



MUNDUS
ASSET MANAGEMENT

This information was updated on the 22nd February, 2022 and is provided by UAB "Mundus", turto valdymo bendrovė (hereinafter - MUNDUS) in accordance with the 27th November, 2019 Regulation (EU) 2019/2088 of the European Parliament and of the Council on sustainability-related disclosures in the financial services sector

I. REG. THE POLICIES ON THE INTEGRATION OF SUSTAINABILITY RISKS IN THE INVESTMENT DECISION-MAKING PROCESS

The Board of MUNDUS has approved the Investment Decision Making Procedure, which is followed in making and executing investment decisions on assets of collective investment undertakings for well-informed investors (hereinafter - Funds) managed by MUNDUS in accordance with the investment strategy provided for in each Fund's founding documents. In accordance with this procedure, the Board of MUNDUS evaluates the Fund Manager's recommendations for an investment decision based on, among other factors, the potential investee's business strategy and competitive advantage and the expected return and risk analysis of the potential transaction. When recommending an investment decision using qualitative and quantitative analysis of publicly available and commercially available information, the Fund Manager seeks to identify, in addition to the main types of investment risks inherent in Funds managed by MUNDUS, all risks that he or she considers relevant in each case, including, where relevant, sustainability risks (sustainability risk means an environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of the investment).

The Board of MUNDUS has also approved the Investment Risk Management Policy, which sets out the general principles of investment risk management in making and executing investment decisions on assets of Funds managed by MUNDUS in accordance with the investment strategy provided for in each Fund's founding documents. This policy provides that when assessing the potential impact of an individual investment from various risks and taking into account market, specific Fund or specific investment circumstances, the Board of MUNDUS may decide to follow case-specific risk management principles and / or apply case-specific risk assessment and management measures, not limited to the risk management tools intended for the main types of investment risks inherent in the Funds managed by MUNDUS.

II.

REG. THE REASONS FOR THE LIMITED DUE DILIGENCE POLICIES WITH RESPECT TO ADVERSE SUSTAINABILITY IMPACTS AT ENTITY LEVEL

Sustainability factors mean environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

Because:

- Private debt Funds managed by MUNDUS, which seek to finance business in the European Union, currently are or have been directly invested in issuers registered in the following countries: Republic of Lithuania, Republic of Estonia (hereinafter - Markets);
- Acc. to 2021 Q3 data by the National Central Banks of the Markets and the Bank for International Settlements and MUNDUS estimates, the total assets of Funds managed by MUNDUS accounted for only 0.04 percent of financial debt of non-financial corporations in the Markets. In turn, financial debt of non-financial corporations accounted for only 52

percent of GDP in the Markets, compared to the 111 percent value of the indicator for the euro area;

- The Our World in Data Human Rights Scores, 2017 for the Markets belonged to the highest quartile of the 195 countries assessed;

taking due account of the small size of Funds managed by MUNDUS and the limited scale of activities, MUNDUS takes into account the adverse sustainability impact of investment decisions to the extent required by the Law on the Prevention of Money Laundering and Terrorist Financing of the Republic of Lithuania.

III. REG. HOW REMUNERATION POLICIES ARE CONSISTENT WITH THE INTEGRATION OF SUSTAINABILITY RISKS

As the assets managed by MUNDUS do not exceed EUR 100 million, in accordance with Article 3 (3) of the European Union Directive 2011/61 / EU and the Law on Collective Investment Undertakings for Well-Informed Investors of the Republic of Lithuania, MUNDUS is not obliged to establish a remuneration policy.