

KawiSafi II L.P. (the *Fund*) – Sustainability-related disclosures

EU Sustainable Finance Disclosures Regulation

Date: 10/10/2024

The Fund Manager (as defined below) is required to publish certain information on its website to comply with SFDR. The distribution of the following information is intended only as a summary which is required to be produced by article 10 of the Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (*SFDR*).

The information contained herein should not be relied upon by any investor and does not constitute part of an offering or an invitation or placement as those terms are understood for the purposes of EU Alternative Investment Fund Managers Directive (2011/61/EU) (*AIFMD*) which shall include all similar, implementing or supplementary measures, laws and regulations in each member state of the EEA, including, but not limited to, the Directive 2019/1160 on the cross-border distribution of collective investment undertakings and the Regulation (EU) 2019/1156 of the European Parliament and of the Council of 20 June 2019 on facilitating cross-border distribution of collective investment undertakings).

The inclusion of the following disclosures does not imply that an offering or placement of interests has been or will be made to or with investors and any such offering or placement will be made only where (i) this is permitted under national law; and (ii) the Manager (as defined below), if applicable, complies with all relevant procedural and substantive obligations relating to the offering or placement of interests.

Terminology used in these disclosures such as “sustainable”, “sustainability” or “sustainable investment” or the negatives thereof or other variations thereon or comparable terminology which describe certain investment practises of the Fund shall not be interpreted as referring to any definition used in, or provision of, laws, regulations or guidance of any jurisdiction, except where used in relation to the SFDR.

Any forecasts and estimates contained herein are necessarily speculative in nature, involving elements of subjective judgment and analysis and are based on certain assumptions and the best judgment of the Manager. It can be expected that some or all of such assumptions will not materialize or will vary significantly from actual results. Actual results will differ and may vary substantially from the results projected herein. Past performance is not necessarily indicative of future results. Any investment entails significant risks, including the loss of the entire investment.

Product name:	KawiSafi II L.P. NACIS Code 526989
Environmental or social characteristics of the financial product:	The Fund’s investments (in whole or in part) will seek to promote environmental and social characteristics, namely by determining that a

proposed investment has the potential to contribute to the Fund’s achievement of its social and environmental impact targets (as further explained below) to promote climate change mitigation and adaptation in Sub-Saharan Africa. For further detail please see Section C of this summary document.

A. Summary

The Fund will seek to invest in companies that are innovating low-carbon and low-cost technologies with the potential to (i) reduce greenhouse gases and mitigate the adverse effects of climate change across Africa, (ii) contribute to adaptation and strengthen the resilience of communities and infrastructure to climate change impacts, and (iii) meet the essential needs of lower and emerging middle-income populations in Africa, all in a manner consistent with the charitable purposes of its sponsor, Acumen Fund, Inc.

Article 8 of the SFDR applies to alternative investment funds which “promote, among other characteristics, environmental or social characteristics, or a combination of those characteristics, provided that the companies in which the investments are made follow good governance practices”. Acumen Capital Partners LLC, the alternative investment fund manager of the Fund (CRD# 285564; SEC# 802-108698), (the **Manager**) considers that the Fund falls within the type of financial product identified by article 8 of the SFDR.

The Fund promotes social characteristics by investing in businesses that promote poverty reduction and access to essential goods and services for low-income populations in Africa. Prior to investing in a prospective portfolio company, the Manager will assess each opportunity on basis of its expected environmental and social characteristics through its potential to contribute to the Fund’s achievement of its impact targets (as further explained in Section C below).

The Fund will promote environmental characteristics by investing in businesses that promote low-carbon technologies and business models across three thematic verticals – energy transition, energy productivity, and mobility & logistics. The Fund also invests in climate adaptation opportunities in carbon finance and natural solutions. In each area, the Fund will invest in fast-growth companies that create pathways out of poverty and green-growth opportunities for emerging African markets.

The Fund also promotes environmental characteristics through the promotion of climate change mitigation by determining that a prospective portfolio company has the potential to make a significant contribution (as defined further in Section C) to the Fund’s aim of avoiding or averting 100 million tonnes of CO₂ equivalent during the Fund’s lifetime.

