

REMEEN LIMITED: ESG – SFDR DISCLOSURE STATEMENT

This Disclosure was prepared by Remeen Limited (the “**Company**”) pursuant to the Sustainable Finance Disclosure Regulation (EU) 2019/2088 of the EU Parliament (the “**SFDR**”) as a Market Participant obliged to do so under Articles 3&4 of the SFDR.

INTRODUCTION

The Company is an Alternative Investment Fund Manager, authorized and regulated by the Cyprus Securities and Exchange Commission (the “**CySEC**”), under License number AIFM 29/56/2013. The Company is an AIFM whose authorisation under section 8 of the AIFM Law covers the Investment management Functions of section 6(5) and the services of sections 6(6), the Company’s object is the management of one or several Alternative Investment Funds (“**AIFs**” or “**Funds**”) and is responsible for the provision of Portfolio Management, Risk Management, and Fund Administration services to AIFs.

The SFDR provides three product categories as follows:

1. “Article 6” financial products, which either integrate financially-material-environmental, social and governance (“**ESG**”) risk considerations into the investment decision-making process, or explain why sustainability risk is not relevant, but do not meet the additional criteria of Article 8 or Article 9 products.
2. “Article 8” financial products, which promote social and/or environmental characteristics, and may invest in sustainable investments, but do not have sustainable investing as a core objective.
3. “Article 9” financial products, which have a sustainable investment objective.

It should be noted that at present the Company only provides Article 6 financial products and as such does not consider sustainability risk or principal adverse impacts of investment decisions on sustainability factors in the investment decision making process. Should this change if Article 8&9 financial products are offered by the Company all the relevant disclosures and policies will be amended accordingly.

The Company as a Financial Market Participant under Article 2 (1)(e) of the SFDR is required to disclose to its investors during the pre-contractual stage of the relationship information on the integration of sustainability risks and potential adverse sustainability impacts on an entity level. As a result the Company must publish the following as per the prescribed information to be disclosed by Articles 3-5 of the SFDR:

1. Information about their policies on the integration of sustainability risks in their investment decision-making process (Article 3 of the SFDR).
2. Where the Company considers principal adverse impacts of investment decisions on sustainability factors, a statement on due diligence policies with respect to those impacts, taking due account of their size, the nature and scale of their activities (Article 4(a)) for Articles 8&9 it may provide in the future.
3. Information on the Company’s approach to non-consideration of adverse impacts of investment decisions on sustainability factors at entity level (Article 4(b)) of the SFDR for the Article 6 Financial Products it provides.
4. Integration of the Sustainability Risks in the Company’s Remuneration Policy (Article 5 of the SFDR)

The information contained in this disclosure is based on the current understanding of the regulatory framework pertaining the Company’s licence and as such may change due to additional regulatory amendments and/or requirements imposed by the CySEC as its regulatory authority.

The Board of Directors of the Company are of the opinion that the steps taken to ensure compliance with the transparency requirements set out by the SFDR are in the best interest of the AIFs managed and the investors invested in those AIFs.

SUSTAINABILITY RISK POLICY

The Company maintains a [Sustainability Risk Policy](#) which forms an integral part of its Internal Operations & Procedures Manual (the ‘IOPM’) that establishes and sets out amongst other things the integration of sustainability risks in its investment decision making process and to what extent. Furthermore the Sustainability Risk Policy sets out the Company’s approach to adherence to the SFDR in its capacity as an Article 2 (1)(e) Market Participant (‘**AIFM**’).

The Company acknowledges the impacts that sustainability risks can impose on the AIFs managed and considers the approach to integrate the risks stemming from sustainability issues described in this policy as strengthening its duties towards the investors of the AIFs managed.

Information on the Company's approach to integrate sustainability risks into the investment decision making process can be found in the dedicated policy which has been set-up in compliance with the requirements set by the SFDR and which has been uploaded separately on the Company's website.

NON-CONSIDERATION OF ADVERSE SUSTAINABILITY IMPACTS

Principle Adverse Impacts ("PAIs") are potential adverse effects of investment decisions on sustainability factors. Sustainability factors are environmental, social and employee, respect for human rights, anti-corruption, and anti-bribery matters. In accordance with Article 4(1)(b) of the SFDR, the Company does not consider adverse sustainability impacts of investment decisions on sustainability factors at entity level and as a result is obliged to publish a disclosure and maintain it on its website stating so.

For the time being the Company only offers Article 6 financial products and does not consider adverse impacts of investment decisions on sustainability factors and sustainability risk in the Risk Management and Investment Decision-making process. In accordance with Art. 4(1)(b) of the SFDR, the main reason for not considering adverse impacts of investment decisions on sustainability factors at the Company level is the lack of information and data available to adequately assess the PAIs. Furthermore it should be noted that the Company only offers financial products governed by Art. 6 of the SFDR that do not require a mandatory consideration of sustainability risk in the Risk Management and Investment Decision-making processes of the Company.

The Risk Management and Portfolio Management of the Company for financial products governed by the SFDR consider to the best of their knowledge and abilities adverse sustainability impacts on the investment strategies employed by the AIFs under management. It should be noted that sustainability risk would not by itself prohibit an investment. Instead, sustainability risk forms part of the overall risk management processes, and is one of many risks which may, depending on the specific investment opportunity, be relevant to a determination of overall risk. Assessment of sustainability risk requires subjective judgements, and may include consideration of third party data that is incomplete or inaccurate. There can be no guarantee that the Risk Management and Portfolio Management functions will correctly assess the impact of sustainability risk on investments.

The Company does not delegate portfolio management services to third parties and as such no Sustainability or ESG PAIs relevant to this activity are applicable.

REMUNERATION POLICY

The Company's Remuneration Policy that is integrated in the IOPM does not require any changes in relation to sustainability risks. It should be noted that the Company's remuneration policy does not encourage excessive risk taking, including risk taking in terms of sustainability risks.

Where sustainability based financial performance remuneration incentives exist, those will be explicit in the relevant founding documents (i.e., prospectus or equivalent of the AIF) and therefore will be bound to the Fund-Specific fees and Expenses Schedule to which the Company will quantify, assess and monitor during the discharge of its duties towards the AIFs' investors.