

Website Product Disclosures in line with Article 10 of the Regulation (EU) 2019/2088 of 27 November 2019 on sustainability related disclosures in the financial sector (“SFDR”) for financial products that have sustainable investments as their objective

DWM Income Funds S.C.A SICAV SIF (the “Company”)

With respect to The Trill Impact DWM SDGs Credit Fund (the “Fund”)

I. Summary

The Fund has a sustainable investment objective under Article 9 SFDR.

This disclosure is prepared by DWM Asset Management, LLC, the investment manager for the Fund (“DWM”) and sets out the Fund’s approach to sustainable investing (also referred to as “impact investing”) and the ways in which the sustainable investment objective of the Fund is achieved.

This includes:

- A summary of the social sustainable objective of the Fund, which is to align with, and make positive contributions to, the Sustainable Development Goals (the “SDGs”);
- The use of DWM Impact IQ containing over 75 metrics covering various dimensions of impact as a measurement tool;
- Confirmation that all assets, excluding cash and liquidity products, are managed in line with the sustainable investment objective of the Fund;
- The consideration of specific principal adverse impacts indicators, to measure and achieve the sustainable investment objective;
- An explanation of the how the Fund assesses sustainability risks, factors and opportunities and monitors the impacts of its underlying investments;
- The monitoring process for collecting data relevant to the principal adverse impact indicators, related to exposure to carbon-intensive sectors, presence of ESG policies to ensure that risks related to environmental harm and violation of human rights are avoided, gender pay gap, gender diversity in the board, management, and staff;
- The key industry aligned methodologies that are used; and
- The process for identifying data quality issues and the mitigation mechanisms in place for ensuring this does not impact the Fund adversely.

II. No significant harm to the sustainable objective

The Fund makes debt investments in inclusive financial institutions and other companies that create positive social and environmental impact. DWM’s ESG policy excludes investments in harmful activities and sectors, such as weapons and activities affecting biodiversity-sensitive areas. DWM’s ESG analysis process assesses each borrower’s adherence to a set of core criteria to avoid harm, including compliance with local regulations, existence of anti-discrimination policies for recruitment and anti-sexual harassment policies for the workplace, maintenance of a clear code of ethics, and policies for diversity, equity, and inclusion in pay, promotion, and career development.

Furthermore, DWM uses several indicators to seek to ensure that its investments do not cause harm, including the following indicators aligned with the principal adverse impact indicators, in line with SFDR: exposure to carbon-intensive sectors, presence of ESG policies to ensure that risks related to environmental harm and violation of human rights are avoided, gender pay gap, and gender diversity in the board, management, and staff.

In the Impact Risk section of the impact framework for each investment, DWM identifies the possible negative social or environmental impacts of the investment and measures to mitigate or avoid them.

III. Sustainable investment objective of the financial product

The Fund's sustainable investment objective is to align with, and make positive contributions to, the Sustainable Development Goals (the "SDGs"). DWM, as Investment Manager of the Fund, measures these contributions using DWM's internal SDG methodology derived from its DWM Impact Questionnaire and Scorecard ("DWM Impact IQ").

A reference benchmark has been not designated for the purpose of attaining the sustainable investment objective.

The Fund aims to achieve its impact objective primarily by facilitating the growth of the financial inclusion sector through investments in microfinance institutions ("MFIs"), small and medium enterprise ("SME") lenders specialty-sector lenders (specializing in affordable housing, education, renewable energy, leasing or factoring or other qualifying impact portfolio segments) and commercial banks with similarly qualifying impact portfolio segments. These types of companies help meet critical development needs in emerging and frontier market countries by providing financial services in a responsible manner to unbanked and underbanked individuals, micro entrepreneurs, and SMEs. In pursuing its impact objective, the Fund intends to directly align with and contribute to targets identified under the following five SDGs:



DWM anticipates that investments in inclusive finance may also indirectly align the Fund with, and contribute to, the seven SDGs listed below based on products or services offered by inclusive finance institutions:



In addition, the Fund aims to achieve its sustainable investment objective through investments in impact-oriented companies providing goods or services in impact sectors other than inclusive finance, including, but not limited to, sustainable agriculture, renewable energy, health, education, insurance, water, sanitation, women's empowerment, displaced communities, and other sectors identified by the SDGs as having significant supply gaps or unmet needs.

IV. Investment strategy and screening criteria

The Fund invests primarily in private loans and other forms of debt (including debt securities); primarily in emerging and frontier market countries; and primarily to inclusive financial institutions that align with or make positive contributions to the SDGs.

In addition to credit analysis and risk evaluation of its investments, DWM evaluates the contributions of the investment and/or issuer to the SDGs through a multi-step process. At the origination phase, DWM documents the theory of change for the investment using a framework based on the five dimensions of impact established by the Impact Management Project. The framework also identifies key metrics that should be used to track impact based on IRIS+. During full due diligence, DWM uses Impact IQs to assess more than 75 metrics and create an impact score for each investment covering social impact and ESG management. The score is analyzed by the Debt and Impact teams and presented to the Risk team for review during the Credit Committee. Before making the loan, DWM identifies areas for improvement (if needed) to be discussed with company management or to be included in loan covenants. The Impact IQ is updated by the investees on an annual basis to monitor impact against expectations.

It is the intention that the Fund only makes sustainable investments that both offer risk-appropriate returns and that make positive contributions to the SDGs. All elements of the investment strategy are binding to the Fund's sustainable investment objective. All sustainable investments must contribute to at least one of the SDGs. In addition, investments must adhere to an exclusion list that prohibits certain types of activities that are detrimental to society or the environment.

