
Koinos Capital

LACK OF CONSIDERATION OF PRINCIPAL ADVERSE IMPACTS OF INVESTMENT DECISIONS ON SUSTAINABILITY FACTORS Disclosure pursuant to Article 4 of Regulation (EU) 2019/2088 (SFDR)

Update: June 2025

Koinos Capital SGR S.p.A. - Via Fatebenefratelli n. 9, 20121 MILANO Codice fiscale, partita IVA 09900230963, iscritta al Registro delle Imprese di Milano-Monza Brianza-Lodi - capitale sociale € 400.000 i.v. Iscritta al N°164 dell'Albo delle Società di gestione del risparmio - Sezione gestori di FIA. RECAPITI: PEC koinos.cp@legalmail.it MAIL info@koinoscapital.com Codice Univoco: BA6ET11 Società Aderente all'Arbitro per le controversie finanziarie www.acf.consob.it

As part of its ESG strategy, Koinos Capital **does not consider the Principal Adverse Impacts** (PAIs) at entity level, deeming that such an approach, at present, is not suitable for the nature and structure of the portfolio of managed asset classes, which include **Private Equity, Venture Capital, and Fund of Funds**.

As an Alternative Investment Fund Manager (AIFM), Koinos Capital manages various investment strategies including Private Equity (Article 8), Venture Capital (Article 6), and Fund of Funds (Article 6) pursuant to Regulation (EU) 2019/2088 on Sustainable Finance Disclosure Regulation (SFDR).

The application of the PAI regime at entity level requires the availability of standardized, reliable, and comparable ESG data. In the **Private Equity segment**, the Koinos Uno fund, qualified as Art. 8, is committed to promoting the environmental and social characteristics described in the Fund's regulation, **considers** some **PAIs** relevant to the Fund's investment strategy, and is actively engaged, with the involvement of management, in a sustainability improvement process of portfolio companies that may also involve obtaining officially recognized certifications, such as, for example, **B-Corp certification**. In the context of **Venture Capital**, many of the companies in which investments are made, at seed or pre-seed stage, do not have the structures and information necessary for a consistent and meaningful assessment of PAIs. Also in the case of **Fund of Funds**, since ESG management is delegated to third-party managers, the collection and harmonization of ESG data relating to PAIs throughout the investment chain is problematic.

The adoption of such metrics at management company level could therefore involve the inclusion of partial or non-homogeneous data, risking the generation of information with limited usefulness for investors.

Despite the non-consideration of PAIs at entity level, Koinos Capital maintains a strong commitment to sustainability and the integration of ESG factors into its investment processes. This approach is implemented through the **exclusion**, for all managed funds, of **sectors** and types of companies **not aligned with the criteria identified in the Sustainability Policy** of the management company.

The non-consideration of PAIs will be subject to **periodic review**.

