

**Information provided by the company**  
**IGS INVESTMENT LIMITED LIABILITY COMPANY**  
**as the Managing Director of the Alternative Investment Company**  
**in the performance of the requirements resulting from**  
**Regulation (EU) 2019/2088 of the European Parliament and of the Council of November 27**  
**2019 on disclosure of information related to sustainable development in**  
**financial services sector (hereinafter "SFDR")**

**I. Preliminary information**

The SFDR, which entered into force on December 29, 2019, establishes harmonized rules for financial market participants and financial advisors regarding transparency regarding the introduction of sustainability risks into their activities and taking into account adverse effects on sustainable development in their activities, and with regard to their submission of sustainability related information on financial products.

Pursuant to the SFDR Regulation, the company under the name IGS INVESTMENT spółka z ograniczoną odpowiedzialnością with its registered office in Gdańsk (hereinafter: "IGS") is qualified as a financial market participant, and alternative investment companies managed by IGS (ASI IGS INVESTMENT spółka z ograniczoną odpowiedzialnością spółka komandytowa and ASI BIS IGS INVESTMENT spółka z ograniczoną odpowiedzialnością spółka komandytowa - hereinafter collectively referred to as "ASI") constitute a financial product.

**II. Transparency in sustainability risk strategies**

According to Art. 3 sec. 1 of the SFDR, financial market participants are obliged to publish on the website a strategy for introducing sustainable development risks in the process of making investment decisions.

Risk for sustainable development, in accordance with Art. 2 point 22 of the SFDR Regulation, has been defined as a situation or environmental, social or management-related conditions, which - if they occur - could have an actual or potential significant negative impact on the value of the investment.

With the above in mind, IGS declares that it does not have a strategy for introducing sustainable development risks into its operations in the process of making investment decisions, however, it does not exclude the possibility that such a strategy will be developed in the future and this statement will be updated accordingly.

**III. Transparency on adverse sustainability impacts at entity level**

Due to the nature of its business, which involves investing in equity instruments of unlisted entities, IGS currently does not take into account the main adverse effects of investment decisions on sustainable development factors, as this would significantly increase the costs of the investment process, which, due to the nature of IGS activity, the type of products made available and the scale of operations - would limit the profitability of IGS.

#### **IV. Transparency of the remuneration policy in connection with the introduction of risks for sustainable development into the business**

According to Art. 13 sec. 1 of Directive 2011/61/EU of the European Parliament and of the Council of 8 June 2011 on alternative investment fund managers and amending Directives 2003/41/EC and 2009/65/EC and Regulations (EC) No. 1060/2009 and (EU ) No. 1095/2010 ("AIFM Directive") - Member States require AIFMs (which include IGS) to have a remuneration policy and practice, with the remuneration policy and practice consistent with sound and effective risk management and promote such management and must not encourage risk-taking that is inconsistent with the risk profiles, regulations or founding documents of the ASIs they manage.

IGS is not obliged to apply a remuneration policy, because pursuant to art. 3 sec. 2 of the AIFM Directive, the above provisions do not apply to e.g. to managers of alternative investment companies, when the total value of assets under management, including assets acquired using leverage, in total does not exceed the threshold of EUR 100 million or does not exceed the threshold of EUR 500 million, when ASIs do not apply leverage and where redemption rights cannot be performed for a period of five years from the date of initial investment in each ASI.

IGS is released from the obligation to develop and implement a remuneration policy also pursuant to art. 70zb sec. 4 in connection joke. 70j of the Act of 27 May 2004 on investment funds and management of alternative investment funds.

For the above reasons, and due to the lack of a strategy for introducing sustainability risks into the business in the process of making investment decisions, IGS does not ensure consistency of the remuneration policy with the introduction of sustainability risks into the business.

#### **V. Transparency in the introduction of risks for sustainable development into the business**

Financial market participants shall include a description of the following elements in their pre-contractual disclosures:

- a) how sustainability risks are introduced in their investment decisions; and
- b) the results of the assessment of the likely impact of sustainability risks on the return on the financial products they provide.

Where financial market participants consider the sustainability risks to be insignificant, the description of the elements referred to in the first subparagraph shall include a clear and concise explanation of the reasons for considering those risks as insignificant .

IGS in its investment strategy, which is disclosed to each investor before joining ASI, informs about the issues described above.

#### **VI. Transparency in terms of promoting an environmental or social aspect in pre-contractual disclosures**

IGS does not offer financial products that promote an environmental or social aspect (or both) or aim at sustainable investments, therefore it does not disclose the above-mentioned aspects. information before concluding the contract.