

## **Sustainability Related Disclosures**

Following our internal assessment, it was determined that Vitesse Capital Ltd (the 'VCL'), LEI 213800LE7EBJ6DVGPN97, falls within the scope of REGULATION (EU) 2019/2088 on sustainability -related disclosures in the financial services sector ("SFDR") qualifying as a financial market participant being an investment firm which provides portfolio management.

Pursuant to the SFDR, "Sustainability Risk" is defined as an environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of the relevant investment.

VCL has determined that Sustainability Risk is not pertinent to the nature of its current business as its investment strategies are not designed to take into account these elements.

### **Article 3 SFDR: Integration of sustainability risks in the investment decision-making process**

Given the non-applicability of Sustainability Risk to the current investment strategies, Sustainability Risks do not form part of the investment decision-making process of VCL.

### **Article 4 SFDR: No consideration of sustainability adverse impact**

VCL does not consider the adverse sustainability impact at entity level nor has plans in the near future to consider the adverse impacts of its investment decisions on sustainability factors. This is because such analysis is not deemed proportionate to its size nor pertinent to the type of investment strategies currently implemented or the nature of its business.

### **Article 5 SFDR: Remuneration policies in relation to the integration of sustainability risks**

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

The rationale for the non-applicability of the above-mentioned requirements is reviewed on an ongoing basis as well as upon any changes to the investment services or strategies carried out by VCL.

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