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ANNEX 5

ANNEX

to the

Commission Delegated Regulation (EU) .../....

supplementing Regulation (EU) 2019/2088 of the European Parliament and of the Council with regard to regulatory technical standards specifying the details of the content and presentation of the information in relation to the principle of 'do no significant harm', specifying the content, methodologies and presentation of information in relation to sustainability indicators and adverse sustainability impacts, and the content and presentation of the information in relation to the promotion of environmental or social characteristics and sustainable investment objectives in pre-contractual documents, on websites and in periodic reports

ANNEX V

Template periodic disclosure for the financial products referred to in Article 9, paragraphs 1 to 4a, of Regulation (EU) 2019/2088 and Article 5, first paragraph, of Regulation (EU) 2020/852

Product name: Kuali Fund S.C.A., SICAR-EuSEF

Legal entity identifier: 213800CUD79SOH59OP69

Sustainable investment objective

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 lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Did this financial product have a sustainable investment objective?

☒ **Yes**	☐ **No**
☒ It made **sustainable investments with an environmental objective: 50%**	☐ It **promoted Environmental/Social (E/S) characteristics** and while it did not have as its objective a sustainable investment, it had a proportion of ___% of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☒ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☐ with a social objective
☒ It made **sustainable investments with a social objective: 50%**	☐ It promoted E/S characteristics, but **did not make any sustainable investments**



To what extent was the sustainable investment objective of this financial product met?

Sustainability indicators measure how the sustainable objectives of this financial product are attained.

The sustainable investment objective is the enhancement of the SMEs and farmers mitigation and adaptation capacity (GHG emissions prevented, and resilience achieved) in global-south countries. The aim is to create an ecosystem for smallholders, SMEs, and other impacted communities to access tailored climate solutions.

This general objective relates to several SDGs but mainly to:

- SDG 1 – End Poverty. SDG 1.4 - Ensure that all men and women, in particular the poor and the vulnerable, have equal rights to economic resources, as well as access to basic services, ownership and control over land and other forms of property, inheritance, natural resources, appropriate new technology and financial services, including microfinance. As all investments during the year were made in Financial Service Providers focused on MSMEs and vulnerable communities, 100% of the portfolio contributed to this target throughout the reporting period.

- SDG 5 – Gender equality. SDG 5A - Increase women access to financial services and other forms of control. As of 31.12.2025, 100% of Kuali's portfolio was invested in Financial Service Providers, of which 58% contributed to SDG 5 by being 2X-aligned.

- SDG 13 – Climate action. SDG 13A - Implement the commitment undertaken by parties to the United Nations Framework Convention on Climate Change to jointly mobilize $100 billion annually by 2020 from all sources to address the needs of nations with fewer resources in the context of meaningful mitigation actions and transparency in implementation. Due to the nature of the fund, this objective was fulfilled by 100% of the portfolio throughout the year.

- SDG 17 – Partnerships for the goals. SDG 17.9 - Enhance international support for implementing effective and targeted capacity-building in countries with fewer resources to support national plans to implement all the sustainable development goals, including through North-South, South-South and triangular cooperation. As the fund invests exclusively in entities located in the Global South, it is expected that 100% of the portfolio will contribute to this target throughout the life of the fund.

Moreover, the fund monitors the SPI5 and Green Index 3.0 indicators to assess an organisation's implementation of the Universal Standards for Social and Environmental Performance Management (USSEPM).

An Environmental and Social Due Diligence (ESDD) is carried out before investing to analyze the entity's impact status. For this, a comprehensive suite of standardized tools is used:

SPI5-Alinus (for FSPs), SBS Light (for Innovative Companies), and the Green Index 3.0 assess the entity's readiness to serve clients through a social and "green" lens. These are integrated with an Expected Impact Rating and Outcome/Output Maps to provide a data-driven projection of investment scale and alignment with Kuali's SDG outcomes. During due diligence, gender practices are also reviewed using a methodology based on *The World Bank (2024) Advancing Women's Financial Inclusion*, and entities are assessed for 2X gender alignment.

