

Sustainability Policy

Approved by the Board of Directors on 21 December 2023

● E-MAIL ADDRESS

info@3xpglobal.eu

● PHONE NUMBER

+351 213 261 598

Contents

1. Sustainability Policy	3
1.1 Introduction	3
1.2 Politics	3
1.3 Principles	3
1.3.1 Adaptability	3
1.3.2 Proportionality	3
1.3.3 Transparency and accountability	4
1.3.4 Current affairs	4
1.4 Integrating sustainability risks into the decision-making process	4
1.4.1 General investment criteria	4
1.4.2 Integrating sustainability risks into the company's decision-making process	4
1.5 Failure to consider the main negative impacts on Sustainability factors	5
1.6 Integration of Sustainability risks into the Remuneration Policy	5
1.7 Approval by the Board of Directors	6
1.8 Approval, monitoring and review	6
1.9 Publication	6
1.10 Document management	7

1. Sustainability Policy

1.1 Introduction

3XP Global - SCR, S.A. ("Company"), in order to make known the commitments it has established and the approach it has taken in terms of responsible investment, in accordance with the sustainability criteria approved at European level, has adopted this Sustainability Policy (hereinafter the "Policy"), in order to comply with the regulatory framework in force and, in particular, with the provisions of Regulation (EU) 2019/2088 of the European Parliament and of the Council, of 27 November 2019, in the version in force.

The Company is monitoring Sustainability with a view to gauging, once the legal framework is complete, how the funds under its management can be categorised as sustainable, under the terms of the SFDR.

1.2 Politics

The Company has adopted the following Sustainability Policy, which is duly filed on the server. N:\Compliance\Sustainability Policy\220601_Grosvenor_Sustainability Policy.pdf

1.3 Principles

1.3.1 Adaptability

The Company complies with the requirements of the Sustainability regime in terms adapted to the funds under management, depending on their characteristics as described in the corresponding constitutive documents.

1.3.2 Proportionality

The Company weighs up Sustainability risks according to the nature, size and complexity of its activities.

The Company does not fulfil the criteria for larger institutions set out in Article 4(3) and (4) of the SFDR Regulation.

1.3.3 Transparency and accountability

The Company recognises that the information to be disclosed on Sustainability must be true, clear and objective, in order to prevent distortions in the information disclosed on sustainability, known as green-washing.

On the contrary, the Company's approach to Sustainability complies with the principles of truth, integrity and transparency, implementing mechanisms to provide information on its actions in terms of Sustainability to its shareholders, participants/investors in the funds under management and Supervisory Authorities.

The Company's commitment to Sustainability takes into account its inclusion in the community in which it operates and its accountability to all relevant stakeholders.

1.3.4 Current affairs

The Company undertakes to keep information on this Policy and its fulfilment up to date and ensures that commercial communications do not contradict the information disclosed under this Policy.

Given that the regulatory framework in terms of Sustainability is not complete and is constantly evolving, the company undertakes to constantly consider the best way to adapt to Sustainability requirements in the light of the regulatory instruments in force at any given time, in the light of the Sustainability principles it pursues, depending on the nature, size and complexity of its activities.

1.4 Integrating sustainability risks into the decision-making process

1.4.1 General investment criteria

To this end, the Company guarantees that it will respect what is established in the Investment Policy of each of the funds under its management, endeavouring in this context to reflect its concerns about Sustainability.

1.4.2 Integrating sustainability risks into the company's decision-making process

The Company recognises that risks of an environmental and/or social nature in terms of the investments made by the funds it manages may affect its activity and the profitability of these investments.

To this end, in defining the risk management policies and procedures relating to its activity, the Company takes due account of sustainability risks whose occurrence could significantly impact the value of the assets comprising the funds under management. The following are considered relevant for this purpose, without prejudice to others:

- (I) Environmental risks, such as the impact of environmental events, for example, the increased risk of flooding on the operations of funds under management;
- (II) Social risks, such as the impact of non-compliance with anti-slavery laws and regulations or labour conditions by the funds under management; and
- (III) Governance risks, such as inadequate supervision of the management of funds under management.

1.5 Failure to consider the main negative impacts on Sustainability factors

The Company is actively working on the internal framework that will lead to the collection and quantification of data, and reporting on the main negative impacts of investment decisions on Sustainability factors.

The Company is aware of the importance of considering the main negative impacts of investment decisions on Sustainability factors, implementing the processes and using the tools necessary to obtain and measure the data required by the SFDR to report the main negative impacts of investment decisions on Sustainability factors.

1.6 Integration of Sustainability risks into the Remuneration Policy

The Company's Remuneration Policy is coherent with the integration of Sustainability risks both in the long term and with regard to shorter-term variable compensation.

Remuneration is generally provided on a fixed basis and may include participation in the Company's annual performance, which considers both financial criteria and external validation of the company's ESG policy. This involves awarding and maintaining certifications, such as the B Corp, and awards related to its direct activity, such as the EVCA awards and others. All criteria are reviewed regularly.

The Remuneration Policy also considers the contribution to effective risk management, taking into account financial, regulatory, security and fraud, operational risks, with special attention to the impacts on the environment and all stakeholders.

3XP Global's Grow Sustainable Programme aims to raise awareness of sustainable practices in our ecosystem and in the business world, so the alignment of employees with

this programme is taken into account in the regular performance review, potentially having a positive impact on individual remuneration. All human resources have a combination of fixed and variable remuneration where the performance of the Funds under management does not have a direct impact on remuneration.

Considering the limited impact of variable remuneration on the risk profile of the Funds under management and the nature of the Company's business, the Company considers that the remuneration components are not based on the performance of the Funds under management and that there is no risk of misalignment with the Sustainability risks associated with the Company's investment decision-making process with regard to the Funds.

1.7 Approval by the Board of Directors

The Board of Directors is responsible for approving and reviewing this Policy (without prejudice to the fact that approval of the Remuneration Policy is the responsibility of the General Meeting, on the proposal and monitoring of the Supervisory Board). In this way, the Company ensures that this Policy is fully integrated into its governance system.

1.8 Approval, monitoring and review

This Policy has been approved by the Board of Directors (without prejudice to the fact that the approval of the Remuneration Policy is the responsibility of the General Meeting, on the proposal and monitoring of the Supervisory Board).

Compliance Department is responsible for overseeing the compliance with the Policy, in liaison with the Supervisory Board, within the scope of its respective competences. This Policy is reviewed regularly in the light of the experience gained from its application and any legislative changes, and the Compliance Department is responsible for submitting proposals for revision to the Board of Directors.

1.9 Publication

This Policy is available for consultation on the Company's website.

1.10 Document management

This document is approved by the company's management body, and Compliance Department is responsible for the interpretation and adequacy of its contents, as well as for its periodic review (at least annually).

Whenever changes are made to this document, the updated version is distributed to all company employees.

An electronic copy of this document and its updates are also made available to employees on the company's intranet and are always archived.

Whenever changes/updates are made, the grid below should be amended accordingly.

Change Management

Date of revision/update	Description of the change	Responsible
12/2023	Original version	Liliana Neves

This Policy is available for consultation for supervisory purposes and by members of the Management Body, as well as by the Company's Employees (including subcontractors).