G10 Capital Limited
Sustainable Finance Disclosures Regulation ("SFDR")
Entity Disclosure

30 September 2026

This Disclosure statement clarifies how G10 Capital Limited ("**G10**" or the "**Firm**"), in accordance with Article 3 of Regulation 2019/2088, approaches sustainability-related disclosures as part of its business. G10 is a full scope Alternative Investment Fund Manager ("**AIFM**") with MiFID 'top up' permissions, authorised and regulated by the Financial Conduct Authority ("**FCA**") (Firm Reference Number, "**FRN**", 648953).

In the course of its business and its FCA authorisation, G10 provides:

- A regulatory hosting platform, as a Principal Firm, for a number of Appointed Representatives ("**AR**s"), some of whom provide investment advice;
- Discretionary investment management on behalf of clients ("**Clients**"), where the Firm is appointed as a portfolio manager or delegated portfolio manager to funds; and
- AIFM services to Alternative Investment Funds ("**AIF**s").

The ARs, Clients and AIFs above are classed as Serviced Entities.

G10's business model can be characterised as follows for the purposes of this Disclosure:

- The Firm is an AIFM or a discretionary manager to both liquid and illiquid portfolios of investments managed by small investment management teams ("**Investment Teams**") acting under its authorisation and working independently of each other, with diverse investment strategies and objectives;
- Some AIFs are marketed in the EU and some other Serviced Entities may provide portfolio management services or investment advice in the EU.

Under Regulation (EU) 2019/2088 (the Sustainable Finance Disclosure Regulation), G10 is required to publish information regarding its policies on the integration of sustainability risks into its investment decision-making processes and investment advice activities where SFDR applies.

Where sustainability risks are relevant to a particular mandate, AIF or investment strategy, G10 considers such risks as part of its oversight of investment decision-making activities and delegated portfolio management arrangements. The manner in which sustainability risks are identified, assessed and monitored will depend on the nature, investment objectives and strategy of the relevant product or mandate. G10's oversight framework is designed to ensure that sustainability risks are considered in a manner proportionate to the activities undertaken and the characteristics of the relevant investment strategy.

Definitions

- "**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 an investment.
- "**Financial Market Participant**" entities which manufacture the financial products, including AIFMs.
- "**Financial Advisers**" entities providing investment or insurance advice.

Principal Adverse Impacts ("PAI")

G10 recognises the importance of transparency regarding the potential adverse impacts that investment decisions may have on sustainability factors and has considered the requirements of the PAI framework under Article 4 of the SFDR.

Having regard to the nature of its business model, the diversity of investment strategies operated across the AIFs under management, and the differing approaches adopted by delegated portfolio managers in relation to sustainability risk integration and PAI reporting, G10 has concluded that the aggregation of PAI information at entity level would not provide meaningful or comparable information to stakeholders. Accordingly, G10 does not currently consider principal adverse impacts of investment decisions on sustainability factors at entity level in the manner prescribed by Article 4 of SFDR in respect of the AIFs under management, including their compartments.

G10 continues to consider sustainability-related matters as part of its governance, oversight and due diligence arrangements where relevant to its role and responsibilities. G10 also notes that the availability, consistency and comparability of non-financial data across markets, asset classes and investment strategies continues to evolve, which may limit the ability to produce entity-level PAI disclosures that are sufficiently reliable and meaningful.

G10 will keep this position under periodic review and will reassess its approach as market practices, regulatory expectations and the availability of sustainability-related data continue to develop.

Description of the SFDR Methodology

Certain AIFs for which G10 acts as AIFM may promote environmental and/or social characteristics or pursue sustainable investment objectives and may therefore be classified under Article 6, Article 8 or Article 9 SFDR, as applicable. The classification of each product is determined by its specific investment objective, strategy and sustainability characteristics.

During the development of an AIF's Investment Objective and Policy ("**IOP**"), and whenever the IOP is materially amended, G10 undertakes a structured review of the sustainability characteristics promoted by the fund. This review includes consideration of the descriptions of the characteristics, the methodologies used to assess, measure, and monitor them, and the requirements of applicable laws and regulations regarding their fulfilment.