The process evaluates key dimensions: social and environmental strategy, climate risk management, and responsible product design. The resulting ESDD Report integrates the E&S Risk Assessment (ESMS), setting the baseline for performance monitoring and serving as the primary input for the Fund's Technical Assistance Facility.

How did the sustainability indicators perform?

As of December 2025, the Fund has made 5 investments in 3 countries promoting mitigation and adaptation capacity (GHG emissions prevented, and resilience achieved) in global-south countries. Beneficiaries with access to financial services attributed to Kuali (number of excluded clients reached) total 11,262, while 861 beneficiaries have gained access to climate finance (number of excluded clients reached with green products). The investees show a 51% green readiness and an average social performance score of 86% according to SPI5, which is periodically monitored to track improvements in the Impact Performance System of the investees'.

On top of the aggregated objectives, the fund also establishes custumized goals that contribute directly and indirectly to the overall performance of the fund. An average of 2-3 specific goals and its related indicadors are collected for every investee, through Technical Assisstance projects that have not yet started. The fulfilment of these goals is included in the overall impact score of the fund. All investees have a strong environmental and social mission shared by the entire organisation and subscribe to the Client Protection Principles.

An external audit of the sustainability indicators will be conducted by an independent third party upon exit from the investments. At present, no external audits have been initiated.

…and compared to previous periods?

Since the investment period commenced in FY25, there is no historical data available to provide a performance comparison against previous periods as of December 2025.

How did the sustainable investments not cause significant harm to any sustainable investment objective?

To this date, the invested Financial Service Providers (FSPs) have maintained a low environmental and social risk profile.

Nonetheless, environmental and social due diligences are carried out before any investment to ensure they are not carrying out economic activities that do significant harm to any sustainable investment objective. Moreover, all financing agreements have specifically included the IFC exclusion list.

The SPI5 has been monitored througout the year and can partially serve as an indicator to monitor that entities do not cause significant harm. The Fund ensures through its Environmental and Social Risk Management System that the investee companies manage not only the Environmental and Social (E&S) risks of their own activity (internal dimension), but also those arising from their investment activity (external dimension).

Lastly, the Fund takes into account the indicators for adverse impacts on sustainability factors.

How were the indicators for adverse impacts on sustainability factors taken into account?

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 following indicators for adverse impacts on sustainability factors have been analysed to confirm that the investments did not cause significant harm to any sustainable investment objectives from Annex I of the SFDR regulated delegation: Table 1, indicators 1 to 14; Table 2, indicators 11 and 15 and Table 3, indicators 1, 5, 8, 15 and 17.

The following conclusions have been obtained from this analysis:

- From its first year of operations (FY25), the Fund adopted the Joint Impact Model (JIM), a tool widely used by Development Finance Institutions (DFIs) and impact investment firms for estimating GHG emissions. This approach aims to measure and report the Fund's GHG contributions in a consistent and comparable manner. The following results have been obtained for FY25, applying the attribution methodology in line with the PCAF Global Standards:

Kuali	GHG (tCO2e) FY25
Scope 1	5,11
Scope 2	13,49
Scope 3	7.152,10
Total	**7.170,70**

Scope 3 emissions include upstream emmissions[1] estimated by the JIM attributed to Kuali's investment the entities and the emissions of the Financial Service Providers' final beneficiaries (downstream). As Kuali's financing is destined to support smallholder farmers, the category of the

[1] Amount of greenhouse gases emitted expressed by tCO2eq by the organisation's suppliers and suppliers of suppliers during the reporting period, except from direct energy providers (i.e. scope 2).

loan purpose used for the estimates was the generic ISIC-01 “Crop and animal production, hunting and related service activities” for all FSP,:

Kuali Scope 3		GHG (tCO2e) FY25
Scope 3	Upstream	137,73
	Downstream	7.014,37
Total		7.152,10

