

# Sustainable Finance Disclosure Regulations ("SFDR") and Taxonomy Regulations (continued)

## ANNEX IV

Template periodic disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

**Product name:** Orchard US Small Cap Value Fund **Legal entity identifier:** 549300JWA1NJDGWP0E37

## Environmental and/or social characteristics

Did this financial product have a sustainable investment objective?

<input checked="" type="radio"/> <input type="radio"/> <input type="checkbox"/> <b>Yes</b>	<input checked="" type="radio"/> <input type="radio"/> <input checked="" type="checkbox"/> <b>No</b>
<input type="checkbox"/> It made <b>sustainable investments with an environmental objective:</b> ___% <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It made <b>sustainable investments with a social objective:</b> ___%	<input type="checkbox"/> It <b>promoted Environmental/Social (E/S) characteristics</b> and while it did not have as its objective a sustainable investment, it had a proportion of ___% of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with a social objective</li> </ul> <input checked="" type="checkbox"/> It promoted E/S characteristics, but <b>did not make any sustainable investments</b>

## To what extent were the environmental and/or social characteristics promoted by this financial product met?

Orchard Capital Management LLC promoted environmental and social characteristics in accordance with Article 8 of SFDR through its investment selection process. The Investment Manager defines environmental and social characteristics as those environmental, social or governance criteria that have a positive environmental and/or social impact. In 2023 the fund continued their ESG Outreach Campaign for select investments to discuss their ESG scores and ESG transparency. Meetings with executives continue over 2023 with a focus on disclosure, transparency, and improvement of ESG scoring. Orchard collaborated with Bloomberg (ESG Data Provider) to advocate for additional scoring and reporting to expand reach and influence. Orchard also researched alternative ESG data providers over 2023 to ensure they have the best data sources.



**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

## Sustainable Finance Disclosure Regulations ("SFDR") and Taxonomy Regulations (continued)

### ● *How did the sustainability indicators perform?*

Orchard has seen over 2023 an increase in reporting from the investments companies within the portfolio and a significant increase in the fund holdings verse the industry averages. Across the industries and the portfolio Orchard sees an increase in reporting of sustainability indicators their scoring but we also see reporting still remains fragmented. The more narrow view taken in 2022 and 2023 appears to have resulted benefits to reporting and consistency for the portfolio. Orchard continues their baseline feelings that more data points will be available as ESG is rolled out more broadly in the US.

The sustainability indicators the research team chose are the most consistent for Orchard's portfolio and benchmark. These are listed below and in the below dashboard and remain unchanged between 2022 and 2023 data sets. There are no plans to change the process or indicators at this time.

Do No Significant Harm (DNSH) Mitigation which provides and estimated pass rate for DNSH to the climate change mitigation environmental objective of the EU Taxonomy, using a combination of the company's policies, processes and quantitative measures that match the requirements of the regulation.

DNSH Adaptation which provides the estimated pass rate for DNSH to the climate change adaptation environmental objective of the EU Taxonomy, using a combination of the company's policies, processes and quantitative measures that match the requirements.

DNSH Water provides the estimated pass rate for DNSH to protection of water and marine resources environmental objective of the EU Taxonomy, using a combination of the company's policies, processes and quantitative measures that match the regulation.

DNSH Waste provides the estimated pass rate for DNSH to the circular economy environmental objective of the EU taxonomy, using a combination of the company's policies, processes and quantitative measures that match the regulation.

NDSH Biodiversity provides the estimated pass rate for the DNSH to the protection and restoration of biodiversity and ecosystems environmental objective and ecosystems environmental objective of the RU Taxonomy, using a combination of the company's policies, processes and quantitative measures that match the regulation.

DNSH Waste provides the estimated pass rate for DNSH to the circular economy environmental objective of the EU Taxonomy, using a combination of the companies policies, processes and quantitative measures that match the regulation.

