

Regulation of the European Parliament and of the Council on sustainable-related disclosures in the financial services sector (EU) 2019/2088 (“SFDR”).

The Regulation (EU) 2019/1088 of the European Parliament and of the Council of 27 November 2019 on sustainable-related disclosures in the financial services sector (known as “*Sustainable Finance Disclosure Regulation*”, “*SFDR*”) seeks to achieve more transparency with regard to the integration of sustainability risks and the consideration of adverse sustainability impacts into their investment decisions and investment or insurance advice and the disclosure of such information with regard to financial products.

Mandatory disclosures under SFDR

(1) Integration of sustainability risks to the investment process

5G Ventures S.A. considers the impact of sustainability factors and sustainability risks during the assessment process of investment proposals which are submitted for approval of investment by “Phaistos Investment Fund”, provided that sufficient data is available with regard to these factors and according to the provisions of the Regulation on the Assessment of Investment Proposals of 5G Ventures S.A., which has been approved pursuant to Art. 93 par. 10 of Law 4727/2020.

(2) Statement regarding adverse impacts of investment decisions on sustainability factors

Art. 4 of SFDR provides that financial markets participants shall publish on their website a statement whether they consider principal adverse impacts of investment decisions on sustainability factors. 5G Ventures S.A. at the current stage has opted not to consider adverse impacts of investment decisions on sustainability factors, in accordance with SFDR. 5G Ventures S.A. will keep this decision under regular review. 5G Ventures S.A. is supportive of the policy aims of SFDR to improve transparency to investors and the market. Moreover, 5G Ventures S.A. has opted to implement positive ESG-related initiatives, as part of the provisions included in the Regulation of Assessment of Investment Proposals which it has approved and is in force.

(3) Remuneration Policy

5G Ventures S.A. is a manager of alternative investment funds (AIFM) under Directive (EC) 2011/61 of the European Parliament and the Council of 8 June 2011, which is included in the exemptions of Art. 3 thereof. Therefore, 5G Ventures S.A. is subject to registration (and not authorization) with the Hellenic Capital Markets Commission, according to Art. 3 par. 3 of Law 4209/2013, which has transposed Directive 2011/61 into Greek law. Subsequently, 5G Ventures S.A. does not need to have a remuneration policy in accordance with the requirements of Directive 2011/61 and of Art. 5 of SFDR.

