

Systematica Investments UK LLP
TCFD-aligned entity report

For calendar year 2025
Published June 2026

1. Introduction and purpose

- 1.1 Systematica Investments UK LLP ("**SIUK LLP**" or the "**Firm**") is a MiFID investment firm regulated by the Financial Conduct Authority (FCA). SIUK LLP forms part of the Systematica group of entities (the "**Systematica Group**" or "**Systematica**"), a technology-driven manager focused on a quantitative and systematic investment approach. Systematica Investments Limited (acting in its capacity as general partner of Systematica Investments LP (the "**Investment Manager**") is appointed to act as investment manager for various fund clients (the "**Funds**") and managed account clients (the "**Managed Accounts**") (together, the "**Clients**"). SIUK LLP is appointed as a sub-investment manager to provide execution services for the Funds and/or to provide other related services in the Investment Manager's place, as an agent of the Funds.
- 1.2 Systematica has a deep interest in incorporating responsible investment considerations into its investment decision-making processes and recognizes that this is key for creating long-term value for all stakeholders. Since 2019, our CEO, Leda Braga, has served on the Board of Trustees of the Standards Board of Alternative Investments (SBAI), engaging in the development and promotion of standards that uphold good governance, transparency, integrity and responsible ownership in the alternative investment industry. Systematica further demonstrates its commitment to responsible investment by sharing expertise and engaging with peers, industry bodies, policymakers, and the broader market through collaborative platforms and public consultations. Systematica Investments became a signatory of the United Nations Principles for Responsible Investment ("UN PRI") in 2017 and incorporates certain Environmental, Social and Governance (ESG) guidelines into its investment analysis and decision-making processes. Systematica Investments has also registered with the Carbon Disclosure Project (CDP).
- 1.3 As a scientific, data-driven company Systematica has chosen to use internal resources to explore the best methods in applying responsible investing throughout our systems and operations. It is anticipated that SIUK LLP's approach to TCFD entity reporting will evolve over time as data and methodologies develop further and the industry's approach to TCFD reporting matures.
- 1.4 The recommendations developed by the TCFD are structured around four thematic areas and are applicable to organizations across sectors and geographies.

TCFD Themes	Recommended Disclosures
Governance Disclose the organization's governance around climate-related risks and opportunities.	a. Describe the board's oversight of climate-related risks and opportunities. b. Describe management's role in assessing and managing climate-related risks and opportunities.
Strategy Disclose the actual and potential impacts of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning where such information is material.	a. Describe the climate-related risks and opportunities the organization has identified over the short, medium, and long term. b. Describe the impact of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning. c. Describe the resilience of the organization's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.
Risk Management	a. Describe the organization's processes for identifying and assessing climate-related risks.

Disclose how the organization identifies, assesses, and manages climate-related risks.	b. Describe the organization's processes for managing climate-related risks. c. Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organization's overall risk management.
Metric and Targets Disclose the metrics and targets used to assess and manage relevant climate-related risks and opportunities where such information is material.	a. Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process. b. Disclose Scope 1, Scope 2 and, if appropriate, Scope 3 greenhouse gas (GHG) emissions and the related risks. c. Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets.

- 1.5 Using the recommendations provided by the TCFD, this report describes our approach as a firm to governance, strategy, and risk management with respect to certain climate-related considerations.
- 1.6 The disclosures contained in SIUK LLP's TCFD entity report comply with the requirements of the FCA's Environmental, Social and Governance Sourcebook. As per the requirements set out in Chapters 1 and 2 of the ESG Sourcebook, the disclosures contained in this report relate to assets managed in connection with SIUK LLP's TCFD in-scope business, which is limited to the provision of managing investment on behalf of clients.

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Position: Director of Systematica Investments UK LLP

Date: 10 July 2026

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Position: Director of Systematica Investments Limited (acting in its capacity as general partner to Systematica Investments LP)

Date: 11 July 2026

2. Our governance

- 2.1 Systematica's management along with its Executive Committees (the "Management Board") are empowered to set the firm's strategy, objectives and overall direction. The Management Board has ultimate oversight of risks and opportunities relevant to the Investment Manager and the portfolios it manages on behalf of Clients, including those arising from climate-related considerations.
- 2.2 Systematica's management considers sustainable development and the firm maintains reporting mechanisms that seek to ensure relevant issues, including climate-related risks and opportunities are escalated to the Management Board, as required. Throughout the year and typically on a monthly basis, the Management Board receives updates and reports from specific business areas, including the firm's Investment Team, Research team, Risk team and Legal and Compliance team as part of the firm's periodic management reporting process.
- 2.3 Such updates and reports cover a range of topics and may include identification of relevant investment risks and opportunities, the firm's policies, regulatory compliance, business planning and relevant ESG initiatives and developments. Systematica's efforts on ESG considerations at a group level outside of the investment process are outlined in the Corporate Social Responsibility Policy.
- 2.4 Gregoire Dooms is Head of Sustainability at Systematica. The implementation and ongoing oversight of Systematica's Responsible Investment Policy are supported by multiple teams and committees across the organisation, including the legal and compliance team and the Investment Committee. In this regard, Systematica's ESG Working Group, with members drawn from the investment, client services and legal and compliance teams, meets on a fortnightly basis to examine current ESG themes, discuss the integration of ESG principles in our existing products as well as examine upcoming ESG/sustainability regulation and collaboration opportunities.
- 2.5 The Investment Manager manages portfolios using a systematic trading strategy, employing specific parameters within the trading models. These parameters seek to assess underlying companies based on various factors which may influence the investment decisions generated by the trading models. The trading models consider a range of factors which may include inputs relating to climate-related risks and opportunities, where relevant. The Management Board ultimately oversees the components of the systematic investment strategies. This process reflects our approach to assessing and seeking to mitigate investment risks for the portfolios we manage and in identifying potential opportunities, where relevant.

3. Our strategy

- 3.1 Systematica recognises the importance of being a responsible and sustainable company. Accordingly, we have put in place several policies, including the Systematica Travel Policy and Systematica Corporate Social Responsibility Policy, that aim to reduce our carbon footprint and minimize our waste over time. These policies will also be rolled out across our supply chain.

- 3.2 Climate-related risks associated with the underlying investments to which our client portfolios have exposure represent a source of climate-related risk to the long-term success of the firm and its clients.
- 3.3 The identification and assessment of such risks in respect of portfolios is underpinned by parameters in the systematic trading models. The systematic trading models employ a process-based approach to investing, underpinned by research and development of hypotheses about market dynamics. Having undergone testing, such hypotheses are implemented into the proprietary automated models executing the investment strategy of certain mandates by generating investment decisions based on market data. Systematica is committed to seeking to integrate sustainability risks across relevant asset classes and strategies to the extent that it is possible to do so.
- 3.4 The Investment Manager recognises that certain asset classes present a more effective opportunity than others to implement ESG considerations and, accordingly, seek to integrate sustainability risk in the investment process in a manner appropriate to the asset class. “Sustainability risk” means ESG events or conditions which, were they to occur, could have a material negative impact on the value of the investments of certain Funds, and hence, the net asset value of such Funds.
- 3.5 We believe that consideration of sustainability risks as part of the investment process may be a necessary aspect of evaluating the risks associated with a particular asset class or strategy. To the extent applicable, such risks are integrated in the overall risk and performance monitoring process and considered as part of the broader investment process. For asset classes where ESG considerations are at an earlier stage of development, we continue to evaluate effective ways to integrate sustainability risk in the investment decision making process. With respect to strategies and asset classes where ESG considerations are more developed, sustainability parameters are included as one set of parameters (among others) integrated into the systematic trading models employed by the relevant Funds. Where appropriate, we use external and proprietary tools and data-providers to identify sustainability risks (and sustainability performance) potentially relevant to the investments that may be generated by the systematic trading models. The results of our identification of sustainability risks and sustainability performance of investee companies is integrated into the relevant trading models as appropriate.

