

EU SFDR Disclosures

Introduction

The EU Sustainable Finance Disclosure Regulation (the "SFDR") sets out harmonized rules for financial market participants and financial advisors on transparency regarding integration of sustainability risks and adverse sustainability impacts in their processes and when providing information on the sustainability of financial products.

Klarphos, as alternative investment fund manager, approaches SFDR as follows:

I. Integration of sustainability risks in our investment decisions

Any investment decision made on behalf of alternative investment funds managed by Klarphos is duly assessed prior to its execution against relevant and material risks. The assessment includes consideration of sustainability risks and their potential impact on the value of an investment for any alternative investment fund under management of Klarphos.

In line with the fund of funds strategy, Klarphos distinguishes between alternative investment funds and traditional funds (i.e., UCITS or ETFs) as target funds while assessing the impact of sustainability risks on the value of an investment as part of the investment due diligence process.

Please refer to our Sustainability Risk Policy for details on how we integrate sustainability risks in our investment decisions, risk management and reporting.

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Details on the integration of sustainability risks into the investment decision process of the relevant alternative investment fund can be found in the respective private placement memorandum.

II. Integration of sustainability risks in our remuneration policy

As part of our remuneration policy, we ensure that the performance of our employees is not remunerated or evaluated in a way that conflicts with our duty to act in the best interests of the investors. Our remuneration policy does not encourage risk-taking which is inconsistent with the risk profiles, management regulations or instruments of incorporation of the alternative investment funds we manage, which includes

sustainability risks stemming in particular from climate-related events or from society's response to climate change.

The Remuneration policy is reviewed annually to ensure alignment with evolving sustainability risk requirements.

III. No consideration of principal adverse impacts of investment decisions on sustainability factors

Klarphos has carefully evaluated the requirements of the principal adverse impacts of investment decisions on sustainability factors and is continuing to assess the data collection and disclosure requirements applicable to this regime. Nevertheless, taking into account the scale of our activities and the type of financial strategies we service, Klarphos currently does not consider any principal adverse impacts of the investment decisions on sustainability factors within the meaning of the SFDR and the Delegated Regulation (EU) 2022/1288.

This decision is based on the limited availability and reliability of ESG-related data from underlying fund managers, as well as the proportionality principle applicable to smaller AIFMs. Klarphos is monitoring regulatory and industry developments related to the principal adverse impacts regime and will formally re-evaluate this decision at least annually.

This statement is published in accordance with Article 4(1)(b) of Regulation (EU) 2019/2088 and is part of Klarphos's sustainability-related disclosures.

Statement last reviewed: November 2025