

REMEEN LIMITED: ESG - SFDR DISCLOSURE STATEMENT

This Disclosure was prepared by Remeen Limited (the “**Company**”) pursuant to the Sustainable Finance Disclosure Regulation (EU) 2019/2088 of the EU Parliament (the “**SFDR**”) as a Market Participant obliged to do so under Articles 3&4 of the SFDR.

INTRODUCTION

The Company is an Alternative Investment Fund Manager, authorized and regulated by the Cyprus Securities and Exchange Commission (the “**CySEC**”), under License number AIFM 29/56/2013. The Company is an AIFM whose authorisation under section 8 of the AIFM Law covers the Investment management Functions of section 6(5) and the services of sections 6(6), the Company’s object is the management of one or several Alternative Investment Funds (“**AIFs**” or “**Funds**”) and is responsible for the provision of Portfolio Management, Risk Management, and Fund Administration services to AIFs.

The SFDR provides three product categories as follows:

1. “Article 6” financial products, which either integrate financially-material-environmental, social and governance (“**ESG**”) risk considerations into the investment decision-making process, or explain why sustainability risk is not relevant, but do not meet the additional criteria of Article 8 or Article 9 products.
2. “Article 8” financial products, which promote social and/or environmental characteristics, and may invest in sustainable investments, but do not have sustainable investing as a core objective.
3. “Article 9” financial products, which have a sustainable investment objective.

Currently, the Company only offers Article 6 financial products. Therefore, sustainability risks and principal adverse impacts (PAIs) are not integrated into the investment decision making process. Should this change in the future and the Company begins offering Article 8 or 9 financial products, it will update this disclosure and related policies accordingly.

The Company as a Financial Market Participant under Article 2 (1)(e) of the SFDR is required to disclose to its investors during the pre-contractual stage of the relationship information on the integration of sustainability risks and potential adverse sustainability impacts on an entity level. As a result, the Company must publish the following as per the prescribed information to be disclosed by Articles 3-5 of the SFDR:

1. Information about their policies on the integration of sustainability risks in their investment decision-making process (Article 3 of the SFDR).
2. Where the Company considers principal adverse impacts of investment decisions on sustainability factors, a statement on due diligence policies with respect to those impacts, taking due account of their size, the nature and scale of their activities (Article 4(a)) for Articles 8&9 it may provide in the future.
3. Information on the Company’s approach to non-consideration of adverse impacts of investment decisions on sustainability factors at entity level (Article 4(b)) of the SFDR for the Article 6 Financial Products it provides.
4. Integration of the Sustainability Risks in the Company’s Remuneration Policy (Article 5 of the SFDR)

The information contained in this disclosure is based on the current understanding of the regulatory framework pertaining the Company’s licence and as such may change due to additional regulatory amendments and/or requirements imposed by the CySEC as its regulatory authority.

The Board of Directors of the Company are of the opinion that the steps taken to ensure compliance with the transparency requirements set out by the SFDR are in the best interest of the AIFs managed and the investors invested in those AIFs.

SUSTAINABILITY RISKS POLICY

The Company maintains a Sustainability Risks Policy which forms an integral part of its Internal Operations & Procedures Manual (the ‘IOPM’) that establishes and sets out amongst other things the integration of sustainability risks in its investment decision making process and to what extent. Furthermore, the Sustainability Risks Policy sets out the Company’s approach to adherence to the SFDR in its capacity as an Article 2 (1)(e) Market Participant (‘**AIFM**’).

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

Information on the Company'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 can be found in the following [link](#).

NON-CONSIDERATION OF ADVERSE SUSTAINABILITY IMPACTS

Principle Adverse Impacts ("PAIs") are potential adverse effects of investment decisions on sustainability factors. Sustainability factors are environmental, social and employee, respect for human rights, anti-corruption, and anti-bribery matters. In accordance with Article 4(1)(b) of the SFDR, the Company does not consider adverse sustainability impacts of investment decisions on sustainability factors at entity level and as a result is obliged to publish a disclosure and maintain it on its website stating so.

Remeen Limited, as an Alternative Investment Fund Manager (AIFM) authorised by the Cyprus Securities and Exchange Commission (CySEC), does not currently consider the principal adverse impacts of investment decisions on sustainability factors as set out in Article 4(1)(a) of the Sustainable Finance Disclosure Regulation (Regulation (EU) 2019/2088).

This decision is based on the nature, size, and scale of the Company's activities, including the limited number of employees (fewer than 500) and the nature of the investment strategies pursued by the AIFs under its management, which do not promote environmental or social characteristics or have sustainable investment objectives. As such, the Company does not seek to assess or mitigate sustainability-related impacts.

Remeen Limited may reconsider this position in the future, in particular in light of evolving regulatory guidance and market practices. This statement is made in accordance with Article 4(1)(b) of the SFDR and the relevant guidance issued by the European Supervisory Authorities and the Cyprus Securities and Exchange Commission.

At this time, the Company does not integrate the consideration of PAIs into its risk management or portfolio management processes for its Article 6 products, due to the same reasons outlined above. Should this position change, appropriate processes, policies and disclosures will be implemented. It should be noted that sustainability risk would not by itself prohibit an investment. Instead, sustainability risk forms part of the overall risk management processes, and is one of many risks which may, depending on the specific investment opportunity, be relevant to a determination of overall risk. Assessment of sustainability risk requires subjective judgements, and may include consideration of third party data that is incomplete or inaccurate. There can be no guarantee that the Risk Management and Portfolio Management functions will correctly assess the impact of sustainability risk on investments.

The Company does not delegate portfolio management services to third parties and as such no Sustainability or ESG PAIs relevant to this activity are applicable.

REMUNERATION POLICY

The Company's Remuneration Policy, which is integrated in the IOPM, does not require any changes in relation to sustainability risks. It should be noted that the Company's remuneration policy does not encourage excessive risk-taking, including risk-taking in terms of sustainability risks.

Where sustainability based financial performance remuneration incentives exist, those will be explicit in the relevant founding documents (i.e., prospectus or equivalent of the AIF) and therefore will be bound to the Fund-Specific fees and Expenses Schedule to which the Company will quantify, assess and monitor during the discharge of its duties towards the AIFs' investors.

CONCLUSION

This Disclosure reflects the Company's understanding of the SFDR at the time of writing and is subject to change following any regulatory updates or guidance from CySEC. The Board of Directors affirms that the Company's approach to SFDR compliance is appropriate, given the Company's activities and current product offerings, and remains committed to investor transparency and regulatory alignment.