

## **ARTICLE 8 FUND WEBSITE DISCLOSURES**

### **1. General**

Pursuant to the provisions of the EU's Sustainable Finance Disclosure Regulation (2019/2088) ("SFDR"), we are required to provide our potential investors with the mandatory product-level website disclosures ("**Disclosures**"). As an alternative investment fund, we believe that we fall within the scope of article 8 SFDR, since we shall promote environmental and/or social characteristics and make investments in portfolio companies that follow good governance practices.

By making the following Disclosures, we aim to increase the transparency on our sustainability approach by ensuring that our potential investors are provided with information regarding (i) the integration of Sustainability Risks (as defined hereinafter) into our investment decision-making process (cf. article 3 SFDR), (ii) the consideration of the adverse impacts of our investment decisions on certain Sustainability Factors (as defined hereinafter) (cf. article 4 SFDR), (iii) the integration of Sustainability Risks into our remuneration policy (cf. article 5 SFDR), and (iv) the promotion of environmental and social characteristics (cf. article 8, 10 and 11 SFDR).

The Disclosures reflect the information available to us at the time of the Disclosures, as well as our compliance with the current SFDR requirements. As our approach to sustainability on the one hand, and SFDR insights on the other hand may evolve over time, it is important to note that the Disclosures may be subject to updates. Nevertheless, we are committed to providing up-to-date information on our sustainability practices and keeping our potential investors informed of any changes that may impact our sustainability approach and the respective Disclosures.

For the purpose of these Disclosures, the following terms shall have the meaning as set forth below:

- "**Sustainability Risk**" means an environmental, social or governance event or condition which, if it occurs, could cause an actual or potential material negative impact on the value of an investment.
- "**Sustainability Factors**" mean environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

### **2. Integration of Sustainability Risks**

As the Fund is a small organisation and currently lacks the resources to fully assess and integrate Sustainability Risks into its discretionary investment decision-making process, and given that the Fund invests in small- to medium-sized portfolio companies that may not be able to provide sufficient information to allow for an accurate assessment of such risks, the Fund does not formally integrate the review and assessment of Sustainability Risks into its discretionary investment decision-making process.

We do however believe that incorporating sustainability considerations into our investment process is key to managing such risks and ensuring the long-term value of our investments, while also contributing to a more sustainable future. We are therefore committed to integrating Sustainability Risks into our discretionary investment decision-making process and are actively working on our internal strategies and policies to ensure that we achieve these goals over the upcoming years. We will continue updating any and all potential investors on our progress in this respect.

In the meantime, we take great care in selecting potential portfolio companies and the sectors in which they operate. Prior to our investments, we conduct thorough due diligence research, which shall include an assessment of the portfolio company's compliance with applicable legislation, including ESG-related legislation. The outcome of such due diligence research is taken into consideration when making investment decisions.

As a responsible investor, we take our responsibility seriously and strive to leverage our influence to implement positive changes throughout the lifespan of our investments. In doing so, our goal is to align the interests of the portfolio companies with those of the broader society and planet.

### **3. Consideration of adverse impacts on certain Sustainability Factors**

To this date, we do not report on or consider the principal adverse impacts of our discretionary investment decision-making process on Sustainability Factors (“**Adverse Impacts**”) as we are a small organisation, currently lack the resources, and we are limited by our capacity and capabilities to fully consider and conduct a thorough analysis of such Adverse Impacts.

Our investment strategy involves investing in small- to medium scale portfolio companies that may not be able to provide the information necessary to accurately determine the Adverse Impacts.

### **4. Integration of Sustainability Risks in remuneration policy**

As a sub-threshold manager of alternative investment funds, we do not have an obligation to have a formal remuneration policy (cf. article 40 and following of the Belgian Law of 19 April 2014 on alternative entities for collective investments and their managers). Consequently, we do not integrate Sustainability Risks in our remuneration policy.

### **5. Promotion of environmental and/or social characteristics (article 8, 10 and 11 SFDR)**

#### *A. Summary*

We shall commit to promoting environmental and social characteristics, by investing in portfolio companies that prioritize good governance practices and minimum environmental, social, and governmental (“**ESG**”) standards and safeguards.

However, we shall not make sustainable investments our exclusive investment objective, nor commit to making one or more sustainable investments.

#### *B. No sustainable investment objective*

As set forth above, we shall promote environmental and sustainable characteristics, but we do not have a sustainable investment objective.

#### *C. Environmental and/or social characteristics*

We shall promote environmental and social characteristics by making responsible investments in portfolio companies that prioritize good governance practices and minimum ESG standards and safeguards, which shall include, but shall not be limited to, safeguards related to human rights, labour rights, combating severe environmental damage and gross corruption.

To achieve our sustainability goals, we aim to combine the following investment principles:

#### 1. Pre-investment exclusion:

We shall exclude any investments in portfolio companies that are either engaged in unethical behaviour (such as, but not limited to, the violation of human rights, issues with respect to labour rights, severe environmental damage, and gross corruption) or active in certain industries that could have a negative impact on our environment or society. By employing this approach, we can align our investments with our values and principles, while also minimizing the potential impact of Sustainability Risks.

2. Pre-investment due diligence:

We take great care in selecting potential portfolio companies and the sectors in which they operate. Prior to our investments, we conduct thorough due diligence research, which shall include an assessment of the portfolio company’s compliance with applicable legislation, including ESG related legislation. In doing so, we aim to investigate and identify any material ESG issues, and the outcome of this due diligence research is taken into consideration when making the investment decisions.

