

No consideration of adverse impacts of investments decisions on sustainability factors

This document sets out disclosures by Fondsmæglerselskabet CABA Capital A/S (the “Firm”), in respect of the principal adverse impacts of our investment decisions on sustainability factors.

The EU Sustainable Finance Disclosure Regulation (“SFDR”) requires the Firm to make a “comply or explain” decision whether to consider the principal adverse impacts (“PAIs”) at entity level, in accordance with a specific regime as outlined in SFDR. The Firm has decided not to comply with that SFDR regime. As such, the Firm is required to publish and maintain on our website a statement to explain our reasons for not complying with the PAI regime in SFDR.

1. Non-compliance with the PAI regime in SFDR

- 1.1 The Firm has carefully evaluated the requirements of the PAI regime in Article 4 SFDR
- 1.2 The Firm is supportive of the policy aims of the PAI regime, which aim to improve transparency to clients, investors, and the market regarding how financial market participants consider of the adverse impacts of their investment decisions on sustainability factors.
- 1.3 However, given the small size of the Firm (currently employing six people), we consider that it would be disproportionate to comply with the full scope of the technical and organizational requirements mandated under the PAI regime. We believe the regulatory burden would be excessive relative to our operational capacity.
- 1.4 Furthermore, the Firm notes that there is currently a lack of reasonably priced and readily available data necessary to comply with many of the detailed reporting requirements of the PAI regime. In our assessment, issuers and market data providers are not yet in a position to reliably supply the full range of information required.
- 1.5 The Firm will keep this decision under regular review, particularly as the market practice evolves, data availability improves, and/or the regulatory environment changes.

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