

# SFDR Disclosures of Jermyn Street S.à r.l.

## 1. INTRODUCTION

In accordance with Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector (the “Sustainable Finance Disclosure Regulation” or “SFDR”), which sets out specific transparency obligations for financial market participants, Jermyn Street S.à r.l. an alternative investment fund manager registered and supervised only under Article 3(3) of the Luxembourg law of 12 July 2013 on Alternative Investment Fund Managers, is required to disclose the following information:

- The manner in which sustainability risks are integrated into its investment decision-making process, pursuant to Article 3 of the SFDR;
- Whether and how principal adverse impacts of investment decisions on sustainability factors are considered, or, where such impacts are not considered, a clear statement and explanation thereof, in accordance with Article 4 of the SFDR; and
- How its remuneration policies are consistent with the integration of sustainability risks, as required under Article 5 of the SFDR.

In this section, the following definitions apply, in accordance with the SFDR:

- “Sustainability risk” means an environmental, social or management situation or condition which, if it occurs, could cause an actual or potential material negative effect on the value of the investment.
- “Sustainability factors” mean environmental, social and employee matters, respect for human rights, anti-corruption and anti- bribery matters.

## 2. ROLE AS ALTERNATIVE INVESTMENT FUND MANAGER

Currently, Jermyn Street S.à r.l. acts as the Alternative Investment Fund Manager (“AIFM”), for the following Alternative Investment Funds:

- Jermyn Street 1 SCSp;
- Jermyn Street 2 SCSp; and
- Jermyn Street 4 SCSp.

(together referred to as the “Funds”).

## 3. INTEGRATION OF SUSTAINABILITY RISKS (ARTICLE 3 SFDR)

In accordance with Article 3(1) of the SFDR, Jermyn Street S.à r.l. has assessed the relevance of sustainability risks in the context of the Funds' investment strategies and policies. At present, sustainability risks are not considered to have a material impact on the returns of the Funds. As such, these risks are not integrated into the investment decision-making process, primarily due to the nature of the investment strategies, investment restrictions, and the expected portfolio composition of the Funds.

Furthermore, the Funds do not promote environmental or social characteristics (Article 8 of the SFDR), nor do they have sustainable investment as an objective (Article 9 SFDR). Accordingly, they fall outside the scope of Articles 8 and 9 of the SFDR.

#### 4. PRINCIPAL ADVERSE IMPACTS (ARTICLE 4 SFDR)

Pursuant to Article 4 of the SFDR, financial market participants must disclose whether they consider the principal adverse impacts (“PAIs”) of investment decisions on sustainability factors at the entity level.

In accordance with Article 4(1)(b) of the SFDR, Jermyn Street S.à r.l. currently does not consider principal adverse impacts of investment decisions on sustainability factors as set forth in Article 4(1)(a) of the SFDR and therefore does not make the disclosures described in Article 4(1)(a) of the SFDR, due to the small size of Jermyn Street S.à r.l. with limited resources and personnel and the nature of the underlying investments of the Funds and the potential unavailability of appropriate data to assess such impacts in a consistent and reliable manner.

Jermyn Street S.à r.l. will continue to monitor developments in the regulatory framework and improvements in data availability and may revise its approach in the future.

It is further noted that the investments underlying the Funds do not take into account the EU criteria for environmentally sustainable economic activities.

#### 5. REMUNERATION POLICY AND SUSTAINABILITY RISKS (ARTICLE 5 SFDR)

Pursuant to Article 5 of the SFDR, financial market participants must disclose how their remuneration policies are consistent with the integration of sustainability risks.

Jermyn Street S.à r.l. has adopted remuneration and incentive mechanisms formalised in its internal remuneration policy, which are designed to ensure sound and effective governance. However, these policies currently do not integrate sustainability risks, in line with the determination that such risks are not materially relevant to the Funds’ investment strategies at this time. Jermyn Street S.à r.l. does not intend to consider such risks unless there is a material change in the Fund's investment strategies.