SFDR Article 3 Disclosure – Sustainability Risk Policy

Integration of Sustainability Risks in Investment Decisions
(*Article 3 of Regulation (EU) 2019/2088*)

New Venture Brokerage CJSC is subject to the disclosure requirements under Article 3 of the EU Sustainable Finance Disclosure Regulation (Regulation (EU) 2019/2088 – "SFDR") in its capacity as a MiFID-licensed investment firm.

The firm manages a wide range of investment structures, including, but not limited to, securitization vehicles (both pass-through and actively managed), private equity-related arrangements, and structured products. These vehicles differ significantly in their investment mandates, asset classes, levels of discretion, and lifecycle characteristics.

New Venture Brokerage CJSC assesses the relevance and materiality of sustainability risks — defined as environmental, social, or governance (ESG) events or conditions which, if they occur, could cause a material negative impact on the value of an investment — in a manner proportionate to each product type.

- For **fixed, pass-through, or pre-defined asset structures**, such as traditional securitizations, ESG-related risks are typically not considered material due to the static nature of the portfolios and the limited decision-making discretion post-origination.
- For **actively managed strategies**, including AMCs and PE-like investment structures, sustainability risks may be considered as part of the investment risk assessment, where relevant and where sufficient data is available.

ESG risk considerations may include exposure to environmentally harmful industries, social compliance issues in investee companies, or governance shortcomings. These risks may be factored into portfolio construction, due diligence, or ongoing monitoring, depending on the specific structure and investment strategy.

SFDR Article 4 Disclosure – Statement on Principal Adverse Impacts (PAIs)

Statement on Consideration of Adverse Sustainability Impacts
(*Article 4 of Regulation (EU) 2019/2088*)

In accordance with Article 4(1)(b) of the SFDR, New Venture Brokerage CJSC hereby states that it **does not currently consider** the principal adverse impacts of investment decisions on sustainability factors at the entity level.

This position is based on the diverse nature of the investment structures under management, which include certain vehicles with no discretionary investment decisions, as well as alternative investment structures for which standardized, reliable, and comparable ESG data is often unavailable. The firm also notes that consistent methodologies and market-wide norms for measuring such impacts across asset classes and jurisdictions are still developing.

While certain ESG considerations may be applied at the individual product level, New Venture Brokerage CJSC has determined that, at this stage, it is not appropriate or proportionate to aggregate and report on PAIs at the entity level across all managed products.

The firm will continue to monitor regulatory developments, industry best practices, and improvements in sustainability data availability and may revisit this approach in the future. Any change in this position will be duly disclosed.