

**Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Product name:** ATP Private Equity Partners VII K/S (the "Fund")  
 registration number: 41820004 and FTID: 25515

**Legal entity identifier:** Danish company

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

## Environmental and/or social characteristics

**Does this financial product have a sustainable investment objective?**

**Yes**                        **No**

<p><input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective:</b> ___%</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul>	<p><input type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of ___% of sustainable investments</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with a social objective</li> </ul>
<p><input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective:</b> ___%</p>	<p><input checked="" type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b></p>

**What environmental and/or social characteristics are promoted by this financial product**

The Fund seeks to promote environmental and social characteristics from an overall perspective. Promotion of environmental and social characteristics is secured by our ESG due diligence, by only investing in funds that comply with the exclusion criteria of the Fund (please refer to section ***“What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by the financial product”*** herein for further about the



exclusion) and during the ownership phase primarily through dialogue with the managers of the portfolio funds. The Fund is a fund-of-funds. As a fund-of-funds investing in numerous funds which again invests in several companies across multiple sectors, the spectrum of environmental and social characteristics of the investments that the Fund directly and indirectly hold are very broad. Accordingly, indirectly promotes improvement in ESG performance of the underlying portfolio companies of its portfolio funds.

The Fund does not use a reference benchmark.

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

● ***What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?***

Each year, the Fund sends out an ESG data questionnaire to each of the funds that the Fund has invested in, requesting responses and data on a broad set of indicators within “E” (environmental indicators), “S” (social indicators) & “G” (governance indicators) in relation to the underlying portfolio companies of each such funds.

This ESG data questionnaire is not always fully responded to by all funds. Therefore, the data can often only be used more broadly in relation to measuring the attainment of the environmental or social characteristics promoted by the Fund.

● ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives? N/A***

● ***How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective? N/A***

— — *How have the indicators for adverse impacts on sustainability factors been taken into account? N/A*

— — *How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? N/A*

*The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.*

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

*Any other sustainable investments must also not significantly harm any environmental or social objectives.*



## Does this financial product consider principal adverse impacts on sustainability factors?

Yes, \_\_\_\_\_

No

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

## What investment strategy does this financial product follow?

The Fund is a fund-of-funds with the aim of creating returns for its investors. The Fund invests in buyout funds (primarily in the small and midcap segment), distressed funds, growth equity/venture capital funds and co-investments and special situations, including continuation funds.

Investments are subject to certain concentration limits set out in the limited partnership agreement entered into between the investors and the Fund. The geographical focus of the Fund is North America and Europe as further set out in the limited partnership agreement.

Further, investment shall comply with certain exclusion criteria – for a general description of these please refer below to the section ***“What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by the financial product”*** in this document.

Focus on ESG characteristics (environmental, social and governance) is a firmly integrated part of the investment strategy of the Fund. An ESG due diligence is performed for all new investments for the Fund in order to assess the ESG characteristics of the investment.

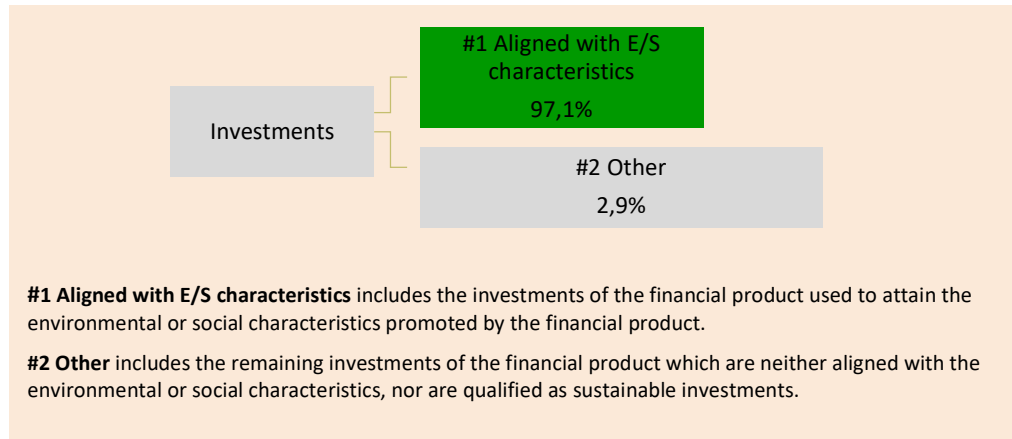
### ● ***What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?***

Prior to investment an ESG due diligence is performed that focuses on a qualitative overall assessment of portfolio fund managers ability to manage ESG issues and to make sure that their practices are reasonably aligned with the Fund’s ESG policies.

