**<u>Intersaction Management B.V. | SFDR website disclosures</u>**

In order to comply with the sustainable finance disclosure regulation (**SFDR**)[1], Intersaction Management B.V. (**Intersaction**) makes the following disclosures.

**Integration of sustainability risks**

A sustainability risk means:

> *"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 the investment".*

Before any investment decisions are made on behalf of a fund that Intersaction manages, an investment decision process is followed which in regard to specific investments includes a due diligence which covers financial, legal, fiscal and sustainability risks, and is performed by external advisors when necessary. The investment committee evaluates the identified risks along with other relevant factors outlined in the investment proposal. Based on this assessment, the investment committee makes the final investment decision. Intersaction views ESG as a standard topic in the pre-investment process. Part of the investment decisions process is that Intersaction assesses the risks attached to a potential investment opportunity, which includes sustainability risks. Identified sustainability risks are considered by Intersaction when making investment decisions.

In addition, Intersaction pays staff a combination of fixed remuneration and variable remuneration (including a possible bonus). Variable remuneration for relevant staff also takes into account compliance with all policies and procedures which are in effect within Intersaction, including those relating to taking into account sustainability risks on the investment decision making process.

Employees are made aware of the applicable policies and procedures when starting their employment with Intersaction.

**No consideration of sustainability adverse impacts**

In accordance with article 4 sub 1 (b) of the SFDR, Intersaction states that it does not consider adverse impacts of investment decisions on sustainability factors as set forth in article 4 sub 1 (a) of the Disclosure Regulation and therefore does not make the disclosures as described in article 4 sub 1 (a) of the SFDR.

At this stage Intersaction does not consider the adverse impacts of its investment decisions on sustainability factors, (i) because Intersaction could not reasonably gather and/or measure all the relevant data of the portfolio companies of Intersaction, taking into account reasonable cost for clients and investors and (ii) due to the small size of the organisation of Intersaction, such disclosure as set forth in article 4 sub 1 (a) of the SFDR and the administrative burden in connection therewith would not be proportional.

Intersaction continues to closely monitor the market developments (including the level of availability of the data) as well as the regulatory developments. Intersaction will at least on an annual basis review whether and when to comply with article 4 sub 1 (a) of the SFDR.

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[1] Regulation (EU) 2019/2088