



### **No Consideration of Adverse Impacts on Sustainability Factors**

Roxbury Asset Management in accordance with Article 4(1)(b) of the SFDR has elected for the time being not to consider the principal adverse impacts of investment decisions of the Fund on Sustainability Factors, primarily as the regulatory technical standards supplementing SFDR which will set out the content, methodology and information required in the principal adverse sustainability impact statement remain in draft form and have been delayed. Roxbury Asset Management will keep the decision to not consider the principle adverse impacts on Sustainability Factors under review and will formally re-evaluate this decision on a periodic basis.

### **Sustainability Risk Policy Statement**

Roxbury integrates consideration of Sustainability Risks into the due diligence it undertakes as part of its investment decision processes but does not screen out potential investments based on Sustainability Risks. Further, Roxbury does not invest in or divest specific assets based on Sustainability Risks as the key objective in managing the Fund is to seek to achieve superior investment performance. The likely impact of Sustainability Risks on the returns of the Fund has been assessed and has been determined to be low. However, Sustainability Risk is an evolving, multi-faceted and multi-point-impact risk category and there can therefore be no guarantee that this will remain the case throughout the lifetime of the Fund.

### **Summary of Remuneration Policy**

Roxbury's remuneration policy has been reviewed in line with the requirements of SFDR. In line with the disclosures outlined in the pre-contractual documentation, sustainability factors are not considered relevant to the Funds and as such do not form part of remuneration considerations.