

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”).

Integration of sustainability risks into investment decision-making processes (Article 3 of the SFDR)

Currently Atena does not market or manage funds that directly promote environmental or social characteristics (Article 8 of the SFDR) nor those aimed at sustainable investments (Article 9 of the SFDR).

Nonetheless, 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.

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

Current investment mandates do not explicitly consider the adverse impacts of investment decisions on sustainability factors.

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.

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

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.