The Fund will promote environmental and social characteristics by applying an exclusion list when considering an investment. The Fund applies the [International Finance Corporation’s Exclusion List](#) and additionally excludes investments that participate in certain specific negative environmental and social activities

For further detail on these characteristics, please see Section C of this summary document.

While the Manager considers that the Fund promotes environmental and social characteristics for the purposes of article 8 of the SFDR, the Fund does not:

- use a designated index as a reference benchmark (within the meaning of article 8(1)(b) of the SFDR);
- commit to making a minimum proportion of investments which qualify as “environmentally sustainable” under Article 3 of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088 (the *Taxonomy Regulation*); or
- take into account the principal adverse impacts (*PAIs*) on sustainability factors within the meaning of the SFDR (where relevant to a strategy, or indeed to comply with the Fund’s other obligations, the Fund may choose to make disclosures in relation to similar or certain of these metrics).

As the relevant terms are defined in the SFDR, the Fund does not (1) commit to investing in a “sustainable investment” (and so the Firm considers that the Fund is an Article 8 “Light” financial product), although the Fund is not restricted from doing so; and/or (2) have “sustainable investment” as its objective (within the meaning of article 9 of the SFDR).

The categories in the SFDR can be open to subjective interpretation, and the Firm’s view on the appropriate classification may develop over time, including in response to statutory or regulatory guidance or changes in industry approach to classification.

B. No sustainable investment objective

This financial product promotes environmental and social characteristics, but does not have as its objective sustainable investment.

C. Environmental or social characteristics of the financial product

What are the environmental or social characteristics promoted by this financial product?

The Fund looks to invest in companies that are innovating low-carbon and low-cost technologies with the potential to reduce greenhouse gases and mitigate the adverse effects of climate change; that contribute to adaptation and strengthen the resilience of communities and infrastructure to climate change impacts; and that are able to meet the essential needs of the lower and emerging middle-income populations in Africa.

The Fund will promote social characteristics by investing in businesses that target poverty reduction and providing access to essential goods and services for low-income populations in Africa. Prior to investing in a prospective portfolio company, the Manager will assess each opportunity on the basis of its expected

social characteristics and the potential to contribute to the Fund’s achievement of its impact targets.

In order to promote environmental characteristics, the Fund will promote climate change mitigation and adaptation by making investments in companies which can contribute to its key themes of:

Energy transition – firms delivering on global and national energy transition strategies through rapid deployment of low-carbon renewable power generation in residential and commercial and industrial markets, financial services, grid management / edge ecosystem / Internet of Things, and waste-to-energy circular economy models;

Productivity – firms focusing on low-carbon productivity and efficiency markets including low-cost internet access, “smart” green manufacturing, recycling / circular economy, clean cooling, and agro-processing technology;

Mobility and logistics – firms involved in the rapidly evolving mobility and logistics markets where unique electric vehicle battery business models and artificial intelligence are driving rapid innovation in fragmented markets and creating new opportunities for growth.

In each area, the Fund will look to invest in fast-growth companies that create pathways out of poverty and green-growth opportunities for emerging African markets.

For each vertical, the Fund has developed a framework to select the most promising opportunities based on potential GHG emissions, climate adaptation and resilience impact on lower-income populations, sustainability and resilience and returns.

The Fund’s social impact targets include that it is targeting to positively impact 20 million people living below the poverty line (“poverty line” as defined by the World Bank for any given country). “Lives impacted” is defined as the number of individuals directly or indirectly reached by the Fund’s portfolio companies with energy-enabled products or services.¹

The Fund’s environment impact targets include to invest in climate mitigation by targeting companies that have the potential to make a significant contribution to the Fund’s aim of avoiding or averting 100 million tonnes of CO₂ equivalent in the Fund’s lifetime. “Significant contribution” here means that the portfolio company has the potential to contribute to at least 10% of the Fund’s target over the lifetime of the investment (noting that this target will be proportionately increased/reduced relative to final close amount of the Fund).

