

Key Capital Investment Management Ltd Sustainable Finance Regulatory Disclosure

The Key Capital group has been a longstanding supporter of the working environment and the communities it operates within. This extends to the investments it shepherds for clients of the firm. Our fundamental belief is that sustainable investing is an essential part of the solution to a sustainable future. Assessing the potential impacts of ESG factors on the financial performance of investments is an important factor in driving a holistic perspective on the investment industry's role in creating value for investors in a sustainable way.

A Sustainability Risk is an environmental, social or governance (ESG) event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of an investment. Key Capital Investment Management (KCIM) recognises the importance and impact of having sustainability risk (and opportunity) consideration as a component of the investment process. The extent to which sustainability risks represent potential or actual material risks to the KCIM Funds are considered by KCIM in its due diligence and investment decision making process in line with the KCIM Sustainability Risks Policy. Sustainability risks are further outlined in the Prospectus of each KCIM Fund.

Principal adverse sustainability impacts of ESG are not explicitly considered by KCIM funds due to their fund-of-fund nature and structure. However, in line with KCIM's Sustainability Risk Policy, KCIM engages with the underlying managers on their ESG policies in an effort to promote best practices in this regard. KCIM does not invest with primary private asset managers where the manager's ESG policies are not aligned to support our position on ESG.

KCIM will continue to consider and develop its approach to principal adverse sustainability impacts over time as more information becomes readily available.

KCIM's remuneration policy includes consideration of quantitative and qualitative factors. These factors include the demonstration of value driven behaviours. This promotes a sound and effective risk management culture to protect the interests of investors and the value of the investment portfolios and therefore is consistent with the integration of sustainability risks.

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