



CSC AIFM Services ApS

Statement in Relation to the Transparency of Sustainability Risk Policies and Adverse Sustainability Impacts Pursuant to Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on Sustainability- Related Disclosures in the Financial Services Sector ("SFDR")

Effective date: 18 June 2026
Version: 1.0

Person responsible: Compliance Officer

Last updated by the Board of Directors of CSC AIFM Services ApS: 18 June 2026

Audit Trail:

Version	Effective Date	Board Approval	Main Changes
V1	18 June 2026	18 June 2026	Initial Statement

- 1.1 In accordance with the SFDR, CSC AIFM Services ApS (the "**Company**") is required to publish on its website information about its policies on the integration of sustainability risks in its investment decision-making process and to disclose whether the Company considers principal adverse impacts of investment decisions on sustainability factors.
- 1.2 The Company is appointed as an external alternative investment fund manager of certain alternative investment funds (each an "**AIF**" and collectively the "**AIF's**"). While the Company retains ultimate responsibility for all aspects of management in respect of the AIFs, including the risk management function, the Company generally appoints a regulated delegate portfolio manager in respect of the AIFs.
- 1.3 A sustainability risk is 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 an investment.
- 1.4 The likely impacts of sustainability risks on the returns of each AIF will depend on each AIF's exposure to such investments and the materiality of the sustainability risks. The likely impact on the return of an AIF from an actual or potential material decline in the value of an investment due to an environmental, social or governance event or condition will vary and depend on several factors including, but not limited to, the type, extent, complexity and duration of the event or condition, prevailing market conditions and the existence of any mitigating factors.
- 1.5 Given the nature of the investments held by the AIFs and the Company's operating model as an external alternative investment fund manager with delegated portfolio management, the Company does not currently integrate sustainability risks into its investment decision-making process for the purposes of Article 3(1) of the SFDR. Nevertheless, sustainability risks may, where relevant, be considered at a high-level as part of the Company's general risk oversight of an AIF, including in assessing the potential impact of certain environmental, social or governance events or conditions on the financial performance of the AIF. Such consideration is limited in scope, does not involve systematic integration of sustainability risks into investment decisions, and may not be applied consistently across all investments or AIFs.
- 1.6 For certain of the AIFs managed by the Company, the delegate portfolio manager may integrate sustainability risks into the investment decision-making process for those AIFs. The pre-contractual documentation for those AIFs contains further details of the manner in which sustainability risks are integrated in their investment decisions. Such integration by a delegate portfolio manager does not affect the Company's disclosure at entity level under Articles 3 of the SFDR.
- 1.7 The Company's remuneration policy takes into account, where relevant, compliance with its policies related to the integration of sustainability risks in its investment decision-making process.

No consideration of sustainability adverse impacts

- 1.8 The Company has decided not to consider principal adverse impacts of investment decisions on sustainability factors (environmental, social and/or governance matters) within the meaning of Article 4(1)(a) of the SFDR.
- 1.9 This decision reflects the size, nature, and scale of the Company's activities, as well as its operating model as an external alternative investment fund manager. In particular, portfolio management of the AIFs is delegated to the relevant sponsors, and the AIFs primarily pursue a fund of funds strategy by investing in underlying third-party managed funds.

- 1.10 As a result, the availability, quality, and consistency of data required to assess principal adverse impacts depend on the underlying fund managers and their respective portfolio companies. At present, the Company is not able to obtain or measure such data in a systematic, consistent, and reliable manner, nor at a reasonable cost to investors, as required under the SFDR.
- 1.11 Accordingly, the Company considers that the full application of the detailed PAI reporting requirements set out in the SFDR Delegated Regulation is not currently feasible. The Company will keep this position under review and will reassess its approach where appropriate.