Trium Alternative Growth Fund SFDR Article 6 Disclosure

The management of sustainability risk forms a part of the due diligence process implemented by the Investment Manager.

When assessing the sustainability risk associated with underlying investments, the Investment Manager is assessing the risk that the value of such underlying investments could be materially negatively impacted by an environmental, social or governance event or condition ("**Sustainability Risk**").

Using both quantitative and qualitative processes (see the 'Investment Selection' process outlined above), sustainability risk is identified, monitored and managed by the Investment Manager in the following manner:

- Prior to acquiring investments on behalf of the Fund, the Investment Manager uses ESG metrics of third party ESG data providers ("**ESG Data Providers**"), including Bloomberg, MSCI ESG and ISS in order to screen the relevant investment against sustainability risk and to identify whether it is vulnerable to such risk. This process incorporates applying an exclusion policy whereby potential investments (namely, investments in the defense/munitions industry) are removed from the investment universe on the basis that they pose too great a sustainability risk to the Fund and positive screening whereby those investments which have a low sustainability risk rating as well as strong financial performance are included in the investment universe.

  Analysis of sustainability risk on a derivative holding or financial index holding is performed on a look-through basis, by assessing the underlying security of the derivative or constituents of the financial index. When the underlying security is a transferable security (equity, bond etc), then the issuer of the underlying security is examined in the same manner as for direct (non-derivative) holdings (as outlined in the 'Investment Selection' section above). In the case of a financial index of transferable securities or a reference to such basket of financial indices (an equity index total return swap, for example), a look-through approach is followed based on the constituent securities and not on the issuer of the financial index. In cases where no tangible transferable security can be established as the underlying security (e.g. an interest rate swap), the sustainability risk of the derivative in question is not assessed.

  For financial indices or baskets of financial indices with a large number of constituents and no specific industry theme (e.g. S&P500) the sustainability risk of the constituent securities is not assessed. However, for financial indices or baskets of financial indices with a small number of constituents and a specific industry theme, the sustainability risk of the constituent securities is assessed (in a manner as outlined above). If these are found to comprise of a high concentration of issuers or assets which are deemed to have a high sustainability risk (in accordance with the process outlined above), then these shall be removed from the Fund's investment universe. The concentration assessment of indices is performed pro-rata, based on either the weights assigned to the constituents, or (in their absence), based on the market value of the constituents. Financial indices/baskets of financial indices with a lower concentration of issuers or assets which are deemed to have a high sustainability risk may also be excluded from the Fund's investment universe if deemed appropriate by the Investment Manager. Concentration analysis is performed on an annual basis, when material changes to indices are identified, or at the pre-investment phase for baskets/indices that have never been assessed.

  The assessment of the ESG eligibility or ESG related credentials for financial indices comprising commodity futures will be assessed on environmental criteria only as the constituents of such indices, (e.g. commodity futures) have no issuer and are not subject to social or governance concerns.

- During the life of the investment, sustainability risk is monitored through review of ESG data published by the issuer (where relevant) or the ESG Data Providers to determine whether the level of sustainability risk has changed since the initial assessment has been conducted. This review is conducted on a monthly basis. Where the sustainability risk associated with a particular investment has increased beyond the ESG risk appetite for the relevant Fund, the Investment Manager will consider selling or reducing the Fund's exposure to the relevant investment, taking into account the best interests of the Shareholders of the Fund.

The Investment Manager has determined that the Sustainability Risk faced by the Fund is low.

Further information on the manner in which sustainability risks are integrated into the investment-decision making process by the Investment Manager is available on https://trium-capital.com.