

Pre-contractual 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: ATENA III – Venture Capital Fund

Legal entity identifier: [0000000000]

## Environmental and/or social characteristics

**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 include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Does this financial product have a sustainable investment objective?**

**Yes**
  **No**

<input type="checkbox"/> It will make a minimum of <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 <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum 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 type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: ___%</b>	<input checked="" type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>



### What environmental and/or social characteristics are promoted by this financial product?

The Fund promotes environmental and social qualities by conducting an initial analysis to steer clear of contentious sectors that pose high reputational or ESG risk. Additionally, it

performs due diligence on ESG factors, regularly evaluates, and actively engages with subsidiaries.

- The Fund promotes the safeguarding of minimum environmental and social requirements by running a Pre-Investment Evaluation applying exclusion criteria on negative environmental or social characteristics and principles of good governance as formalised in the fund's Management Regulation.
- The Fund applies ESG due diligence processes, assessing Sustainability-Related Risks and Opportunities and identifying any contingent risks and regulatory issues that might need to be managed, integrating ESG principles in decision-making process.
- The Fund adopts an active engagement approach during the Portfolio Management period that contributes to the continuous improvement of ESG factors and key adverse impacts. ATENA is present in all decisions of shareholders and in all relevant decisions of the board of directors of investees. The Fund uses ESG methodology to enhance its own, fund and investee companies' performance.

Information on the Fund's performance in relation to the promotion of environmental or social characteristics is included in a quarterly and annual reports for investors.

No benchmark has been designated to achieve the environmental or social characteristics promoted by the Fund.

***What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?***

A combination of sustainability and adverse impacts indicators are used to measure this financial product's environmental and social characteristics.

Additional details on the indicators in the sustainability-related information can be found published on the website, as per the guidelines specified in article 10 of the SFDR.

***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

Not applicable. The Fund promotes Environmental and Social characteristics but will not make sustainable investments.

***How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?***

Not applicable. The Fund promotes Environmental and Social characteristics but will not make sustainable investments.

***How have the indicators for adverse impacts on sustainability factors been taken into account?***

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

Not applicable. The Fund promotes Environmental and Social characteristics but will not make sustainable investments.

— — — *How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?*

Not applicable. The Fund promotes Environmental and Social characteristics but will not make sustainable investments.

*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 EU criteria.*

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

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



### Does this financial product consider principal adverse impacts on sustainability factors?

Yes,

ATENA takes into account and monitors the main negative impacts of investment decisions on sustainability factors, as prescribed by Article 4 of the SFDR. As part of the ESG strategy, defined in ATENA's Responsible Investment Policy, the main negative impacts on sustainability factors are integrated into all stages of the investment process.

As the investees vary in size and sector, ATENA works with portfolio companies on various ESG criteria. The selection of the main adverse impacts on sustainability factors is based on the materiality analysis of each subsidiary and the Fund. Particular attention is given to certain environmental and climate indicators, working conditions and the corporate governance model. The scope of the indicators analysed includes all mandatory indicators defined by the SFDR.

Each year, each portfolio company is asked to analyse the performance of these indicators, which determines the level of subsequent involvement. If certain indicators are flagged as having high impacts or an opportunity to improve performance is identified, ATENA works with the respective company to develop the necessary improvement actions.

**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.

In deciding appropriate actions, ATENA considers, among other things, the severity and scope of each adverse impact and the likelihood of such impacts occurring, including the potential irremediable consequences.

No



### What investment strategy does this financial product follow?

Atena acquires controlling stakes in underperforming Portuguese companies operating in attractive sectors, and works alongside their management teams to improve operational performance and accelerate growth.

ATENA aims to create a diversified portfolio for investors in order to prevent risk exposure. The Fund's Management Regulation expressly prevents investments above 20% of the total amount subscribed to a single investment platform.