The Average DNSH score is the average of the six Taxonomy Scores. The Taxonomy Scores are the weighted averages of the portfolio verse the US Small Cap Value Index Bloomberg Industry Group averages.

There is a noticeable reduction in negative ESG performance relative to the fund's benchmark industry group averages over the 2022 to 2023 periods. All companies are contacted as part Orchard's ESG Outreach Campaign where the analysts will speak directly to company executives on their scoring. Orchard feels their conversations with these companies have increased their reporting. As an example, meetings with Summit, Franklin, and Pathward educated these firms on reporting and their transparency reporting, and as a result scores improved. Negative scoring is not a fundamental reason for disinvestment. There has been no significant downward scoring of investments.

Sustainable Finance Disclosure Regulations ("SFDR") and Taxonomy Regulations  
(continued)

## Portfolio EU Scoring Dashboard

Orchard US Small Cap Value Fund Scoring vs Bloomberg Industry Group

Relative Versus Industry in Russell 2000 Value (Relative Score color vs Holdings)

Relative: vs Industry	EU Taxonomy: DO No Harm Scoring						
	Average DNSH	Mitigation	Adaptation	Water	Waste	Biodiversity	Polution
	<b>+19.4</b>	<b>+23.4</b>	<b>+19.1</b>	<b>+10.5</b>	<b>+25.8</b>	<b>+20.0</b>	<b>+17.5</b>
89BIO INC	7.9	4.0	6.2	-1.0	16.2	9.3	12.7
ARCBEST CORP	32.5	48.5	24.9	15.8	56.9	30.6	18.6
ARCOSA INC	41.9	54.1	30.6	49.9	33.9	59.0	23.9
AXOS FINANCIAL INC	14.9	15.7	19.9	-0.3	23.8	13.4	17.2
BANC OF CALIFORNIA INC	22.0	26.8	34.2	16.4	23.8	13.4	17.2
BANCORP INC/THE	19.2	26.8	34.2	-0.3	23.8	13.4	17.2
BLACK STONE MINERALS LP	9.0	3.6	14.0	-4.7	15.4	9.9	15.6
CENTRAL GARDEN & PET CO	27.7	25.6	4.9	16.7	48.9	20.0	50.0
CENTURY CASINOS INC	6.0	0.3	0.3	10.4	15.8	-1.3	10.4
CRITEO SA-SPON ADR	22.4	63.4	30.4	-3.0	19.6	17.8	6.2
DIGITALBRIDGE GROUP INC	18.3	18.7	39.4	10.0	19.6	8.5	13.6
ENCOMPASS HEALTH CORP	28.1	29.5	21.6	14.7	42.5	37.5	22.7
ENHABIT INC	28.1	29.5	21.6	14.7	42.5	37.5	22.7
ENOVA INTERNATIONAL INC	14.5	6.0	10.7	0.0	31.6	17.2	21.5
FERROGLOBE PLC	35.6	45.7	32.8	12.9	21.4	62.9	38.0
FRANKLIN BSP REALTY TRUST IN	25.4	28.2	25.0	16.7	44.1	17.2	21.5
FTAI AVIATION LTD	16.3	17.1	10.7	0.0	31.6	17.2	21.5
FTAI INFRASTRUCTURE INC	11.2	10.4	6.9	-1.3	20.8	13.0	17.3
GARRETT MOTION INC	31.2	44.5	-2.3	40.3	50.4	31.8	22.4
GREENLIGHT CAPITAL RE LTD-A	8.6	-6.7	11.3	-1.3	23.0	10.6	14.7
HERON THERAPEUTICS INC	7.9	4.0	6.2	-1.0	16.2	9.3	12.7
HUBBAY MINERALS INC	27.8	23.5	61.4	29.6	-3.6	42.9	13.0
IDT CORP-CLASS B	4.7	-3.5	-3.5	-6.6	19.6	8.5	13.6
VERSABANK	0.0	0.0	0.0	0.0	0.0	0.0	0.0
INTELLIA THERAPEUTICS INC	7.9	4.0	6.2	-1.0	16.2	9.3	12.7
LIONS GATE ENTERTAINMENT-A	-4.5	-6.2	-15.3	0.0	2.9	-10.0	1.9
MUELLER WATER PRODUCTS INC-A	36.8	54.9	33.1	10.6	33.1	69.5	19.7
NI HOLDINGS INC	8.1	4.4	-3.0	-1.3	23.0	10.6	14.7
OMNIAB INC	11.1	0.1	3.9	16.2	19.6	10.2	16.5
PATHWARD FINANCIAL INC	23.5	37.9	19.9	16.4	36.3	13.4	17.2
REVOLVE GROUP INC	8.5	6.4	3.5	-1.8	19.4	9.3	14.3
SHYFT GROUP INC/THE	22.1	28.3	11.2	37.8	11.7	30.9	12.4
STANDARD MOTOR PRODS	30.5	33.4	54.8	40.3	0.4	31.8	22.4
SUMMIT MATERIALS INC -CL A	35.8	52.8	38.8	47.9	37.9	12.5	25.0
TIDEWATER INC	23.1	32.7	37.9	11.8	28.2	18.6	9.4
TRIMAS CORP	39.4	49.5	26.1	29.4	42.9	43.3	45.2
TRINITY INDUSTRIES INC	29.7	39.5	54.1	4.4	36.7	30.9	12.4

