

No consideration of adverse impacts of investment decisions on sustainability factors

Seroba has fewer than 500 employees and, in accordance with Article 4 of the EU Sustainable Finance Disclosure Regulation (2019/2088) ("SFDR"), has chosen not to consider adverse impacts of investment decisions on sustainability factors.

Indeed, while the integration of material ESG issues is a fundamental component of our investment process, we do not believe our investment decisions have a direct adverse impact on sustainability factors; Rather we believe our most influential strategy for addressing sustainability factors is through engagement activities and exercising voting rights.

Seroba may choose at a later date to publish and maintain on its website the consideration of principal adverse impacts of investment decisions on sustainability factors.