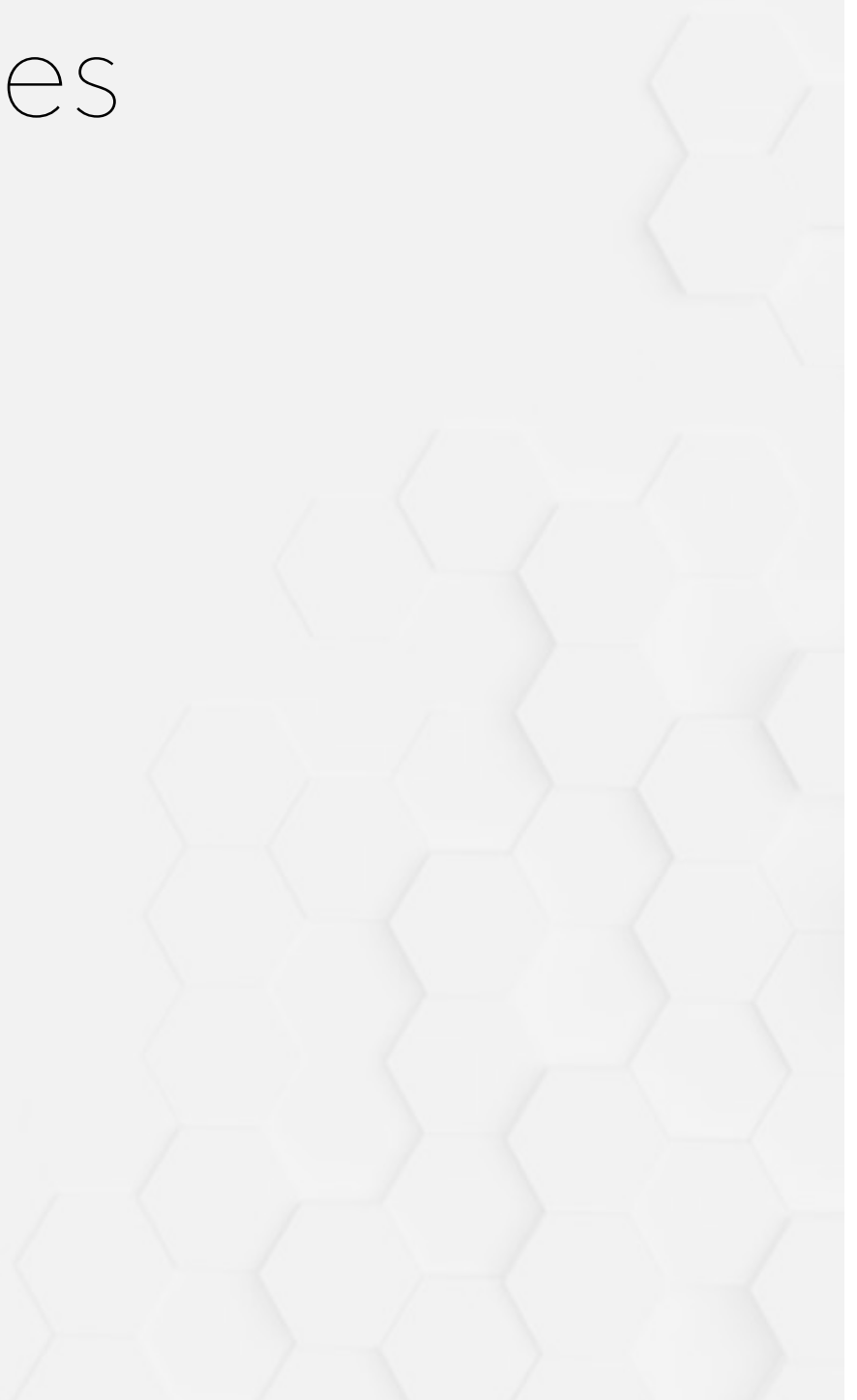


**Draft**

# SFDR website disclosures



## **Draft SFDR website disclosures**

In order to comply with the sustainable finance disclosure regulation (**SFDR**)<sup>1</sup> and the SFDR Delegated Regulation<sup>2</sup>, One Two Capital B.V. (**One Two Capital**) 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 that One Two Capital manages, an investment decision process is followed. One Two Capital views ESG as a standard topic in the pre-investment process. Part of the investment decisions process is that One Two Capital assesses the risks attached to a potential investment opportunity, which includes sustainability risks. Identified sustainability risks are considered by One Two Capital when making investment decisions.

In addition, One Two Capital pays staff a combination of fixed remuneration and variable remuneration (including a possible bonus). Variable remuneration for relevant staff also takes into account compliance with all policies and procedures which are in effect within One Two Capital, including those relating to 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 One Two Capital.

### **No consideration of adverse impacts of investment decisions on sustainability factors**

In accordance with article 4 sub 1 (b) of the SFDR, One Two Capital states that it does not consider adverse impacts of investment decisions on sustainability factors as set forth in article 4 sub 1 (a) of the Disclosure Regulation and therefore does not make the disclosures as described in article 4 sub 1 (a) of the SFDR. At this stage One Two Capital does not consider the adverse impacts of its investment decisions on sustainability factors. One Two Capital could not reasonably gather and/or measure all the relevant data of the portfolio companies of One Two Capital, taking into account reasonable cost for clients and investors and due to the small size of the organisation of One Two Capital, 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.

One Two Capital continues to closely monitor the market developments (including the level of availability of the data) as well as the regulatory developments. One Two Capital 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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<sup>1</sup> Regulation (EU) 2019/2088

<sup>2</sup> Commission Delegated Regulation (EU) 2022/1288