DWM assesses a range of governance indicators through our financial and impact due diligence processes. Topics covered include: compensation and incentives (staff and management), board composition and quality, ownership composition, and the establishment and execution of relevant policies to assess and manage risk.

V. Proportion of investments

The Fund invests at least 80% its assets in companies that are aligned with and contribute to with the UN Sustainable Development Goals (SDGs). The primary sector in which the Fund invests is the financial inclusion sector.

As the Fund's sustainable investments have a social objective, it does not invest in economic activities contributing to an environmental objective covered by the EU Taxonomy.

In addition, investments in the Fund that are not defined as sustainable investments are used to manage liquidity, and can include financial instruments such as deposits, listed bonds, notes, trade finance paper, bills, ETFs, money market funds or other liquid fund structures, with a preference, but not a requirement, for issuers or use of proceeds to be aligned with the SDGs or economic development broadly. In all cases, DWM will evaluate the ESG risk and risk mitigants of any such investments using elements of DWM's Impact IQs. Accordingly, DWM believes that making such investments is consistent with the Fund's overall sustainable investment objective.

VI. Monitoring of the sustainable investment objective

DWM uses the DWM Impact IQ containing over 75 metrics covering various dimensions of impact and ESG.

For financial inclusion investments, the primary indicators used pertain to the amount and type of clients reached (e.g., gender, income level, urban/rural, business size), products and services provided, uses of loans by end-clients, measures in place to protect clients from over indebtedness and other harmful practices, environmental policies and products, employee treatment, and governance. External data is used to determine the level of need for financial access in the country and GDP per capita (using sources such as Global Findex and World Bank Data), which is compared to loan size to determine how small the loans are in the local context. As needed, DWM adjusts the DWM Impact IQ to include metrics for measuring impact of investments made in other sectors, consistent with the Fund's overall sustainable investment objective to align with and contribute to the SDGs. The metrics used are aligned with industry standards including IRIS+ (the metrics system managed by the Global Impact Investing Network).

DWM measures relevant Principal Adverse Impact indicators *i.e.* exposure to carbon-intensive sectors, presence of ESG policies to ensure that risks related to environmental harm and violation of human rights are avoided, gender pay gap, gender diversity in the board, management, and staff.

VII. Methodologies

DWM evaluates the contributions to SDGs through a multi-step process:

- Use of a framework to describe the theory of change for each investment and identify expected impact based on the five dimensions of impact. The framework typically includes the following sections:
 - o Problem statement: Country-specific information on the scope and scale of the specific problem to be addressed, including references to the SDGs where relevant.
 - o Outputs: Immediately observable results demonstrating how the investment directly addresses the problem described.
 - o Outcomes: Expected medium-term changes in people's lives or environmental

- conditions resulting from outputs.
- Impact: Ultimate long-term population-level change and aligned SDGs.
- Impact Risk: Factors that affect the feasibility of achieving impact or potential to create negative impact; mitigation measures.
- Key metrics to track covering who, what, how much, contribution, and risk.
- Full due diligence process where Impact IQs are used to gather data on over 75 metrics and create an impact score for each investment covering social impact and ESG management. All investments must comply with 10 basic criteria for ESG minimum standards (the “DWM 10”).
- If applicable, before investing, DWM identifies areas for improvement to be discussed with the company management, beneficiary of the loan, or to be included in the loan covenants.
- The Impact IQ is updated by the investees annually to monitor impact against expectations.

VIII. Data sources and processing

Impact and ESG data is gathered directly from portfolio companies via a proprietary survey tool (the Impact IQ). Third-party research and data are used to assess country context and level of need (e.g., level of financial access in the country from Findex, GDP per capita from World Bank Data). The data is reviewed by members of DWM's Debt and Impact teams, and inconsistencies or possible errors are raised with portfolio companies for correction. In general, DWM does not estimate data used for impact measurement. In some cases, portfolio companies may provide estimates if their systems do not capture exact results in the categories DWM requests.

IX. Limitation to methodologies and data

Availability and accuracy of the impact and ESG data collected by DWM have limitations. Given that the data is self-reported by the portfolio companies, DWM primarily relies on the strength of the companies' monitoring and reporting systems to ensure data is accurate and up to date. Verification of data is limited to the datapoints that can be vetted via on-site due diligence in headquarters and branch offices. Another limitation, which is common across the impact investing sector, is the ability to measure longer-terms outcomes resulting from investments. DWM supplements its own data collection and analysis with third-party research to support outcomes measurement at the end-client level.

X. Due diligence

Potential transactions supported by an executed term sheet undergo DWM's due diligence process. This typically involves review of detailed financial and other information, as well as discussions with the Borrower's management and stakeholders to assess their ability to establish strategic directives, implement effective policies and procedures, and measure, monitor and control key inherent risks. This is both a backward-looking and forward-looking analysis, involving reviews of past performance and future business plans and projections. For new investments, typically DWM conducts parts of this due diligence on-site in one or more visits to the head office and/or sample operations of the target company.

XI. Engagement policies

As a private debt impact investor and primary originator, DWM engages with portfolio companies throughout due diligence and the loan life cycle. DWM employs tools such as the impact questionnaire, use of proceeds clauses, and covenants to influence borrower policies and encourage positive ESG performance. Ultimately, the Fund will not invest in a borrower which does not meet ESG/impact criteria. There are several stages of engagement for each borrower:

1. DWM requests all investees complete its Proprietary Impact IQs as part of desktop due diligence. This is conducted by DWM Debt team with support from the Impact team.
2. DWM Debt team conducts on-site due diligence, visits to local branches, and meetings with executives to verify financial and impact information, and to expand on or clarify responses where needed
3. DWM Impact team recommends improvements to ESG and impact management if needed
4. DWM requires annual completion of DWM Impact IQs for monitoring purposes