ATENA's investment strategy integrates ESG considerations into all phases of the Fund's investment process, with the overall objective of reducing ESG risks and key adverse impacts and progressively improving the ESG performance of subsidiaries.

The following list summarizes the objectives of the investment process detailed in the Responsible Investment Policy, which is available on our website (<https://www.ATENAEP.com/esg>):

- Comply with all relevant regulations at the level of the management company and at the level of the subsidiaries;
- Avoid controversial industries with high reputational or ESG risk through screening and perform thorough due diligence on ESG factors;
- Support investee companies to manage and minimise ESG impacts and principal adverse impacts; and
- Monitor and report on the progress of ESG initiatives and stakeholder indicators. ESG reporting updates are included in quarterly and annual reports to investors.

● ***What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?***

The Fund complies with the principles detailed in ATENA's responsible investment Policy, including Pre-Investment Evaluation to avoid controversial sectors with high reputational or ESG risk, conducting due diligence on ESG factors, post-acquisition planning including ESG and annual ESG assessment during Portfolio Management.

To ensure a thorough ESG evaluation, Atena collaborates with specialist third-party ESG due diligence advisors. These experts are specifically tasked with identifying industry-specific

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

and financial material sustainability factors related to the investment. Their responsibilities include assessing:

Their responsibilities during due diligence include assessing environmental and social aspects, as well as any contingent risks and regulatory issues that might need to be managed including, among others:

- Physical, transitional, and regulatory climate risks;
- Eligibility under the EU Taxonomy; and
- Contribution to the Sustainable Development Goals (SDGs).

The insights and findings from these ESG due diligence efforts are instrumental in our decision-making process. ESG Due Diligence Reports are carefully reviewed and considered by the Partner and Executive Team. Based on these reports, we identify remedial actions when necessary, ensuring that our investments align with our commitment to responsible and sustainable practices.

● ***What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?***

There is no minimum rate. Atena has always focused on value creation considering ESG factors.

● ***What is the policy to assess good governance practices of the investee companies?***

ATENA has set a policy to assess good governance.

At Atena, we are committed to promoting and upholding strong corporate governance practices among our investee companies. Our aim is to enhance transparency, accountability, and ethical conduct while safeguarding the interests of our stakeholders.

Principles:

1. **Transparency:** Investee companies are expected to maintain a high level of transparency in their operations, financial reporting, and decision-making processes. We encourage open communication with shareholders and stakeholders.
2. **Accountability:** We expect investee companies to establish clear lines of accountability within their organizational structures. This includes defining roles and responsibilities, both at the board and management levels.
3. **Ethical Conduct:** We require investee companies to adhere to the highest ethical standards. This includes avoiding conflicts of interest, adhering to anti-bribery and anti-corruption policies, and promoting a culture of ethical behaviour.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.

4. Shareholder Rights: Investee companies should respect and protect the rights of shareholders. This includes ensuring equitable treatment of all shareholders and providing mechanisms for shareholders to voice concerns.
5. Risk Management: We expect investee companies to have robust risk management systems in place. This includes identifying, assessing, and mitigating risks that could impact the company's operations and stakeholders.

#### Assessment Process:

1. Initial Assessment: Upon investment, we conduct an initial assessment of the investee company's governance practices. This assessment includes a review of the company's corporate documents, board composition, ethical policies, and risk management procedures.
2. Ongoing Monitoring: Throughout the investment period, we maintain ongoing monitoring of governance practices. This involves regular communication with the investee company's management and board, as well as the review of financial reports and compliance with relevant regulations.
3. Performance Evaluation: We conduct periodic evaluations to assess the investee company's adherence to our governance principles. This evaluation informs our decision-making regarding the investment's continuation or adjustments.
4. Remedial Actions: In cases where governance practices fall short of our standards, we work collaboratively with the investee company to implement corrective measures. These actions may include board composition changes, policy enhancements, or targeted training.

