

## **HBK Services LLC**

### **INFORMATION RELATING TO THE EU SUSTAINABLE FINANCE DISCLOSURE REGULATION (EU) 2019/2088 OF THE EUROPEAN PARLIAMENT**

#### The manner in which sustainability risks are integrated into the Investment Manager's investment decisions

In order for certain funds managed by HBK (the "HBK Funds") to remain registered for marketing in certain EEA jurisdictions under the AIFMD national private placement regimes, certain limited disclosures must be made in respect of HBK Services LLC (the "Manager") in accordance with SFDR.

A "sustainability risk" means an environmental, social or governance ("ESG") event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of an investment. While the Manager's portfolio managers and analysts may be provided with information on sustainability risks that may be taken into account when making an investment decision, a sustainability risk would not by itself prevent any of the HBK Funds from making any investment. Instead, sustainability risks are some of many risks which may or may not, depending on the specific investment opportunity, be relevant to an investment decision.

#### The assessment of adverse sustainability impacts

The SFDR requires the Manager to disclose whether, and if so how, it considers the principal adverse impacts of its investment decisions on sustainability factors, in accordance with a specific regime outlined in SFDR. The Manager does not consider the principal adverse impacts of its investment decisions on sustainability factors either generally or in relation to the HBK Funds, as the investment objective and approach of the HBK Funds does not provide that such impacts be taken into account.

No HBK Fund has as its objective sustainable investment, nor does any HBK Fund promote environmental or social characteristics for the purposes of the SFDR. The HBK Funds are therefore not subject to the additional disclosure requirements for financial products referred to in Article 8 or Article 9 SFDR. For the same reason, the HBK Funds are not subject to the requirements of the EU Regulation on the establishment of a framework to facilitate sustainable investment, and the HBK Funds do not take into account the EU criteria for environmentally sustainable economic activities.

#### Incorporating sustainability risks in employee remuneration

The Manager carries out an assessment of an individual's performance, when assessing and determining variable remuneration. This assessment is based on both quantitative criteria (for example, financial performance of the individual and their business unit) and qualitative criteria (for example, holistic assessment of general adherence to the Manager's policies and procedures). No particular assessment of adherence to policies related to sustainability risks is required or likely to occur.