

## **Sustainability-related disclosures pursuant to Art. 10 of Regulation (EU) 2019/2088 ("SFDR")**

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Financial Product: **DTCP Growth Equity III SCSp SICAV-RAIF** (the "Fund" / der "Fonds")

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### Summary

The Fund considers certain environmental and/or social characteristics as part of its investment decisions and monitoring processes but does not seek to make sustainable investments as defined in the SFDR. The consideration of environmental and/or social characteristics is carried out both before and after an investment. For this purpose, information is initially and regularly obtained from the portfolio companies by means of qualitative queries. The Fund incorporates exclusion (negative screening) aspects during the decision-making process. Thereby the Fund considers several ESG themes to be the key to responsible investing.

### Zusammenfassung

Der Fonds berücksichtigt bestimmte ökologische und/oder soziale Merkmale im Rahmen seiner Investitionsentscheidungen und Monitoring-Prozesse, strebt aber keine nachhaltigen Investitionen im Sinne der SFDR an. Die Berücksichtigung von Umwelt- und/oder Sozialmerkmalen erfolgt sowohl vor als auch nach einer Investition. Zu diesem Zweck werden zunächst und regelmäßig Informationen von den Portfoliounternehmen durch qualitative Abfragen eingeholt. Der Fonds bezieht Exklusionsaspekte (negatives Screening) in seinen Entscheidungsprozess ein. Dabei betrachtet der Fonds mehrere ESG-Themen als Schlüssel für verantwortungsvolles Investieren.

### No sustainable investment objective

The Fund promotes environmental or social characteristics, but does not have as its objective sustainable investment.

### Environmental or social characteristics of the financial product

The Fund promotes environmental and/or social characteristics by implementing certain investment exclusions (see section 'Investment strategy' below) during the decision-making process.

### Investment strategy

The purpose of the Fund is to build, hold and manage (including to divest) a portfolio of Securities in Portfolio Companies active in the technology sector with a special emphasis on software solutions in accordance with and subject to the Investment Restrictions and Limitations. The Fund will seek to make investments which provide opportunities for value creation through growth and/or the ability, through its direct or indirect shareholder rights, to support such investments with respect to operational improvements. Early stage investments are permitted but are not a key element of the Investment Scope. The Fund shall not invest in infrastructure and infrastructure-related assets and business. The Fund may invest globally but intends to invest predominantly in Europe, Israel and North America. However, the Fund intends to undertake opportunistic investments in Asia.

The Fund's investment strategy is implemented in the investment process on a continuous basis: Every investment opportunity will be tested against the Fund's investment strategy, in particular its investment exclusions, as part of the due diligence prior to any investment made by the Fund.

The Fund is bound by the investment restrictions and limitations set out in the Fund's limited partnership agreement and shall procure that such requirements, restrictions and limitations are complied with at all times. In particular, the Fund will screen each investment opportunity against the following investment exclusions and no investments will be made in the area of such exclusions.

The Fund shall not invest, guarantee or otherwise provide financial or other support, directly or indirectly, to any entity (i) which has either its registered office, principal place of business or derives the majority of its revenue from any country subject to European Union or United Nations Sanctions; or whose business activity consists of:

- any illegal economic activity (i.e., any production, trade or other activity, which is illegal under the laws or regulations applicable to the respective portfolio company);
- the production of, and trade in, tobacco, distilled alcoholic beverages, other non-alcoholic recreational drugs, and related products;
- the financing and production of, and trade in, weapons and ammunition of any kind; or

Good governance practices are assessed through an informal process as appropriate in light of the circumstances of each individual case as part of every due diligence process prior to any investment made by the Fund. Moreover, if the Fund becomes aware of severe governance issues in the portfolio companies, it will investigate them and work with all parties involved to find an appropriate solution during the term of the Fund. The Fund will either exclude the target or if deemed feasible, will cause the target to promote sustainability factors in the target's business

With regards to corporate governance, the factors that are analyzed are related to anti-competitive behavior, bribery and corruption, data privacy data protection and AML. The Fund will also gather relevant ESG data from the targets.

#### Proportion of investments

The Fund will invest fully in line with its investment strategy and investment restrictions, *i.e.*, will only make investments which are aligned with its environmental or social characteristics (*i.e.*, its investment exclusions) The Fund does not make and does not intend to make sustainable investments within the meaning of Art. 2 (17) SFDR or environmentally sustainable investments within the meaning of Art. 3 Taxonomy Regulation (EU 2020/852); hence, no portion of its investments will be aligned with the Taxonomy.

### Monitoring of environmental or social characteristics

The Fund has an increased awareness on the impact of environmental or social characteristics on risk management and thus on the value potential of investments. In order to monitor the environmental or social characteristics promoted by the Fund (*i.e.*, its investment exclusions), the Fund consults with the portfolio companies in regular intervals and will carry out further checks in order to identify potential issues with such characteristics. Moreover, the Fund obtains further information from ESG questionnaires which the portfolio companies are asked to fill out on an annual basis. Therefore, the Fund monitors compliance with its environmental or social characteristics (*i.e.*, its investment exclusions) on an ongoing basis. External monitoring mechanisms are not in place.

### Methodologies for environmental or social characteristics

Currently the Fund applies qualitative and quantitative assessments with regard to its environmental or social characteristics (*i.e.*, its investment exclusions). The Fund conducts its initial assessment in the course of its due diligence prior to any investment. Based on the results of such assessment the Fund identifies whether the environmental or social characteristics promoted by the Fund are met.

In order to measure how the environmental or social characteristics are met during the holding period, the Fund consults with the portfolio companies in regular intervals and will carry out further checks in order to identify potential issues with such characteristics. Moreover, the Fund obtains further information from ESG questionnaires which the portfolio companies are asked to fill out on an annual basis.

### Data sources and processing

In order to attain each of the environmental or social characteristics promoted by the Fund (*i.e.*, its investment exclusions), the Fund obtains most of the relevant data from its (potential) portfolio companies. Moreover, during the holding period, the Fund obtains further information via ESG questionnaires which the portfolio companies are asked to fill out on an annual basis. Hence, data is obtained only from the (potential) portfolio companies. An internal or external review or verification of the information obtained will be carried out if misrepresentations are suspected. The results of the data obtained are considered in the investment decision.

### Limitations to methodologies and data

The information collected from the (potential) portfolio companies as part of the due diligence carried out by the Fund is internally or externally verified only if and to the extent misrepresentations are suspected. Thus, it cannot be ruled out completely that false information may remain undetected in certain cases. As the Fund's investments are made for several years, the Fund considers it a priority to establish and maintain a trustful working relationship with its portfolio companies in order to ensure compliance with the environmental or social characteristics promoted by the Fund (*i.e.*, its investment exclusions).

### Due diligence

An initial assessment of how an investment relates to the environmental or social characteristics promoted by the Fund (*i.e.*, its investment exclusions) is carried out as part of the due diligence process. As a rule, purely qualitative statements of an environmental or social nature or relating to corporate governance are requested from the portfolio companies and then taken into account in the investment decision-making process. An

internal or external review or verification of the information obtained will only be carried out if misrepresentations are suspected.

#### Engagement policies

Engagement is not part of the environmental or social investment strategy of the Fund. However, where relevant, the Fund will use the findings of the due diligence as a foundation to establish a dialogue with the company. The Fund in general strives to raise further awareness for ESG matters in the portfolio companies' daily businesses and will seek to implement – if not in place – a plan to establish ESG processes as well as a performance plan for material ESG issues.

#### Designated reference benchmark

No index has been designated as a reference benchmark to meet the environmental or social characteristics promoted by the Fund.