#### Reporting:

We provide regular reports to our stakeholders on the governance assessments of investee companies, highlighting areas of strength and improvement. Our commitment to transparency extends to our reporting practices.

#### Alignment with Regulatory Requirements:

Our governance assessment policy is designed to align with relevant regulatory requirements and industry best practices. We remain vigilant in ensuring compliance with all applicable laws and regulations.

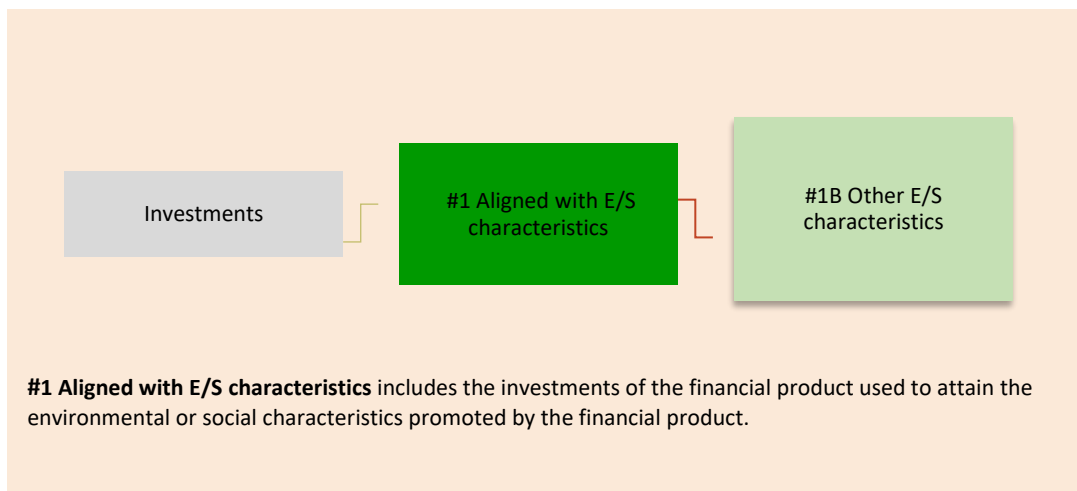
ATENA also includes indicators related to good governance practices in the annual evaluation that monitors the ESG performance of each investee. As a result of the monitoring process, ATENA will be able to promote specific improvements and updates on governance policies. These indicators are related to management structures, labor relations, corporate culture, workers' compensation and tax compliance and absence of negative events.



## What is the asset allocation planned for this financial product?

All investments (100%) of the Fund promote environmental and social characteristics. There will be no sustainable investments as defined in the SFDR and the Fund will not be aligned with the selection criteria established under the EU taxonomy.

- **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**



ATENA will not use derivatives to attain the environmental or social characteristics promoted by the financial product.



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

Not applicable. The Fund promotes A/S characteristics but will not make sustainable investments.

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

The Fund does not deliver a minimum proportion of environmentally sustainable investments aligned with the EU taxonomy, however it will not invest in fossil gas and/or nuclear energy.

<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.

Yes

In fossil gas

In nuclear energy

No

● **What is the minimum share of investments in transitional and enabling activities?**

Not applicable. Atena has not set minimum share of investment in transitional and enabling activities.



**What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy**

Not applicable. The Fund promotes Environmental and Social characteristics but will not make sustainable investments.



**What is the minimum share of socially sustainable investments?**

Not applicable. The Fund promotes Environmental and Social characteristics but will not make sustainable investments.



**What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

Not applicable.



**Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

No benchmark has been designated to achieve the environmental or social characteristics promoted by the Fund.

● **How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?**

Not applicable.

● **How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?**



Not applicable.

- ***How does the designated index differ from a relevant broad market index?***

Not applicable.

- ***Where can the methodology used for the calculation of the designated index be found?***

Not applicable.

### **Where can I find more product specific information online?**



**More product-specific information can be found on the website:**

More product-specific information can be found on ATENA's website: