

Sustainability-Related Disclosures

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Date of update: 22 June 2026 (*Adjustment of the summary translation, reassessment of consideration of principal adverse impacts on the entity level, clarification of proportion of sustainable investments and promoted characteristics on the product level, editorial amendments*)

This disclosure ensures compliance with the Sustainable Finance Disclosure Regulation (“**SFDR**”) 2019/2088 and Regulatory Technical Standards (“**RTS**”) 2022/1288.

The first part of this disclosure addresses the entity level sustainability disclosures and the second part product level disclosure.

Entity level disclosures

The following disclosures relate to **Caesar Ventures Management GmbH (LEI: 391200V2S0BBFPKJG146)**.

This statement includes three sections:

1. Transparency of sustainability risk policies (2019/2088 – 3-1)
2. No consideration of adverse sustainability impacts (2019/2088 – 4-1-b)
3. Transparency of remuneration policies in relation to the integration of sustainability risks (2019/2088 – 5)

1. Transparency of Sustainability Risk Policies

Caesar Ventures Management GmbH (the “Manager”) addresses sustainability risks in its investment decision making process insofar as relevant. “Sustainability risk” means an environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of the investment. When identifying a sustainability risk during the due diligence on potential investments, the Manager decides in light of the specific situation taking due account of the proportionality principle whether it gives up on the investment or proceeds with the investment alongside appropriate measures to mitigate the relevant sustainability risk.

The Manager regularly reviews its policies to ensure that they address new and emerging risks as well as investors' concerns. Currently, the Manager does not expect sustainability risks to have a negative impact on **Caesar Ventures Fund I GmbH & Co. KG's (the "Fund")** returns.

2. No consideration of Adverse Sustainability Impacts

The Manager does not consider principal adverse impacts of its investment decisions on sustainability factors pursuant to the SFDR.

Previously structured at entity level, considerations regarding principal adverse impacts are now made at product level. Considering the legal uncertainties related to the application of the provisions of the SFDR and the RTS – in particular with respect to the consideration of adverse impacts – and the administrative burden resulting from such uncertainties as well as the potential lack of adequate portfolio level data, the Manager is not in a position to commit to such standard in light of its fiduciary duty to the fund and its investors regarding the Partnership's investments that do not qualify as sustainable investments.

Considering the nature of the early-stage investments, the severity of principal adverse impacts from the portfolio companies is limited. Additionally, the data necessary to report in compliance with the SFDR is not sufficiently available. Collecting and reporting data related to the sustainability indicators listed in Annex I of the RTS would constitute a significant burden if applied to all portfolio companies and is therefore not required. The Manager reserves the right to change its data collection processes based on disclosure requirements as well as data availability and capacity limitations. This does not affect the consideration of principal adverse impacts on the fund level, described below under product level disclosures.

The Manager will constantly monitor and review the evolution around new regulations and standards and considers changing its position on adverse impacts once (i) a best practice has evolved among market participants, (ii) there is clear guidance by the administration on the application of such regulations and (iii) the consequences of a commitment towards the consideration of principal adverse impacts are reasonably clear to the Manager.

3. Transparency of Remuneration Policies in Relation to the Integration of Sustainability Risks

As a registered alternative investment fund manager within the meaning of the German Investment Code (Kapitalanlagegesetzbuch, KAGB), Caesar Ventures Management GmbH does not have, and is not required to have, a remuneration guideline or policy under the requirements of the KAGB. Sustainability risks are not considered with respect to the determination of remuneration.

Product level disclosures

The following disclosure relates to **Caesar Ventures Fund I GmbH & Co. KG (“Fund”)** (LEI: **HRA 117821**).

Summary

The Fund, classified as an article 8+ fund under the SFDR, integrates certain environmental and social characteristics into its investment decisions for the majority of its investments. Additionally, 15 % of investments have a sustainable investment objective. Caesar's investment thesis focuses on creating a better tomorrow for current and future generations.

Investment opportunities are evaluated based on their alignment with this thesis, emphasizing the positive impact of the company's products and services. To achieve this, the following environmental and social characteristics have been chosen:

- GreenTech
- HealthTech
- FinTech
- AI & DeepTech

E and S characteristics are rigorously assessed before and after investments using qualitative and quantitative inquiries through a third-party tool. The Fund incorporates both positive screenings and investment exclusions (negative screening) during the decision-making process.

Zusammenfassung

Der als Artikel 8+ eingestufte Fonds bezieht bei der Mehrzahl seiner Investitionen bestimmte ökologische und soziale Merkmale in seine Anlageentscheidungen ein. Darüber hinaus haben 15 % der Investitionen ein nachhaltiges Anlageziel. Die Anlagethese von Caesar konzentriert sich auf die Schaffung einer besseren Zukunft für heutige und künftige Generationen.

Investitionsmöglichkeiten werden auf der Grundlage ihrer Übereinstimmung mit dieser These bewertet, wobei die positiven Auswirkungen der Produkte und Dienstleistungen der Portfolio Unternehmen im Vordergrund stehen. Um dies zu erreichen, wurden die folgenden ökologischen und sozialen Merkmale ausgewählt:

- GreenTech
- HealthTech
- FinTech
- AI & DeepTech

Die E- und S-Merkmale werden vor und nach den Investitionen anhand von qualitativen und quantitativen Untersuchungen durch ein Drittanbieter-Tool bewertet. Der Fonds berücksichtigt bei der Entscheidungsfindung sowohl positive Screenings als auch Investitionsausschlüsse (negatives Screening).

No sustainable investment objective

The Fund promotes environmental and social characteristics and, while it does not aim to have as its objective a sustainable investment, it has a minimum proportion of 15% of sustainable investments with an environmental objective in economic activities that qualify as environmentally sustainable.

