

WEBSITE DISCLOSURE UNDER ARTICLE 10 OF SFDR

FOR A FINANCIAL PRODUCT WHICH PROMOTES ENVIRONMENTAL AND/OR SOCIAL CHARACTERISTICS ACCORDING TO ARTICLE 8 OF SFDR

PRODUCT NAME:	New Haven Housing Fund
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A. Summary

This section provides detailed sustainability-related disclosures regarding the **New Haven Housing Fund** (hereinafter referred to as “the Fund”) which is categorised as Article 8 as outlined in Article 10 of the Sustainable Finance Disclosure Regulation (“SFDR”):

Cantor Fitzgerald Ireland (CFIL) is part of leading global financial services firm Cantor Fitzgerald. With a proud history of stockbroking and servicing our private clients and financial advisors in Ireland since 1995, CFIL provides a full suite of investment services, primarily in personalised share dealing, pensions and wealth management, fund management, debt capital markets and corporate finance. CFIL is recognised as a primary dealer in government bonds, and always aims to put clients first and ensure they are at the forefront of every decision made. With the introduction of this Fund, CFIL maintains its priority of meeting client interests by introducing a new environmentally and socially promoting fund.

The Fund derives income for investors from investment in, and the management and sale of, its property investments through managing the Fund in accordance with the Investment Policy as set out in the Fund Supplement. The Fund invests in social and affordable housing the need for which is driven by current supply constraints. The Fund may acquire properties with tenants in situ, work with developers to forward purchase or forward fund new developments, invest in the financing of new developments or undertake new developments on its own behalf. The Fund may also hold property investments which are not used for social housing where they form part of a larger transaction to acquire a social housing portfolio or for other strategic reasons.

Although the Fund does not have a sustainable investment objective, it does promote environmental and social characteristics. The Fund promotes climate change mitigation by seeking to acquire properties that are energy efficient. The Fund promotes social characteristics include providing housing to the vulnerable in society and it promotes social responsibility through compliance with the United Nations Universal Declaration of Human Rights, particularly Article 25.

The Fund does not use a benchmark to assess its environmental or social performance but uses the indicators mentioned to assess its performance against environmental and social goals.

B. No Sustainable Investment Objective

The Fund promotes environmental and social characteristics but does not have a sustainable investment objective.

C. Environmental or Social Characteristics of the Financial Product

The Fund promotes the following environmental and social characteristics:

1. Environmental

a) Climate change mitigation;

% of properties held in the portfolio to be classified as Building Energy Rating (“BER”) A

2. Social

a) Provision of housing to vulnerable in society;

% of the portfolio that will be used as social housing

b) Promotion of social responsibility.

Compliance with the United Nations Universal Declaration of Human Rights, particularly Article 25 - “Everyone has the right to a standard of living adequate for the health and well-being of himself and of his family, including food, clothing, housing and medical care and necessary social services, and the right to security in the event of unemployment, sickness, disability, widowhood, old age or other lack of livelihood in circumstances beyond his control.” This will be measured by the % of the portfolio that will be used as social housing which will assist in ensuring an adequate standard of living for households.

No reference benchmark has been designated for the purpose of attaining the above referenced characteristics.

D. Investment Strategy

The Fund pursues an actively managed investment strategy seeking to invest in social and affordable rental accommodation in Ireland. The Fund intends to assemble a portfolio of social and affordable housing properties. It is anticipated that a significant portion of the properties held by the Fund will be let on long term leases to Local Authorities or Approved Housing bodies, delivering an annual yield for investors whilst serving to provide housing to the vulnerable in society and promoting social responsibility.

The Fund has an objective to work with Local Authorities, Approved Housing Bodies and Developers to deliver social and affordable housing through a combination of:

- Working with developers to fund the delivery of housing stock
- Working with developers to fund the renovation of existing stock to make it suitable for social and affordable housing
- Bringing vacant housing stock back into the system
- Working on other solutions to deliver new housing social and affordable stock including assisting in funding new housing developments

Deploying the Funds capital to assist in the delivery of new housing social and affordable stock will:

- Assist in alleviating the current lack of housing supply
- Assist in meeting the Irish Government housing targets per the Housing for All plan
- Assist in reducing the households currently on the social housing waiting list

- Provide housing for vulnerable households who do not currently have suitable accommodation

Furthermore, the Fund will also target holding a % of the portfolio in Building Energy Rating (“BER”) A rated stock. This will provide warm, energy efficient homes for households while also being environmentally friendly and promoting climate change mitigation.

