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License n° C92570

DISCLOSURE ART. 4-5

Sustainable Finance Disclosures Regulation ("SFDR")

Article 4 - Transparency of adverse sustainability impacts at entity level

(Regulation (EU) 2019/2088)

Introduction

This document sets-out the firm-level disclosures required to be made under Article 4 of SFDR by the

Rigsave Capital LTD [1]

The required disclosures will be subject to regulatory technical standards which are not yet adopted

at the date of this document. The disclosures will be updated as required.

Disclosure

Rigsave Capital LTD considers principal adverse impacts of its investment decisions on sustainability factors. This statement will consolidate the principal adverse sustainability impacts[2] (PAIs) in the Company.

Description of Principal Adverse Sustainability Impacts.

The following PAIs indicators will be monitored and measured on a best endeavours basis from 1st October 2021 (with the exception of scope 3 emissions).

Additional material environmental and social sustainability impacts will be determined in consultation with investment team and such impacts will be included from 1 January 2022.

CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS

1. Total GHG emissions (broken down by scope 1, 2 and 3 (from Jan 2023) carbon emissions

2. Carbon footprint

3. GHG intensity

4. Fossil fuel sector exposure

5. Share of non-renewable energy consumption and production

6. Energy consumption intensity per high impact climate sector

[1] In particular, this document includes disclosures made by Rigsave Capital LTD.

[2] Principal adverse impacts are those impacts of investment decisions that result in negative effects on sustainability factors.

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7. Activities negatively affecting biodiversity sensitive areas

8. Emissions to water

9. Hazardous waste ratio

SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS

10. Share of companies in violations of UN GC and OECD Guidelines Implementation of fundamental ILO Conventions

11. Share of companies without policies or processes to monitor compliance with UNGC and OECD Guidelines

12. Unadjusted gender pay gap

13. Board gender diversity

14. Exposure to controversial weapons (land mines and cluster bombs, chemical and biological weapons)

From 1 January 2022, the principal adverse sustainability impacts will be assessed formally at each quarter end and reviewed by the Investment Committee that monitors all investment related risks across the business.

This governance process will inform what, if any, actions are to be taken in relation to the principal adverse sustainability impacts which will be reported annually for the period commencing 1 January 2022.

Policies to identify, prioritise and monitoring principal adverse sustainability impacts.

The Company has oversight of all the policies relating to sustainable investment, ESG integration, sustainability risks and investment operating procedure. Such policies are reviewed annually.

Implementation of the policy is managed by the Investment Committee.

Additional principal adverse sustainability impacts indicators are prioritised by investment commitee

where there is a belief that there will be a material impact on investment returns and/or an impact on meeting the social and environmental characteristics of the products for the specific investment strategies managed by the team.

The investment committee is responsible for the identification of these impacts.

Sustainability data used to assess this is sourced from a series of third party providers and used alongside information gathered through analysis conducted by our investment managers as a result of their own research engagement.

Third party sourced information is subject to limitations relating to methodologies and disclosures from investee companies and other entities. Such limitations are mitigated by proprietary research and direct engagement.

The Investment Operating Policy can be found at:

https://www.rigsavecapital.com.

International Standards, Norms and Codes of Practice

The Company's approach to responsible investment includes commitments to international norms and standards. Rigsave Capital LTD:

- support and uphold fundamental principles of human rights as articulated in the UDHR;

- support international norms and standards enshrined in widely adopted treaties, conventions and codes of practice including the OECD Guidelines[3] ; and

- uphold the highest standards of environmental stewardship.

These standards are applied in the investment processes by reference to the FSI Human Rights and Modern Slavery and Climate Change Working. Rigsave Capital LTD monitors climate impacts and risks by using third party sourced carbon data (emissions, carbon intensity and footprints plus fossil fuel exposures).

[3] OECD Guidelines for Multinational Enterprises (recommendations on responsible business conduct)

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Sustainable Finance Disclosures Regulation ("SFDR") Article 5 - Transparency of remuneration policies in relation to the integration of sustainability risks (Regulation (EU) 2019/2088)

Introduction

This document sets-out the company-level disclosures required to be made under Article 5 of SFDR by the Rigsave Capital Ltd.

The required disclosures will be subject to regulatory technical standards which are not yet adopted at the date of this document. The disclosures will be updated as required.

Disclosure

Remuneration policy

Rigsave Capital Ltd has a Remuneration Policy to ensure that an appropriate remuneration framework exists to support our strategic priorities. The Remuneration Policy is designed to ensure employees are rewarded for behaviour that upholds a culture that aligns with the interests of our clients and shareholders.

The Remuneration Policy motivates employees to achieve individual and corporate performance outcomes that deliver longterm sustainable results, enhance the client experience, adhere to legal and regulatory requirements, promote sound and effective risk management (including sustainability risks[4] for investment professionals through the Performance Framework) and avoid conflicts of interest.

Specifically, the Remuneration Policy outlines a remuneration framework that:

- meets all applicable regulatory and legal requirements;
- aligns with our vision, values and strategy;
- aligns with the interests of our clients, employees, and the community;

[4] "sustainability risk" means an environmental, social or governance event or condition that, if it occurs, could cause and actual or potential material negative impact on the value of the investment. As per EU Regulation 2019/2088."

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• encourages responsible behaviour that supports long-term sustainability;

• avoids conflicts of interest; and

• supports a diverse and inclusive workforce.

We actively manage risks associated with measuring and delivering short-term and long-term performance,with a bias towards the longer-term. All activities are carefully managed within our risk framework, and individual Variable Remuneration outcomes are reviewed and may be reduced in the light of any associatedrisk outcomes.

Performance and risk management is built into our remuneration framework by ensuring that employees areassessed against risk and behavioural standards, which are considered upon allocation of short-term and long-term incentives.

Upon payment or vesting of deferred incentives, a further assessment is conducted to confirm they have adhered to our risk framework. Our philosophy ensures that Variable Remuneration outcomes are based onboth what was achieved (goals) and how it was achieved (values), with adjustments for risk outcomes appliedwhere required. An integral part of our annual remuneration governance process also includes reviewing remuneration decisions through the lens of gender equity, with approvals dependent on demonstrated equitable outcomes.

When remuneration includes a variable element, it shall be performance-based and risk-adjusted. The variable remuneration should be reasonable, structured in such a way as to achieve a fair balance between fixed and variable elements, and in-line with the business strategy, market condition and the specific environment in which the Manager operates.

The Board, in its supervisory function, has adopted and periodically reviews the general principles of the Remuneration Policy, and is responsible for its proper implementation. These tasks are primarily undertakenby the independent member(s) of the Board.

This policy will be reviewed by the Board at least annually.

An independent member of the board (the “Remuneration Director”), will make sure that this policy is constantly kept up to date and will coordinate with the rest of the Board to ensure that the Board directly oversees the remuneration of the Control Functions of the Manager.

September 2021