FIFECAPITAL

FIFE CAPITAL SINGAPORE

SUSTAINABILITY RELATED DISCLOSURES

Introduction

Fife Capital Singapore Pte. Ltd., UEN 201423213W, ("**FCS**") a Singapore private company limited by shares, with its registered office at 89 Club Street, Singapore 069457, has been appointed as investment advisor to fund(s) that qualify as an alternative investment fund (respectively, the "**Investment Advisor**" and "**AIF**") as defined in Directive 2011/61/EU of the European Parliament and of the Council of 8 June 2011 on Alternative Investment Fund Managers ("**AIFM**") and amending Directives 2003/41/EC and 2009/65/EC and Regulations (EC) No. 1060/2009 and (EU) No. 1095/2010, as published in the Official Journal of the European Union on 1 July 2011

On 27 November 2019, Regulation (EU) 2019/2088 of the European Parliament of the Council of 27 November 2019 on sustainability-related disclosure requirements in the financial services sector ("**SFDR**") was published and entered into force on 10 March 2021.

As Investment Advisor to AIFs, FCS is responsible for advising each AIFM in relation to, *inter alia*, the sourcing, acquisition, management and realisation of investments in accordance with the investment objectives, investment strategy and investment restrictions. The Investment Advisor is not vested with the power to make investment decisions in relation to the AIF.

Requirement

This document contains disclosures required under the SFDR.

Version and Review

This document was published December 2024.

This document will be reviewed at least once every two years, or more frequently if required.

PRINCIPAL ADVERSE IMPACT STATEMENT

No consideration of adverse impacts of investment decisions on sustainability factors

SFDR requires certain investment firms to make a "comply or explain" statement on whether they consider the principal adverse impacts ("**PAIs**") of investment decisions at an entity (corporate) level. PAIs are indicators and metrics which show financial market participants how certain investments pose sustainability risks.

This statement is made in accordance with Article 4.5 (b) of the SFDR and applies to FCS acting as "financial adviser" as per Article 2 (11) (d) of the SFDR.

FCS as an Investment Advisor does not consider the PAIs of investment decisions on sustainability factors in its investment advice. FCS considers, amongst others:

- applying the PAI regime at the entity level currently poses challenges for the real estate asset class due to the lack of available and accurate data and inconsistencies with reporting methodologies; and
- its relative scale imposes constraints on FCS to manage, capture and report on environmental, social and governance ("**ESG**") data in relation to FCS's assets and strategies. FCS will continue to channel its resources to support its sustainability goals and strategic priorities.

Responsible Investment

Despite PAIs of investment decisions not currently being considered at the entity level as per Article 4 of the SFDR, FCS is a signatory of the United Nations Principles of Responsible Investment ("**UNPRI**") and is committed to integrating ESG considerations within its operations and to the transparent monitoring and disclosure of ESG performance in investor reports, and via GRESB and UNPRI reporting.

Ongoing Review

Fife Capital is continually striving to improve data collection across its assets under management, for example, through the implementation of green lease clauses with tenants and the installation of smart meters at assets where possible.

SUSTAINABILITY RISK INTEGRATION

SFDR Article 3 (2) states that:

"Financial advisers shall publish on their websites information about their policies on the integration of sustainability risks in their investment advice or insurance advice."

SFDR Article 2 (22) defines a sustainability risk as "*an environmental, social, or governance event or condition that, if occurs, could cause an actual or potential material negative impact on the value of an investment*".

The following outlines FCS's policies regarding the integration of sustainability risks in the investment decision making process and applies to FCS acting as "financial adviser" as per Article 2 (11) (d) of the SFDR.

Risk Management

The AIFM is responsible for establishing and maintaining a permanent risk management function to implement effective risk management policies and procedures to identify, measure, manage, and monitor on an ongoing basis all risks relevant to an AIF's investment objective including market, credit, liquidity, counterparty and operational risks.

The Compliance Manual of FCS (the "**Compliance Manual**") sets out policies and procedures to ensure that FCS performs efficiently, to a high professional standard in compliance with all relevant legislation and regulations. The Compliance Manual documents and illustrates FCS's policies and procedures which govern the conduct of directors, officers and employees of FCS.