## Sustainable Finance Disclosure Regulations ("SFDR") and Taxonomy Regulations (continued)

● ...and compared to previous periods?

Orchard's EU Taxonomy scores did improve overall significantly relative position's benchmark industry. The Average DNSH increased significantly as illustrated below, which we do expect a smaller improvement in 2024. Orchard believes their outreach program has assisted the management teams to produce the proper disclosures and reporting. From the meetings Orchard had with some management teams they indicated they will be investing in ESG reporting and adherence to ESG processes.

Year	Average DNSH	Mitigation	Adaptation	Water	Waste	Biodiversity	Pollution
<b>2023</b>	<b>+19.4</b>	<b>+23.4</b>	<b>+19.1</b>	<b>+10.5</b>	<b>+25.8</b>	<b>+20.0</b>	<b>+17.5</b>
Year	Average DNSH	Mitigation	Adaptation	Water	Waste	Biodiversity	Pollution
<b>2022</b>	<b>+4.8</b>	<b>+8.3</b>	<b>+4.1</b>	<b>+6.5</b>	<b>+4.2</b>	<b>+5.5</b>	<b>+0.3</b>
<b>Change</b>	<b>+14.6</b>	<b>+15.1</b>	<b>+14.9</b>	<b>+4.0</b>	<b>+21.6</b>	<b>+14.5</b>	<b>+17.2</b>

What were the objectives of the sustainable investments that the financial product partially made and how did the sustainable investment contribute to such objectives?

Not Applicable

How did the sustainable investments that the financial product partially made not cause significant harm to any environmental or social sustainable investment objective?

Not Applicable

How were the indicators for adverse impacts on sustainability factors taken into account?

Not Applicable

Were sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:

Not Applicable

*The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific Union criteria.*

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the Union criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the Union criteria for environmentally sustainable economic activities.

*Any other sustainable investments must also not significantly harm any environmental or social objectives.*

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.



**How did this financial product consider principal adverse impacts on sustainability factors?** Not Applicable

# Sustainable Finance Disclosure Regulations ("SFDR") and Taxonomy Regulations (continued)



## What were the top investments of this financial product?

*[include note only for the financial products referred to in Article 6, first paragraph, of Regulation (EU) 2020/852]*

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective. **Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

