

Nobel Capital Partners | SFDR website disclosures

In order to comply with the sustainable finance disclosure regulation (**SFDR**)¹, Nobel Capital Partners B.V. (**Nobel**) makes the following disclosures.

Integration of sustainability risks

A sustainability risk means:

"an environmental, social or governance event or condition that, if it occurs, could cause an actual or potential material negative impact on the value of the investment".

Before any investment decisions are made on behalf of a fund that Nobel manages, an investment decision process is followed which in regard to specific investments includes the approval of the investment committee of such fund. Nobel views ESG as a standard topic in the pre-investment process. Part of the investment decisions process is that Nobel assesses the risks attached to a potential investment opportunity, which includes sustainability risks. Identified sustainability risks are considered by Nobel when making investment decisions.

In addition, Nobel pays staff a combination of fixed remuneration and variable remuneration (including a possible bonus). Variable remuneration for relevant staff also takes into account compliance with all policies and procedures which are in effect within Nobel, including those relating to taking into account sustainability risks on the investment decision making process.

Employees are made aware of the applicable policies and procedures when starting their employment with Nobel.

No consideration of sustainability adverse impacts

In accordance with article 4 sub 1 (b) of the SFDR, Nobel states that it does not consider adverse impacts of investment decisions on sustainability factors as set forth in article 4 sub 1 (a) of the SFDR and therefore does not make the disclosures as described in article 4 sub 1 (a) of the SFDR. Given the small size of the organisation of Nobel, such disclosure as set forth in article 4 sub 1 (a) of the SFDR and the administrative burden in connection therewith would not be proportional.

Nobel continues to closely monitor the market developments (including the level of availability of the data) as well as the regulatory developments. Nobel will at least on an annual basis review whether and when to comply with article 4 sub 1 (a) of the SFDR.

¹ Regulation (EU) 2019/2088