CITADEL | Securities

CITADEL SECURITIES GCS (IRELAND) LIMITED WEBSITE DISCLOSURES PURSUANT TO ARTICLES 3, 4 AND 5 OF THE EU SUSTAINABLE FINANCE DISCLOSURE REGULATION (2019/2088)

Sustainability-related disclosures

Citadel Securities GCS (Ireland) Limited ("CSGI") is authorised and regulated by the Central Bank of Ireland as an investment firm under the Markets in Financial Instruments II Directive (Directive 2014/65/EU). As CSGI provides portfolio management services, as defined in Article 4(1)(8), to one or more clients, CSGI is required by the Sustainable Finance Disclosure Regulation (Regulation 2019/2088) (the "SFDR") to make certain disclosures regarding its policies on integrating sustainability risks into its investment decisions and related matters on its website.

No consideration of sustainability adverse impacts

CSGI does not currently consider adverse impacts of investment decisions on sustainability factors as the portfolios managed by CSGI are not designed to have a specific environmental, social or governance ("ESG") focus. CSGI's primary focus is in European and/or EMEA-based investment instruments that are listed, traded or arranged primarily in the EU and EMEA region. In the pursuit of the objectives of its clients' portfolios CSGI does not take into account ESG impacts in managing these portfolios.

Policies on the integration of sustainability risks in the investment decision-making process

CSGI has authority under the relevant portfolio management agreements with its clients to undertake trading in a variety of instruments, with a primary focus on listed equities, exchange traded options products, and index futures. CSGI notes that all forms of investment it may undertake for its clients' portfolio involve risk. Sustainability risks can be relevant to a variety of sectors and can directly impact equity values and indirectly impact index futures, and associated market parameters. CSGI may, if deemed appropriate by the relevant investment professional, consider the potential impact of sustainability factors on the prospective financial performance of a proposed investment.

Consistency of remuneration policies

CSGI's remuneration policies are consistent with its approach to the integration of risks into the investment decision making process. Given that sustainability risks are a type of financial risk, CSGI acknowledges that failure to consider such risks could have an adverse impact on the performance of the portfolios managed by CSGI. To the extent that sustainability risks have an adverse impact on the performance of clients' portfolios, this may be reflected in the overall level of variable remuneration awarded to staff.

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