



Information Statement on our Policy on the Consideration of Principal Adverse Impacts of Investment Decisions on Sustainability Factors

Information Statement on our Policy on the Consideration of Principal Adverse Impacts of Investment Decisions on Sustainability Factors Issued by B-FLEXION Fund Management (Jersey) Limited In respect of the funds under management (the “Funds”)

This Information Statement is accurate as at: 28 February 2023

Sustainable Finance Transparency

The European Union has introduced a series of legal measures (the primary one being the Sustainable Finance Disclosures Regulation (Regulation (EU) 2019/2088), "SFDR") requiring firms that manage investment funds to provide transparency on how they integrate sustainability considerations into the investment process with respect to the investment funds they manage. This Information Statement has been prepared for the purpose of meeting the disclosure requirements in Article 4 of SFDR, that is, specifically, the disclosure requirements applicable to a firm with regard to whether and how they consider principal adverse impacts of investment decisions on sustainability factors.

It is noted that the regulatory technical standards ("RTS") to specify the details of the content, methodologies and presentation of the information to be disclosed under Article 4 of SFDR have been delayed and will not be issued when the relevant disclosure obligations in SFDR become effective. It is noted that the European Commission has recommended that from the effective date of SFDR, firms are recommended to comply with the specific disclosure obligations in SFDR that are reliant on RTS on the basis of a high-level, principles-based approach. We therefore seek to comply on a best-efforts basis with the relevant disclosure obligations and issue this Information Statement as a means of achieving this objective.

It is expected that this Information Statement will be reviewed and updated once the relevant RTS come into effect, noting in particular, that the RTS are expected to contain details on the content, methodologies and presentation of the information to be disclosed and this could therefore require a revised approach to how firms seek to meet the SFDR disclosure obligations.

The Information Statement may also be updated to take account of the Regulation on the Establishment of a Framework to Facilitate Sustainable Investment (Regulation EU/2020/852, the "Taxonomy Regulation") once it comes into effect (1 January 2022).

Our Approach to Sustainable Investment

B-FLEXION Fund Management (Jersey) Limited ("BFMJ") has appointed affiliated investment managers to manage the investments of the Funds. We believe that investors, and investment managers that invest on their behalf, have a responsibility to make their investments in a way that effectively supports a sustainable society.

At the core of our commitment to help clients achieve their financial objectives is a conviction that this can be achieved by responsible investing. We value the importance of integrating Environmental, Social, and Governance ("ESG") factors into the investment and risk processes and fundamentally believe that this should be aligned with the aim of achieving long-term positive financial performance for investors.

We also recognise and value the fact that this will also support the better functioning of companies that investment managers invest in, enhancing behaviour in a wide range of markets and industries and having a positive societal impact beyond the financial markets.

Information Regarding the Consideration of Principal Adverse Impacts of Investment Decisions on Sustainability Factors

The investment managers to the below mentioned funds do not currently consider the adverse impacts of investment decisions on sustainability factors. BFMJ has elected not to do so at the present time as it considers its existing ESG policies and procedures to be appropriate, proportional and tailored to the investment strategies of its funds.

Further Information

This Information Statement is issued for information purposes only. This Information Statement is not intended as investment advice and is not an offer or a recommendation about managing or investing assets and should not be used as the basis for any investment decision. The information contained herein is current as of the date of issuance and is subject to change without notice. We do not make any express or implied warranties or representations as to the completeness or accuracy or accept responsibility for errors. No risk management technique can guarantee the mitigation or elimination of risk in any market environment. Past performance is not a guarantee, or a reliable indicator of future results and an investment could lose value. All investments involve risk, including the possible loss of capital.