



Sustainable Finance Disclosure Regulation

These sustainability-related disclosures are made pursuant to Articles 3, 4 and 5 the EU Sustainable Finance Disclosure Regulation (Regulation (EU) 2019/2088) (“**SFDR**”).

Introduction

The SFDR sets out sustainability disclosure obligations for financial market participants, financial advisers and financial products. Under Articles 3 to 5 of the SFDR, Phoenix Equity Partners Limited (“**Phoenix**”) is required to make the following disclosures on its websites.

(1) Remuneration

Whilst Phoenix’s remuneration policy does not directly link the remuneration level of personnel specifically to consideration and/or integration of sustainability risks or compliance with ESG policies and procedures, indirectly remuneration levels of personnel may be impacted by such factors.

Under Phoenix’s remuneration policy, remuneration is linked to, amongst other factors: (a) the financial performance of the firm and of the relevant business unit; and (b) the personal performance of the individual employee and the performance of their business unit within the wider firm. Since risks, including sustainability risks, can have a materially adverse impact on the financial performance of the firm and of the relevant business unit, indirectly the remuneration level of personnel may be impacted by consideration, monitoring and management of sustainability risks. In determining variable remuneration, the overall assessment of personal and business unit performance takes into account compliance with all of Phoenix’s policies and procedures, which include Phoenix’s responsible investment policy (the “**RI Policy**”) and accordingly compliance may impact the variable remuneration of Phoenix’s personnel.

(2) Integrating sustainability risks

Phoenix integrates ESG management throughout the investment cycle, from pre-deal screening to exit and takes an active role throughout its investment period in monitoring, supporting and encouraging ESG initiatives. Phoenix’s investment process has been developed to enable Phoenix to make sound investment decisions that assesses sustainability considerations. This is documented and outlined in the RI Policy. Phoenix engages a third party to conduct specific due diligence to identify and understand sustainability risks and opportunities, the findings of which are documented and discussed through the investment committee process. Findings are then incorporated into the 100-day plan, including steps to mitigate risks and capitalise on ESG opportunities.

(3) No consideration of adverse impacts of investment decisions on sustainability factors

Phoenix does not currently consider the principal adverse impact indicators (“**PAIs**”) at the entity level under Article 4 SFDR. Phoenix has not elected to do so at the present time as it is unable to meaningfully measure against such PAIs. The detailed rules underlying the SFDR would require Phoenix to commit to gathering a substantial volume of data in line with the minimum mandatory PAI requirements of the SFDR, which is currently not practicable due to limited, uncertain and scarce data being available. However, Phoenix does and will continue to

gather certain sustainability-related data in order to monitor and report against its selected key performance indicators and metrics.

Phoenix will continue to review its position on the entity level PAIs on an ongoing basis.

(4) Ongoing review

Phoenix will periodically review these website disclosures and ensure they are kept up to date.

For legal and regulatory reasons, product level disclosures are accessible only via the relevant fund's virtual data room.