4. Climate Risk and Opportunities Assessment

- 4.1 Systematica continues to monitor and adapt to prevailing market conditions and risks; as a result, we may from time to time refine or modify our approach with respect to the integration of sustainability risks in response to such conditions and risks.
- 4.2 Transition risks arise from the shift to a lower-carbon economy and may include policy, legal, technology, market, and reputational risks. For Systematica, these risks may impact portfolio valuations, investment performance, client demand, and regulatory compliance requirements.
- 4.3 Physical risks arise from the direct impacts of climate change and may be acute (e.g. extreme weather events) or chronic (e.g. long-term climate pattern changes). These risks may affect the operations, supply chains, and financial performance of portfolio companies, potentially impacting asset values and investment returns.

4.4 Depending on the sector and geography, these climate-related risks vary across different time horizons and may have different impacts. We consider the most material risks categorised as per TCFD guidance over the time horizons below, principally reflecting the investment horizon of our mandates:

- (a) One year or less: short term
- (b) Two years to five years: medium term
- (c) Over five years: long term.

Risk/ Opportunity	Description		Resulting impact on the firm as an investment manager and on underlying investments		
		Time Frame	Impact	Controls	Rating
Risk: Reputation (transitional)	Risk of perception of not having responded adequately to climate-related challenges.	Short, medium, long term	Perceived lack of actions or inappropriate actions by SI UK LLP in relation to peers on climate-related matters could adversely affect client and employee relationships. This could lead to decreased AUM and revenues, and higher staff turnover.	SI UK LLP maintain transparent ESG/climate reporting aligned to the TCFD framework and UNPRI Reporting and continue to communicate progress on ESG factors to clients.	Medium
Risk: Legal and policy (transitional)	Changes to current/emerging climate-related legal and regulatory regimes.	Medium to long term	Increased compliance costs or disruption to existing operations could occur due to new or diverging regulations or disclosure requirements.	Compliance and the ESG working group monitor climate-related regulatory and disclosure developments across relevant jurisdictions on an ongoing basis. Compliance conducts a periodic review of the Firm's internal policies, procedures and reporting frameworks. Any material regulatory or legal changes are reported to the ESG Working Group and where appropriate escalated to the Executive Committee.	Low
Risk: Product (transitional)	Risk that climate-related considerations impact customer demand for products and services.	Medium to long term	Increased client preference for ESG-aligned products could be detrimental to wider firm business, leading to increased costs for developing new solutions or decreased revenues as a result of withdrawals.	Systematica maintains communications with clients around ESG preferences and requirements and takes this into account at a product level. Systematica UCITS Fund ICAV and Systematica Liquid Multi Strategy Fund Limited are SFDR Article 8 Funds and therefore are managed in line with their specified ESG characteristics.	Medium
Risk: Technology Transition (transitional)	AI and cloud computing backlash threatens our quantitative strategy.	Short, medium, long term	A backlash against cloud computing and AI threatens our quantitative investment strategy as carbon emissions associated with these areas become more of a focus and investors seek lower carbon alternatives.	As use of AI and Cloud computing becomes more common across the financial services industry, the firm will continue to follow industry practices and consider the impacts of this.	Low
Risk: Investment (transitional)	Risk that climate-related considerations negatively impact valuations of investments.	Medium to long term	If returns were affected, this could lead to the withdrawal of client funds. This would decrease revenues and impact firm profitability.	Climate risk screening is embedded into some investment processes and systematic trading software. The Executive Committee and Fund boards receive reporting on valuation exposures across the portfolio.	Medium

