

## **FIRM LEVEL WEBSITE DISCLOSURE**

### **Sustainable Finance Disclosure Regulation (EU) 2019/2088 (“SFDR”)**

Articles 3(1), 4(1)(b) and 5(1)

Festos Investment Partners B.V. (the “Manager” or “Festos”) makes the following disclosures in accordance with Articles 3(1), 4(1)(b) and 5(1) of Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector (the “SFDR”). These disclosures apply at entity level and relate to the activities of Festos as manager (beheerder) of alternative investment funds, including Festos Fund I Coöperatief U.A. (the “Fund”).

#### **Sustainability risk policies (Article 3 SFDR)**

For the purposes of the SFDR, a sustainability risk is defined as an environmental, social or governance (“ESG”) event or condition that, if it were to occur, could cause an actual or potential material negative impact on the value of an investment. In line with the Fund Agreement and the investment objectives of the Fund, Festos considers sustainability risks to be those ESG-related risks which, if they were to materialise, could have a material adverse effect on the value of the Fund’s portfolio investments. Prior to making any investment on behalf of the Fund, Festos performs due diligence in accordance with its investment process as set out in the Fund documentation. This due diligence includes, where relevant and appropriate given the nature of the investment, an assessment of sustainability risks alongside financial, operational, legal and strategic factors. Identified risks, including sustainability risks, are considered by the investment committee as part of the overall assessment of an investment proposal. Investment decisions are taken in accordance with the Fund’s investment policy and objectives, as laid down in the Fund Agreement, and on a case-by-case basis, taking into account the characteristics of the target company, its sector and the specific circumstances of the investment.

#### **Remuneration policy (Article 5 SFDR)**

Festos applies a remuneration policy under which staff receive a combination of fixed remuneration (including salary and benefits) and, where applicable, variable remuneration. Variable remuneration is designed to promote sound and effective risk management and takes into account compliance with applicable policies and procedures, including those relating to the identification and management of risks. This includes consideration of sustainability risks to the extent such risks are relevant to the investment decision-making process. Festos considers its remuneration policy to be consistent with the integration of sustainability risks as part of its broader risk management framework.

#### **Principal adverse impact statement (Article 4 SFDR)**

In accordance with Article 4(1)(b) of the SFDR, Festos currently does not consider the principal adverse impacts of investment decisions on sustainability factors as referred to in Article 4(1)(a) of the SFDR and therefore does not publish a principal adverse impact statement. This position is based on the size, nature and scale of Festos’ activities and the closed-end private equity character of the Fund. At this stage, the systematic collection, monitoring and reporting of the data required for such disclosures would impose a disproportionate administrative burden. Festos will periodically review this position and may reassess its approach as its organisation, regulatory environment or activities evolve.

#### **Status of the Fund under SFDR**

The Fund is classified as a financial product falling under Article 6 of the SFDR. The Fund does not promote environmental or social characteristics within the meaning of Article 8 SFDR, nor does it have sustainable investment as its objective within the meaning of Article 9 SFDR.

