

Key Capital Private 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 factor 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.

Key Capital Private (KCP) believes, in our role as financial advisors, that to act in the best interests of our clients we should assess the likely impacts of sustainability risks on the financial return of financial products in a coordinated and systematic way. Therefore, we integrate an assessment of sustainability risks into our fund research, due diligence and selection process. In this regard, we consider how an ESG event or condition may have a material adverse impact on the value of a fund, and how the fund managers' deal with those risks. A key component of this will involve engaging with each product producer to ensure we have the relevant information and understand the sustainability risks of each fund.

Sustainability risks will be monitored on an ongoing basis as part of our Product Governance process.

Principal adverse impact on sustainability factors is defined as having a negative, material or likely to be material effect on sustainability factors that are caused, compounded by or directly linked to investment decisions and advice performed by the legal entity.

SFDR in respect of the sustainability factors include:

- adverse impacts on the climate and other environment-related adverse impacts
- adverse impacts in the field of social
- employee matters, respect for human rights, anti-corruption and anti-bribery matters

We engage with product producers to understand how they consider, evaluate and monitor the Principal Adverse Impacts on sustainability factors.

As already stated, when assessing products, we will consider the different approaches taken by product providers in terms of them integrating sustainability risks into their product offering. This will form an important part of our analysis for choosing a provider and/or product. We will also consider Principal Adverse Impacts when there is sufficient information available and relevant to do so.

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

KCP'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 clients and the value of the investment portfolios and therefore is consistent with the integration of sustainability risks