- The portfolio's Carbon Footprint stands at 41.68 tCO2eq./mEUR, measuring total Scope 1, 2, and 3 emissions allocated proportionally to the million EUR invested. Meanwhile, the GHG Intensity is 300.53 tCO2eq./mEUR, assessing the environmental efficiency of investee companies by weighting their emissions against their million EUR revenue.
- None of the entities were active in the fossil fuel sector; they do not have activities that affect negatively biodiversity-sensitive areas; they do not generate emissions to water or hazardous waste, nor radioactive waste.
- The portfolio’s share of non-renewable energy consumption and production, currently stands at 50.55%. This metric tracks the proportion of non-renewable energy sources used by investee companies relative to renewable ones, accounting for both direct effects and those from the finance enabling module across energy and non-energy purposes.
- The portfolio's Energy consumption intensity per high impact climate sector is currently 0. This is due to the fact that all investments to date have been directed toward financial service providers, which do not fall under high-impact climate sectors. While future expansions into innovative companies may alter this exposure, as of FY25, the portfolio has zero allocation to high-impact climate sectors, resulting in an intensity metric of zero.
- Even though policies related to sustainable land, agriculture practices and deforestation do not apply directly to Kuali’s current portfolio (which consists exclusively of Financial Service Providers), some of the investees (2 out of 5 in FY25) are starting to incorporate these policies into their credit approval processes, showing strong commitment to sustainability.
- For FY25, there are no activities in the portfolio negatively affecting biodiversity-sensitive areas, zero emissions to water, and a 0% ratio for both hazardous and radioactive waste.The results regarding OECD Guidelines and the UN Guiding Principles on Business and Human Rights as requested by the SFDR regulation are poorer than any other indicator (none of the companies had processes and compliance mechanisms to monitor compliance with the Guidelines). However, it is important to notice that these Guidelines do not directly apply to the entities, as they are not Multinational Companies and, as it will be further developed below, Kuali covers the main points in the contracts with the investees to prevent any harm, even if the company does not have in place a specific process or compliance mechanism to monitor the compliance with the general principles and guidelines.
- Although gender pay gaps depend largely on industry and location[2], the average gender pay gap can be classified as low: unadjusted gender pay gap was at -16.12% for Kuali’s portfolio (compared to the estimated 31% globally[3]). For those companies with higher pay gaps, a further discussion has

[2] WEF Global Gender Gap Report 2025 (June 11, 2025). https://www.weforum.org/publications/global-gender-gap-report-2025/.

[3] WEF Global Gender Gap Report 2025 (June 11, 2025). https://www.weforum.org/publications/global-gender-gap-report-2025/.

taken place, confirming that there are no controlled gaps (difference in pay between men and women performing the same job, with the same experience and qualifications) but rather an uncontrolled gap, omitting variables such as job type, level of responsibility, seniority, career path, or occupational composition. The CEO pay ratio average across the five reporting entities was 10.68, with the highest ratio observed at 16:1. These levels remain significantly lower than the 490:1 ratio highlighted by Oxfam International, based on an analysis of the top 1,500 corporations across 33 countries that reported CEO compensation data for that year[4]. The board's gender diversity ratio stands at 28%, outperforming the global market average of 25%.[5]

- During FY25, there is no exposure in the portfolio to controversial weapons.
- Regarding other relevant policies, all the potfolio companies (5 out of 5) had in place workplace accident prevention policies, even though office activities are not characterized by a high incidence of such incidents.
- Lastly, it should be noted that 5 out of 5 reporting companies had in place anti-corruption and anti-bribery policies and none of the entities was convicted or fined for violation of anti-corruption and anti-bribery laws.

Were sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:

The invested entities do not qualify for the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises, as the fund invests primarily in small and medium-sized enterprises in emerging and frontier economies.