E. Proportion of Investments

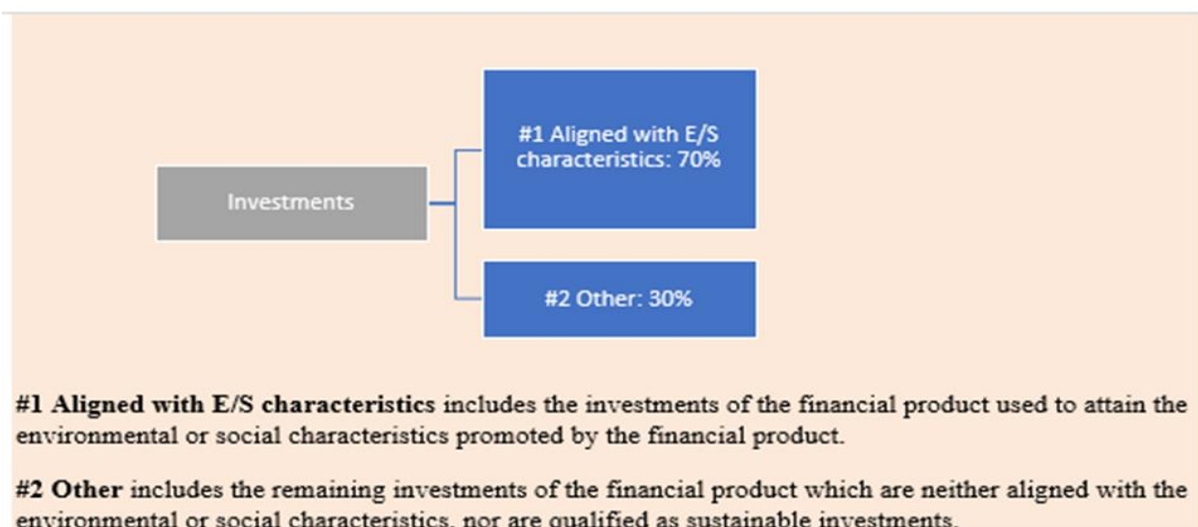
As part of its commitment to promoting these environmental characteristics, the following investment restrictions will apply on a binding basis to the Fund:

- (a) 70% of the Property Investments will either be:
 - (i) let for social housing; or
 - (ii) have the objective of delivering social housing (for example, vacant housing stock to be refurbished and used as social housing or investment in new developments that are intended to be used as social housing); and
- (b) 15% of Properties in which the Fund invests will be receive a Building Energy Rating (“BER”) Certificate of ‘A’.

The Fund will invest up to 100% of its Gross Asset Value in a portfolio of social and affordable housing and related assets.

A minimum of 70% of the Fund’s portfolio will be comprised of those assets which align with the promoted social characteristics. The remaining 30% of the Fund’s portfolio, represented below within the box marked ‘#2 Other’, may be invested in other Properties and Property-Related Assets which assist the Fund in achieving its objectives but which may not specifically align with the promoted social characteristic (for example, where the Fund has acquired an apartment block and a percentage of the apartments within the block are not designated for social or affordable housing, this will contribute to the 30% ‘non-aligned’ weighting).

It should be noted that the Fund may also hold large cash balances at any one time whilst waiting to deploy capital and acquire a Property Investment. As such, the planned annual average asset allocation shown below under ‘#2 Other’ reflects both the non-aligned assets mentioned above and any cash holdings.



F. Monitoring of Environmental or Social Characteristics

The Fund uses the following sustainability indicators to measure the attainment of each of the above-mentioned characteristics:

1. Environmental

- a) The Fund assesses the % of properties in which the Fund invests will be receive a Building Energy Rating (“BER”) Certificate of ‘A’ and the BER ratings of other properties acquired.
- b) When making an investment decision to acquire a new property, the Fund assesses the energy efficiency of the property to be acquired and takes this into account when making its investment decision.
- c) The Fund monitors the % of energy efficient properties in its portfolio on a quarterly basis.

2. Social

- a) The Fund assesses the % of properties which are used for social housing or have the objective of delivering social housing (for example, vacant housing stock to be refurbished and used as social housing or investment in new developments that are intended to be used as social housing).
- b) The Fund assesses compliance with the United Nations Universal Declaration of Human Rights, particularly Article 25
- c) When making an investment decision to acquire a new property, the Fund considers the use of the property and whether it will contribute to new social housing stock.
- d) The Fund monitors the % of social housing properties in its portfolio on a quarterly basis.

The Investment Manager does not use external control mechanisms to review monitoring of the sustainability indicators.

The Investment Manager has direct communication lines with Cantor Fitzgerald Ireland’s (“the group”) Sustainable & Responsible Investing Team to discuss any changes or trends in environmental or social characteristics.

G. Methodologies

The Fund uses ongoing monitoring to determine that the environmental and social characteristics promoted by the Fund are met.

The energy efficiency of the portfolio is assessed on a quarterly basis.

The % of properties used as social housing or with the objective of being used as social housing is also assessed on a quarterly basis.

When making any new investment decisions, both the energy efficiency of the property, the use of the property and how the acquisition will impact the overall portfolio are considered.

Compliance with the United Nations Universal Declaration of Human Rights, particularly Article 25 is also considered.

H. Data Sources and Processing

The Fund uses various data sources including BER energy certificates provided by third parties.

The Fund uses the data it gathers and processes the data to determine its alignment with its economic and social characteristics.

I. Limitations to Methodologies and Data

ESG data collected is in certain circumstances reliant on a third-party data provider, which compared to other data providers may have a different assessment measure. Additionally, there may be some subjectivity when assessing certain data.

It should be noted that the consideration of ESG data may lead to the exclusion of certain investment opportunities that would be available to a fund not considering such data.

J. Due Diligence

The Investment Manager performs due diligence prior to any investment. Such due diligence includes assessment of ESG criteria including the energy efficiency of the property and the social characteristics the property will promote.

The outcome of the due diligence, including any information on sustainability risks and opportunities, guides the Investment Manager's investment decision. The Investment Manager does not use any external control mechanisms.

K. Engagement Policies

A key part of the Investment Manager's approach to ESG is actively engaging with stakeholders in relation to investment opportunities. Where investment opportunities do not meet ESG policies of the Fund, the Investment Manager will discuss this with the stakeholders with a view to looking for ways for the stakeholders to improve the investment ESG characteristics.

L. Designated Reference Benchmark

No reference benchmark has been designated for the purposes of attaining the environmental or social characteristics promoted by the Fund.