PANDOO Management

No consideration of principle adverse impacts of investment decisions on sustainability factors

1. The AIFM and legal framework

PANDOO Management (hereinafter the "AIFM") is an alternative investment fund manager authorised pursuant to the Luxembourg law of 12 July 2013 on alternative investment fund managers (hereinafter "AIFM Law").

Within the scope of its regulatory authorisation, the AIFM manages funds that qualify as alternative investment funds (hereinafter "AIF" or "alternative investment funds").

1.1 Sustainability-related disclosures in the financial services sector

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

The main objective of the SFDR is to create transparency on:

1. how sustainability risks are considered in the management of AIFs; and
2. if principal adverse impacts of investment decisions on sustainability factors ("comply or explain") are considered in the management of AIFs.

These transparency requirements apply in principle to both, the AIFM as well as the alternative investment funds managed by the AIFM. Further clarifications and details on application of specific requirements of the SFDR were made through Commission Delegated Regulation (EU) 2022/1288 of 6 April 2022 supplementing Regulation (EU) 2019/2088 of the European Parliament and of the Council with regard to regulatory technical standards specifying the details of the content and presentation of the information in relation to the principle of 'do no significant harm', specifying the content, methodologies and presentation of information in relation to sustainability indicators and adverse sustainability impacts, and the content and presentation of the information in relation to the promotion of environmental or social characteristics and sustainable investment objectives in pre-contractual documents, on websites and in periodic reports (hereinafter "RTS").

2. Purpose of this document

2.1 Sustainability-related disclosures on entity level/financial product level

This statement explains the AIFM's decision not to consider principal adverse impacts (hereinafter "PAIs") of investment decisions on sustainability factors at an entity level for the time being pursuant to Article 4 (1) of the Disclosure Regulation. The decision is the result of a thorough assessment of the quality of data available at this stage. The assessment showcased that although information on PAI is available and considered in the investment decision and investment due diligence process for some AIFs managed by the AIFM that do incorporate sustainability features, this is not yet the case for most of the AIFs managed by the AIFM. The AIFM strongly believes that only a full picture on the PAIs of investment decisions creates additional value for interested parties.

Therefore, the AIFM keeps this situation under constant review and aims at considering and reporting on the PAIs of its investment decisions in the future.

Information on AIFs that do consider PAI individually is available either as part of the respective annual financial statements of the individual AIFs or upon request. For those AIFs which consider PAI, the assessment of PAI will be made jointly by the Investment Advisor or delegated Portfolio Manager and the AIFM, taking into consideration the data made available.

3. Annual review

This statement will be reviewed and updated annually, and on an ad hoc basis in case of relevant changes to the organisational structure of the AIFM, in case of amendments to the regulatory framework governing this policy or if otherwise deemed necessary.

The AIFM expects to perform its next review as of 31 December 2026, with regard to the content, methodologies and presentation of disclosures pursuant to Article 2a (3), Article 4 (6) and (7), Article 8 (3), Article 9 (5), Article 10 (2) and Article 11 (4) of the SFDR which shall be applied.

Luxembourg, September 2026