With respect to the United Nations Guiding Principles on Business and Human Rights, Kuali incorporates in all its financing agreements clauses in which the investee company commits to continue its social mission during the time horizon of the investment, to respect the ICF exclusion list, the U.S. International Development Finance Corporation (DFC) categorical prohibition list as well as the protection of workers' rights. In addition, Cerise's Alinus/SPI5 tool monitors financial service providers' implementation of the Universal Standards for Social Performance Management, including the Smart Campaign's Client Protection Principles.

How did this financial product consider principal adverse impacts on sustainability factors?

During the environmental and social risk categorization and due diligence phases, the level of risk and the main adverse impacts on sustainability factors are identified.

Due to the nature of Kuali’s investments in Financial Service Providers (FSPs), the portfolio includes entities with low to medium risk classification. While some institutions operate with lower inherent risk profiles, others present medium risk depending on their scale and range of financial activities. However, all investees are verified to comply with an exclusion list aligned with the IFC Performance Standards (PS1–PS8), ensuring that environmental and social risks are systematically identified, managed, and mitigated across the portfolio.

The risks and covenants are monitored by incorporating the indicators of adverse impacts on sustainability factors as a tool for quantification and as a warning element in the event of potential changes in status. Thus, specific data collections have taken place during the year to proceed with the deep analysis of the principal adverse impacts on sustainability factors, as detailed above, to confirm that none of the investments caused significant harm to any sustainable investment objectives.Going forward, Kuali will continue to monitor these indicators to determine if any additional course of action with the entities (additional social covenants;

[4] Oxfam International (May 1, 2026). https://www.oxfam.org/en/press-releases/top-ceo-pay-increased-20-times-faster-workers-pay-2025

[5] IFC Gender Equality Analysis 2025 (March 3, 2026). https://sseinitiative.org/publication/gender-equality-corporate-leadership-g20-regional-analysis-2025

adaptations to any TA projects; etc.) is needed in order to improve the performance of its portfolio regarding these indicators.

The following indicators for adverse impacts on sustainability factors have been analysed from Annex I of the SFDR regulated delegation: : Table 1, indicators 1 to 14; Table 2, indicators 11 and 15 and Table 3, indicators 1, 5, 8,9,10,14, 15 and 17. Data on the performance of these indicators have been disclosured in the previous section ("*How were the indicators for adverse impacts on sustainability factors taken into account?*")

The list includes the investments constituting **the greatest proportion of investments** of the financial product during the reference period which is: 2025 (quarterly average).

What were the top investments of this financial product?[6]

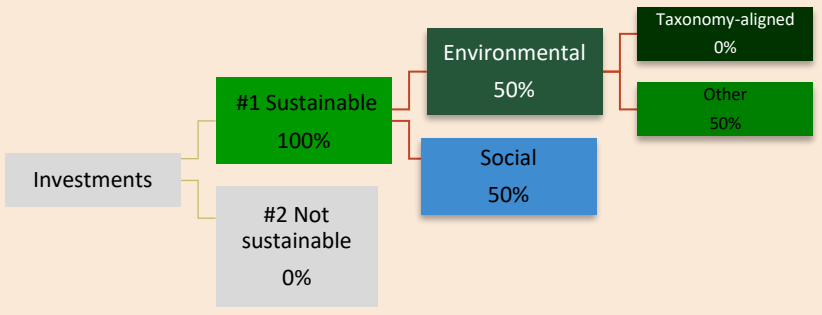
Largest investments	Sector	% Assets	Country
FACES	*Microfinance/FSP*	*29.89%*	*Ecuador*
Zeta Banco	*Microfinance/FSP*	*7.18%*	*Paraguay*
Banco Solidario	*Microfinance/FSP*	*6.73%*	*Ecuador*
Norandino	*Microfinance/FSP*	*3.39%*	*Peru*
VisionFund	*Microfinance/FSP*	*2.81%*	*Ecuador*

Asset allocation describes the share of investments in specific assets.

What was the proportion of sustainability-related investments?

100% of investments of the Fund (excluding cash and Temporary Investments, if any) qualifies as sustainable investments.

What was the asset allocation?



