

DECLARATION

NON CONSIDERATION OF NEGATIVE IMPACTS OF INVESTMENT DECISIONS ON SUSTAINABILITY FACTORS

Quadrantis Capital SCR SA seeks, whenever applicable, to consider possible sustainability risks in the investment decision-making process.

Currently, Quadrantis Capital SCR SA does not consider the negative impacts of investment decisions on sustainability factors, due to the following reasons:

- In the process of making investment decisions and controlling and managing the development of investment projects, Quadrantis Capital SCR SA does not meet the requirements of large financial market participants set out in paragraphs 3 and 4 of article 4 of the Regulation (EU) 2019/2088, of the European Parliament and of the Council, of 27 November 2019 (Sustainability Finance Disclosure Regulation, referred to as SFDR for short).
- Regardless of, given the type of investments made, the public information available on ESG matters, particularly regarding the indicators listed in Annex I of Commission Delegated Regulation (EU) 2022/1288, of April 6, 2022, which complements the SFDR in this matter is insufficient, which prevents a reasonable consideration of the negative impacts of investment decisions on sustainability factors based on this information, such risks and impacts are already preliminarily considered, both in the investment analysis and decision phase and , subsequently, in monitoring the management and control of investment projects, in accordance with what is specified in the Quadrantis Capital **Sustainability Policy**.
- In the absence of the aforementioned systematized public information, combined with the very initial degree of maturity, structuring and capacity of investments and subsidiaries in ESG matters, which will not have, in the initial/start-up phases, reasonable capacity to make structured ESG information available, in sufficient time and content for the purposes of the paragraph 1 of Article 4 of the SFDR.

Due to the framework previously described, Quadrantis Capital, currently, does not ensure the consideration of the negative impacts of investment decisions on sustainability factors, with the detail recommended in the previously mentioned Annex 1 – Declaration model of the main negative impacts on sustainability, constant of Commission Delegated Regulation (EU) 2022/1288 of 6 April 2022.

Regardless of the current framework, described above, Quadrantis Capital SCR SA already considers, whenever applicable, as described in the Sustainability Policy, regarding:

- **Environmental Sustainability Factors**, framed within the general principles of applying the defined sustainability policy, particularly regarding investment decisions.
- **Integration into the government and organization of Quadrantis Capital**, the commitment to consider Sustainability in all dimensions of its activity, namely, in its organizational structure, in investment processes, specifically in the initial due diligence phase, before making an investment decision initial and throughout the life

of the various OIC's, in the decision-making of the funds it manages, in its procedures and controls.

- In terms of **Risk Management**, it already ensures the integration of ESG criteria into the investment risk assessment matrix and the identification, assessment, and management of sustainability risks.

When the circumstances initially mentioned change and allow another type of consideration, regarding the preparation with systematized information from the previously mentioned Annex 1, Quadrantis Capital will make this information available. This framework will be reevaluated periodically, at least annually.