

Mandatory disclosures under REGULATION (EU) 2019/2088 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 November 2019 on sustainability-related disclosures in the financial services sector (“SFDR”)

INFORMATION ABOUT POLICIES ON THE INTEGRATION OF SUSTAINABILITY RISK IN INVESTMENT DECISION-MAKING PROCESSES (Article 3 disclosures)

FlyCap AIFP, SIA (hereafter “FlyCap”) considers environmental, social, and corporate governance (hereafter “ESG”) risks in our investment decision-making process. Potential sustainability risks, if they occur, could cause an actual or a potential material negative impact on the value of the investment. ESG risks evaluated throughout the due diligence and investment negotiation processes. The scope of assessment varies depending on the individual characteristics of particular investment case. FlyCap believes that sustainability factors can have both a direct and indirect impact on the return and cost structure of the fund and investments. In order to develop a strong culture that supports ESG practices at both FlyCap and our portfolio businesses, FlyCap aims to integrate sustainability considerations into our internal policies in a more thorough manner.

FlyCap follows an exclusion policy and refrains from investing in businesses engaged in activities that pose a significant risk to sustainability, such as the sale of alcoholic beverages, betting and gambling, the sale of firearms and ammunition, adult entertainment, and the production, processing, and marketing of tobacco and tobacco products, and others.

ESG considerations are seen as inputs in the investment process rather than the objective of our operations since FlyCap currently does not manage any funds that promote, among other qualities, environmental or social characteristics, or a combination of such characteristics.

STATEMENT OF NO CONSIDERATION OF ADVERSE IMPACTS OF INVESTMENT DECISIONS ON SUSTAINABILITY FACTORS (Article 4 disclosures)

FlyCap currently does not take into consideration the adverse impacts (“PAI”) of investment decisions as defined by Article 4 of the SFDR on sustainability factors as defined by Article 2 (24), due to the size, nature, and scale of FlyCap activities as well as the types of financial products FlyCap offers. Investment focus of the funds under our management is small and medium size companies (SME’s), which, considering their scale of activities, are currently not required to collect and report the data necessary to reliably assess and monitor PAI. Requirement to collect and report such data would, in most cases, be disproportionate to the size of the operations of these companies and resources available to them. FlyCap will continue to monitor the situation and will re-evaluate our approach whenever more data becomes available.

INFORMATION ON CONSISTENCY OF REMUNERATION POLICIES WITH THE INTEGRATION OF SUSTAINABILITY RISKS (Article 5 disclosures)

The structure of remuneration policies does not encourage excessive risk-taking with respect to sustainability risks.