

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

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

Rubens Capital Partners B.V. (**RCP**) 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 RCP, sustainability risks are risks which, if they were to crystallise, would cause a material negative impact on the value of the real estate investments of its alternative investment funds (**AIFs**).

Before any investment decisions are made on behalf of an AIF, RCP performs general confirmatory due diligence which covers *inter alia* environmental issues. RCP views ESG as a standard topic in the pre-investment due diligence process. The Board of RCP aims to assess the identified risks alongside other relevant factors set out in an investment proposal. Following its assessment, the Board makes investment decisions having regard to the relevant AIF's investment policy and objectives.

Remuneration policy

RCP pays 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, RCP 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 RCP, 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.