

General Information On The Handling Of Sustainable Finance Topics

Initial Version. Applicable From July 2021

I. Scope

The following information aims at giving further guidance on how Waystone Management Company (Lux) S.A. (formerly known as MDO Management Company S.A. and hereafter “**Waystone**”) handles the implementation of the requirements set by the Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector (hereafter “**SFDR**”). The SFDR requires financial market participants to disclose additional information on the integration of sustainability risks and potential adverse sustainability impacts on an entity level.

Furthermore, the SFDR requires amongst others the amendment of pre-contractual information of undertakings for collective investment (“**UCIs**”).

The following information is based on the current understanding of the regulatory framework in place and may therefore vary based on additional texts published by the regulators.

Please contact us for up-to-date information on approach.

Waystone is of the opinion that transparency regarding the implementation steps taken with regard to those requirements is in the best interest of the UCIs managed and the investors invested in those UCIs.

II. Integration of sustainability risks

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

Detailed information on Waystone’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 accordingly on our website <https://www.mdo-manco.com/en/about-mdo/legal-documents>.

In case Waystone delegated the portfolio management function to an external portfolio manager being located in one of the member states of the European Union (“EU”), and the portfolio manager integrated

sustainability risks in his investment decision additional information on the integration of sustainability risks into the investment decision making process (pre-trade assessment) can be found on the website of the specific portfolio manager.

For those cases, Waystone fulfils its duties as Management Company/Alternative Investment Fund Manager by including sustainability risks in its post-trade risk assessments.

However, in the case where Waystone delegates the portfolio management function to an external portfolio manager not being located in one of the member states of the EU, there may be no further information available on the integration of sustainability risks into their investment decision making process on the website of such external portfolio manager.

III. Principle adverse impact (PAI) statement

For the time being Waystone does not consider adverse impacts of investment decisions on sustainability factors. In accordance with Art. 4 I 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 further information and data available to adequately assess the principal adverse impacts.

As Waystone mainly cooperates with duly authorized external portfolio managers being located in one of the member states of the EU who may already consider principle adverse impacts on their investment decision for the funds (or sub-funds thereof) they manage; further information may be found in each Fund's relevant documentation (i.e. in the Fund's Prospectus or the Fund's Private Placement Memorandum as applicable), which can be found on the website of the specific external portfolio manager.

However, in the case where Waystone cooperates with duly authorized external portfolio managers not located in one of the member states of the EU, further information with respect to the principal adverse impacts of their investment decisions on sustainability factors might not be available on their website.

IV. Remuneration policy

SFDR requires financial market participants to integrate information on the consistency of their remuneration policy with the integration of sustainability risks, in accordance with Art. 5 I of the SFDR. Waystone amended its remuneration policy accordingly. Additional information can be found in our website at <https://www.waystone.com/waystone-policies/>.

V. Pre-contractual information

All required information on product level can be found in the specific pre-contractual information of the product (e.g. sales prospectus; private placement memorandum).