



## **Disclosures pursuant to Regulation (EU) 2019/2088 ('SFDR') Applicable to Equitix Investment Management Ltd and Equitix Investments North America L.P. ('Equitix')**

Equitix makes the following disclosures in line with Articles 3(1), 4(1)(a), 5(1) and 10(1) of the SFDR.

### **Article 3: Transparency of sustainability risk policies**

Equitix takes into account "sustainability risks" (as defined in the SFDR) in its investment decision making process in accordance with the Equitix Responsible Investment Policy.

Sustainability risk analysis is a fundamental component of the Responsible Investment Process and is the responsibility of the Investments Team and ultimately the Investment Committee when making investment decisions. Equitix considers a broad range of sustainability risks in assessing potential investment opportunities and throughout the ongoing asset management period.

The Equitix approach to sustainability risks is based on a level of materiality, with emphasis placed on those risks that are considered most important given the industry, type of asset, its physical location, legal jurisdiction, stage in the asset cycle as well as the outcomes of the due diligence process.

Sustainability risks are integrated into investment decisions in a manner proportionate to investment objectives and in the same way as Equitix approaches other forms of risk management in relation to its products, where relevant, including through the following processes:

- (1) identification of ESG risks/opportunities;
- (2) managing ESG risks/opportunities;
- (3) targeting ESG outcomes for addressing these risks and opportunities with the asset;  
and
- (4) achieving sustainable goals which have a positive impact on society and/or the planet

The Equitix Responsible Investment Policy provides further information on the way in which sustainability-related risks are integrated into the investment decision making process. This Policy is available to read on the Equitix website.

#### [Article 4: Principle Adverse Impacts Statement](#)

Equitix incorporates ESG considerations throughout the investment process. It is making preparations for compliance with principal adverse impact reporting under SFDR and the relevant ESG data gathering that is consequently required. However, it does not currently consider principal adverse impacts of investment decisions on sustainability factors as defined under the SFDR until such systems and operations are fully in place.

#### [Article 5: Transparency of remuneration policies in relation to the integration of sustainability risks](#)

Equitix employees are required to read and comply with the Equitix Responsible Investment Policy as is appropriate for the exercise of their role within the business. Exercising this role to the standards expected in the Responsible Investment Policy is one factor managers conducting annual performance reviews may consider when making remuneration decisions.

#### [Article 10: Website product disclosure for financial products referred to in Article 8\(1\) SFDR](#)

Equitix maintains information required under Article 10 SFDR in the ESG folder of the Intralinks Dataroom and Investor Portal. Access to the Intralinks Dataroom and Investor Portal is available to certain prospective and existing investors in Equitix funds and managed accounts.