

# Periodic disclosures for the financial products according to Article 8 SFDR

Product name: Inven Capital – Podfond D (“Sub-Fund D”)  
Legal entity identifier: 75163861 (NIČ of Sub-Fund D)

## Environmental and/or social characteristics

Did this financial product have a sustainable investment objective	
<input checked="" type="radio"/> <input type="radio"/> Yes	<input checked="" type="radio"/> <input type="radio"/> No
<div><input type="checkbox"/> It made <b>sustainable investments with an environmental objective:</b> ____%</div> <div><div><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</div><div><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</div></div> <div><input type="checkbox"/> It made <b>sustainable investments with a social objective:</b> ____%</div>	<div><input type="checkbox"/> It <b>promoted Environmental/Social (E/S) characteristics</b> and while it did not have as its objective a sustainable investment, it had a proportion of ____% of sustainable investments</div> <div><div><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</div><div><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</div><div><input type="checkbox"/> with a social objective</div></div> <div><input checked="" type="checkbox"/> It promoted E/S characteristics, but <b>did not make any sustainable investments</b></div>

To what extent were the environmental and/or social characteristics promoted by this financial product met

### Environmental and social characteristics promoted by Sub-Fund D

Our investment strategy intends to promote environmental or social characteristics, or a combination of those characteristics, provided that the companies in which the investments are made follow good governance practices in accordance with Article 8 of Regulation (EU) 2019/2088 of the European Parliament and of the Council, on the disclosure of information

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of environmentally sustainable economic activities. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



related to sustainability in the financial services sector, as amended (hereinafter referred to as the "SFDR").

Sub-fund D committed to investing in a responsible way by actively integrating environmental, social and governance considerations into our investment selection and ongoing monitoring process. Specifically, Sub-fund D aims at:

- a) investing into companies where we see a commitment towards ESG goals,
- b) supporting these companies with the process of defining their own ESG strategy and policy as well as their implementation,
- c) ensuring that the companies in which the Sub-Fund D invests ideally benefit investors, society and the environment.

We monitor several metrics during our investment process that are listed in our ESG policy (document Inven ESG policy) published on our website [www.invencapital.cz](http://www.invencapital.cz) in the section Info for Investors.

The ESG metrics we consider in our investment process can be divided into the following areas: general environment, carbon footprint, material management, supply chain, employees, customers, community, diversity and inclusion, general governance and board of directors.

#### ● *How did the sustainability indicators perform?*

##### **Performance of ESG characteristics promoted by Sub-Fund D in 2024**

In 2022 we formulated our ESG policy and framework in a structured way during 2022 (as described in detail in our Inven ESG policy on our website)

We collect sustainability data using the professional platform Worldfavor, which we implemented in 2023 (we first used it to collect data for the 2022 period). Based on this data, we publish on our website a statement of the main adverse sustainability impacts of our portfolio companies in accordance with Annex 1 of Commission Delegated Regulation (EU) 2022/1288 annually by the end of June for the previous period.

An overview of the data we have thus obtained from our portfolio companies for 2024 is summarised in several broad categories below. A comparison with the data for 2023 is also provided.

As of 31/12/2024, there is only one portfolio company in the portfolio of Sub-Fund D, in which Sub-Fund D invested in 2023.

##### *General commitment towards ESG*

The commitment to sustainability goals is demonstrated by Sub-Fund D especially in the environmental area, where it mainly deals with issues of biodiversity, climate change, waste and water management.

##### *Environmental metrics*

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

Sub-fund D promotes environmental properties. The Subfund's portfolio company formulated initiatives for reducing its carbon footprint and waste. In 2024 and 2023, the company measured its carbon footprint (scope 1, 2 and 3).

#### *Social metrics*

Sub-fund D promotes social properties. In the social area, we focused in particular on the analysis of the workforce and the supply chain.

The company of Subfund D employed an average of 25% of women in 2024, same as in 2023. We did not obtain data regarding the directives in 2024.

The company implemented a supply chain guideline in 2024.

#### *Governance metrics*

In the area of governance, we monitored the functioning of the board of directors and the existence of some basic mechanisms such as whistleblowing and anti-corruption measures. The company formulated an anti-corruption policy in 2024. In 2024, the company introduced a directive governing the rules of conduct and a whistleblowing mechanism.

#### ● ***...and compared to previous periods?***

Comparing 2024 and 2023, we see similar results in promoting the environmental and social properties of the product. A comparison of individual indicators with 2023 is provided for individual indicators in the section above.

Data collection is also coordinated with other investors in the companies and there is a noticeable tendency to limit the number of indicators collected. Increasingly, emphasis is placed on indicators relevant to the given company.

#### ● ***What were the objectives of the sustainable investments that the financial product partially made and how did the sustainable investment contribute to such objectives?***

The intention of Subfund D is not to make sustainable investments.

#### ● ***How did the sustainable investments that the financial product partially made not cause significant harm to any environmental or social sustainable investment objective?***

How were the indicators for adverse impacts on sustainability factors taken into account?

The intention of Subfund D is not to make sustainable investments.

Were sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

N/A



### How did this financial product consider principal adverse impacts on sustainability factors?

Even though Sub-Fund D did not make any sustainable investments, it considered the principal adverse indicators on sustainability. In June 2024 Sub-fund D published the Principal adverse sustainability impacts statement defined in Appendix 1 of Commission Delegated Regulation (EU) 2022/1288 of the European Parliament and of the Council, as amended ("RTS") on Inven's website [Inven Capital](#) in the section Info for investors.

