31/03/2025

No consideration of adverse impacts of investment decisions on sustainability factors

Sequoia Investment Management Company Ltd ("SIMCo"), with LEI: 213800WAVVOPS85N2205, is a 'financial advisor' for the purpose of Article 2 of Regulation (EU) 2019/2088 (the "Sustainable Finance Disclosure Regulation", "SFDR").

SIMCo does not consider the principal adverse impacts ("PAIs") of its investment advice on sustainability factors at the entity level.

This statement on the integration of PAIs in SIMCo's investment process covers the reference period from 1 January 2024 to 31 December 2024.

SIMCo advises multiple financial products and may in the future advise different products still. Please refer to the 'Sustainable Finance Related Disclosures' sheet and 'ESG Policy' of each respective fund for details regarding the consideration of PAIs specific to such a product.

Considering the size, nature, and scale of its activities, SIMCo is not subject to the mandatory integration and disclosure of PAIs, in accordance with Article 4(1) of SFDR.

Nonetheless, SIMCo recognises the importance of considering PAIs and is taking reasonable steps on making progress in the measurement of these metrics at the fund level. The entity's ability to measure and thus consider PAIs is highly dependent on the availability and accuracy of data. We request relevant data from our investee companies upon origination and annually thereafter and embed covenants into loans, where possible, to mandate the provision of certain datapoints.

However, we invest predominantly in private debt with a skew towards smaller and mid-sized companies and a sizeable proportion of the portfolio is US-based. Given the asset class and nature of our investments, the collection and reporting of PAI data at our investee companies are limited.

The integration of PAIs is further impaired by the current absence of a reliable benchmarks or external data sources that could be used to reliably generate estimated data specific to our portfolios to comply with the PAI technical reporting requirements.

We cannot yet commit to a date by which we will be able to adequately consider such PAIs.