

## EU Sustainable Finance Disclosure Regulation

Atena Equity Partners makes the following disclosures in accordance with the Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (“SFDR”).

### **Policies on the integration of sustainability risks into investment decision-making (Article 3 of the SFDR)**

Until recently, Atena did not market or manage funds that directly promoted environmental or social characteristics (Article 8 of the SFDR) nor those aimed at sustainable investments (Article 9 of the SFDR) (Fund I and Fund II). Atena III, raised in 2024, is an Article 8 Fund that promotes environmental or social characteristics but not sustainable investments.

We firmly believe ESG-driven decisions by consumers and governments worldwide have a material impact on the success of our investment mandates. Therefore, as long-term investors, we hold that a focus on ESG throughout the investment lifecycle allows us to better identify investment risks and value creation opportunities.

For further information regarding the policies on the integration of sustainability risks into investment decision-making processes please refer to the **Responsible Investment Policy**.

### **Statement on the Principal Adverse Impacts (PAI) of investment decisions on sustainability factors (Article 4 of the SFDR)**

- **Non-consideration of the PAI of investment decisions on sustainability factors:** Atena I and Atena II Funds do not explicitly consider the adverse impacts of investment decisions on sustainability factors.
- Atena III Fund, takes into account the negative impacts of its investment decisions on sustainability factors, as described in our **Responsible Investment Policy** and in the **Pre-contractual terms of Atena III**.

### **Integration of sustainability risks into remuneration policy (Article 5 of the SFDR)**

Atena does not have a formal remuneration policy and is not obliged by the RGA to have such a remuneration policy. Nonetheless, Atena pays a combination of fixed and variable remuneration aligned with the performance of the funds managed and can be reduced in case of poor monitoring of sustainability indicators.

### **Final considerations**

As this is a subject under continuous review, Atena intends to reassess its position on an annual basis, updating, when possible, its practices and information made available here.

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