



Sustainable Finance Disclosure Regulation (SFDR)

Version 1.1

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Introduction:

Sodefi Management BV, (Sodefi) currently offers a single product, the Sodefi Umbrella Fund, also comprising the Sodefi Manage Futures Sub-Fund. The investment process is applied to international equities (ex- Asia) and Futures contracts. The aim of the fund is to generate long-term capital growth while investing in the shares of high quality companies. This is complemented with investments in long and short positions in futures contracts where returns are generated from extended trends in the price patterns of these contracts.

Environmental or Social Characteristics and Sustainable Investment Objectives:

Sodefi does not actively consider sustainability risks as defined in Regulation (EU) 2019/2088 (the Sustainable Finance Disclosure Regulation), i.e., environmental, social or governance (ESG) criteria that may have a negative impact, (perceived or real), on the value of the investments.

Methodologies Used:

Given the nature of the instruments in our portfolio, we do not employ methodologies related to assessing, measuring, or monitoring environmental or social characteristics, or the impact of sustainable investments. Our market activity in company shares is related strictly to metrics based on fundamental and quantitative analysis of good companies and prices at which we believe are beneficial to the long term goals of our investors. In this regard we tend to be a price provider as often as we are a price taker in the market. Sodefi's activity in the Futures Exchanges is based solely on a systematic algorithm that detects nascent trends in a diversified set of futures contracts. Sodefi is a price provider in most of our transactions in this market and we believe in supporting the price discovery process and hence the efficiency of capital markets.

Additional Required Information:

As per Article 11 of the SFDR, it is necessary to disclose any principal adverse impacts of investment decisions on sustainability factors. However, since our company does not integrate sustainability risks into our investment decisions, and our products do not focus on environmental or social characteristics or sustainable investment objectives, this aspect may not be applicable. Nonetheless, we ensure compliance with all regulatory requirements and commit to transparency in our investment activities.

Sodefi revisits its policy disclosures annually and publishes any amendments shortly thereafter.