Integration of Sustainability Risks (SFDR Article 3)

As of December 2025

Article 3 of the SFDR requires financial market participants to disclose how sustainability risks are integrated into investment decision-making.

For the purposes of SFDR, sustainability risk refers to an environmental, social or governance ("ESG") event or condition that, if it were to occur, could cause an actual or potential material negative impact on the value of an investment.

The Investment Manager, Sector Theta, considers sustainability risks in its investment decision-making process to the extent that such risks may have a material negative impact on the value of investments. ESG factors are not systematically integrated into investment decisions and do not constitute a binding element of the Investment Manager's investment strategy.

Sustainability risks are considered from a holistic perspective as part of the Investment Manager's fundamental analysis and overall risk management, where relevant and to the extent such risks may affect the financial performance of investments. The Investment Manager may decide to either exclude investments which present certain sustainability risks or include investment with ESG-related risks if it deems that these risks are appropriately reflected in the market price.

The Investment Manager also complies with applicable internal policies and external frameworks, including adherence to observation and exclusion lists where required, as part of its broader investment governance and risk management processes. Such compliance does not imply the promotion of environmental or social characteristics or the pursuit of a sustainable investment objective.

The Investment Manager does not promote environmental or social characteristics and does not have as its objective sustainable investment within the meaning of Articles 8 or 9 of the SFDR.