

Tower Development Venture Capital Fund FCR

- (CATEGORY A – PTIUMEIM0004 / CATEGORY B – PTIUMFIM0003 / CATEGORY C – PTIUMGIM0002)
- This Fund is managed by ATLANTIC PREMIUM CAPITAL PARTNERS – SCR, S.A.
- SFDR Classification: Article 8

Summary

This Fund...	Yes	No
Complies with article 8 of SFDR*	✓	
Integrates ESG factors and sustainability risks	✓	
Has a sustainable investment objective		✓
Promotes environmental or social characteristics	✓	
Assesses good governance practices of the investee companies	✓	
Conducts engagement	✓	
Exercises voting rights		✓
Considers and, where possible, mitigates adverse impacts of its investments on society and the environment	✓	
Excludes controversial weapons and thermal coal extraction	✓	
Excludes thermal coal power generation, unconventional oil & gas exploration and production, conventional weapons and small arms, tobacco production, adult entertainment production and gambling operations	✓	
Excludes conventional oil & gas production, nuclear power generation, military contracting weapon-related products & services, genetically modified organisms development / growth, pesticide	✓	
Excludes companies in severe breach of international norms including the UN Global Compact principles on human rights, labour standards, environmental protection and anti-corruption	✓	
Has guidelines in place with regards to ESG methodologies, data sources and processing, and monitors compliance with the binding elements of the fund	✓	
Has a specific ESG index		✓

*Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on Sustainability-related disclosures in the financial services sector (SFDR)

Investment Strategy

The Fund's capital is dedicated to the capitalization of small and medium sized companies that develop eco-friendly resorts that prioritise sustainable practices such as renewable energy, water conservation, and waste reduction, aimed at reducing the environmental impact of the resort.

In actively managing the fund, the investment manager uses a combination of market and fundamental company analysis to select companies that it believes offer favourable growth prospects at a reasonable price. The investment manager considers ESG factors a core element of its strategy by seeking to invest mainly in economic activities that contribute to an environmental and social objective whilst avoiding activities that adversely affect society or the environment. There may be engagement with companies to positively influence ESG practices.

The fund's binding elements include:

- up to 100% of investments aligned with environmental and social characteristics i.e. 100% of the Fund Capital will be deployed into companies that focus primarily on sustainable eco resorts.
- exclusion of companies that:
 - are involved in the production of controversial weapons including anti-personnel mines, cluster munitions, biological and chemical weapons, nuclear weapons and depleted uranium
 - derive a significant portion of their revenue from activities detrimental to society or the environment, such as thermal coal extraction and power generation, unconventional oil and gas exploration and production, conventional oil and gas production, nuclear power generation, conventional weapons and small arms, military contracting weapons and weapon-related products and services, tobacco production, adult entertainment production, gambling operations, genetically modified organisms development/growth, pesticides product/retail. Please refer to Atlantic Premium Capital Partners' ESG policy for further details on exclusion thresholds applicable to the above activities.
 - severely violate international norms including the UN Global Compact principles on human rights, labour standards, environmental protection and anti-corruption

The fund assesses company decision-making processes and controls, as well as how management balances the interests of shareholders, employees, suppliers, customers, the community and other stakeholders.

No sustainable investment objectives

This financial product promotes environmental or social characteristics but does not have as its objective sustainable investment.

Environmental or social characteristics of the financial product

The fund seeks to increase the weight of investments with low sustainability risks and/or decrease the weight of investments with high sustainability risks and, as a result, aims to have a better environmental, social and governance (ESG) profile.

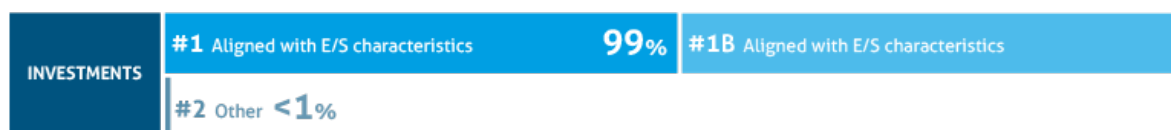
The fund excludes investments in companies that are in severe breach of international norms or have significant activities with adverse impacts on society or the environment.

The fund may engage with the management of companies on material ESG issues and may discontinue investment if progress proves unsatisfactory.

Proportion of investments

The fund is up to 99% aligned with E/S characteristics (#1 Aligned with E/S characteristics) and less than 1% invested in Other (#2 Other).

TOWER DEVELOPMENT VENTURE CAPITAL FUND FCR



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

Monitoring of environmental and social characteristics

Our ESG department monitors on an ongoing basis the binding elements (referred to in the Investment strategy section) of the fund to ensure that these are met throughout the lifecycle of the fund.

Methodologies

- The fund uses the following Indicators:
overall ESG profile
- Principle Adverse Impact (PAI) indicators such as exposure to companies that are in severe breach of international norms or have significant activities with adverse E/S impacts on society or the environment

Data sources and processing

Atlantic Premium Capital Partners relies on various sources of information to analyse and monitor potential investments. The Investment Manager integrates sustainability risks and opportunities into its research, analysis and investment decision-making processes. Once ESG data is integrated into our systems, we conduct quality controls on an on-going basis to detect and address issues that may negatively affect data usage.

Environmental and social characteristic measurements

Atlantic Premium Capital Partners invests in a range of asset classes and underlying strategies. The approach to managing sustainability risk will differ by and be influenced by the asset class and the investment strategy. In line with the overall fund objective, Atlantic Premium Capital Partners targets investment in strategies which help contribute to achieving the Fund's sustainability goals. In addition, as a responsible investor, the Fund adopts an active ownership approach across its holdings. Atlantic Premium Capital Partners uses the discretion afforded to it under a client's Investment Management Agreement to constructively engage with investee companies, encouraging better standards and management processes covering financially material ESG risks.

Limitations to methodology and data

Key limitations to our methodologies may include a lack of data coverage and/or quality.

Due Diligence

Our due diligence process of investee companies incorporates the following:

- The clarity and robustness of the company's long-term strategy
- The functioning and calibre of governance structures and effective leadership
- The financial strength and performance of companies and the fair valuation of underlying assets
- Sustainability risks & opportunities and adverse impacts of potential investments on society and/or the environment

Engagement Policies

Interaction with companies take the form of one-to-one discussions, shareholder meetings, investor roadshows and/or conference calls. The objectives of these interactions are to assess an organisation before investment, monitor that their strategy is being implemented in line with our expectations and ensure that the companies are on track to meet their goals and objectives. Where appropriate, we engage companies on material ESG issues, including controversies, to satisfy ourselves that they fully understand and address them effectively over the short, medium and long term. Our engagement activities include a combination of targeted in-house-led discussions, collaborative institutional investor initiatives, and third-party engagement services.

Designated reference benchmark

No specific ESG index has been designated.

