

Template Article 8 Fund SFDR Website Disclosure

	Atrato European Private Credit Fund I (the "Fund")	
Section		Source Reg / Commentary
Summary	<p>The objective of the Atrato European Private Credit Fund I (the "Fund") is to preserve capital and deliver stable returns on a risk adjusted basis.</p> <p>The Fund will seek to achieve its investment objective through the Fund's investment in, and taking exposure to, a diversified portfolio of loans and Debt Securities.</p> <p>The investment strategy of the Fund does not have sustainable investments within the meaning of the (EU) Regulation 2019/2088 ("SFDR") as its objective.</p> <p>The Fund's exclusion policy is enforced from the outset of the investment process and remains in effect throughout the entire lifespan of the Fund.</p>	<p>List of Sections to be Published on Website (RTS Article 24)</p> <p>FMPs shall publish on their websites:</p> <ul style="list-style-type: none"> • The information referred to in Article 10(1); and • In the following sections titled: <ul style="list-style-type: none"> a. 'Summary'; b. 'Investment strategy'; c. 'Proportion of investments'; d. 'Methodologies'; e. 'Data sources and processing'; f. 'Limitations to methodologies and data'; g. 'Due diligence'; and h. 'Engagement policies'; <p>In addition to the above, the following headings must also be included for Article 8 Financial Products:</p> <ul style="list-style-type: none"> a. 'No sustainable investment objective';

		<p>b. 'Environmental or social characteristics of the financial product';</p> <p>c. 'Where an index is designated as a reference benchmark to attain the environmental or social characteristics promoted by the financial product'; 'Designated reference benchmark'; and</p> <p>d. 'Monitoring of environmental or social characteristics'.</p> <p>RTS Article 25</p> <ul style="list-style-type: none"> • The summary of the information referred to under the above headings, shall be published on the FMP's website; • The summary section shall have a maximum length of two sides of A4-sized paper when printed; and • The website section 'Summary' shall be provided in the official language of the Home Member State and in an additional language if in another Member State.
No Sustainable Investment Objective	This Fund promotes environmental or social characteristics, but does not have as its objective sustainable investment.	RTS Article 26
Environmental or social characteristics promoted by the Portfolio	<p>The Fund promotes:</p> <ul style="list-style-type: none"> • A <i>minimum environmental and/or social standard</i> that seeks to mitigate or avoid practices that the Investment Manager deems environmentally and/or socially detrimental. Exclusion criteria is used to achieve this minimum standard which allows the Fund to promote the following environmental and social characteristics: 	<p>RTS Article 27</p> <p>FMPs shall describe the environmental or social characteristics that the Article 8 Financial Product promotes.</p>

	<ul style="list-style-type: none"> ○ The transition towards less reliance on fossil fuels and carbon intensive activities through a fossil fuels-related exclusion; ○ A reduction in the detrimental long-term humanitarian impact via the exclusion of controversial weapons, gambling, predatory lending and adult entertainment; ○ Animal welfare and biodiversity protection through animal testing and exploitation-related exclusion; ○ Improved societal health outcomes through a tobacco-related exclusion; and ○ Adherence to and conducting business activities in accordance with the Ten Principles of the United Nations Global Compact (“UNGC”) by excluding companies that violate these principles. <p>The Fund has not designated a reference benchmark for the purposes of attaining the environmental and/or social characteristics that it promotes.</p>	
Investment Strategy	<p>The following sustainability indicators are used to measure the attainment of the environmental and social characteristics promoted by the Fund:</p> <p><u>Exclusion Policy</u></p> <p>An assessment of whether the Fund has successfully and consistently executed its exclusion policy by ensuring that the Fund does not invest in issuers whose primary business activity revenues are derived from:</p> <ul style="list-style-type: none"> • the exploration, extraction or refinement of fossil fuels (unless the investee company has provided a commitment to reduce these emissions over time and the lending agreement entered into with the Fund can similarly encourage such reduction through applicable debt covenants and associated economic incentives that the Investment Manager can verify through mandatory reporting from the investee companies); 	<p>RTS Article 28</p> <p>FMPs shall describe all of the following:</p> <ul style="list-style-type: none"> • The investment strategy used to meet the environmental or social characteristics promoted by the Article 8 Financial Product • The policy to assess good governance practices of the investee companies, including with respect to sound management structures, employee relations, remuneration of staff and tax compliance.

	<ul style="list-style-type: none"> • the manufacture or sale of controversial weapons; • gambling operations (unless such operations are principally related to lotteries conducted on behalf of charitable organizations); • predatory lending, payday lending or short-term consumer lending; • tobacco and vape product production; • cosmetic or household products that use animal testing and companies involved in the transport and commercial exploitation of rare or endangered animals; and • the production or distribution of adult entertainment. <p>(collectively, the “Excluded Investments”).</p> <p>In addition, the Investment Manager will exclude investments by the Fund in companies that it believes do not adhere to good governance practices through the Investment Manager’s analysis of several governance-related matters that it considers within its investment process. This promotes adherence to and conducting business activities in accordance with UNGC principles by excluding companies that violate these principles.</p> <p>The Investment Manager believes that adherence to strong governance principles is an important feature of the companies in which the Fund will invest. The Investment Manager’s active approach to investing will generally include frequent interaction with company management, as the Investment Manager seeks to keep an open line of communication with respect to actions that could negatively impact the value of the investment.</p>	
Proportion of Investments	The Fund does not make a commitment to sustainable investments.	<p>RTS Article 29</p> <ul style="list-style-type: none"> • FMPs shall insert the information referred to in Article 14 of the RTS with respect to the presentation by FMPs of the pre-contractual information to be disclosed for Article 8 Financial Products and shall distinguish between direct exposures in investee entities and all other types of exposures to those entities.

