

## **FIRM LEVEL WEBSITE DISCLOSURE (ARTICLE 3, 4 AND 5 SFDR)**

### **Sustainable Risk Finance Disclosure Regulation (2019/2088) (the Disclosure Regulation)**

Bencis Capital Partners B.V. (**Bencis**) makes the following disclosures in accordance with articles 3(1), 4 (1) (b) and 5(1) of the Disclosure Regulation.

#### **Sustainability risk policies**

A sustainability risk means "an environmental, social or governance event or condition that, if it occurs, could cause an actual or potential material negative impact on the value of the investment". For Bencis, sustainability risks are risks which, if they were to crystallise, would cause a material negative impact on the value of the portfolios of its alternative investment funds (**AIFs**).

Before any investment decisions are made on behalf of an AIF, Bencis performs general confirmatory due diligence which covers financial, legal, fiscal and sustainability issues, and is performed by external advisors when necessary. The investment committee of Bencis aims to assess the identified risks (including sustainability risks) alongside other relevant factors set out in an investment proposal. Following its assessment, the investment committee of Bencis makes investment decisions having regard to the relevant AIF's investment policy and objectives.

#### **Remuneration policy**

Bencis pays parts of its staff a combination of fixed remuneration (salary and benefits) and variable remuneration (including bonus). Variable remuneration for relevant staff takes into account compliance with all policies and procedures, including those relating to the impact of sustainability risks on the investment decision making process.

#### **Principal Adverse Impact reporting**

In accordance with article 4 sub 1 (b) of the Disclosure Regulation, Bencis states that it does not consider adverse impacts of investment decisions on sustainability factors as set forth in article 4 sub 1 (a) of the Disclosure Regulation and therefore does not make the disclosures as described in article 4 sub 1 (a) of the Disclosure Regulation. Given the small size of the organisation of Bencis, such disclosure as set forth in article 4 sub 1 (a) of the Disclosure Regulation and the administrative burden in connection therewith would not be proportional.

