

Dedalo Management S.à.r.l.
Société à responsabilité limitée
12C, Rue Guillaume J. Kroll
L-1882 Luxembourg
R.C.S B300485

**STATEMENT OF NO CONSIDERATION OF PRINCIPAL ADVERSE IMPACTS
OF INVESTMENT DECISIONS ON SUSTAINABILITY FACTORS – ARTICLE 4.1 (b)
OF THE SUSTAINABLE FINANCE DISCLOSURE REGULATION (“SFDR”)**

Table of Contents

1. INTRODUCTION	2
2. NO CONSIDERATION OF PRINCIPAL ADVERSE IMPACTS OF INVESTMENT DECISIONS ON SUSTAINABILITY FACTORS.....	2
3. COMMITMENT TO RESPONSIBLE INVESTMENT	2

1. INTRODUCTION

Dedalo Management S.à.r.l. (the “**Company**”) is a Luxembourg-based asset management company, specialized in the management of investment funds with a diversified portfolio designed to deliver value to its investors.

The Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector (the “**SFDR**”) requires financial market participants to make a “comply or explain” statement regarding their consideration of principal adverse impacts (the “**PAIs**”) of investment decisions on sustainability factors. PAIs refer to the potential negative impacts of investment decisions on sustainability factors, such as environmental, social, and employee matters.

This statement (the “**Statement**”) is made in accordance with Article 4.1(b) of the SFDR, specifically for the Company, as part of its compliance obligations under the regulation.

2. NO CONSIDERATION OF PRINCIPAL ADVERSE IMPACTS OF INVESTMENT DECISIONS ON SUSTAINABILITY FACTORS

At this time, the Company has decided not to consider PAIs in accordance with Article 4.1 (b) of the SFDR at the entity level. This decision is influenced by several challenges, including the limited availability of reliable and comparable data, as well as inconsistencies in PAIs reporting methodologies, which may not accurately represent the nature of our investments or our ability to influence such impacts.

The Company continues to work on improving the quality of data collected for its investments, particularly through the enhancement of our reporting practices. While PAIs reporting at the entity level is not being implemented at this stage, the Company is committed to providing transparent disclosures for funds categorized under Article 8 and Article 9 of the SFDR, where applicable.

The Company will review this position periodically and may adjust its approach in the future as the availability of relevant data and the methodologies for PAIs assessment evolve.

3. COMMITMENT TO RESPONSIBLE INVESTMENT

Despite the current decision not to consider PAIs of investment decisions on sustainability factors, the Company remains dedicated to responsible investing and the integration of Environmental, Social, and Governance (ESG) factors into its operations. The Company aligns its strategies with recognized frameworks for responsible investment, which include risk assessments as part of its overall sustainability goals. Moreover, the Company continues to support sustainable development by actively managing sustainability risks in line with Article 3 of the SFDR.

The Company believes that responsible investment practices and a commitment to sustainable development are essential for creating long-term value for its stakeholders. Through these actions, the Company supports global sustainability objectives, despite not currently considering PAIs at the entity level.