The remaining investments in the Fund promote environmental or social characteristics. The Fund aims to ensure that the portfolio companies are committed to sustainable and responsible operating and management practices. Additionally, an exclusionary policy was implemented to ensure alignment with the standards defined by the European Investment Bank, KfW and IFC.

The sustainable investment objective of the Fund is fulfilled through investments that are directed towards sustainable objectives, contributing to the environmental goals as defined by the Taxonomy Regulation EU 2020/852, and adhere to the 'Do No Significant Harm' criteria.

Environmental or social characteristics of the financial product

The following environmental and/or social characteristics chosen from the BAFIN Guidance on Sustainability Risks are promoted by the Financial Product:

Environment

- Climate Mitigation

Social

- Compliance with recognised labour standards (no child labour, forced labour or discrimination)
- Compliance with employment safety and health protection
- Appropriate remuneration, fair working conditions, diversity, and training and development opportunities
- Exposure to controversial weapons

Governance

- Anti-corruption measures
- Board remuneration based on sustainability criteria
- The facilitation of whistle blowing
- Employee rights guarantee
- Data protection guarantees
- Information disclosure

Investment strategy

The Fund makes relatively small first investments in very early-stage startups with extreme growth potential and intends to do follow-on investments in the best of them. Thereby, the fund invests in startups that solve real problems with disruptive ideas in the sectors GreenTech, HealthTech, FinTech, AI & DeepTech and deliver outstanding financial and, ideally, environmentally, or socially sustainable returns.

Proportion of investments

The Fund invests strictly according to its investment strategy and investment restrictions. It does not intend to make any investments that do not align with its environmental or social characteristics, PAI or exclusions.

Monitoring of Environmental or Social characteristics

The Fund has heightened its awareness of the impact of sustainability risks on risk management and, consequently, on the investment's potential value. The Fund engages with portfolio companies on an ad-hoc basis and conducts further checks if there are indications of potential issues with the Fund's exclusion criteria. Therefore, ongoing monitoring of ESG compliance is conducted, with annual reporting on selected KPIs for all portfolio companies.

Methodologies

Currently, the Fund conducts qualitative and quantitative assessments of environmental and social characteristics. These assessments occur during the annual reporting using a third-party ESG data collection tool for the sustainable investments. The methodology for calculating Scope 1,2 and 3 emissions is done by the portfolio companies themselves or via the Business Carbon Calculator by Normative. The assessments can include i.a. the following indicators:

Environmental Indicators

- Scope 1: Direct GHG (greenhouse gas) Emissions, Scope 2: Indirect Emissions and Scope 3: Indirect Emissions from Value Chain (#tCO₂e).
- Total Energy Consumption (#kWh)
- Renewable Energy Consumption (#kWh)
- Activities in Fossil Fuels
- ESG Policy

Social Indicators

- Anti-Discrimination and Equal Opportunities Policy
- Human Rights Policy
- Work Related Injuries
- Female Full Time Employees

Governance Indicators

- Anti-Corruption and Anti-Bribery Policy
- Privacy and Data Security Policy
- Code of Conduct
- Cyber Security Risks Program/Training
- Number of Female Board Members

Data sources and processing

Information is obtained from the respective portfolio companies. An external review or verification of this information will only be conducted if misrepresentations are suspected.

Limitations to methodologies and data

The information collected from portfolio companies as part of the Fund's due diligence or annual reporting requirements is externally verified only if misrepresentations are suspected. Therefore, it cannot be completely ruled out that false information may remain undetected in certain cases. Given that the Fund's investments span several years, establishing and maintaining a trustworthy working relationship with portfolio companies is considered a priority to ensure compliance with the restrictions outlined in this section.

Due diligence

An initial assessment of how an investment aligns with the aforementioned characteristics is conducted as part of the due diligence process through an informal approach, tailored to the circumstances of each individual case. Portfolio companies are requested to provide purely qualitative statements regarding environmental, social, or corporate governance aspects. These statements are then considered in the investment decision-making process. For more details, please request our Responsible Investment Policy.

Engagement policies

The Manager intends to develop engagement policies on the identification and prioritization of principal adverse sustainability impacts on sustainability factors. The methodologies intended to be used by the Manager reflect the inherent characteristics of investing in start-ups and growth companies that are expected to grow their operations – this may lead to an increase in some of the adverse sustainability indicators as specified above, so that in those cases only a relative and tailored adverse impact mitigation strategy can be pursued.

The principal adverse sustainability impact is considered individually under a specifically required mitigation strategy, taking into account the extent and type of impact and providing for a mitigating or minimizing strategy in each case.

The principal adverse sustainability impacts will be assessed during the due diligence process and portfolio companies will have to measure and report on each adverse sustainability impact on a regular basis, allowing the Manager to track and evaluate the impacts for each portfolio company.

Information about the principal adverse impacts on sustainability factors can be found in the Partnership's annual reports.

The Manager recognizes that engaging with sustainability issues in investee companies can positively influence both investment outcomes and societal benefit. Working in tandem with investment teams, the Manager identifies a range of engagement themes pertinent to both the firm and its clients. There are two main avenues for this engagement: **corporate and public policy**.

Corporate engagement sees the Manager utilizing its shareholder rights to encourage companies towards better sustainability and governance practices, employing various strategies such as value engagement, SDG engagement, and enhanced engagement for addressing significant breaches in conduct. The engagement efforts are strategic and outcome-oriented which will be compared with data reported in the next and subsequent reporting cycles to gauge improvements.

In terms of public policy, Caesar engages with governments and regulators to support regulations that enhance ESG considerations, aligning with principles of transparency and appropriate influence.