

SFDR Statement

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

Alpina Management GmbH (“Alpina”) acts as managing limited partner to Alpina Technology Fund I GmbH & Co. KG and Alpina Technology Fund II GmbH & Co. KG (the “Funds”). Unless the information is explicitly provided in relation to a specific Fund, the following statements refer to the management and investment decision-making processes of all Funds.

Alpina is an external alternative investment funds manager within the meaning of the German Investment Code (Kapitalanlagegesetzbuch, KAGB) registered with BaFin and as such, Alpina publishes the following information on its website also in light of the consideration of sustainability-related aspects in accordance with the SFDR.

I. Sustainability risks

Alpina 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.

Alpina believes in the benefits of rigorous and comprehensive due diligence. This also includes sustainability risks. As such, a ESG review is a part of Alpina’s target company analysis. The Firm’s due diligence focuses on identifying sustainability risks that can have a material negative impact on investment performance.

The results of such assessment are taken into account when the investment decision is being taken. However, Alpina remains free in its decision to refrain from investing or to invest despite sustainability risks in which case Alpina can also apply measures to reduce or mitigate any sustainability risks.

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

Alpina does not consider any adverse impacts of its investment decisions on sustainability factors and, hence, does not use the indicators listed in Annex I of the Regulatory Technical Standards (Delegated Regulation (EU) 2022/1288, “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.

The SFDR, the Regulation (EU) 2020/852 (“Taxonomy”) and the accompanying RTS are relatively new legislative acts. Considering the numerous legal uncertainties currently related to the application of these provisions – in particular with respect to the consideration of adverse impacts – and the administrative burden resulting from such uncertainties, Alpina feels it is not yet in a position to commit to such standard in light of its fiduciary duties to their investors.

Alpina will constantly monitor and review the evolution around SFDR and Taxonomy. Once a practicable market and administrative practice will evolve in this regard and the consequences of a commitment towards the consideration of principal adverse impacts are reasonably clear to Alpina, Alpina will re-evaluate considering principal adverse impacts of its investment decisions in due course.

III. Remuneration disclosures

The Funds are registered alternative investment managers and do, as such, not have remuneration policies. Although Alpina considers sustainability risks as part of its investment decision-making process, such risks are not integrated in Alpina's remuneration decisions.

For further information on our ESG approach, please find refer to our ESG-Policy.