

[Apogem SFDR website disclosure EU Sustainable Finance Disclosure Regulation (2019/2088) ("SFDR")]

The EU Sustainable Finance Disclosures Regulation (2019/2088) on sustainability-related disclosures in the financial services sector (the "SFDR") requires Apogem Capital LLC ("Apogem") to publish information on the integration of sustainability risks in its investment decision making process and the consideration of adverse sustainability impacts. The following disclosures apply only in respect of those funds managed by Apogem that are subject to SFDR.

Integration of Sustainability Risks in Investment Decision-Making Process

A "sustainability risk" means "an environmental, social or governance event or condition that, if it occurs, could cause an actual or potential material negative impact on the value of the investment".

Apogem is committed to considering ESG factors and sustainability risks in the course of its due diligence, its investment decisions, and investment monitoring, to the extent reasonably practicable under the circumstances and where consistent with its fiduciary responsibilities.

Apogem's ESG policy is available on request. In addition, Apogem may apply specific ESG policies and frameworks, and approaches appropriate to particular investment strategies where relevant.

Principal Adverse Impacts

Adverse impact under SFDR is the risk of harm that an investment decision may have externally on sustainability factors. Sustainability factors are defined under the SFDR as environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

Apogem does not consider the adverse impacts of its investment decisions on sustainability factors, within the meaning of Article 4(1)(a) of the SFDR and the technical standards made under the SFDR in relation to the funds that it makes available in the EU. Among other reasons, Apogem does not consider it reasonable nor proportionate in relation to the type of investment strategies and funds that it makes available to systematically collect or report on data in relation to principal adverse impacts on investment decisions on sustainability factors in line with the technical standards set out by the SFDR in relation to the funds it manages. Apogem's position on this topic will be reviewed on a periodic basis.

Remuneration Policy

In addition to traditional financial metrics, remuneration of Apogem's personnel is also calculated using non-financial metrics and performance indicators. Apogem is not subject to Article 5 SFDR with respect to remuneration.