NewPort Buyout Fund III Coöperatief U.A.

Principal Adverse Impact Statement 2025

1. Summary

NewPort Buyout Fund III Coöperatief U.A. (the 'Fund' or 'Fund III') considers Principal Adverse Impacts ('PAI') of its investment decisions on sustainability factors.

The present statement is the consolidated disclosure of PAI indicators on sustainability factors for the reference period 1 January to 31 December 2025.

2. Description of Principal Adverse Impacts

Please find the summary for all PAI indicators that are considered, as well as their description, in the table below.

Name	Metric	2024 (R)	2025	Explanation	Actions taken, actions planned and targets
1. GHG Emissions	Scope 1 emissions (tCO2-eq.)	33.19	27.45	Calculated as a weighted average across the fund and attributed by ownership share. Scope 1 covers direct emissions from sources a company owns or controls: fuel combustion in company vehicles and equipment, and on-site heating such as natural-gas boilers, using activity data and GHG-Protocol factors.	Newport Capital will support its portfolio companies on mitigating direct emissions where reasonable, including the transition of vehicle fleets and on-site heating over time.
	Scope 2 emissions (tCO2-eq.)	7.90	9.67	Indirect emissions from purchased energy, on the market-based method per the GHG Protocol, reflecting each company's actual electricity contracts including any certificate-backed green electricity, which is counted at zero.	Newport Capital will support its portfolio companies in measuring and, where reasonable, reducing greenhouse gas emissions, proportionate to their stage and resources. For the next period it will attempt to collect a more complete breakdown.
	Scope 3 emissions (tCO2-eq.)	n/a	867.95	Previously not reported. For 2025 Scope 3 was collected for the first time, on a documented spend-based and activity-based model. The categories that apply differ by sector, so coverage is assessed per category. Because this is the first year of collection, the figure should be read as an initial baseline.	Having started to measure Scope 3, Newport Capital will broaden coverage in upcoming periods, prompting portfolio companies for the most relevant categories and refining the estimates as primary data improves.

	Total GHG Emissions (tCO2-eq.)	41.09	905.07	The sum of Scope 1, 2 and 3. Scope 3 is included for the first time this period, which is the main driver of the increase versus 2024, when only Scope 1 and 2 were measured.	Newport Capital will support its portfolio companies in measuring and, where reasonable, reducing greenhouse gas emissions, proportionate to their stage and resources. For the next period it will attempt to collect a more complete breakdown, in particular Scope 3, and will calculate estimations where they can be based on reliable assumptions.
2. Carbon Footprint	Carbon footprint (in tCO2-eq./M€)	6.33	74.71	Total Scope 1 to 3 emissions per million euro invested. Per the RTS, each company's emissions are attributed by ownership share (investment value divided by enterprise value) and divided by total investment value. The first-time inclusion of Scope 3 explains most of the change.	Newport Capital will engage its portfolio companies to understand the drivers and assist improvement where reasonable.
3. GHG Intensity	GHG intensity of investee companies (in tCO2-eq./M€)	12.06	151.90	Emissions per million euro of revenue, as an investment-weighted average of each company's intensity, now covering Scope 1 to 3. As Scope 3 is new and partly modelled this is a conservative baseline.	Newport Capital will support its portfolio companies on mitigating emissions where reasonable.
4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	0%	0%	Newport Capital does not invest in companies active in the fossil-fuel sector, which is part of its exclusion list.	Continue to screen all investments against the exclusion list.

