SFDR Statement

Frontclear Management B.V. (the "Manager") is the fund manager of the Frontier Clearing Funds (the "FCF"), funds for joint account that invest in notes issued by Frontier Clearing Corporation B.V. ("FCC"). The Manager, the FCF and FCC are together referred to as Frontclear.

The Manager is registered as an exempted Alternative Investment Fund (AIF) Manager with the Dutch Authority for the Financial Markets (*Autoriteit Financiële Markten*, AFM). The mandate of the FCF is limited to investments in the notes issued by FCC only. These investments are mandatory. Therefore, sustainability risks are not a relevant consideration in the investment decision. The remuneration of the Manager for its management of the FCF, nor the remuneration of staff in relation to the management of the FCF, is dependent on the integration of sustainability risks in the investment decisions.

FCC does include sustainability risks in its investment decisions. FCC provides guarantees on interbank transactions and intermediates access to funding for financial institutions based in emerging markets and developing countries. FCC assesses environmental and social risks as part of customer due diligence and excludes counterparties that run significant sustainability risks in their loan and investment portfolios, without having an adequate environmental and social management system. FCC furthermore does not accept counterparties performing activities captured on the **Harmonized EDFI Exclusion List.** FCC does not qualify as an AIF and therefore falls outside the scope of SFDR.