#1 Sustainable covers sustainable investments with environmental or social objectives.

#2 Not sustainable includes investments which do not qualify as sustainable investments.

Since the investment period commenced in FY25, there is no historical data available to provide a performance comparison against previous periods as of December 2025.

In which economic sectors were the investments made?

[6] The fund did not consider in the top investments calculation "Kuali Fund SV S.à.r.L." as this company is invested in the same assets.

Microfinance institutions and other financial intermediaries with a rural presence, that aim to deliver environmental and social impact to the rural population:

- Microfinance institutions and other financial services providers (SME lending) with agricultural presence account for 5 out of 5 investments, 100% of the portfolio's value.

As the Fund is currently in the early stage of its investment period, this concentration is expected to vary over time. As the portfolio matures, further investments will be directed toward innovative companies focused on climate solutions, broadening the scope of the Fund's impact.

The Fund has no exposure to fossil fuel activities. None of the investees were active in sectors or sub-sectors of the economy that derive revenues from exploration, mining, extraction, production, processing, storage, refining or distribution, including transportation, storage and trade, of fossil fuels as defined in Article 2, point (62), of Regulation (EU) 2018/1999 of the European Parliament and of the Council.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switchin to fully 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 environmenal objective

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

To what extent were sustainable investments with an environmental objective aligned with the EU Taxonomy?

As reported in the asset allocation, there are no investments with an environmental objective aligned with the EU Taxonomy.

Did the financial product invest in fossil gas and/or nuclear energy related activities complying with the EU Taxonomy[7]?

☐ Yes:

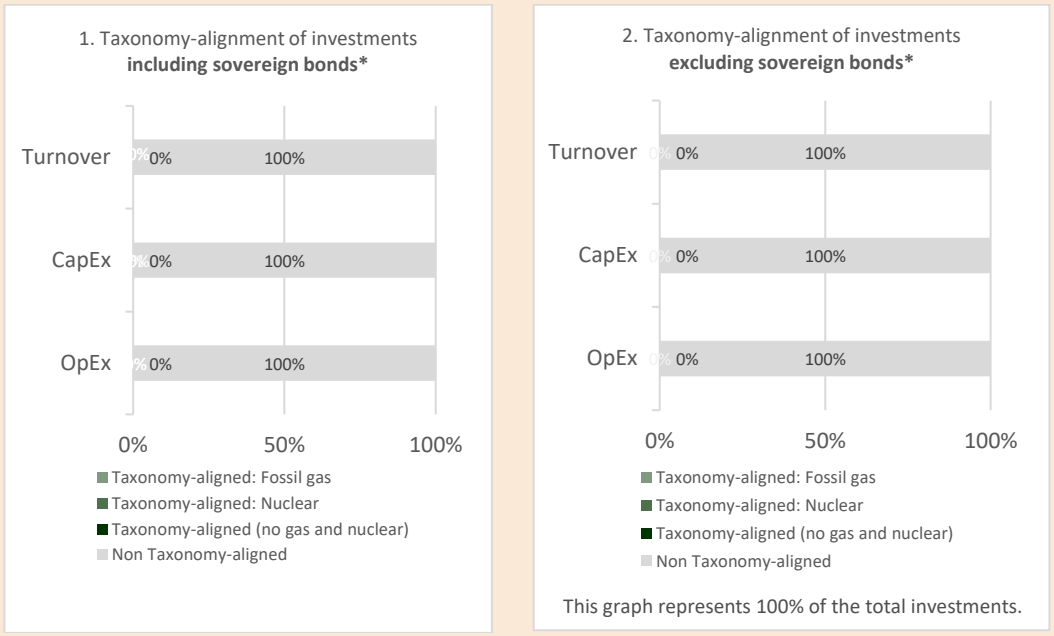
☐ In fossil gas ☐ In nuclear energy

☒ No

[7] 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 no significant harm to any EU Taxonomy objective - see explanatory note in the left hand 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.

