

Sustainability Related Disclosures

9 March 2021

Following our internal assessment we determined that Vitesse Capital Ltd (the 'VCL'), LEI 213800LE7EJB6DVGPN97, falls within the scope of REGULATION (EU) 2019/2088 qualifying as a financial market participant being an investment firm which provides portfolio management.

VCL does not integrate sustainability risk in the investment decision making process and does not consider, nor has plans in the near future to consider, the adverse impacts of its investment decisions on sustainability factors. Considering sustainability factors do not form part of the investment management process and VCL does not have sustainable investment as its investment objectives to date hence strategies are not designed to take into account these elements.

As VCL does not consider the adverse impacts of investment decisions on sustainability factors on the entity level, they are also not considered at a financial product (a portfolio managed) level for the same reasons as stated above.

VCL does not integrate sustainability risk into its remuneration policy as sustainability risk considerations are not relevant or material for the investment performance.

Vitesse Capital Ltd monitors on an on-going basis the compliance with its policies ensuring adequate updates to the above if and when needed.