

Policy on the Integration of Sustainability Risks in the Investment Decision-Making Process

## **Information Statement on our Policy on the Integration of Sustainability Risks in the Investment Decision-Making Process Issued by B-FLEXION Fund Management (Ireland) Limited In respect of the Funds under Management.**

**Date of initial publication of this Information Statement: 10th March 2021**

**This Information Statement is accurate as at: November 2025**

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)) 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.

### **Our Approach to Sustainable Investment**

At B-FLEXION Fund Management (Ireland) Limited we believe that investors, and asset 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 our clients achieve their financial objectives is a conviction that this can be achieved by investing responsibly. We value the importance of integrating Environmental, Social, and Governance (ESG) factors into the investment and risk processes and fundamentally believe that this is 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.

### **What is a Sustainability Risk?**

In this context a sustainability risk is considered to be 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 an investment. Information on How we Integrate Sustainability into the Investment Decision-Making Process B-FLEXION Fund Management (Ireland) Limited has appointed affiliated investment managers to manage the investments of the Funds.

The SFDR identifies two categories of ESG products:

1. Article 8: Where a financial product promotes, among other characteristics, environmental or social characteristics, or a combination of those characteristics; and
2. Article 9: Where a financial product has sustainable investment as its objective and an index has been designated as a reference benchmark.

On consultation with each Investment Manager, the Company has determined that Article 8 applies to the Capital Four Global Funds ICAV – Capital Four Total Credit Return Fund, Capital Four DP HY Fund and Capital Four DP Loan Fund, the Securis Global Funds ICAV – Securis Catastrophe Bond Fund; and the Vantage Global Funds ICAV – Vantage Infrastructure Debt II B Fund. The Company has determined that Article 9 does not apply to any Fund at this time. This will be reviewed on a continuous basis. All other Funds and Sub-Funds fall outside the scope of Article 8 and Article 9 of the SFDR.

The below extra disclosure requirements will not be required in respect of Funds and Sub-Funds which fall outside the scope of Article 8 and Article 9 of the SFDR.

Where a Sub-Fund is in scope of Article 8 of the SFDR, the Company will rely on the Investment Manager to that Sub-Fund to provide that the following information is published on their website:-

- (a) a description of the environmental or social characteristics or the sustainable investment objective;
- (b) information on the methodologies used to assess, measure and monitor the environmental or social characteristics or the impact of the sustainable investments selected for the financial product, including its data sources, screening criteria for the underlying assets and the relevant sustainability indicators used to measure the environmental or social characteristics or the overall sustainable impact of the financial product;
- (c) the information required to be included in the prospectus of the sub-fund, as referred to in Articles 8 and 9 and as outlined in the prospectus of the Sub-Fund;

For more information on how each investment manager integrates sustainability risks into their investment research and risk management process, please refer to the investment strategy of the relevant Funds as set out in the addendum to the Prospectus which can be found on the B-FLEXION Fund Management (Ireland) Limited website and the associated investment manager materials, which can be found on the websites of each investment manager as set out below 1 Note – when updates are made to this information statement, updated text will be clearly identifiable.

Securis Global Funds ICAV [www.securisinvestments.com/esg/](http://www.securisinvestments.com/esg/)

Capital Four Funds ICAV [www.capital-four.com/sustainability-related-disclosures.html](http://www.capital-four.com/sustainability-related-disclosures.html)

Vantage Global Funds ICAV [www.vantageinfra.com/sustainability](http://www.vantageinfra.com/sustainability)

Forestay Capital II, ILP <https://www.bflexion.com/businesses/b-flexion-fund-management-jersey-limited>

Kedge Capital Private Equity XI, I.L.P <https://www.bflexion.com/businesses/b-flexion-fund-management-jersey-limited>

Kedge Capital Principal Opportunities VI, I.L.P <https://www.bflexion.com/businesses/b-flexion-fund-management-jersey-limited>

#### **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.