services provided. Advisory mandates, cash and cash equivalent are excluded as asset classes from ESG investment policy and strategy.

Triton follows a targeted exclusion policy. ESG standards relate, among other things, to the ten principles of the United Nations Global Compact and the sectoral policies of Triton. The United Nations Global Compact (www.unglobalcompact.org) is a globally recognized common framework that applies to all industrial sectors. This initiative is based on international conventions in the areas of human rights, labor standards, the environment, and the fight against corruption. Companies which violate one or more of these principles are excluded from the investments of the managed portfolios, and those for which a risk of non-compliance exists are closely monitored, or even excluded, where applicable. In this context, Triton's ESG policy establishes the exclusion framework and approach towards investments in sensitive sectors. Companies that do not comply with the principles are excluded. The sectors concerned include (but are not limited to):

- Weapons of mass destruction, chemical, biological and depleted uranium weapons, anti-personnel mines and cluster bombs, as well as civilian firearms.

- Thermal coal mining, when this activity represents more than 35% of the company's revenues.
- Power generation from companies with excessive thermal energy production and no decarbonization transition plan.
- Pornography.
- Tobacco.

Triton's ESG analysis includes the assessment of the below three non-financial criteria at the level of the companies in which Triton invests:

- Environmental: includes energy efficiency, reduction of emission of greenhouse gases and waste treatment.
- Social: concerns in particular respect of human and workers' rights, human resources management (workers' health and safety, diversity).
- Governance: relates in particular to the independence of the board of directors/management body, the remuneration of managers and the respect of minority shareholders rights.

Engagement and dialogue are an integral and crucial part of Triton's sustainable investing. They are used to steer companies and the world on the right track. As fiduciaries of our clients' assets, we take our shareholder responsibilities seriously. Triton considers divestment as a last resort decision. In this context, Triton is committed at three levels:

- Company engagement: the aim is to encourage companies to achieve the highest possible standards in terms of environmental, social and governance responsibility and to support them in this process.
- Voting engagement: the use of voting rights at annual general meetings is one of the cornerstones of our strategy of continuous dialogue with the companies and an integral part of the investment process.
- Public policy engagement: Triton believes that it may be in the interest of companies to engage with decision-makers in favor of the development of a regulatory framework that encourages those who have achieved high environmental and social standards.

Triton has established a sustainability scorecard and a broader ESG dashboard to allow focus on the material factors it believes to have the greatest impact. ESG scores, as defined by an internal proprietary framework, are used to assist the ESG evaluation of security issuers. At the same time, Triton's approach to evaluating sustainability risk recognizes the many times scarcity of reliable data and the fact that relevance and materiality of sustainability factors vary across asset classes and securities.

Given the variance, Triton currently does not consider any specific adverse impacts of investment decisions on sustainability factors, as defined in Regulation (EU) 2019/2088 of 27

November 2019 and analysts are responsible for identifying sustainability-factor materiality, as well as any relevant timing, probability, and severity of sustainability-related risks.

Today, none of Triton's managed portfolios pursue an investment strategy that promotes environmental or social characteristics or has a sustainable investment objective as defined in Regulation (EU) 2019/2088 of 27 November 2019 on sustainability-related disclosures in the financial services sector (SFDR). In addition, Triton does not deem the investment decisions to have adverse impact on sustainability factors.

In case Triton decides in future, for any of the managed portfolios, including UCITS, to follow a strategy which promotes specific environmental or social characteristics or is in line with sustainable Investment objectives, the mandate / prospectus will be updated according to the requirements of the SFDR and the investors will be duly informed and notified in advance.