5. Share of non-renewable energy consumption and production	Share of non-renewable energy consumption and production of investee companies, expressed as a percentage of total energy sources (%)	100%	97.2%	Share of non-renewable energy across all energy sources, electricity and gas, for the companies in control of their own energy procurement. Certificate-backed green electricity counts as renewable.	Newport Capital will encourage portfolio companies to move to certificate-backed green electricity contracts where feasible.
6. Energy consumption intensity per high impact climate sector	Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector	Sector G: 0.0186	Sector G: 0.0229	Energy consumption in GWh per million euro of revenue, disclosed per high-impact climate sector. Only one holding (in retail trade, Section G) is in a high-impact sector.	Where a holding is in a high-impact sector, Newport Capital will assist with energy efficiency and source switching where feasible.
7. Activities negatively affecting biodiversity-sensitive area	Share of investments in investee companies with sites/operations located in or near biodiversity-sensitive areas where activities negatively affect those areas	0%	0%	Activities negatively affecting biodiversity-sensitive areas, assessed from the proximity and potential threat of operating sites to such areas.	Newport Capital will continue to monitor this indicator as portfolio companies expand.
8. Emissions to Water	Tonnes of emissions to water generated by investee companies per million EUR invested	0.00	0.00	Tonnes of emissions to water (priority substances per Article 2(30) of Directive 2000/60/EC) per million euro invested, as a weighted average.	Newport Capital will continue to monitor this indicator as portfolio companies expand.
9. Hazardous waste and radioactive waste	Tonnes of hazardous and radioactive waste generated by investee companies per	0.00	0.00	Tonnes of hazardous and radioactive waste (per Article 3(2) of Directive 2008/98/EC) per million	Newport Capital will continue to monitor this indicator as portfolio companies

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ratio	million EUR invested			euro invested, as a weighted average.	expand.
10. Violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises	Share of investments in investee companies involved in violations of the UNGC principles or OECD Guidelines (%)	0%	0%	Share of investments in companies involved in violations of the UN Global Compact principles or the OECD Guidelines, assessed through a structured question set.	Newport Capital will continue to monitor this indicator as portfolio companies expand.
11. Lack of processes and compliance mechanisms to monitor compliance with UNGC principles and OECD Guidelines	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines, or a grievance/complaints mechanism (%)	100%	45.7%	Share of investments in companies without policies to monitor compliance with the UN Global Compact principles or OECD Guidelines, OR a grievance or complaints mechanism to address such matters. A company with either is treated as compliant.	Newport Capital will offer its portfolio companies guidance to establish such policies and mechanisms where feasible.
12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies (%)	5.01%	25.9%	Average unadjusted gender pay gap, the difference between men's and women's average hourly pay irrespective of role, weighted by investment size.	Newport Capital will engage portfolio companies. The increase is due mainly to the entry of a new portfolio company and at first sight it seems more of a role-composition effect (senior or placement roles versus administrative), not a discrimination signal. Newport will nonetheless verify the data and explore improvements.

13. Board gender diversity	Average ratio of female to male board members in investee companies, expressed as a percentage of all board members	33.33%	18.1%	Average ratio of female to male board members, weighted by investment size.	Newport Capital will continue to emphasise board gender diversity. Board composition changes infrequently.
14. Exposure to controversial weapons	Share of investments in investee companies involved in the manufacture or selling of controversial weapons (%)	0%	0%	Newport Capital does not invest in companies involved in controversial weapons, which is part of its exclusion list.	Continue to screen all investments against the exclusion list.
15. Lack of Grievance Mechanisms	Share of investments in investee companies without a grievance/complaints mechanism related to employee matters (%)	100%	45.7%	Share of investments in companies without a grievance or complaints mechanism related to employee matters, assessed for whether it exists, its nature, and whether employees are informed.	Newport Capital will provide its portfolio companies with guidance to establish grievance mechanisms where feasible. One of the companies established a complaints process over the reporting period.
16. Lack of Carbon Reduction Initiatives	Share of investments in investee companies without carbon reduction initiatives in place (%)	100%	100%	Share of investments in companies without carbon-emission-reduction initiatives aligned with the Paris Agreement. An initiative qualifies only as a credible plan or target delivering reductions against a baseline.	Considering the stage of the portfolio companies, a formal Paris-aligned initiative may not be proportionate in most cases. Newport Capital will engage its companies to develop tailored plans as they mature. Notably, informal measures were taken by one of the companies to switch part of its electricity consumption to a green contract.

