

Version history	
Version 2.0	1 October 2025
Version 1.0	21 December 2022

Sustainability-related Disclosures pursuant to Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector dated 27 November 2019 (“SFDR”)

TRANSPARENCY OF SUSTAINABILITY RISK POLICIES (Article 3, SFDR)

EAAA Pte. Limited (Formerly known as Edelweiss Alternative Asset Advisors Pte. Limited) and affiliated entities that serve as Alternative Investment Fund Managers to affiliated investment funds (“EAAA”) considers sustainability risks (as defined by SFDR) during the course of its pre-investment due diligence through the application of its Environment, Social & Governance Policy (“**ESG Policy**”) and related procedures, which define its approach towards integrating the consideration of sustainability risks.

Examples of sustainability risks may include the following:

- **Environment** - e.g. climate change, natural resources, pollution and waste, extreme weather-related event risks;
- **Social** - e.g. human capital and human rights, product liability, stakeholder opposition to controversial practices of any kind; and/or
- **Governance** - e.g. an empowered and effective board, effective systems for internal control and risk management covering ESG and other areas of risk, suitable transparency and accountability business ethics, anti-competitive practices, corruption.

EAAA integrates sustainability risks into its investment decisions in the following ways:

- **Exclusion policy:** Application of an exclusion policy in respect of direct investments in companies which derive their revenue from certain activities. Details of the exclusion policy are included in the EAAA Responsible Investment Policy ([Click here to access our website](#)).
- **Pre-investment ESG Assessment:** Investment teams seek to conduct an assessment of sustainability risks as part of pre-investment diligence. On a case-by-case basis and as required, external advisors may be engaged to carry out additional diligence.
- **Investment Decision:** The relevant investment team will present key findings from the ESG assessment to the Investment Committee, including any identified sustainability risks. The nature of applicable sustainability risks, including any findings and next steps, are documented and recorded by EAAA.

The ESG Policy and related procedures support the integration of sustainability risks into investment decision-making by establishing a process to embed ESG considerations during pre-investment due diligence, investment approval, and ongoing monitoring. The ESG Policy operates in close conjunction with the EAAA Responsible Investment (RI) Policy, which sets out EAAA’s principles for, and approach to, responsible stewardship. Together, the ESG Policy and RI Policy seek to create a unified approach to the systematic identification, management,

and reporting of material environmental, social, and governance risks.

The relevant investment team is responsible for ensuring that the consideration of sustainability risks is integrated into the investment decision-making process in collaboration with the risk, compliance and product teams. External resources, as relevant and necessary, may be utilized if additional subject matter expertise is needed.

NO CONSIDERATION OF ADVERSE SUSTAINABILITY IMPACTS AT ENTITY LEVEL (Article 4, SFDR)

EAAA does not consider adverse impacts of investment decisions on sustainability factors as specifically set out in the SFDR. EAAA has chosen not to do so for the present time, as it considers its ESG Policy and related procedures to be appropriate and proportional to the investment strategies of its funds. EAAA will continue to monitor regulatory developments with respect to the SFDR and other applicable ESG-focused laws and regulations, and will, as appropriate, make changes to existing policies and procedures.