

Mandatory disclosures under Regulation of the European Parliament and of the Council on sustainable-related disclosures in the financial services sector (EU) 2019/2088 ("SFDR").

I. Policies on the integration of sustainability risk in investment decision-making processes (Article 3 SFDR)

Vendep Capital Oy ("Vendep Capital") takes sustainability risks into account when conducting risk analysis during the investment decision making process. Sustainability risks are environmental, social or governance events or conditions, the occurrence of which could have an actual or potential material adverse effect on the value of the investment. Vendep Capital considers sustainability risks as part of the due diligence process prior to any investment. Vendep Capital remains free in its decision to refrain from investing or to invest despite sustainability risks in which case Vendep Capital can also apply measures to reduce or mitigate any sustainability risks. At all times, Vendep Capital will apply the principle of proportionality taking due account of the strategic relevance of an investment as well as its transactional context.

II. Principle adverse sustainability impact statement (Article 4 SFDR)

"No consideration of adverse impacts on sustainability factors"

Currently, Vendep Capital does not consider adverse impacts of investment decisions on sustainability factors. The burden associated with considering adverse impacts on sustainability factors is disproportionate considering the very limited relevance that such impacts could have in the context of Vendep Capital's investment strategy, as the Venture Capital funds managed by Vendep Capital invest in early-stage software companies in the Nordics and Baltics. Within the software economy, we do not expect adverse impacts on sustainability factors to occur regularly. Moreover, given that the SFDR and the accompanying Regulatory Technical Standards ("RTS") are new legislative acts, there is very little practical experience or practice regarding applying their respective provisions.

III. Mandatory disclosures of remuneration policies in relation to the integration of sustainability risks

As a registered AIFM within the Finnish Alternative Investment Managers Act (162/2014, as amended), the integration of sustainability risks is not considered with respect to the determination of the remuneration.

(Pre-contractual) Disclosures related to our Funds

Sustainability risks are environmental, social or governance events or conditions, the occurrence of which could have an actual or potential material adverse effect on the value of the investment in our Funds, cf. Art. 3 SFDR. Vendep Capital considers and assesses sustainability risks within its investment decision making process. The results of such assessments will be considered on a non-binding basis prior to taking any investment decision, provided that the principle of proportionality shall always be respected in dealing with sustainability risks taking due account of the strategic relevance of an investment as well as its transactional context.

Considering our investment strategy, we expect sustainability risks not to be relevant in most cases for our funds. Where relevant, Vendep Capital will apply reasonable efforts to appropriately assess such risks and their potential impacts.

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