

# General disclosure obligations at manager level

Articles 3-5 SFDR

Seaya Capital Gestión, S.G.E.I.C, S.A.

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Seaya Capital Gestión, S.G.E.I.C, S.A., (hereinafter, "Seaya Capital" or "Seaya") is subject to Regulation (EU) 2019/2088 on sustainability disclosures in the financial services sector, (hereinafter the "Regulation").

a) **Article 3**

Seaya Capital integrates sustainability risks into its investment decisions and in compliance with its transparency obligations towards its investors and other stakeholders, the detail on the policy of integrating these risks required by article 3 of the Regulation is described in its **Responsible Investment Policy**.

b) **Article 4**

Seaya Capital **considers the principal adverse impacts** (PAIs) on the sustainability factors of its investment decisions within the meaning of article 4.1. of the Regulation. These are identified during the due diligence phase and are actively managed throughout the investment period by defining and implementing actions that contribute to their reduction. Their evolution is measured through the annual calculation of 16 indicators set out in the Technical Development (RTS) of the Disclosure Regulation.

c) **Article 5**

Seaya Capital's **Remuneration Policy** includes information on how this policy is consistent with the integration of sustainability risks, as established in article 5 of the Regulation.