For Period January 1, 2023 to December 31, 2023			
Largest Investments	GICS Sector	% Assets	Country
US DOLLAR	Not Classified	5.40	US
BANCORP INC/THE	Financials	4.76	US
CRITEO SA-SPON ADR	Communication Services	4.55	France
AXOS FINANCIAL INC	Financials	4.01	US
PATHWARD FINANCIAL INC	Financials	3.73	US
FTAI AVIATION LTD	Industrials	3.71	US
ENOVA INTERNATIONAL INC	Financials	3.64	US
TRIMAS CORP	Materials	3.48	US
ARCBEST CORP	Industrials	3.31	US
GREENLIGHT CAPITAL RE LTD-A	Financials	3.18	US
MUELLER WATER PRODUCTS INC-A	Industrials	2.98	US
ENCOMPASS HEALTH CORP	Health Care	2.92	US
TRINITY INDUSTRIES INC	Industrials	2.90	US
DIGITALBRIDGE GROUP INC	Real Estate	2.89	US
SUMMIT MATERIALS INC -CL A	Materials	2.84	US

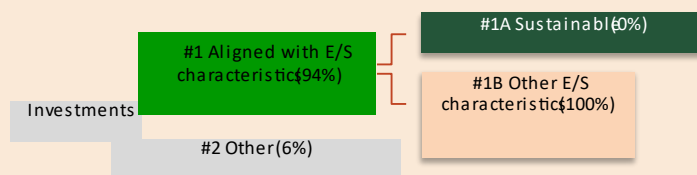
## What was the proportion of sustainability-related investments?

Not Applicable

### What was the asset allocation?

The Fund allocated 94% of its assets to equity and equity-like securities. These investments are categorized as "#1 Aligned with E/S characteristics". The Fund does not commit to making sustainable investments. The remaining investments in the Fund can be categorized as "#2 Other" at 6% which is an investment in cash and/or cash equivalents.

*[Include only relevant boxes, remove irrelevant ones for the financial product]*



**#1 Aligned with E/S characteristics** include the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** include the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

***In which economic sectors were the investments made?***

*2023 quarterly averages of Sectors as of December 31, 2023*

<b>ORCHARD US SMALL CAP VALUE FUND</b>	
<b>GICS Sectors</b>	<b>Portfolio Average</b>
Communication Services	9%
Consumer Discretionary	9%
Consumer Staples	2%
Energy	4%
Financials	27%
Health Care	12%
Industrials	19%
Information Technology	2%
Materials	8%
Real Estate	2%
Not Classified/Cash	6%

**Asset allocation** describes the share of investments in specific assets.

## Sustainable Finance Disclosure Regulations ("SFDR") and Taxonomy Regulations (continued)



### To what extent were the sustainable investments with an environmental objective aligned with the EU Taxonomy?

0%

- Did the financial product invest in fossil gas and / or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?

Yes:

In fossil gas

In nuclear energy

No

- As of December 31, 2023, the fund did invest in companies that have activities in fossil gas with measured fossil fuel operations revenue which equated to a weighted average of 4% of the portfolio. The portfolio did not have exposure to nuclear energy related activities. The Investment Manager has not calculated the degree to which these activities comply with the EU Taxonomy.

