

Sustainable Finance Disclosures Regulation Details

Variety Capital ICAV

KBA Consulting Management Limited (“KBA”), in its capacity as UCITS Manager to the Variety Capital ICAV (the “Fund”) and the Variety CKC Credit Opportunity Fund (the “Sub-Fund”) has appointed CKC Capital LLC (the “Investment Manager”) as its delegate. As part of this delegation arrangement, the Investment Manager has responsibility for the consideration and management of sustainability factors and sustainability risks as part of their investment decision making process.

No Consideration of Adverse Impacts on Sustainability Factors

Taking due account the nature and scale of its activities, the Investment Manager does not currently consider the principal adverse impacts of investment decisions of the Sub-Fund on sustainability factors (in the manner specifically contemplated by Article 4(1)(a) of 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”). The Investment Manager considers this an appropriate and proportionate approach to compliance with its obligations under SFDR.

Sustainability Risk Policy and Sustainability Related Disclosures

Sustainability Risk Policy Summary

The Fund is a mainstream product for the purposes of the SFDR, meaning it does not have sustainability as an investment objective, nor does it seek to promote environmental or social characteristics. Accordingly, and in light of the actual investment policy of the Sub-Fund, sustainability risks are not taken into account in formulating investment decisions or integrated into the investment process as they are not deemed relevant for Sub-Fund by the Investment Manager at this time.