

# BLUEGLEN

## **Blueglen Investment Partners Ltd ESG Disclosure**

In accordance with Article 6 of the Sustainable Finance Disclosure Regulations (EU) 2019/2088 (the “SFDR”), the Investment Manager, Blueglen Investment Partners Ltd (“Blueglen”), is required to disclose the extent to which sustainability risks are integrated into the investment decision making process and the anticipated impacts of those risks on the financial returns of the (i) Blueglen European Credit Fund I; nor (ii) Blueglen European Credit Fund II - 24 (the “Credit Funds”). Sustainability risks are defined in the SFDR as environmental, social or governance events (“ESG”) or conditions that, if they were to occur, could have actual or potential material negative impacts on the value of the investments of the Credit Funds.

While the regulatory environment in respect of sustainable investment in equity markets is well established and continues to grow, sustainable investment in regards to the fixed income market is much less formed. Furthermore, the information available is targeted largely as investment grade assets for large corporates or sovereigns; applying ESG to structured credit securities is much more complex. The regulatory environment in respect of sustainable investment is currently evolving and the expectations as to how an entity carrying out the same activities and offering the same types of products as Blueglen should define and evaluate ESG Factors and their adverse impacts is not yet clear. As such, there is no definitive guidance available at this time in relation to the systems, controls and measures that Blueglen would need to put in place in order to track and evaluate the adverse impacts on ESG Factors of the investments made for the Credit Funds.

Blueglen aims to ensure that sustainability risk is considered alongside all other risks and factors in investment management decisions. As a result, in relation to each of the Credit Fund’s investment objective and strategy, Blueglen does not consider the adverse impact of investment decisions on sustainability factors as it believes that focusing on the selection of investment opportunities for the Credit Funds to be a more efficient use of resources and thus in the interests of the Credit Funds’ investors.

Blueglen will keep its approach to this matter under review and may consider the adverse impact of investment decisions on sustainability factors in the future where it believes there is sufficient information made readily available by targeted investments of the Credit Funds.

Dated 17<sup>th</sup> March 2021