



PALISTAR

PALISTAR CAPITAL LP

ENTITY LEVEL WEBSITE DISCLOSURES

February 2024

600 5TH AVENUE, 27TH FLOOR
NEW YORK, NY 10020

CONFIDENTIAL

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I. PURPOSE

Regulation 2019/2088 on sustainability-related disclosures in the financial services sector dated 27 November 2019 (the “SFDR”).

For the purposes of the SFDR, a sustainability risk is an environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of the investment.

II. TRANSPARENCY OF SUSTAINABILITY RISK POLICIES (ARTICLE 3, SFDR)

Palistar Capital LP (“Palistar”) seeks to integrate environmental, social and governance (“ESG”) considerations into its investment management processes, operations, and those of its portfolio companies, where appropriate, and consistent with and subject to any applicable legal, regulatory, fiduciary, or contractual duties and in accordance with its Responsible Investing policy.

Palistar believes the consideration of material ESG factors and the interests of relevant stakeholders may help identify and manage ESG risks and maximize long-term financial value for the Fund’s investors and portfolio companies. As responsible stewards of capital, Palistar seeks prudent identification, evaluation, and management of material ESG risks and value creation opportunities to support its ability to deliver stable and lasting returns for its investors and help contribute to the fulfillment of Palistar’s fiduciary duty.

Palistar is committed to integrate ESG considerations across its investment process, and to promote the management of ESG within its investments and portfolio companies, as appropriate. Palistar generally considers ESG and business integrity factors affecting its portfolio companies and other investments, both pre-investment during the course of due diligence, and post-investment as part of its monitoring procedures, as commercially practicable and where consistent with its fiduciary responsibilities.

III. NO CONSIDERATION OF ADVERSE IMPACTS OF INVESTMENT DECISIONS ON SUSTAINABILITY FACTORS (ARTICLE 4, SFDR)

Palistar does not consider adverse impacts of investment decisions on sustainability factors as specifically set out in the SFDR.

Palistar has chosen not to do so for the present time, since Palistar considers its existing due diligence processes and ESG framework to be appropriate and proportional to the investment strategies of its funds. Palistar continues to monitor regulatory developments with respect to the SFDR and other applicable ESG-focused laws and regulations, including the implementation of related and secondary legislation and regulatory guidance and will, where required or otherwise appropriate, make changes to existing policies and procedures.

This statement takes due account of Palistar’s size, the nature and scale of its activities and the types of financial products it makes available.

IV. REMUNERATION POLICY (ARTICLE 5, SFDR)

Palistar adheres to the fair treatment of its employees, including with respect to remuneration. Palistar has identified a set of key sustainability risks, which reflect the environmental, social and governance aspects relevant to Palistar. Palistar's structure of remuneration does not encourage excessive risk taking with respect to direct or indirect sustainability risks.

V. PRODUCT-SPECIFIC SUSTAINABILITY DISCLOSURES

Product-specific sustainability disclosures are available on the investor portal for relevant funds.
Responsible investment governance:

Important notice: These disclosures are made by Palistar only in its capacity as the delegated portfolio manager of Palistar Communications Infrastructure Offshore Fund II, SCSp and Palistar Digital Infrastructure Fund III, SCSp and not in any other capacity or in respect of any other financial products.