Risk/ Opportunity	Description		Resulting impact on the firm as an investment manager and on underlying investments		
		Time Frame	Impact	Controls	Rating
Risk: Physical, (chronic and acute)	Risk to operations or supply chain due to extreme weather and/or rising temperatures.	Long term	Increasing frequency or intensity of extreme weather events could result in increased insurance costs, or the unavailability of required insurance. These events could also disrupt business operations and employees' lives.	Risks to operations are monitored through BCP process and overseen by the Operations and IT teams. Costing of operations and within the supply chain are monitored by the Finance team. Insurance policies are in place and are reviewed on a periodic basis.	Low
Opportunity: Investment	Increased demand for investment products that align with clients' sustainable investment objectives, such as ESG- aligned funds.	Medium to long term	Increasing demand for ESG- and Climate-focused products could allow Systematica to increase AUM and revenues, leading to growth.	Systematica maintains communications with clients around ESG preferences and requirements and takes this into account at a product level. Systematica SLM UCITS Funds (UCITS & Cayman) is an SFDR Article 8 Fund, and therefore is managed in line with its specified ESG characteristics.	Medium

Resilience of our strategy against climate scenarios

The transitional and physical risks of climate change are wide reaching and impact most regions, sectors and underlying companies. Systematica is a professional services company and as such is affected to a lesser extent than other industry sectors (for example, heavy industry).

Systematica seeks to develop a forward-looking, quantitative assessment of the possible implications of these risks and opportunities on investments.

5. Our Approach to Climate Risk Management

- 5.1 A key characteristic of Systematica's philosophy is a focus on robust risk management, centered on diversification, capital preservation and downside protection. Systematica has developed detailed policies that are implemented across the business. This framework ensures risk control coverage as the top-down and bottom-up controls are driven simultaneously by both senior business heads and product managers respectively.
- 5.2 The research and investment teams are evaluating multiple vendors of ESG raw and derived data, with a goal to formalise a systematic approach to the task of identifying best in class and worst offenders per industry. The focus is on selecting a small set of material measures in each industry and ranking each company on its level and improvements along these dimensions.
- 5.3 Systematica uses data from SASB, Bloomberg and Asset4 in its sector neutral PAI-based ESG integration model. Systematica also uses data from sell-side research, index membership and non-profit organizations in its thematic ESG strategy.
- 5.4 The Clients managed by the Investment Manager where appropriate will seek to invest via derivatives and do not hold any voting rights in relation to our investments.

6. Metrics and targets

Metrics used to assess climate-related risks and opportunities

- 6.1 Systematica reports ESG activities annually to the UN PRI. Our PRI assessment scores are used to measure progress. Systematica also measures progress through the total risk in active ESG tilts in the portfolios as well as through simulation of the TCFD total carbon in the portfolios with and without ESG integration.
- 6.2 The impact of integration of these ESG considerations on the portfolio holdings of our liquid multi-strategy funds is material with an annualised risk contribution of around 0.7% of AUM and "ESG-active" positions that go up to over 1% of AUM. Finally, it reduces the Total Carbon Emissions of the portfolio (according to the TCFD definition) from around 62,000 tonnes to -700 tonnes on average (computed-based on Asset 4 disclosed Scope 1+2 CO2 emissions, average reduction computed over a 20 year back test). In that simulation, the Total Carbon Emissions of the portfolio was reduced on 98% of the days when compared to a simulation without ESG integration.

- 6.3 As discussed above, Systematica has put in place the Corporate Social Responsibility Policy that aims to reduce our carbon footprint and minimize our waste over time. Our aim is to reduce our environmental impact and carbon emissions through improvements to energy efficiency in our business operations, reduce our business air travel by utilizing virtual meeting technologies, increase recycling and reduce the waste sent to landfill.
- 6.4 Systematica is currently focused on gathering and base-lining our environmental data and developing our measurement methodologies, before reflecting on the output and setting new targets to help deliver our commitment to sustainable investments and business operations.

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