Sub-fund D will take into account the following adverse sustainability impacts:

- emissions of greenhouse gases,
- carbon footprint,
- the intensity of greenhouse gas emissions of companies in which investments are made,
- exposure to companies operating in the fossil fuel sector,
- share of energy consumption and production from non-renewable sources,
- the intensity of energy consumption by sector with a high impact on the climate,
- activities with a negative impact on areas sensitive to biological diversity,
- emissions into water,
- share of hazardous waste and radioactive waste,
- violation of the principles of the United Nations Global Compact and the guidelines of the Organization for Economic Cooperation and Development (OECD) for multinational enterprises,
- missing procedures and mechanisms for monitoring compliance with the principles of the UN Global Compact and OECD guidelines for multinational enterprises,
- the unadjusted difference in the remuneration of women and men,
- gender diversity in the board of directors,
- exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical and biological weapons),
- investments in companies without initiatives to reduce carbon emissions,
- missing supplier code of conduct,
- missing policies in the area of combating corruption and bribery.



The list includes the investments constituting the **greatest proportion of investments** of the financial product during the reference period which is: **1.1.2024-31.12.2024**

### What were the top investments of this financial product?

Largest investments	Sector	% Assets	Country
Hydrogrid	Energy	100%	Austria

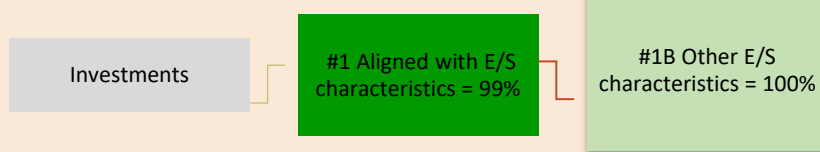


### What was the proportion of sustainability-related investments?

It is not relevant, as the intention of Subfund D is not to make sustainable investments.

● **What was the asset allocation?**

**Asset allocation** describes the share of investments in specific assets.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The EU taxonomy sets out the "do no significant harm" principle, according to which investments that comply with the taxonomy should not significantly harm the objectives of the EU taxonomy, and is complemented by specific Union criteria.

The "do no significant harm" principle applies only to those underlying investments of the financial product that take into account the EU criteria for environmentally sustainable economic activities. The underlying investments of the remaining part of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Even other sustainable investments must not significantly harm any environmental or social goals.

● **In which economic sectors were the investments made?**

The investments were made into the energy sector.



**To what extent were the sustainable investments with an environmental objective aligned with the EU Taxonomy?**

The intention of Subfund D is not to make sustainable investments.

● **Did the financial product invest in fossil gas and/or nuclear energy related activities complying with the EU Taxonomy?**

☐ Yes

☐ In fossil gas

☐ In nuclear energy

☒ No

Sub-fund D does not pursue the objective of sustainable investments in the reference period, however, it is gradually preparing to implement the screening of sustainable economic activities at its portfolio companies in accordance with Regulation (EU)

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework for facilitating sustainable investments, as amended (EU Taxonomy"). Due to the lack of available data and the readiness of companies to report this data, we consider the compliance of Subfund D's portfolio with the EU taxonomy to be 0% by the end of 2024. The companies in which Subfund D has invested are private start-ups whose data is usually not publicly available.

We are currently working on taxonomy screening implementation and will present the results in the following reporting periods.

● ***What was the share of investments made in transitional and enabling activities?***

There were no investments in transitional and enabling activities.

● ***How did the percentage of investments that were aligned with the EU Taxonomy compare with previous reference periods?***

Currently, it is not the intention of Sub-Fund D to make sustainable investments. The percentage share of these investments has therefore not changed compared to the previous reference period and is zero.



**What was the share of sustainable investments with an environmental objective not aligned with the EU Taxonomy?**

Based on data from the current reference period, Sub-Fund D does not hold sustainable investments with an environmental objective.



**What was the share of socially sustainable investments?**

Sub-fund D does not follow the objective of sustainable investments.



**What investments were included under "other", what was their purpose and were there any minimum environmental or social safeguards?**

N/A



**What actions have been taken to meet the environmental and/or social characteristics during the reference period?**

Inven's investment managers actively monitoring the activities of portfolio companies and participating in the meetings of the boards of directors of the given companies (in most companies, Inven has a member on the board of directors). In 2024, investment managers presented the results of their sustainability data collection to their portfolio companies and presented Inven's sustainability strategy. Inven evaluated companies' approach to sustainability using the Worldfavor reporting platform, its questionnaires

and subsequent interviews with company representatives. Based on the evaluation of the established facts, Inven helps its portfolio companies set priorities and goals in the area of sustainability depending on the individual needs of each company.

Regular monitoring (at least annually) was set up and will happen in the first quarter of each year.



**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

#### **How did this financial product perform compared to the reference benchmark?**

We haven't designated any reference benchmark for this financial product.

- ***How does the reference benchmark differ from a broad market index?***  
N/A
- ***How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the environmental or social characteristics promoted?***  
N/A
- ***How did this financial product perform compared with the reference benchmark?***  
N/A
- ***How did this financial product perform compared with the broad market index?***  
N/A