The Fund’s further impact targets are set out in Section F.

The Fund will also look to invest in businesses that increase resilience to climate shocks of lower-income populations, for example, through access to more resilient energy and transport infrastructure, strengthened food security, and access to a

¹ This target assumes that the Fund’s total commitments are equal to \$200 million. In the event that the total commitments are less than \$200 million, this target will be proportionately reduced as described in the PPM.

broader range of reliable climate proof opportunities and tools for employment, income generation and economic opportunities.

The Fund further promotes environmental and social characteristics by applying an exclusion list when considering an investment. The Fund applies the [International Finance Corporation's Exclusion List](#) and additionally excludes investments that participate in certain specific negative environmental and social activities, as set out in its Environmental and Social Management System (the *ESMS*). In the Manager's complete discretion, the Manager may, over time, choose to update the environmental and/or social characteristics of the Fund.

D. Investment strategy

What investment strategy does this financial product follow?

As described above, the Fund seeks to invest in companies that are innovating low-carbon and low-cost technologies with the potential to reduce greenhouse gases and mitigate the adverse effects of climate change; that contribute to adaptation and strengthen the resilience of communities and infrastructure to climate change impacts; and that are able to meet the essential needs of the lower- and emerging middle-income populations in Africa, all in a manner consistent with the charitable purposes of its sponsor. The Fund will have a pan-African geographical focus. In carrying out its investment objectives and strategy, the Fund will attempt to scale up successful businesses, take proven business models into new geographies, and identify and invest in key market gaps.

The Fund will look to invest \$1-5 million per company, in an expected 15 companies. No single exposure will exceed 20% of the total committed capital. The indicative target portfolio construction across the three verticals is: Energy Transition (35%), Energy Productivity (35%), Mobility & Logistics (30%). In line with private equity best industry practices, the Fund has appropriate limits on investments and industry concentration to ensure risk diversification.

The Fund will aim to invest in a mix of equity, equity linked instruments (including warrants and preference shares) as well as convertible and/or non-convertible securities depending on the investment structure, efficiency for upstreaming capital and tax optimization.

The Fund will aim to focus on investing in companies that generate capital appreciation and promote a positive climate impact through innovative products/services and business models. The Fund looks to invest in fast-growing businesses that impact low-income consumers and participate in a sustainable, green economy. Portfolio companies must meet the following criteria for investment:

- Potential to make a significant contribution to the Fund target of avoiding / averting 100 million tonnes of CO₂ equivalent.
- Provide access to clean-tech and climate-smart products and services (renewable energy, productive use, energy efficient appliances, sustainable mobility solutions, etc.) that builds resilience for households and small businesses.

- Exceptional and capable management teams with a demonstrated commitment to promoting green, inclusive growth.
- Demonstrated traction in their markets (product-market fit, proven technology) and are poised to scale with the Fund's capital and partnership.
- Material sales and / or operating presence in Africa.
- Technologies, products/services, and / or business models which are relevant for and replicable in multiple markets in Africa.
- At least \$1 million in annualized revenues (or contracts to that effect).
- Can absorb capital from the Fund and hold future promise for follow-on investment.
- Compliance with the Fund's ESG and Responsible Investment policies and alignment with the ESMS.

In pursuing the above investment strategy, the Fund will take into consideration the environmental and social characteristics noted in this disclosure. The Firm has a defined investment approach, investment criteria and an investment process.

What is the strategy used to meet the environmental or social characteristics promoted by the financial product?

The Fund's investment process is guided by two main policies: the ESMS and the Responsible Investment Policy. These policies describe how the Manager evaluates and ensures positive climate impact and the approach to managing environmental, social and governance (*ESG*) risks, meeting the environmental and social characteristics, and performance in its investments. After investment, the Fund will aim to provide portfolio management support and value addition to its investees, to ensure that the investments perform well and meet the intended environmental or social characteristics.

