

No consideration of sustainability adverse impacts

In accordance with article 4 sub 1 (b) of the SFDR^[1], NewPort 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. Given the small size of the organisation of NewPort, such disclosure and the administrative burden in connection therewith would not be proportional. This decision will be reviewed on an annual basis.

Despite opting out of the principal adverse impacts framework on fund-manager level, NewPort Capital considers the adverse impacts of the investment decisions of its Fund II. The Firm aims to increase its ambition to consider such impacts for NewPort Capital as a whole in the following years. In efforts to achieve this, NewPort has requested a few of Fund I's portfolio companies to begin monitoring their impacts with the PAI framework, as a way of getting ready to monitor the latter on fund-level in the future, and therefore opt-in on entity-level for the whole of NewPort Capital.

[1] Regulation (EU) 2019/2088