

BYRON

CAPITAL PARTNERS

PRINCIPAL ADVERSE IMPACT STATEMENT

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1. INTRODUCTION

Byron Capital Partners Ltd (hereinafter, the “Company”) operates as an Alternative Investment Fund Manager (“AIFM”) and as a UCITS Management Company, authorized and regulated by the Cyprus Securities and Exchange Commission (hereinafter, “Cysec”) with license number AIFM 13/56/2013.

Within the scope of its regulatory authorisation by Cysec, the Company manages Alternative Investment Funds and UCITS Funds (hereinafter, “Funds”).

2. APPLICABLE REGULATION AND INTERPRETATION

The Regulation (EU) 2019/2088 as amended by Regulation (EU) 2020/852 on sustainability-related disclosures in the financial services sector (hereinafter “SFDR”) requires financial market participants to disclose information on the integration of sustainability risks in their investment decision-making process (Article 3 SFDR).

This document was developed in line with and to comply with the requirements set by Article 4 SFDR based on which financial market participants shall publish and maintain on their websites:

- (a) Where they consider principal adverse impacts of investment decisions on sustainability factors, a statement on due diligence policies with respect to those impacts, taking into account of their size, the nature and scale of their activities and the types of financial products they make available; or
- (b) Where they do not consider adverse impacts of investment decisions on sustainability factors, clear reasons for why they do not do so, including, where relevant, information as to whether and when they intend to consider such adverse impacts.

Byron Capital Partners applies the definition of Principal Adverse Impacts (PAIs) prescribed by Recital 20 of the Regulation:

Principal adverse impacts should be understood as those impacts of investment decisions and advice that result in negative effects on sustainability factors.

3. PRINCIPAL ADVERSE IMPACT STATEMENT

No consideration of Principal Adverse Impacts

Byron Capital Partners does not consider the principal adverse impacts of its investment decisions on sustainability factors in the manner prescribed by Article 4 of the Regulation.

Article 4 (b) of the Regulation requires financial market participants to provide clear reasons for why they do not consider adverse impacts of investment decisions on sustainability factors. Byron Capital Partners believes that there are no indicators currently available.

Byron Capital Partners continues to review and analyse its obligations with respect to whether it considers principal adverse impacts of investment decisions on sustainability factors as set out in Article 4 of the Regulation.

4. DOCUMENT REVIEW

The document will be reviewed and updated annually, and on an ad hoc basis in case of relevant amendments to the regulatory framework governing this policy or if otherwise deemed necessary.