For every prospective Fund investment, the management team will develop an impact thesis. Assessment of the social and environmental impacts of potential investments takes place during the screening and diligence stage. The Manager must demonstrate for each investment its potential to make a significant contribution to the Fund's impact targets (the *impact thesis*).

The impact thesis for each investment will be presented as part of the investment memo to the Fund's investment committee for consideration and approval. The Fund aims to achieve its impacts through the provision of capital as well as through management support and strategic engagement with investee companies through the life of the investment. Consistent with good practices for ESG, and to meet the environmental and social characteristics, the Fund will aim to articulate its impact expectations in its investment agreements, ensuring alignment with management.

The impact management plan will include (but not be limited to) the following contents:

1. Articulation of the impact thesis;
2. Reference to any secondary research or primary company data in support of the impact thesis;
3. Identification of the key impact metrics (and any secondary metrics) for the investment using an attached indicator framework as a basis;

4. Projected annual and aggregate impact across the impact metrics (with sensitivity analysis based on base/down scenarios);
5. Assessment of any risks of negative impacts from the company's business, and how to mitigate these; and
6. Plan for how to work with the company to ensure achievement of impact targets.

In accordance with the ESMS and the Responsible Investment Policy, the Fund carries out ESG due diligence on all potential investments, based on an ESG checklist and informed by site visits (where appropriate). The ESG checklist will include a risk categorization of the investment. Any findings from the external due diligence are reflected in the transaction documents, which will include an ESG action plan. The action plan will include the identified priority ESG concerns, risk levels, actions required, delegated responsibilities, implementation timeline and costs involved (where possible). These will be presented to the investment committee for final approval. Following the Fund's investment, the portfolio company will implement the reforms identified as necessary to fully comply with the ESG requirements of the Fund and detailed in the relevant action plan.

Engagement with investee companies on impact is tailored to the context and nature of the investee company – particularly considering the stage of the company, experience of the team and maturity of the business model. Each investee agreement will contain covenants that clarify the impact management and measurement and reporting responsibilities of investee companies. Throughout the life of the investment, the Fund's staff will aim to communicate regularly with investee companies to obtain impact data and case studies. Insights from impact monitoring inform engagements with investee companies and adjustments to the Fund investment strategy.

What is the policy to assess good governance practices of the portfolio companies, including with respect to sound management structures, employee relations, remuneration of staff and tax compliance?

The Fund's ESG processes focus at two levels:

- On its underlying portfolio – risks and opportunities for ESG impact are identified, screened and assessed during pre-investment diligence. This results in company-specific action plans that are then monitored and used as an engagement tool once the company is in the portfolio, and re-assessed on an annual basis;
- As a tool for Fund governance – the Fund has developed its own ESG policy, the Responsible Investment Policy, and the ESMS, that sets out the monitoring and reporting framework to ensure best-in-class performance and diligence.

The Fund's ESG framework, as detailed in the Fund's ESMS, is consistent with global standards, such as the International Finance Corporation's Performance Standards, and covers detailed elements under eight primary topics: governance, commitment, society, environment, resources, workforce, innovation and gender.

The Fund's ESG processes and framework address good governance practices, including with respect to sound management structures, employee relations, remuneration of staff and tax compliance.

E. Proportion of investments

Insert the information referred to in article 14 of Commission Delegated Regulation (EU) 2022/1288 and distinguish between direct exposures in investee entities and all other types of exposures to those entities

Article 14 of Commission Delegated Regulation (EU) 2022/1288 (the *SFDR RTS*) refers to the template pre-contractual disclosures required pursuant to article 8(1), (2) and (2a) of the SFDR (in the format of the template set out in Annex II of the SFDR RTS). These are contained as an annex to the PPM.

Please refer to the diagram below, which sets out how the asset allocation is displayed in Annex II of the SFDR RTS, as completed in respect of the Fund.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental and social characteristics promoted by the financial product.

The Fund does not commit to making a minimum proportion of sustainable investments or Taxonomy aligned investments (accordingly the Fund does not commit to making a minimum proportion of Taxonomy aligned fossil gas and/or nuclear energy related investments). For the purposes of this Section E, no distinction is made between direct exposures in investee entities and all other types of exposures to those entities.

