



## **Disclosures made under Regulation (EU) 2019/2088 (“SFDR”)**

Lightyear Capital is a registered investment adviser with the US Securities and Exchange Commission and provides investment advice to private funds. Lightyear Capital considers sustainability risks and ESG factors during the investment decision making process of certain funds to which it provides investment advice in line with Lightyear’s ESG Policy, but does not prioritize such risk factors over any other investment risk factors. A description of the sustainability risks and ESG factors considered by Lightyear and a fulsome description of Lightyear’s practices related to sustainability and ESG can be found in [Lightyear’s ESG Policy](#).

Lightyear Capital does not consider the adverse impacts of its investment decisions on ESG factors within the meaning of Article 4(1)(a) of the SFDR. This is because the final investment decisions take into account a broad range of factors with the aim of achieving the optimum outcome for investors within the stated investment objectives and restrictions for each fund, and over different time horizons. The methodology for considerations of adverse impacts on ESG factors for these wide range of factors are difficult to implement at this present time.

Lightyear Capital will continue to review the above positions and any material amendment to the approach above will be updated as necessary.

*Last reviewed January 2024.*