SUSTAINABLE FINANCE DISCLOSURE REGULATION ("SFDR") COMPLIANCE STATEMENT

JTC ENTITY NAME – JTC GLOBAL AIFM SOLUTIONS LIMITED

This compliance statement will demonstrate how JTC Global AIFM Solutions Limited (hereafter "the **AIFM**") fulfils current SFDR requirements to publicly disclose certain elements of the AIFM's compliance with the SFDR.

SUSTAINABILITY RISK

For the AIFM sustainability risks refer to the definition as presented in the SFDR (sustainability-related disclosures in the financial services sector) to the set of environmental, social and governance events or conditions that, if it occurs, could cause a potential or actual material negative impact on the value of the investment.

HOW SUSTAINABILITY RISK IS CONSIDERED BY THE AIFM

The AIFM regards sustainability risks as having a potential impact on the investment decision making process. The AIFM reviews potential emerging sustainability risks identified as such by the portfolio investment managers / investment advisors during the investment decision-making process.

Sustainability risks are identified and assessed using investment strategy considerations. The considerations will vary depending on a number of factors including, but not limited to, type of product, investment sector and geographical location. The risks identified correlate to environmental, social and governance risk categories. These are explored and explained in more detail within the AIFM's internal risk management policy and procedure and in the investment management policy and procedure.

The objective is to manage sustainability risks in line with the stated objectives of the relevant AIF and manage them carefully through the AIFM's active portfolio and risk management processes.

ARTICLE 3

Integration of sustainability risks

The AIFM will integrate sustainability risks into its investment decision-making process for the purposes of Article 3(1) of the SFDR. The integration of sustainability risks into the AIFM's investment decision-making process will vary depending on the investment objective and policies of the AIF in question (in particular, the assets invested in by the AIF).

However, below is the standard approach which is taken by the AIFM in relation to integration of sustainability risks:

- AIFM will integrate sustainability risks into its own policies, including but not limited to the investment management policy and procedure and the risk management policy and procedure.

- If the AIF uses an investment manager / investment advisor / specialist consultant, the AIFM will review any analysis in relation to sustainability risks within the context of any investment guidance made by that third party.

ARTICLE 4

Consideration of principal adverse impacts

For the reporting period 1 January to 31 December, 2023 the AIFM did not consider principal adverse impacts of its investment decisions on sustainability factors as defined within Article 4 (1) of the Disclosure Regulation EU 2019/2088. Given the AIFM's size and the asset classes in which its client AIFs invest, the AIFM does not currently have access to sufficient ESG information to determine and weight with accuracy the negative sustainability effects across all client AIFs. Therefore, the AIFM has elected to utilise the opt-out exemption provided under Article 4 for companies with fewer than 500 staff. The AIFM will continue to monitor the industry's position closely and update this approach as the position evolves and more regulatory guidance is made available.

ARTICLE 5

Transparency of the AIFM's remuneration policy in relation to the integration of the sustainability risks

For the AIFM there is no impact of variable remuneration of the Identified Staff on the risk profile of the AIFs for which the AIFM acts. As the variable remuneration components are not based on the performance of the AIFs, there is no risk of misalignment with the sustainability risks (if any) associated with the investment decision-making process of the AIFM in respect of the client AIFs. The AIFM's remuneration policy covers this in more detail.