

Pre-contractual SFDR disclosures to investors in QVA Fund.

in accordance with

Articles 4, 5 and 6 of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial sector (the “SFDR”).

QVA Fund (the “Fund”) qualifies as an alternative investment fund (an “AIF”) within the meaning of the Directive 2011/61/EU of the European Parliament and of the Council of 8 June 2011 on Alternative Investment Fund Managers, and is managed by **QVA Trading B.V.** (the “Fund Manager”).

The Fund Manager is exempt from the license requirement of Article 2:65 of the Dutch Act on Financial Supervision (*Wet op het financieel toezicht*) under the so-called small managers regime of Article 2:66a AFS.

Under the small managers regime, the Fund Manager is required to submit a registration form with the Netherlands Financial Markets Authority (*Autoriteit Financiële Markten*) (the “AFM”), which registration form the Fund Manager has filed with the AFM.

As clarified by the European Commission in its Q&As on sustainability-related disclosures published on 14 July 2021, the Fund Manager must comply with certain SFDR requirements applicable to registered AIFMs.

The Fund qualifies under Article 6 SFDR because it does not promote environmental and/or social characteristics (Article 8 SFDR) and does not have sustainable investment as its objective (Article 9 SFDR).

Article 4 SFDR: Transparency of adverse sustainability impacts at entity level

The Fund does not consider the adverse impacts of investment decisions on sustainability factors in the manner prescribed by Article 4 of the SFDR. Given (i) the size of the Fund; (ii) a lack of sufficient reliable data; and (iii) the small size of the Fund Manager, such consideration and the administrative burden and associated costs in connection therewith would not be proportional.

Article 5 SFDR: Transparency of remuneration policies in relation to the integration of sustainability risks

The remuneration of all employees of the Fund Manager and its affiliates is in line with common market practice and its components do not encourage excessive risk taking. The remuneration policies of the Fund Manager and its affiliates are therefore consistent with the integration of sustainability risks.

Article 6 SFDR: Transparency of the integration of sustainable risks

In accordance with Article 6 of SFDR, the Fund Manager herewith provides information about (a) whether sustainability risks are integrated into its investment decisions with regard to the Fund; and (b) whether it makes available the results of the assessment of the likely impacts of sustainability risks on the returns of the Fund.

A “sustainability risk” means 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 investment.

Given (i) the size of the Fund; (ii) a lack of sufficient reliable data; and (iii) the small size of the organization of the Fund Manager, the Fund Manager finds these sustainability risks for the Fund insufficiently relevant to integrate these into its investment decisions and to make available the results of the assessment of the likely impacts of sustainability risks on the returns of the Fund.

EU criteria for environmentally sustainable economic activities

The investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.