F. Monitoring of environmental or social characteristics

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

- CO₂ emissions reduction.
 - Total CO₂ emissions reduced (tonnes).
 - CO₂ emissions avoided through the use of renewable energy or energy-efficient technologies (tonnes).
- Number of households or individuals gaining access to reliable energy sources.
 - Increase in renewable energy capacity installed (MW).
- Number of lives or communities with improved resilience to climate change impacts (e.g., improved infrastructure or access to resources).
 - Reduction in climate-related risks for portfolio companies (quantified through risk assessments).
- Reduction in water usage (cubic meters saved).
 - Increase in waste diverted from landfills (tonnes recycled or repurposed).
 - Improvements in energy efficiency (percentage reduction in energy consumption).
- Number of direct and indirect jobs created.
 - Number of job opportunities created for marginalized or underserved communities.
- Increase in income or economic output for beneficiaries (measured in USD or local currency).
 - Number of small or medium enterprises (SMEs) supported or created.
- Number of individuals with improved access to healthcare services.
 - Number of health-related projects implemented and their impact (e.g., reduction in disease incidence).
 - Number of health and safety incidents reported and addressed in portfolio companies.
- Percentage of women in leadership roles (board of directors, management teams).
 - Percentage of female employees in total workforce.
 - Number of initiatives promoting gender equality and women's empowerment.

How are the environmental or social characteristics and the sustainability indicators monitored throughout the lifecycle of the financial product and what are the related internal/external control mechanisms?

Engagement with investee companies on impact is tailored to the context and nature of the investee company – particularly considering the stage of the company, experience of the team and maturity of the business model. Throughout the life of the investment, the Manager will aim to communicate regularly with investee companies to obtain impact data and case studies. Insights from impact monitoring inform engagements with investee companies and adjustments to the Fund investment strategy.

- Availability of information about the investee company and its activities;
- Location, sensitivity and scale of the investee company's activities;
- Significance and likelihood of any risks identified in terms of the context or operations of the investee company;
- The commitment and capacity of the investee company management to manage the risks; and
- The nature of the Fund's investment and influence over the company.

The Manager will cause annual reports to be produced that will measure the Fund's progress in achieving the environmental and social characteristics. The Fund's advisory committee, that advises the Manager and the general partner, will have the option of reviewing and assessing the analyses before deciding whether to dispute the findings. If the advisory committee disputes the findings, an independent consultant reasonably acceptable to the advisory committee will be appointed by

the Manager, whose decision will be binding on all parties in the absence of manifest error.

In cases of an investee company's non-compliance with the Fund's Responsible Investment Policy, the Fund will make all efforts to remedy the situation and work with the investee company to achieve compliance as quickly as possible. However, should the engagement or remediation efforts not be successful, the Fund reserves the right to exit its investments in cases of egregious and irremediable breaches.

G. Methodologies

What is the methodology to measure the attainment of the environmental or social characteristics promoted by the financial product using the sustainability indicators?

As described in Section D, the Fund will aim to carry out ESG due diligence on all potential investments. Any findings from the external due diligence are reflected in the transaction documents, which will include an ESG action plan. These will be presented to the investment committee for final approval.

The Fund will conduct annual ESG monitoring and reporting for portfolio companies as well for the Fund itself, in addition to its quarterly financial and impact reporting templates. These reports will inform annual ESG and impact reporting to relevant stakeholders.

Following an investment, and as described in Section F, the Manager will aim to engage regularly with investee companies on their impact and the Fund annually measures the Fund's progress against its impact and ESG metrics.

H. Data sources and processing

What are the data sources used to attain each of the environmental or social characteristics including the measures taken to ensure data quality, how data is processed and the proportion of data that is estimated?

The Fund will obtain the majority of its data from its investee companies. In particular, qualitative data may be provided regularly by the investee companies and the Fund will aim to focus on obtaining data for the purposes of its annual measurement of impact and ESG metrics.

