

## JTC Global AIFM Solutions Limited (the “Company”)

### Statement Made in Compliance with Regulation (EU) 2019/2088 of the European Parliament and of the Council on Sustainability-Related Disclosures in the Financial Services Sector (the “SFDR”)

This statement is made in compliance with the SFDR and summarises the Company’s policies on environmental, social and governance (“ESG”) issues and Sustainability Risks and Sustainability Factors (as defined below), as well as its portfolio management and risk management policies and its remuneration policy. This statement was approved by the Board of directors on 1 October, 2021.

In this statement:

“**Sustainability Risk**” means an environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of an investment.

“**Sustainability Factors**” mean environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

#### ESG Policy

As a member of the JTC group of Companies, the Company’s ultimate beneficial owner and controlling party is JTC Plc, a Jersey-incorporated company whose shares have been admitted to the Official List of the UK’s Financial Conduct Authority and to trading on the London Stock Exchange’s Main Market for Listed Securities (mnemonic JTC LN, LEI 213800DVUG4KLF2ASK33). In the conduct of its own affairs, the Company is committed to best practice in relation to ESG matters and has therefore adopted JTC Plc’s ESG framework (the “**ESG Framework**”) and a copy of the ESG Framework can be viewed on the Company’s website at <https://www.jtcgroup.com/wp-content/themes/jtcgroup/dist/img/review-2019/pdfs/esg.pdf>.

#### Portfolio Management and Risk Management Policies

From the perspective of the SFDR, the Company does not manage any financial products domiciled in the European Union (the “**EU**”). However, the Company does manage a financial product which is marketed into the EU, Supermarket Income REIT Plc (“**SUPR**”), a UK-incorporated alternative investment fund, which the Company has classified as being within the scope of Article 6 of the SFDR. The Company does not manage any financial products marketed into the EU which would be within the scope of Articles 8 or 9 of the SFDR.

The Company and Atrato Capital Limited (“**Atrato**”) as SUPR’s alternative investment fund manager and investment advisor respectively do consider ESG matters in their respective capacities. The Company, Atrato and SUPR continually seek to enhance their collective approach to ESG matters and detailed reporting on (a) each party’s policies, procedures and operational practices and (b) our collective future intentions and aspirations is included in SUPR’s prospectus dated , a copy of which can be found at <https://www.jtcgroup.com/wp-content/uploads/2021/01/2021-10-01-PROSPECTUS.pdf>.

The Company also has a comprehensive risk matrix (the “**Matrix**”), which is used to identify, monitor and manage material risks to which SUPR is exposed, including ESG and Sustainability Risks.

For each of the other financial products managed by the Company which are not marketed into the EU, the Company manages those financial products in accordance with their own investment objectives and policies, as explained in their own offering documents, having regard always to the Company’s own investment philosophy and the ESG

Framework described above. The Company also utilises risk matrices to identify, monitor and manage the risks to which those financial products are exposed.

The level of detail of any review of Sustainability Risks depends on the size, nature and scale of the activities of each financial product and their own ESG policies.

As of the date of this policy, the Company is intending to become a signatory of the U.N. Principles for responsible investment, which define responsible investment as “a strategy and practice to incorporate environmental, social and governance factors in investment decisions and active ownership.” This policy will be updated once the Company has become a signatory.

The Company also notes the announcement published by H.M. Treasury in the UK of its intention to make mandatory by 2025 disclosures aligned with the recommendations of the Task Force on Climate-Related Disclosures, with a significant proportion of disclosures mandatory by 2023. The Company also notes the roadmap and interim report of the UK’s Joint Government-Regulator TCFD Taskforce published by H.M. Treasury on 9 November, 2020. The Company continues to monitor developments and intends to comply with the UK’s regime to the extent either mandatory or desirable as a matter of best practice.

### **Remuneration Policy**

The Company has four directors, Gregory Kok, Graham Taylor, Matthew Paul Tostevin and James Bernard Tracey. Messrs Kok, Taylor and Tracey are full time employees of companies within the JTC group of companies, so have waived their entitlement to separate remuneration from the Company. Mr Tostevin is a non-executive director, so he is paid a fixed fee of £10,000 per annum for acting as a director, attendance at all Board meetings and work performed as a director of the Company in the ordinary course of business. Subject to the prior approval of the Board of directors on each occasion, Mr Tostevin is paid additional remuneration on a time spent basis for services rendered to the Company which are not in the ordinary course of business.

Because the directors’ remuneration is not linked to investment performance, the directors are not encouraged to take excessive risks, including in relation to Sustainability Factors.

Other than the directors, the Company has no employees.