R: Prior-year figure restated for comparability. The 2024 carbon footprint has been aligned to the SFDR RTS investment-value basis, and the high-impact-sector energy intensity widened to include all energy sources.

3. Description of Policies to Identify and Prioritise Principal Adverse Impacts

3.1 Indicator Selection and Relevance

The Fund selects and prioritises PAI indicators by analysing the sustainable targets it seeks to meet and linking the indicators that bear on those targets, identifying those most significant for its portfolio companies' business operations. To tailor the PAI framework to its needs, the Fund works with Treety, which assists in selecting the relevant indicators and setting up a monitoring system across all portfolio companies. The framework covers the fourteen mandatory PAI indicators together with two voluntary indicators: the share of investments in companies without grievance or complaints mechanisms, and the share without carbon-reduction initiatives. This selection is reviewed annually to implement any necessary changes.

3.2 Data Collection and Oversight

PAI data is collected through an annual data campaign in which portfolio companies report against each indicator, supported by documentation where available. The data is self-reported. Treety supports the process by checking data quality, resolving inconsistencies, and making best-effort estimations where needed to close gaps or address non-responsiveness. Compliance with the SFDR is overseen by Newport Capital's management team, who ensure portfolio companies respond to data requests in a timely manner. The calculation method for each indicator is documented in the ‘Explanation’ column of the table above.

3.3 Data Quality and Estimations

Across the full reporting perimeter, approximately 67% of the data points were obtained directly from investee companies, 4% were estimated on a best-effort basis, and 29% are data gaps, by count. One company was acquired only shortly before year-end. Given the very short holding period and the limited engagement possible to date, it was not surveyed this cycle. It nonetheless remains within the reporting perimeter and its indicators are recorded as data gaps. Nonetheless, the Fund can state with confidence from its knowledge of the company that it derives no revenue from fossil fuels and has no exposure to controversial weapons. The data gaps are therefore concentrated in the late-acquired company, which represents a larger share when measured by invested value and will be fully included from the 2026 reference period.

Scope 3 emissions were collected for the first time this period, on a partial basis, and should be read as an initial baseline. The disclosures rely on self-reported data with the assistance of Treety. Consistent with the SFDR best-efforts standard (Article 7(2) of Commission Delegated Regulation (EU) 2022/1288) read with the proportionality principle (Article 4(1) of the SFDR), the Fund sought data directly from investee companies and supplemented it with best-effort estimates only where a sound basis existed, leaving the remaining gaps transparent rather than estimating without basis.

Where prior-year figures have been restated for comparability they are flagged ‘R’. The restatements concern the 2024 carbon footprint, aligned to the RTS investment-value basis, and the 2024 high-impact-sector energy intensity, widened to include all energy sources.

4. Engagement Policy

The Fund believes in the importance of its role in guiding portfolio companies to minimise their operations' adverse environmental and social negative externalities. The Fund uses the PAI framework to monitor such externalities, as described above. Additionally, the Fund has set up various processes to incorporate the PAI results into its Engagement Policy.

To ensure due consideration and progressive mitigation efforts from portfolio companies, the Fund engages with portfolio companies through the following processes:

- Providing guidance in setting an ESG ambition (& Policy)
- Engaging in active dialogue with portfolio companies
- Giving portfolio companies access to our network and relevant stakeholders

- Yearly review based on previous results and regular discussions about improvement strategies

Further details on the practical implementation of these processes can be found in Newport Capital B.V.'s Engagement Policy.

5. Reference to International Standards

The Fund is aligned with the Principles for Responsible Investment ('PRI'). The Fund is actively involved in data gathering and calculation of the PAI indicators to show adherence with (parts of) the international standards/codes it complies with.

The indicators from the PAI framework listed above will be used to showcase the portfolio companies' equivalent KPI compliance within the international standards (e.g., using the GHG emissions PAI to demonstrate adherence with the OECD environmental standard of reducing GHG emissions and other air pollutants).

6. Review

This statement covers the 2025 reference period. The Fund measures the PAI indicators annually, using 2024 as the baseline, to track changes over time and assess the actions taken in response.