

# SUSTAINABLE FINANCE DISCLOSURE REGULATION STATEMENT

## ACCOLADE INVESTMENT COMPANY LTD (“COMPANY”)

This statement refers to the REGULATION (EU) 2019/2088 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 November 2019 on sustainability-related disclosures in the financial services sector (“**SFDR**” or the “**Regulation**”).

More information on the Regulation may be found on the official website of European Union [EUR-Lex - 32019R2088 - EN - EUR-Lex \(europa.eu\)](https://eur-lex.europa.eu/lexuri/ui.do?uri=CELEX:32019R2088:EN:EUR-Lex).

## TRANSPARENCY OF SUSTAINABILITY RISK POLICIES

The Company does not consider sustainability risks as a separate category of risks in its investment decisions. The Company does at the same time promote a sound and effective risk management culture to protect value of its investments, without any incentive or bias towards excessive risk taking which implicitly include any category of risks including sustainability risks. Therefore, any potential sustainability risk that may have a material impact on the value of the investments and are in a contradiction to long-term interests of investors and the long-term success of the portfolios managed by the Company have to be assessed by the Company and, furthermore, any health, safety, and environmental risks are monitored prior to and throughout the course of its investments.

## TRANSPARENCY OF ADVERSE SUSTAINABILITY IMPACTS AT ENTITY LEVEL

The process of identification and prioritisation of principal adverse impacts within the meaning of Article 4 of SFDR is not performed nor implemented into due diligence policies of the Company. The Company does at the same time consider any potential detriment to the sustainability factors for each investment decision, to the extent information is available about the investments based on business-as-usual regulatory frameworks at place. Since the Company exclusively invests into large industrial parks, the acquisitions are subject to environmental impact assessment (EIA), environmental due diligence and/or administrative proceeding in which environmental impacts are assessed, as the case may be according to the specifics and matters of the project and particular regulation according to the legislation of the individual states in which the construction takes place, which the Company has so far considered as sufficient assessment of potential harm to the environment. The Company’s sustainability forward-oriented approach is further expressed by the fact that all investment projects are required to comply with the highest standards for modern development and with BREEAM or DGNB (German market) or similar (as the case may be according to the specifics and matters of the project) sustainable approach certification.

## TRANSPARENCY OF REMUNERATION POLICIES IN RELATION TO THE INTEGRATION OF SUSTAINABILITY RISKS

The Company views its remuneration policy to be consistent with the integration of sustainability risks. Indeed, there is no component of the Company’s remuneration structure which is geared towards creating an incentive or bias towards excessive risk taking to the detriment of sustainability Factors.

Also, the Company's remuneration structure has been designed to: (i) align the Company's incentives with investors' long-term interests and the long-term success of the managed portfolios; and (ii) to promote a sound and effective risk management culture to protect value, in both cases, without any incentive or bias towards risk taking which could have a material impact on sustainability factors.