



**SEVEN  
GEN**  
INVESTMENT  
PARTNERS

SevenGen Investment Partners B.V. | SFDR 9 disclosure

In order to comply with the sustainable finance disclosure regulation (SFDR)<sup>1</sup>, SevenGen Investment Partners B.V. (SevenGen) makes the following disclosures.

#### Integration of sustainability risks

A sustainability risk means:

*"an environmental, social or governance event or condition that, if it occurs, could cause an actual or potential material negative impact on the value of the investment".*

Before any investment decisions are made on behalf of a fund managed by SevenGen, an investment (decision) process is followed which in regard to specific investments includes o.a.:

The first step of our four-step approach to assess, measure, manage, and reward impact. Before an investment decision, we conduct an initial assessment of the investment's existing impact, quantifying both positive and negative effects and potential ways to improve the impact. Per investment we focus on the two to three most relevant and material Principle Adverse Impacts (PAI's) as defined in table 1 of annex 1 (PAI statements) of the Delegated Regulation (EU) 2022/1288 by the Commission of April 6, 2022 in line with SFDR (article 7).

SevenGen views ESG as a standard topic in the pre-investment process. Part of the investment decisions process is that SevenGen assesses the material risks attached to a potential investment opportunity, which includes sustainability risks. Identified sustainability risks are carefully considered by SevenGen when making investment decisions.

We establish impact reporting mechanisms at fund level, ensuring transparency and accountability. Our objective is not only to measure but also to make the impact insightful in order to be able to manage impact.

To manage impact effectively, we take proactive steps, including strategies to increase impact (e.g. increase sales and/or influence supply chains positively). Additionally, we may implement cost-saving programs to target a broader audience to increase the overall impact, aligning with our sustainability objectives. Adherence to regulations and if needed, the formulation of relevant policies by our investments are a part of our commitment to responsible investing.

As part of our management approach, if and when possible, we link management rewards also to the increase of impact achieved.

SevenGen pays staff a combination of fixed remuneration and variable remuneration. Variable remuneration for relevant staff also takes into account compliance with all internal policies and procedures, including those relating to actual impact being realized by the portfolio companies of the funds managed by SevenGen and taking into account sustainability risks on the investment decision making process.

Employees are made aware of the applicable policies and procedures when starting their employment with SevenGen. Consideration of sustainability adverse impacts

In accordance with article 4 sub 1 (b) of the SFDR, SevenGen states that it does consider adverse impacts of investment decisions on sustainability factors as set forth in article 4 sub 1 (a) of the SFDR yet SevenGen cannot gather and/or measure all the relevant data of the portfolio companies

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<sup>1</sup> Regulation (EU) 2019/2088

of SevenGen. SevenGen takes into account only the two to three relevant sustainability factors and therefore cannot make a the full disclosures as described in article 4 sub 1 (a) of the SFDR.

At this stage SevenGen considers the adverse impacts of its investment decisions on relevant sustainability factors, as described in the Impact Assessment Protocol. SevenGen cannot gather and/or measure all the relevant data of the portfolio companies of SevenGen, taking into account (i) the availability of data at the portfolio companies, (ii) reasonable cost for clients and investors and (iii) due to the small size of the organization of SevenGen, such disclosure as set forth in article 4 sub 1 (a) of the SFDR and the administrative burden in connection therewith would not be proportional.

SevenGen continues to closely monitor the market developments (including the level of availability of the required data) as well as the regulatory developments. SevenGen will at least on an annual basis review whether and when to comply with article 4 sub 1 (a) of the SFDR.

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