



## 1. INTRODUCTION

BAO Capital Partners Ltd (the “Company”), is an Alternative Investment Fund Management (“AIFM”) Company registered under the Cyprus Companies Law 113, with registration number HE365647, and regulated by the Cyprus Securities and Exchange Commission (“CySEC), with license number AIFM 16/56/2013.

Within the framework of the Sustainable Finance Disclosure Regulation (EU) 2019/2088 (“SFDR”), the Company as a financial market participant is required to disclose information on the integration of sustainability risks and potential impacts of its financial products on its website (Article 3 of the SFDR).

The information below is based on our understanding of the framework mentioned above and therefore may vary according to additional regulations imposed by the regulators. For additional information, please contact the Company directly.

The Company promotes transparency implementation for the best interest of its products managed by it and its investors.

## 2. SUSTAINABILITY RISK AND APPROACHES

As defined by the SFDR, sustainability risk is any Environmental, Social, or Governance (“ESG”) condition or event that occurs and may seem or cause an actual or potential negative impact on the investment value. The Company hereby states that it does not involve itself in any ESG-related investments and does not mislead its investors on the matter.

The Company does not specifically promote sustainability or social characteristics, however the sectors the Company is active in may not significantly harm the environment or social structures. . Nonetheless, as per the SFDR Regulations, the Company’s products fall under Article 6 as funds with no sustainability goal.

## 3. REMUNERATION POLICY

The Company has a remuneration policy based on fixed and variable remuneration for its employees based on criteria. Employees in Risk Management and Compliance are exempt from the variable remuneration to employees in positions of Risk Management and Compliance, to avoid conflict of interest and financial gain at the expense of the investor by providing misleading ESG claims.

The remuneration policy is part of the Internal Operations Manual (“IOM”) of the Company and is reviewed by the Board of Directors.

## 4. REVIEW

The Company will review and monitor the SFDR regulations and disclosures to ensure compliance with new implementations. This document will be updated if and when needed per the regulations applied.