Principal Adverse Impact Statement

OCORIAN

Ocorian AIFM (Ireland) Limited (the "**AIFM**") is an alternative investment fund manager and a **financial market participant** for the purposes of Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector ("**SFDR**").

In accordance with **Article 4(1)(b) SFDR**, the AIFM **does not currently consider** the principal adverse impacts of its investment decisions on sustainability factors at the entity level.

The AIFM is a third-party management company providing AIFM services to AIF funds. Our clients are large-scale institutional investors, international fund promoters and investment managers. The business model of the AIFM is to offer investment funds to institutional investors, which frequently are also initiators of these investment funds. The concept of the funds under our management, especially the investment policy, is determined by these initiators.

The AIFM has determined not to consider such adverse impacts at this time on the basis of the **size, nature and scale** of its activities and the nature of the funds under management, together with current limitations in relation to the **availability, consistency and reliability of relevant data** required to assess principal adverse impacts on a robust and systematic basis.

The AIFM **keeps this position under periodic review** and will reconsider its approach if and when it determines that it is appropriate to do so, including where data availability, methodological clarity, regulatory expectations or the scale of the AIFM's activities materially change.

This statement is published for the purposes of **Article 4 SFDR** and will be updated as appropriate.