

SFDR Principal Adverse Impacts Statement (PAIS)

Disclosures in accordance with Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on Sustainability-Related Disclosures in the Financial Sector (the “SFDR”)

TRANSPARENCY OF SUSTAINABILITY RISK POLICIES (Article 3, SFDR)

For the purposes of these disclosures, “sustainability risk” refers to an environmental, social, or governance (ESG) event or condition that, if it occurs, could result in an actual or potential material negative impact on the value of an investment.

Tower Peak Partners incorporates the assessment of material business and legal risks, including sustainability risks, as part of its investment due diligence process. This evaluation includes consideration of factors such as industry, company size, and geographic presence to assess the materiality of potential risk factors, including those related to ESG issues.

During the later stages of investment diligence, Tower Peak Partners applies a structured, proprietary methodology to assess potentially material sustainability risks. Key findings from this process are documented and integrated into final investment decision-making materials, including a memorandum, for further evaluation of a potential investment by the investment team. Where material sustainability risks are identified, Tower Peak Partners may engage internal or external expertise, including third-party specialists, to deepen the analysis and determine appropriate risk mitigation strategies.

Tower Peak Partners does not anticipate that sustainability risks will materially impact investment performance. However, no assurance can be given that all material risks will be identified or mitigated through this process.

TRANSPARENCY OF ADVERSE SUSTAINABILITY IMPACTS AT ENTITY LEVEL (Article 4, SFDR)

Tower Peak Partners does not currently consider the principal adverse impacts of investment decisions on sustainability factors, as defined in Article 4 of the SFDR. This decision has been made after careful consideration of the firm’s investment approach and resources, which are proportionate and aligned with the strategic objectives of its funds.

Tower Peak Partners remains committed to responsible investing and will continue to monitor developments under the SFDR, evaluating the appropriateness of incorporating further specific adverse impact considerations into its policies and processes over time.

Disclaimer: This disclosure is intended solely for compliance purposes and does not constitute investment advice or an offer to invest. The SFDR framework and policies are subject to change based on evolving regulatory guidance and market conditions.