The below figure does not apply to this financial product.

The graphs below show in green the percentage of investments that were 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*

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 was the share of investments made in transitional and enabling activities?

Not applicable

How did the percentage of investments aligned with the EU Taxonomy compare with previous reference periods?

Not applicable

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

What was the share of sustainable investments with an environmental objective that were not aligned with the EU Taxonomy?

50% of the investments, mainly due to data limitations and the geographic scope of the investments, as all of these investments were located outside the European Union. These entities may follow different sustainability reporting standards and not being subject to EU Taxonomy requirements, limits the availability of comparable Taxonomy-aligned information.

What was the share of socially sustainable investments?

50% of the investments.

What investments were included under "not sustainable", what was their purpose and were there any minimum environmental or social safeguards?

All investments are sustainable investments, as disclosed in the asset allocation. The Fund did hold cash and other liquid assets (weekly deposits) as of year end, which is not taken into account for the calculation of the percentage of "not sustainable" investments.

What actions have been taken to attain the sustainable investment objective during the reference period?

Kuali Fund aims to promote the transformation of Latin America and India financial sector into a more inclusive and greener industry. To achieve this objective, the Fund uses the following impact catalytic tools: impact management & measurement and technical assistance.

Before an investment is made, a comprehensive Environmental and Social Due Diligence (ESDD) is conducted to analyze the entity's impact status and alignment with the Fund's mission. This process utilizes a specialized suite of standardized tools: SPI5-Alinus for Financial Service Providers (FSPs), SBS Light for Innovative Companies, and the Green Index 3.0 to evaluate green readiness. These metrics are integrated with an Expected Impact Rating and Outcome/Output Maps, providing a data-driven projection of the investment's scale and its alignment with specific SDG outcomes.

The ESDD evaluates critical dimensions such as social and environmental strategy, climate risk management, and responsible product design. The resulting ESDD Report incorporates an Environmental and Social Risk Assessment (ESMS), which establishes the baseline for performance monitoring and serves as the primary roadmap for the Fund's Technical Assistance (TA) Facility.

Kuali Fund utilizes a robust Measurement, Reporting and Verification Protocol and Technical Assistance Facility to empower FSPs and Innovative Companies to accurately measure and report climate impact, overcoming technical gaps through a partnership-based approach. Beyond data collection, the Fund strictly monitors social covenants—such as mission preservation and client protection—to ensure long-term compliance with international standards. This comprehensive oversight culminates in quarterly progress updates and an annual GAWA Capital report that ranks institutional impact while showcasing real-world success stories.

Through the quarterly monitoring of the investees, the progress made by the entities is measured. Active management is maintained, checking the evolution of indicators and compliance with metrics, thus allowing to react in case the objectives are not being reached and redirect if necessary.

Furthermore, the fund's Technical Assistance (TA) is designed as a key tool to support the achievement of Kuali's objectives by strengthening investees' capacity to better serve their end clients. TA initiatives will be developed on a tailored, entity-by-entity basis, ensuring alignment between each project and the strategic objectives of both the investee and the Kuali Fund.

At this stage, no TA projects have yet been launched. Once defined, each initiative will include specific indicators and objectives to guide implementation and monitoring, as well as agreed commitments with the entity to ensure continuity beyond the duration of the support, thereby promoting long-term impact and sustainability.

Lastly, Kuali does not have engagement policies referred to in Article 3g of Directive 2007/36/EC of the European Parliament and of the Council, as the Directive is not applicable given that the fund does not invest in shares admitted to trading on regulated markets within any Member State.



Reference benchmarks are indexes to measure whether the financial product attains the sustainable objective.

How did this financial product perform compared to the reference sustainable benchmark?

Not applicable

- ***How did the reference benchmark differ from a broad market index?***

Not applicable

- ***How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the sustainable investment objective?***

Not applicable

- ***How did this financial product perform compared with the reference benchmark?***

Not applicable

- ***How did this financial product perform compared with the broad market index?***

Not applicable