The Manager seeks to take reasonable commercial steps to "sense check" data provided to it by its investee companies, however the Manager does not seek to fully audit or verify all information. Please also see Sections F and J for further information.

Where data is obtained or generated internally, the Manager shall take such steps as it considers practical and appropriate to ensure data quality. Wherever possible,

data will not be estimated. However certain data, such as GHG emissions generated, may need to be estimated.

I. Limitations to methodologies and data

What are the limitations to the methodologies and data sources? (Including how such limitations do not affect the attainment of the environmental or social characteristics and the actions taken to address such limitations)

When conducting due diligence and making an assessment regarding a portfolio investment, the Manager will rely on the resources available to it, including information provided by the target of the investment and, in some circumstances, third-party investigations. The due diligence investigation that the Manager carries out with respect to any investment opportunity may not reveal or highlight all relevant facts that may be necessary or helpful in evaluating such investment opportunity. Moreover, no such investigation will guarantee that a portfolio investment will be successful or ensure a return of invested capital. This is noted without prejudice to other risks applicable to the Fund.

The information that the Fund receives from investee companies is not necessarily audited. Consequently, without prejudice to other risks applicable to the Fund, one of the primary limitations is that the Manager is reliant on data obtained from portfolio investments and/or other third parties, and some of that data may itself be reliant on estimates, qualitative assessments and/or any limitations in the self-review or data collection processes.

These limitations are not considered to materially limit the monitoring or attainment of the Fund's promoted characteristics as self-reported data is usually provided by portfolio companies in a timely fashion and information obtained from third parties is typically provided pursuant to a contract specifying minimum quality standards. Where the Manager becomes aware that information is incomplete or materially inaccurate, it will take such steps as it considers practical and appropriate in order to ensure data quality.

J. Due diligence

What is the due diligence carried out on the underlying assets and what are the internal and external controls in place?

The Fund will seek to follow a rigorous and structured investment process from sourcing through evaluation, due diligence and transaction documentation. This includes:

Initial Diligence – the initial diligence phase is focused on information provided by the company, tested against the team's market knowledge and research. If a company's business model proves compelling in this context, it advances to the next stage. At this stage, the team will seek to develop an

impact thesis for the investment and identify how and in what ways the target contributes to the Fund's impact objectives.

Commercial Diligence – following an investment committee approval based on the preliminary investment memo, the team proceeds to full commercial diligence.

Impact Assessment – concurrently with the commercial diligence, the team will seek to validate the impact theses developed at the initial stage and conduct more detailed impact analysis and forecasting. The impact assessment will score the company across different Fund impact objectives.

ESG Due Diligence – the Fund carries out ESG due diligence on all potential investments. Any material red flags from the external due diligence are addressed in the transaction documents, which will include an ESG action plan. These will be presented to the investment committee for final approval.

Finalise Terms and Full Diligence – the team negotiates terms with the company to execute a term sheet. Upon execution, the team engages external advisors for legal and ESG due diligence. Any findings from the external diligence are reflected in the transaction documents, which include an ESG action plan. The final terms and diligence findings are presented to the investment committee for final approval.

K. Engagement policies

Is engagement part of the environmental or social investment strategy? If so, what are the engagement policies? (Including any management procedures applicable to sustainability-related controversies in portfolio companies)

Engagement forms part of the Fund's strategy and is a core part of the attainment of the Fund's environmental and social promoted characteristics and ongoing monitoring of the Fund's sustainability indicators. The Fund's ESMS includes a Stakeholder Engagement Plan that outlines the Fund's intended stakeholder engagement activities. Please refer to Section D for more details.

The Fund does maintain specific management procedures in respect of sustainability-related controversies in investee companies, contained in the Fund's ESMS policy. Sustainability-related controversies in investee companies will be taken into account where they cause an actual or potential material negative impact on the value of an investment and, in such cases, the Manager shall follow the procedures set out in its sustainability risk policies.

As per the Fund's ESMS policy, portfolio companies are also required to notify the Manager immediately in cases of serious incidents or where changes in business structure or operations affect the ESG risk profile of the investment.