Sustainability Disclosure – Principal Adverse Impact ("PAI")

EU Sustainable Finance Disclosure Regulation (Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019; "SFDR" or the "Regulation") requires Westbeck Capital Management LLP ("Westbeck Capital") to make a "comply or explain" decision whether to consider the Principal Adverse Impact ("PAI") of its investment decisions on sustainability factors, in accordance with a specific regime outlined in SFDR. PAIs are described as impacts that result, or might result, in negative effects on sustainability factors, such as social and employee matters, respect for human rights, anti-corruption or anti-bribery matters.

Westbeck Capital provides this disclosure in relation to Westbeck Volta UCITS Fund which is categorised as Article 8 under SFDR.

No consideration of sustainability adverse impacts

Westbeck Capital has opted not to comply with that regime, both generally and in relation to investments products.

Westbeck Capital has carefully evaluated the requirements of the PAI regime in Article 4 of the SFDR. On the one hand, Westbeck Capital is supportive of the policy aims of the PAI regime to improve transparency to clients, but on the other hand Westbeck Capital is aware that, considering the scale of its activities and the types of products, it would be challenging to comply with that specific regime of the SFDR.

Westbeck Capital also believes that its investment strategy cannot currently support the adoption of the PAI regime, as the strategy involves underlying securities or products where it is impossible to conduct a detailed due diligence on the adverse sustainability impact.

Finally, Westbeck Capital is concerned about the current lack of readily available data to comply with the reporting requirements of the PAI Statement as companies and market data providers cannot provide consistent, reliable data. Westbeck Capital will at least on an annual basis revisit its decision not to comply with the PAI regime and reserves the right to change its position in the future.

Sustainable investment approach

Despite Westbeck Capital's decision not to comply with the PAI regime and as part of its overall commitment to ESG matters, Westbeck Capital incorporates ESG considerations during pre-investment due diligence and continues to assess sustainability credentials throughout portfolio monitoring, where practicable and applicable. This approach is aligned with the firm's objective of delivering risk- adjusted returns to investors. Westbeck Capital has established ESG policy which can be found on Westbeck Capital's website, www.westbeckcapital.com

VERSION CONTROL

DATE	CHANGES AND UPDATES
December 2022	Initial version
August 2025	Periodic review