As part of this process, G10 also reviews the related disclosures made available to investors, including information contained on the fund-specific pages of the website and the relevant pre-contractual disclosure documents. The purpose of this review is to ensure that all disclosures remain accurate, sufficiently detailed, and consistent with applicable regulatory requirements and minimum disclosure standards.

G10 oversees, on a periodic basis, the monitoring of environmental and social characteristics promoted by Article 8 products and sustainable investment objectives pursued by Article 9 products, taking into account the nature and characteristics of the relevant fund.

Remuneration

In accordance with Article 5 of the Sustainable Finance Disclosure Regulation ("**SFDR**"), G10 is required to disclose information regarding the consistency of its remuneration policies with the integration of sustainability risks. G10 recognises that remuneration arrangements play an important role in promoting effective risk management and supporting appropriate decision-making, and therefore seeks to ensure that its remuneration framework is aligned with its overall approach to risk management, including the consideration of sustainability risks where relevant.

The Firm maintains and operates under a Remuneration Policy ("**Policy**"). For the purposes of the Policy, "**Staff**" are considered to be employees supporting the Firm's regulated activities, including IQ

EQ Group Senior Management Function holders seconded to the Firm, and individuals seconded into the Firm to undertake activities under the Firm's MiFID investment services and AIFM permissions ("**Secondees**").

Due to the scope of its regulatory permissions and associated activities, G10 is subject to both the 'AIFM Remuneration Code' (based on AIFMD and incorporating ESMA guidelines on sound remuneration policies) and 'MIFIDPRU Remuneration Code'. The Firm considers that the MIFIDPRU Remuneration requirements, for SNI MIFIDPRU investment firms, are in general less demanding than the requirements under the AIFM Remuneration Code. Under SYSC 19G.1.20 R of the FCA Handbook, a firm such as G10, which is subject to multiple remuneration codes, with provisions imposing different remuneration requirements, only one of which can be complied with, must comply with the most stringent of the relevant provisions.

As all Employees are associated with both MIFID and AIFM activities, the Firm complies with the most stringent provisions in the AIFM Remuneration Code with regard to Employees. All Secondees who work exclusively on MIFID business are subject to the MIFIDPRU Remuneration Code while all other Secondees who work on both types of business are subject to the AIFM Remuneration Code.

The Firm has in place a Policy which has been approved by its governing body in the form of its Board of Directors. The Policy's overarching aim is the promotion of sound and effective risk management, whilst reducing conflicts of interests and encouraging good conduct amongst Staff.

The purpose of the Policy is to set out how the Firm provides remuneration in a manner that is consistent with the relevant remuneration codes outlined above. The Policy is designed to support sound and effective risk management while attracting, motivating and retaining appropriately qualified Staff.

G10 seeks to ensure that its remuneration arrangements are consistent with the integration of sustainability risks and do not encourage excessive risk-taking in relation to environmental, social or governance matters. Sustainability risks form part of the Firm's broader risk management framework. The Firm seeks to ensure that its remuneration arrangements support effective risk management and do not encourage excessive risk-taking, including in relation to environmental, social and governance risks where relevant.

The Policy has been designed to ensure consistency with the risk profiles, rules and instruments of incorporation of the funds and managed accounts and with the objectives set out in the Firm's business plan as well as to ensure that there is no conflict of interest between Staff and investors, as well as compliance with the FCA's Conduct of Business rules.

The Firm's remuneration arrangements are designed to promote sound and effective risk management, support good conduct, avoid conflicts of interest and align the interests of Staff, investors and other stakeholders. Sustainability risks are considered as part of the Firm's overall risk management framework and are taken into account where relevant to the activities performed by the individual or business area concerned.

The Policy is subject to periodic review to ensure that it remains consistent with applicable legal and regulatory requirements, the Firm's risk management objectives and its approach to the integration of sustainability risks