

## **Sustainability-related disclosures pursuant to Regulation (EU) 2019/2088 ("SFDR")**

Date of publication: 10.03.2021

Date of update: 21.12.2022; [explanation of amendment(s): Compliance with the legal requirements of Commission Delegated Regulation (EU) 2022/1288]

### **I. Sustainability risks**

Yttrium GmbH ("**Yttrium**", LEI: 529900LBNKPE3UMCMK44) analyzes sustainability risks as part of its investment decision-making process. Sustainability risks are environmental, social or governance events or conditions, the occurrence of which could have an actual or potential material adverse effect on the value of the investment. Yttrium considers sustainability risks as part of its due diligence process prior to any investment. This also includes an assessment of sustainability risks. Such assessment is being conducted by using a questionnaire as appropriate in light of the circumstances. The results of such assessment are taken into account when the investment decision is being taken. However, Yttrium remains free in its decision to refrain from investing or to invest despite sustainability risks, in which case Yttrium can also apply measures to reduce or mitigate any sustainability risks. At all times, Yttrium will apply the principle of proportionality taking due account of the strategic relevance of an investment as well as its transactional context.

### **II. No consideration of adverse impacts of investment decisions on sustainability factors**

Yttrium does not consider any adverse impacts of its investment decisions on sustainability factors and, hence, does not use the sustainability indicators listed in Annex I of the Regulatory Technical Standards (Commission Delegated Regulation (EU) 2022/1288, "**RTS**") to identify and assess potential adverse impacts. Sustainability factors are environmental, social and employee concerns, respect for human rights and the fight against corruption and bribery. Given that the SFDR, the Regulation (EU) 2020/852 ("**EU Taxonomy**") and the accompanying RTS are relatively new legislative acts, there is very little or no practical experience or practice with regard to the application of their respective provisions. Therefore, substantial legal uncertainties would remain when applying those provisions to the strategies pursued by Yttrium. Moreover, most of the funds managed by Yttrium will hold minority interests in their portfolio companies. Such minority interests are, however, generally not sufficient to encourage the funds' portfolio companies to collect and provide the relevant data. If and to the extent that the legal uncertainties will be resolved and a practicable market and administrative practice will evolve in this regard, Yttrium will re-evaluate considering principal adverse impacts of its investment decisions in due course.

### **III. Remuneration disclosures**

As a registered alternative investment fund manager within the meaning of section 2 (4) of the German Investment Code (*Kapitalanlagegesetzbuch*, "**KAGB**"), Yttrium does not have and does not need to have a remuneration guideline or policy in accordance with the requirements of the KAGB.