Monitoring of environmental or social characteristics	<p>Engagement with management is an important component of the Fund's investment process and the Investment Manager will engage directly with management teams of investee companies on ESG performance to identify and minimize sustainability risks. This includes requesting that investee companies complete an annual ESG Questionnaire to gather ESG data and monitor progress in relation to sustainability risks. The Investment Manager will maintain an open dialogue with the management teams of investee companies including leading proactive discussions on current ESG performance and any material ESG issues and, to the extent possible, influencing improved sustainability practices through this engagement.</p>	<p>RTS Article 30</p> <ul style="list-style-type: none"> FMPs shall describe how the environmental or social characteristics promoted by the Article 8 Financial Product and the sustainability indicators used to measure the attainment of each of those environmental or social characteristics promoted by the Article 8 Financial Product are monitored throughout its lifecycle and the related internal or external control mechanisms.
Methodologies for environmental or social characteristics	<p>The Fund's exclusion policy is enforced from the outset of the investment process and remains in effect throughout the entire lifespan of the Fund.</p> <p>Please see above under “Investment Strategy” for further details of the exclusion policy.</p>	<p>RTS Article 31</p> <ul style="list-style-type: none"> FMPs shall describe the methodologies to measure how the social or environmental characteristics promoted by the Article 8 Financial Product are met.
Data sources and processing	<p>The assessment and integration of sustainability risks is subject to the availability of relevant data, which can be challenging to obtain and/or incomplete in private markets.</p> <p>The Investment Manager will collect ESG data from borrowers, assess ESG performance, consider climate-related risks in decision making, and target a range of ESG opportunities. This includes opportunities to improve corporate governance (including increasing board gender diversity) and achieve emissions reductions – including by encouraging climate metrics for borrowers, where practical, incorporating these into reporting and developing a portfolio response to climate change. In addition, where possible, the Investment Manager will guide borrowers to achieving more sustainable outcomes through direct engagement. The Investment Manager will seek to do so via information sharing (particularly on ESG-risk management) and reporting covenants with borrowers and in some instances via economic incentives, which will be included in loan documentation.</p> <p>Data will be stored using a market leading platform.</p>	<p>RTS Article 32</p> <ul style="list-style-type: none"> FMPs shall describe all of the following: <ul style="list-style-type: none"> a. The data sources used to attain each of the environmental or social characteristics promoted by the Article 8 Financial Product; b. The measures taken to ensure data quality; c. How data are processed; and d. The proportion of data that are estimated.

Limitations to methodologies and data	Please see above under “ Data sources and processing ”.	RTS Article 33 <ul style="list-style-type: none"> FMPs shall describe any limitations to the methodologies and to the data sources. In addition to the above, the following shall also apply to Article 8 Financial Products FMPs shall describe how such limitations do not affect how the environmental or social characteristics promoted by the Article 8 Financial Product are met.
Due Diligence	<p>As part of the due diligence carried out on the underlying assets the Fund applies an exclusion policy.</p> <p>Please see above under “Investment Strategy” for further details of the exclusion policy.</p> <p>ESG considerations are included in investment papers, presented to, and considered by the Fund’s Investment Committee. A detailed section of ESG is required in all Investment Committee papers.</p>	RTS Article 34 <ul style="list-style-type: none"> FMPs shall describe the due diligence carried out on the underlying assets of the Article 8 Financial Product including the internal and external controls on that due diligence.
Engagement Policies	The Fund actively engages with the investee company’s management to monitor and manage sustainability risks and opportunities. The Investment Manager will maintain an open dialogue with the management teams of investee companies including leading proactive discussions on current ESG performance and any material ESG issues and, to the extent possible, influencing improved sustainability practices through this engagement.	RTS Article 35 <ul style="list-style-type: none"> FMPs shall describe the engagement policies implemented where engagement is part of the environmental or social investment strategy in the case of Article 8 Financial Products, including any management procedures applicable to sustainability-related controversies in investee companies.
Designated Reference Benchmark	The Fund has not designated a specific index as a reference benchmark to determine whether it is aligned with the environmental and/or social characteristics that it promotes.	RTS Article 36 <ul style="list-style-type: none"> FMPs shall describe whether an index has been designated as a reference benchmark to meet the environmental or social characteristics promoted by the Article 8 Financial Product, and how that index is

		<p>aligned with the environmental or social characteristics promoted by the Article 8 Financial Product, including the input data, the methodologies used to select those data, the rebalancing methodologies and how the index is calculated; and</p> <ul style="list-style-type: none">• Where part or all of the information referred to above is published on the website of the administrator of the reference benchmark, a hyperlink shall be provided to that information.
--	--	---