FCS's ESG Risk Management Policy is incorporated into the Compliance Manual. FCS understands that ESG related risks have increasingly influenced the risks and returns of investment portfolios; believes in acting responsibly to create sustainable and long-term value not just for itself, but also for its stakeholders; and reaffirms its commitment to keep its ESG principles at the forefront of its internal and external activities. FCS's ESG Risk Management Policy recognises FCS's fiduciary duty to protect and grow the value of the assets of its investment partners.

Sustainability Risk Assessment and Integration into Investment Advice

FCS's due diligence and investment analysis process identifies and assesses material risks, including sustainability risks, and opportunities relevant to a prospective investment and its surrounding areas. Risks and opportunities are considered within the environmental context of each property proposed for investment by an AIF advised by FCS. A factor is considered material if it has the potential to impact long term investment value and/or enterprise sustainability.

Only investments that meet an AIF's respective risk and return profile are pursued.

Due diligence checklists help the Investment Advisor gather information pertinent to assessing sustainability risks and ensuring adherence to investment restrictions.

Procurement of third party professional environmental engineers and assessment experts is often part of the physical due diligence analysis of a proposed direct property investment.

Investment Recommendation

An investment advisory board or investment committee (referred to as investment committee herein) is established to approve all investment recommendations to be made by the Investment Advisor to the AIFM. The investment committee will not participate in the management or operations of the Fund. The investment committee is not vested with the discretionary power to make investments.

All investment recommendations require unanimous, program-specific, investment committee approval.

The Investment Advisor briefs the investment committee on all material factors that may substantially impact investment decisions or divestments, including sustainability risk, to ensure the investment committee has all relevant information necessary to make an informed decision to approve or reject any investment recommendation.

At the conclusion of due diligence and finalisation of key terms, the Investment Advisor will provide a final investment proposal and recommendation to the AIFM for analysis. The final investment proposal confirms a target asset's compliance with the AIF's investment strategy and restrictions, compliance with any ESG strategy (if applicable) and includes Know Your Client documentation and checks performed on the counterparty(ies). FCS also applies any anti-money laundering ("**AML**") policies and procedures required by the AIFM. No investment decision will be made unless and until the AIFM has confirmed its satisfaction with regards to applicable AML considerations for a particular transaction.

The AIFM is expected to review the proposed investment opportunity in good faith and take its own decision as to whether it wants to make such investment on behalf of the AIF(s) it manages.

Other key asset level events (such as a divestment) are similarly notified to the investment committee and the recommendation to the AIFM is supported by a briefing paper.

Investment Holding Period

The management of any identified material risk or opportunity is integral to the investment and value creation strategy. A strategic plan is created for each asset and includes management of material risks and opportunities relating to sustainability risks. FCS will engage stakeholders in the sustainability process to ensure achievement of desired results in sustainability aspects and measures.

Weekly meetings are held to discuss progress on all assets' strategic plans and any adjustments that need to be made as circumstances change and new information is incorporated into the investment process.

Each property is valued externally at least annually for financial reporting and finance purposes. The external valuers factor into their pricing assumptions any material input that could impact an asset's valuation, which may include sustainability risks.

Governance

FCS maintains a comprehensive set of policies and management procedures to identify and manage risks. The FCS Risk Management Policy outlines the intention and direction of FCS's approach to risk management and adoption of business practices having regard to FCS's known risk environment.

To ensure a sound understanding, oversight and accountability of its ESG risks, FCS has instituted effective governance and strategy at senior management and board level. FCS provides its Board of Directors with an annual report on FCS' sustainability impact.

The Fife Capital Cyber Security Policy outlines the processes, practices and procedures required to preserve the security of data used and stored by FCS, as well as its technological infrastructure.

The Fife Capital Code of Conduct Policy sets out the principles, values, commitments, ethical standards and policies applicable to FCS and outlines the standards of conduct expected of its business and people, considering FCS's legal and other obligations to its stakeholders.