

SFDR pre-contractual and website disclosures

Date: 10/10/2024

Version 1

Acumen Capital Partners LLC (CRD# 285564; SEC# 802-108698) (the "**Fund Manager**") is a financial market participant as defined in the Sustainable Finance Disclosures Regulation (EU) 2019/2088 (the "**SFDR**").

The Fund Manager is required to publish certain information on its website to comply with SFDR. The following disclosures are made in accordance with Articles 3(1), 4(1)(b) and 5(1) of the SFDR.

The information contained herein should not be relied upon by any investor and does not constitute part of an offering or an invitation or placement as those terms are understood for the purposes of EU Alternative Investment Fund Managers Directive (2011/61/EU) ("**AIFMD**" which shall include all similar, implementing or supplementary measures, laws and regulations in each member state of the EEA, including, but not limited to, the Directive 2019/1160 on the cross-border distribution of collective investment undertakings and the Regulation (EU) 2019/1156 of the European Parliament and of the Council of 20 June 2019 on facilitating cross-border distribution of collective investment undertakings).

The inclusion of the following disclosures does not imply that an offering or placement of interests has been or will be made to or with investors and any such offering or placement will be made only where (i) this is permitted under national law; and (ii) the Fund Manager, if applicable, complies with all relevant procedural and substantive obligations relating to the offering or placement of interests.

Terminology used in these disclosures such as "sustainable", "sustainability" or "sustainable investment" or the negatives thereof or other variations thereon or comparable terminology which describe certain investment practises of the Fund shall not be interpreted as referring to any definition used in, or provision of, laws, regulations or guidance of any jurisdiction, except where used in relation to the SFDR.

Sustainability risk policies and integration of sustainability risks

(Article 3(1) SFDR)

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

The Fund Manager will consider sustainability risks as with other operational risks, which may impact on the value of the investment, in its investment decision-making process, notably in light of the investment diligence strategy and restrictions applicable to its funds and other products.

The Fund Manager has developed an environmental and social management system that details the pre and post investment environmental and social safeguarding process. The Fund Manager will screen each investment for environmental and social characteristics that are excluded from its funds' investing strategy. The Fund Manager will undertake a deeper due diligence for companies that are potential investments to aim to comply with the environmental and social expectations of its funds.

Environmental and social due diligence will be reported to the investment committee as a component of their decision-making. Any investee environmental and social activities that need to be improved

or better aligned with the relevant fund's environmental, social or governance requirements will be captured in binding agreements with the company and an environmental and social action plan. Companies are expected to report on environmental and social metrics including the action plan on a recurring basis.

No consideration of Principal Adverse Impacts of investments

(Article 4(1)(b) SFDR)

The Fund Manager does not consider the principal adverse impacts ("PAIs") of its investment decisions on sustainability factors in the manner prescribed by Article 4 of the SFDR (at its own level nor in respect of investments of its funds).

Considering the nature and scale of our activities and the types of products that the Fund Manager makes available, the Fund Manager considers that it would be disproportionate to consider the PAIs as prescribed. As such, the Fund Manager does not intend to consider PAIs of investment decisions on sustainability factors following the specific requirements set out in the SFDR. The Fund Manager will keep its decision not to fully comply with the PAIs regime under regular review.

Although the Fund Manager does not consider the PAIs in line with the procedures set out in Article 4 of the SFDR, the PAIs identify certain impacts and metrics which the Fund Manager may wish to consider and report on. Where relevant to a strategy or a product, or indeed to comply with the Fund Manager's other obligations, the Fund Manager may choose to make disclosures in relation to similar or certain of these metrics.

Transparency of remuneration policies in relation to the integration of sustainability risks

(Article 5(1) SFDR)

The Fund Manager pays staff a combination of fixed remuneration (salary and benefits) and variable remuneration (including bonus). Variable remuneration allocated to relevant staff reflects personal, team and firm performance. Compliance with all the Fund Manager's policies and procedures, including policies and procedures relating to the impact of sustainability risks on the investment decision making process, shall be taken into account as part of that overall assessment.

Website disclosures are required for certain products under the SFDR. These can be found at <https://www.kawisafi.com/>