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).

TRANSPARENCY OF SUSTAINABILITY RISK POLICIES

Sustainability risks refer to 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. The Company treats sustainability risk as both a standalone risk, and also a cross-cutting risk which manifests through other principal risk types (such as financial risks, operational risks, credit risks, etc).

The Company promotes 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 have to be monitored prior to and throughout the course of its investments.

The Company reviews the sustainability risks which are considered relevant, being those that could cause an actual or potential material negative impact on the value of any of the Sub-Fund's / future funds' investments, should these risks occur. Where any material sustainability risks are identified during the investment analysis process, the Company will, through internal assessment and third-party sources, consider potential related mitigative actions. In line with the Company's Sustainability Risk Policy, the Company will manage sustainability risks by applying a set of filters for the purpose of determining which companies, sectors or activities are eligible or ineligible to be invested in based on its preferences, values and, or ethics; and by implementing a mix of positive and negative screens in accordance with the predefined exclusion criteria. Following the assessment, and prior to making an investment for and on behalf of the Sub-Fund, the Company's Investment Committee performs a pre-trade compliance check for the purpose of ensuring, amongst other things, that the potential investment does not carry a material sustainability risk. The Company makes investment decisions considering all risks identified during the investment analysis process, including any sustainability risks. Once invested in, the on-going eligibility of said companies, sectors or activities are monitored, and will be revisited on a periodic basis or if there are significant changes

TRANSPARENCY OF ADVERSE SUSTAINABILITY IMPACTS AT ENTITY LEVEL

As of now, the adverse impacts of investment decisions on sustainability factors are not considered. For the purpose of establishing robust screening of adverse impacts of investments, metrics related to already existing and owned assets (in line with Table 1 of Annex I of the SFDR RTS) are under verification and evaluation. If it is determined that principle adverse impacts should indeed be considered, then the policies and procedures to identify and prioritise such principal adverse impacts on sustainability factors will be implemented. It is estimated that this analysis exercise will be fully implemented during the year 2025.

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.