

Clearlake Luxembourg – Explanation of non-compliance with SFDR’s PAI Regime

No consideration of adverse impacts of investments decisions on sustainability factors, and no consideration of adverse impacts of investment advice on sustainability factors.

This document sets out disclosures by MV Credit S.à.r.l. (“Clearlake Lux”) in respect of the principal adverse impacts of our investment decisions and investment advice on sustainability factors.

The EU Sustainable Finance Disclosure Regulation (“SFDR”) requires Clearlake Lux to make a “comply or explain” decision whether to consider the principal adverse impacts (“PAIs”) of investment decisions on sustainability factors in its investment advice or its investment decision-making processes, in accordance with a specific regime as outlined in SFDR. Clearlake Lux has decided not to consider the PAIs of investment decisions and investment advice on sustainability factors within the meaning of Article 4(1)(a) (the “PAI Regime”). Clearlake Lux is therefore required to publish and maintain on its website a statement to explain its reasons for not complying with the PAI Regime, and information as to whether and when Clearlake Lux intends to comply with the PAI Regime.

Taking account of the nature and scale of Clearlake Lux’s activities and types of products Clearlake Lux makes available, Clearlake Lux considers that it would be disproportionate to comply with the PAI Regime.

Clearlake Lux will keep its decision not to comply with the PAI Regime under regular review, and will formally re-evaluate the decision from time to time.

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