matter
Real Estate

SFDR DISCLOSURE

Integration of Sustainability Risk in the Investment Decision-Making Process

“Sustainability risk” is defined in the EU’s Sustainable Finance Disclosure Regulation (2019/2088) (“SFDR”) as an environmental, social or governance event or condition which, if it occurs, could cause an actual or potential material negative impact on the value of an investment. Ruby Senior Living GP S.à r.l. (“Ruby”) has integrated sustainability risks into its investment decision-making process, and take these into account as part of their investment decision alongside Ruby’s wider policies and procedures on responsible investing. Sustainability risk forms part of Ruby’s overall risk management processes, and is one of many risks which may, depending on the specific investment opportunity, be relevant to Ruby’s determination of risk. The investments underlying Ruby’s financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Examples of certain sustainability risks which are potentially likely to cause a material negative impact on the value of an investment, should those risks occur, are as follows:

- environmental: climate change, carbon emissions, air pollution, rising sea levels, coastal flooding or wildfires;

- social: human rights violations, human trafficking, child labour or gender discrimination; and

- governance: lack of diversity at board or governing body level, health and safety concerns for the workforce or poor safeguards on personal data or IT security, and infringement or curtailment of rights of shareholders.

The likely impacts of a sustainability risk may be numerous and vary depending on the specific risk. To the extent that a sustainability risk materialises, or materialises in a manner that is not anticipated by Ruby, there may be a material negative impact on the value of an investment. Further information on the manner in which sustainability risks are integrated into investment decisions, including any relevant policies, is available to investors upon request.

Principal Adverse Impacts

Ruby adheres to the objectives set out in Regulation (EU) 2019/2088 with regard to principal adverse impacts but has chosen not to commit to comply for the time being. The main reason for not considering adverse impacts is the lack of sufficient data and data of sufficient quality to enable Ruby to define material metrics for disclosure. We intend to monitor the industry position closely and to review our approach on an annual basis, as the industry position evolves and further regulatory guidance is made available.

Notwithstanding our decision not to comply with the principal adverse impact regime, Ruby wishes to re-affirm its overall commitment to ESG matters. We summarise in the ESG Policy which can be found on Matter Real Estate's website the ESG-related initiatives and policies adopted by the firm. For the avoidance of doubt, none of the following information is intended to suggest that the Firm complies with the principal adverse impact regime.