<sup>1</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

Not Applicable

# Sustainable Finance Disclosure Regulations ("SFDR") and Taxonomy Regulations (continued)

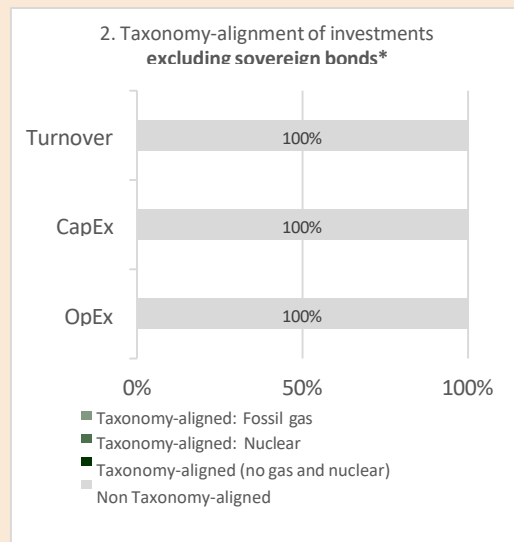
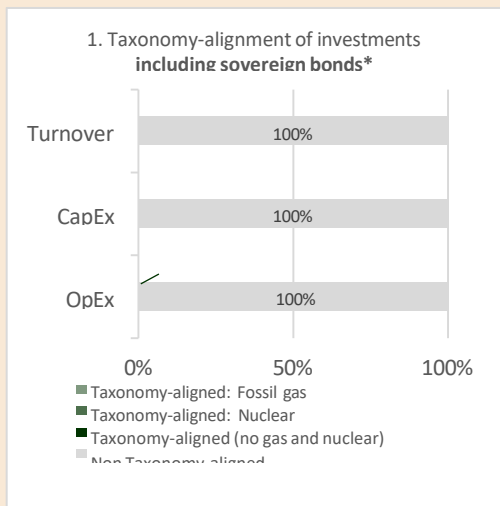
Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies.
- **capital expenditure (CapEx)** showing the green investments made by investee companies, e.g., for a transition to a green economy.
- **operational expenditure (OpEx)** reflecting green operational activities of investee companies.

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under Regulation (EU) 2020/852.

**The graphs below show in green the percentage of investments that were aligned with the EU Taxonomy. As there is no appropriate methodology to determine the taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.**

**As of December 31, 2023 there was no information available for the below Turnover, CapEx, or OpEx for the below graph. There was 4.25% asset weighted Fossil Fuel Operations Revenue in the portfolio. There was no nuclear energy Taxonomy-aligned economic activities during the period.**



\*For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures



● What was the share of investments made in transitional and enabling activities?  
0%



● How did the percentage of investments that were aligned with the EU Taxonomy compare with previous reference periods?  
0%



What was the share of sustainable investments with an environmental objective not aligned with the EU Taxonomy?  
0%

What was the share of socially sustainable investments?  
0%



## Sustainable Finance Disclosure Regulations ("SFDR") and Taxonomy Regulations (continued)



### **What investments were included under “other”, what was their purpose and were there any minimum environmental or social safeguards?**

The fund holds cash as part of its liquidity management and does not measure the environmental or social safeguards on these investments. Under #2 Other, the Fund kept 6% of its Net Asset Value in cash and cash equivalents. All remaining securities went through the Investment Committee’s selection and ESG process.



### **What actions have been taken to meet the environmental and/or social characteristics during the reference period?**

In 2023 the fund continued the ESG Outreach Campaign where Orchard reached out to the investment’s company executives to discuss their ESG scores and to gain greater transparency into ESG related data points. The company receive an ESG summary page, and Orchard discussed their scores with the goal to improve transparency and advocate for more disclosure of ESG data points. The additional transparency and disclosure Orchard believes will lead to overall improvement of scores.

Orchard collaborated with Bloomberg (fund’s ESG Data Provider) to advocate for additional scoring and reporting to expand reach and influence. Orchard also reached out to ISS, MSCI, Morningstar, Sustainalytics to review their ESG data offering and performed due diligence. This process has reinforced Orchard’s decision to choose Bloomberg as their ESG data vendor.



### **How did this financial product perform compared to the reference benchmark?**

There was no reference benchmark designated for the financial product.

*How does the reference benchmark differ from a broad market index?*

Not Applicable

*How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the environmental or social characteristics promoted?*

Not Applicable

*How did this financial product perform compared with the reference benchmark?*

There was no reference benchmark designated for the financial product

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

● *How did this financial product perform compared with the broad market index?*

The Institutional Share Class fund returned 16.99% net of all fees for 2022 compared to the Russell US Small Cap Value Index with a gross return of 14.65%. The Retail Class net of all fees returned 16.35% for 2022.

<b>Ending 12/31/2022</b>	<b>1-Yr</b>
Institutional Share Class-Net	16.99%
Retail Share Class-Net	16.35%
Russell US Small Cap Value Index	14.65%