# **SFDR Disclosures**

Date: November 4th, 2021

The following SFDR statement is the consolidated statement of Signature Ventures GmbH ("Signature Ventures"), LEI 391200GHW6P9GX8WYO87, and Signature Ventures Fund I GmbH & Co. KG (the "Fund"), LEI 3912005174Z8NOSUXE77.

### I. Art. 3 – Sustainability Risks

Signature Ventures considers sustainability risks as part of its diligent 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. Signature Ventures considers sustainability risks as part of the due diligence process prior to any investment and includes these results in its investment decision on a non-binding basis.

In addition, Signature Ventures monitors progress in addressing environmental, social or governance issues. Where potential for improvement is identified it is discussed between the Signature Ventures team and the portfolio company's management. If sustainability risks are unavoidable, they are mitigated and/or compensated. Signature Ventures applies the proportionality principle in dealing with sustainability risks. This means that the effort should always be proportionate to the size and type of investment as well as the transactional context and the related scope.

### II. Art. 4 - No Consideration of Sustainability Adverse Impacts

Signature Ventures does not consider adverse impacts of investment decisions on sustainability factors. Sustainability factors are environmental, social and employee concerns, respect for human rights and the fight against corruption and bribery. No sustainability indicators are currently used. The burden associated with considering adverse impacts on sustainability factors (particularly if sustainability indicators are used) is disproportionate in light of the very limited significance that such impacts could have in the context of Signature Ventures' investment strategy (i.e. investing in distributed ledger technology (DLT) and DLT related ventures and thereby software-focused projects that drive decentralization).

Furthermore, there remain legal uncertainties around the provisions of the Sustainable Finance Disclosure Regulation (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) and the Regulatory Technical Standards (Final Report on draft Regulatory Technical Standards). If and to the extent that these regulations evolve and the mentioned uncertainties are being resolved or a practicable market and administrative practice is established in this regard, Signature Ventures will reevaluate applying them in due course.

# III. Art. 5 - Remuneration Disclosure

As a registered alternative investment fund manager within the meaning of section 2 (4) of the KAGB, Signature Ventures does not have, and does not need to have, a remuneration guideline or policy in accordance with the requirements of the KAGB. Sustainability risks are not considered with respect to the determination of the remuneration.



### IV. Art. 10, 8 - Sustainability-related Disclosures

### **Summary**

The Fund considers certain environmental and social characteristics as part of its investment decisions but does not seek to make sustainable investments as defined in the SFDR. The consideration of environmental and social characteristics is carried out both before and after the investments. For this purpose, information is initially and regularly obtained from the portfolio companies by means of qualitative queries. The Fund incorporates investment exclusions during the decision-making process. The actions and decisions described in the following section are each made by Signature Ventures on behalf of the Fund.

#### Zusammenfassung

Der Fonds berücksichtigt bestimmte ökologische und soziale Merkmale im Rahmen seiner Investitionsentscheidungen, strebt aber keine nachhaltigen Investitionen im Sinne der SFDR an. Die Berücksichtigung von Umwelt- und Sozialmerkmalen erfolgt sowohl vor als auch nach den Investitionen. Zu diesem Zweck werden zunächst und regelmäßig Informationen von den Portfoliounternehmen durch qualitative Abfragen eingeholt. Der Fonds bezieht Investitionsausschlüsse in seinen Entscheidungsprozess ein. Die in diesem Abschnitt beschriebenen Handlungen und Entscheidungen erfolgen jeweils durch Signature Ventures für den Fonds.

#### No sustainable investment objective

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

#### Environmental or social characteristics of the financial product

The Fund does not invest in portfolio companies whose business includes:

- a) Performing research and innovation activities considered as illegal according to the applicable legislation in the country of the statutory seat of the portfolio company;
- b) An illegal economic activity (*i.e.*, any production, trade or other activity, which is illegal under the laws or regulations applicable to the Fund or the statutory seat of the portfolio company);
- c) The production of, and trade in, tobacco and distilled alcoholic beverages and related products;
- d) The financing and production of, and trade in, weapons and ammunition of any kind;
- e) Casinos and equivalent enterprises (this shall, for the avoidance of doubt, not include skill-based gaming);
- f) The research, development or technical applications relating to electronic data programs or solutions, which aim specifically at: (i) supporting any activity referred to under b) through e); or (ii) pornography.

#### Investment strategy

The Fund shall focus on investments in the full scope of distributed ledger technology (commonly also referred to as blockchain technology) and DLT related ventures, including but not limited to infrastructure (e.g., fundamental protocols, 2nd layer solutions, enabler technology, developer tools), decentralized finance (e.g. fiat on-ramps, wallets, custody solutions), blockchain applications (e.g., decentralized identity, gaming and IoT). The Fund intends to make its initial investments in the early stage, i.e., Pre-Seed, Seed and Series A rounds (including, for the avoidance of doubt, late seed rounds).

Good governance practices are monitored on an ad hoc basis, i.e. if the Fund becomes aware of severe governance issues in the investee companies, it will investigate them and work with all parties involved to find



an appropriate solution and through a checklist as part of every due diligence process prior to any investment made by the Fund.

#### **Proportion of investments**

The Fund invests fully in line with its investment strategy and investment restrictions. The Fund does not intend to make any investments which are not aligned with its environmental or social characteristics (i.e., its investment exclusions).

### Monitoring of environmental or social characteristics

The Fund has an increased awareness of the impact of sustainability risks on risk management and thus on the value potential of investments. The Fund consults with the portfolio companies in regular intervals and will carry out further checks if there are indications of relevant undesirable developments. Therefore, the Fund monitors compliance with the ESG requirements on an ongoing basis. External monitoring mechanisms are not provided.

#### **Methodologies**

Currently the Fund applies qualitative assessments with regard to environmental or social characteristics. The Fund conducts its initial assessment in the course of its due diligence. The Fund's due diligence takes the form of a questionnaire which the Fund asks its portfolio companies to complete.

# Data sources and processing

A questionnaire is completed by the portfolio companies. An external review or verification of the information obtained will only be carried out if misrepresentations are suspected. Data is obtained only from the portfolio companies.

### Limitations to methodologies and data

The information collected *via* the questionnaire as part of the due diligence on behalf of the Fund is 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 investment is made for several years, the Fund considers it a priority to establish and maintain a trustful working relationship with the Fund's portfolio companies in order to ensure compliance with the restrictions described in this section.

#### Due diligence

An initial assessment of how an investment relates to the aforementioned characteristics is carried out as part of the due diligence process using a questionnaire. As a rule, purely qualitative statements of an ecological 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.

#### **Engagement policies**

The Fund decides at its sole discretion whether or not to make an investment and may include risk mitigation measures where appropriate.