The Fund does not invest in companies principally engaged in the extracting and/or exploration of fossil fuels (coal, oil or gas) or in utility companies exceeding certain thresholds for carbon intensity in its energy production (which for the avoidance of doubt, does not exclude investment in companies providing services to the foregoing companies).

**Asset allocation** describes the share of investments in specific assets.

The Fund does not invest in companies (through funds) or in co-investments which upon the time of investment is included in ATP's list of prohibited investments.



To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities are** activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

- **What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy? N/A**
- **What is the policy to assess good governance practices of the investee companies?**

As an important part of the Fund's investment process, due diligence is performed on the various portfolio funds' management teams in relation to whether good and adequate governance practices are in place for the fund manager. This includes interviews and references.

As part of the ongoing monitoring of the funds, membership of those funds' Advisory Boards is often sought to the extent possible, and the Fund will participate on AGMs as well as investor meetings in the portfolio funds. In case of material detected irregularities related to good governance a dialogue will be initiated to seek to address the issue.

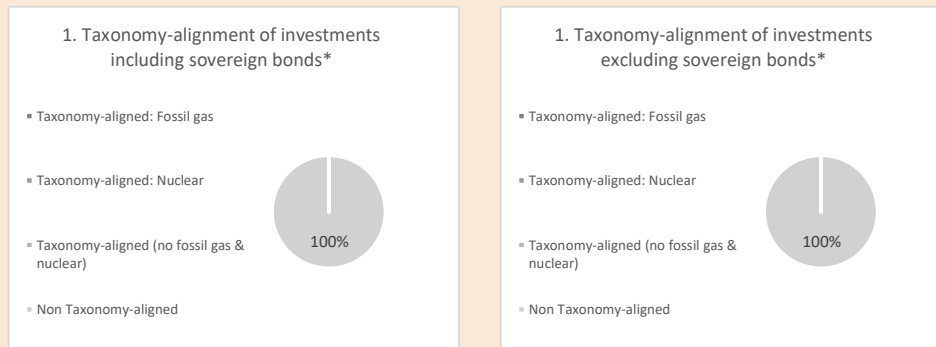
Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

## What is the asset allocation planned for this financial product?

The Fund promotes environmental and social characteristics in all its investments pursuant to article 8 of the SFDR but does not have as its objective sustainable investment.

*The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.*



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.



- **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?** N/A



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?


The Fund does not operate with a minimum share of investments in sustainable investments with an environmental objective aligned with the EU Taxonomy.



## Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?

- Yes:
- In fossil gas
  - In nuclear energy
- No

<sup>1</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the lefthand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

 are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.



- **What is the minimum share of investments in transitional and enabling activities?**  
N/A
- **What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?** N/A

The Fund does not operate with a minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy



**What is the minimum share of socially sustainable investments?** N/A



**What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

Investments under “#2 Other” consist of positive values of cash holdings and currency hedging positions. The purpose of these holdings is to facilitate the ordinary cash and currency hedging management in relation to the Fund.

The Fund’s ESG related policies do not cover instruments for liquidity and currency hedging management.



**Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

The Fund does not use a reference benchmark.

- **How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?** N/A
- **How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?** N/A
- **How does the designated index differ from a relevant broad market index?** N/A
- **Where can the methodology used for the calculation of the designated index be found?** N/A



**Where can I find more product specific information online?**

**More product-specific information can be found on the website:** [www.ATP-PEP.com](http://www.ATP-PEP.com)