



Sustainability-related disclosures pursuant to Regulation (EU) 2019/2088 (“SFDR”)

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Date of Update	Description of amendment(s)
October 2026	Streamlining of former ESG due diligence section; refinement of sustainability risk wording; update of PAI non-consideration rationale; revision of remuneration disclosure.

I. Sustainability risks

DPE Investment Gesellschaft mbH (LEI: 391200SMXXSV12LJNX31, the “**Manager**”) considers sustainability risks as part of its investment decision-making process. Sustainability risks are environmental, social or governance events or conditions, the occurrence of which could have an actual or potential material adverse effect on the value of the investment. The Manager considers sustainability risks as part of its due diligence process prior to any investment. Such assessment is conducted by way of an ESG due diligence performed by independent experts, the findings of which are compiled in a standardised report and summarised in the investment memorandum submitted to the Manager’s investment committee. The results of such assessment are taken into account when the investment decision is being taken. However, the Manager remains free in its decision to refrain from investing or to invest despite sustainability risks, in which case the Manager can also apply measures to reduce or mitigate any sustainability risks. At all times, the Manager will apply the principle of proportionality taking due account of the strategic relevance of an investment as well as its transactional context.

The Manager expects sustainability risks within the meaning of Art. 3 SFDR not to negatively affect the returns of financial products made available by the Manager. Where relevant, the Manager will apply reasonable efforts to appropriately assess such risks and their potential negative impacts on the returns of the financial products it manages.

II. No consideration of adverse impacts of investment decisions on sustainability factors

The Manager does not consider adverse impacts of its investment decisions on sustainability factors within the meaning of Art. 4 (1) lit. b) SFDR and, hence, does not use the sustainability indicators listed in Annex I of Delegated Regulation (EU) 2022/1288 (as amended from time to time, “**RTS**”) to identify and assess potential adverse impacts. Sustainability factors are environmental, social and employee concerns, respect for human rights and the fight against corruption and bribery.

Given that the SFDR, the Regulation (EU) 2020/852 (“**EU Taxonomy**”) and the accompanying RTS have now been in force for some time, there is a growing body of regulatory guidance and market practice. However, significant legal and practical uncertainties persist regarding their application to private equity as an asset class. This is particularly relevant for the Manager, whose investment strategy focuses on small and mid-cap companies in the DACH region. Such portfolio companies typically have limited experience in ESG reporting and often lack the infrastructure to provide comprehensive data across all indicators of Annex I of the RTS. As a result, obtaining complete and reliable data for all mandatory indicators on a consistent basis continues to pose considerable challenges in practice.



If and to the extent that the legal uncertainties will be resolved and a practicable market and administrative practice will evolve in this regard, the Manager will re-evaluate considering principal adverse impacts of its investment decisions in Q4 2027. In the meantime, the Manager remains free in its decision to use part of the sustainability indicators listed in Annex I of the RTS and/or an own set of indicators.

III. Remuneration disclosure

The Manager's remuneration policy is consistent with the integration of sustainability risks: it does not encourage excessive risk-taking, including with respect to sustainability risks, compared to the investment policies of the AIFs managed by the Manager. Sustainability risks and their impact on sustainability factors are monitored primarily in relation to the AIFs' investments by the Manager's ESG function.