For the time being, we consider the following ESG characteristics to be key in the context of our due diligence process:

Environmental	Social	Governmental
<p><b>Green mobility:</b> The adoption of low-emission and resource-efficient transport solutions, including electric, shared, and alternative-fuel mobility, aimed at reducing environmental impact and supporting sustainable transportation systems.</p> <p><b>Severe environmental damage:</b> Significant and long-lasting harm to ecosystems, biodiversity, natural resources, or environmental quality, resulting from human activities and impairing environmental sustainability.</p>	<p><b>Diversity and inclusion:</b> The practice of creating an environment that respects and values individual differences, fostering a sense of belonging and equal opportunity for people of diverse backgrounds.</p> <p><b>Safeguards on labour rights and human rights, safety at work:</b> Policies, procedures, and practices designed to ensure respect for internationally recognised labour and human rights standards, prevent abuses, and promote fair, safe, and non-discriminatory working conditions.</p> <p><b>Corruption:</b> The misuse of authority or position for personal or improper advantage, in breach of applicable laws and ethical standards.</p>	<p><b>Good governance practices:</b> The transparent, accountable, and ethical decision-making processes, along with effective oversight and regulation, ensuring a responsible and fair functioning.</p>

Apart from the aforementioned key characteristics, we do not exclude other ESG characteristics beforehand (e.g., waste management, biodiversity preservation, community engagement, executive compensation and transparency risk management and accountability, etc.) but will rather assess on a case-by-case basis which other ESG characteristics may form part of our due diligence process.

Moreover, we reserve the right to revise and update the list of key ESG characteristics from time to time.

*D. Investment strategy*

Our objective is to provide funding and generate returns for our investors through privately negotiated equity and equity-linked investments in selected portfolio companies. These portfolio companies are privately held, growth-oriented companies, primarily at the buy-out stage. Our investments are limited to entities located in Belgium and The Netherlands. Such portfolio companies may operate through subsidiaries or group entities outside Belgium and The Netherlands, typically within Europe, while their

core activities and the majority of their revenues are generated in Belgium and/or The Netherlands. By focusing exclusively on these markets, we aim to maximise exposure to the Belgian and Dutch economies and to benefit from their economic growth and relative stability.

We consider the good governance practices of the portfolio companies as an essential component of our investment strategy. Prior to the respective investment, a thorough analysis of such governance practices is conducted as part of our overall risk and impact screening process. This includes the assessment of:

- the effectiveness of a portfolio company's management body;
- the compliance of a portfolio company's audit and risk processes with best practice standards; and
- the portfolio company's overall compliance with tax, anti-money laundering, anti-bribery and environmental standards, and a portfolio company's commitment to employment rights.

#### *E. Asset allocation*

In accordance with our investment strategy as set out above, we shall invest all assets made available for investments exclusively in portfolio companies which are privately held, growth-oriented companies, primarily at the buy-out stage.

At present, we have not yet established a specific asset allocation strategy. However, our ultimate goal is to establish a robust and sustainable asset allocation strategy which is tailored to our specific goals and objectives. In the meantime, we remain committed to managing our investments prudently and in the best interests of our (potential) investors.

#### *F. Monitoring of environmental and/or social characteristics*

As we place great importance on (i) the ESG compliance and practices of our portfolio companies, and (ii) the effective monitoring of their progress and growth in the respect, we shall require periodic reports from each of our portfolio companies to effectively monitor their progress and growth in this respect. Such reports should provide specific details on their ESG procedures and performance. We shall provide guidelines to assist with the formatting and content of such reports to ensure consistency and transparency across our portfolio companies.

#### *G. Methodologies*

ESG compliance, performance and progress of our portfolio companies will be monitored on the basis of periodic reporting, providing insight into sustainability impacts and identified Sustainability Risks, as well as an evaluation of any identified Sustainability Risks. In addition, the outcome of such periodic reportings will be carefully analysed to identify areas of improvement and opportunities for growth.

In doing so, our goal is to ensure that our portfolio companies are making measurable progress towards their predetermined sustainability objectives while also mitigating any potential Sustainability Risks that could impact the long-term sustainability of their operations.

#### *H. Data sources and processing*

We will rely on data obtained from our portfolio companies. This information will be kept up to date through periodic reporting by the portfolio companies throughout the lifespan of the respective investment.

In addition, we are committed to continuous monitoring of any developments in national and supranational regulations regarding ESG characteristics. By staying up to date on industry developments through monitoring of our portfolio companies, as well as keeping a close eye on regulatory changes, we are better equipped to navigate the rapidly evolving ESG landscape.

*I. Limitation to methodologies and data*

Since we heavily rely on the data provided by our portfolio companies, it is crucial for our portfolio companies to furnish us with accurate and truthful information. In this regard, we depend on their cooperation and transparency.

While we acknowledge this dependency, we are committed to closely monitoring the data collection process to ensure that our promoted environmental and/or social characteristics are not compromised. Through careful oversight, we will work to mitigate any potential discrepancies.

*J. Due diligence*

Please refer to section “C. Environmental and/or social characteristics”.

*K. Engagement policies*

We are committed to collaborating with each of our portfolio companies to develop a feasible strategy that will enable them to make measurable progress towards achieving their sustainability objectives while also mitigating any potential Sustainability Risks. This approach is designed to help our portfolio companies maintain their business operations in a sustainable and responsible manner.

To achieve this, we will work closely with each portfolio company to identify and prioritize their sustainability objectives and risks, taking into account the unique challenges and opportunities of their industry and operations. We will then develop a tailored strategy that outlines specific actions and targets for achieving these objectives and mitigating identified risks.

By partnering with our portfolio companies in this way, we believe we can create long-term value for both the portfolio companies and our investors, while also contributing to a more sustainable future for all.

*L. Index as reference*

We have not identified a specific index as a reference benchmark to meet the environmental and/or social characteristics.

**Schedule 1**

**Restricted Investments**

Investments in companies or entities active in the following activities, are referred to as Restrictive Investments:

1. **Illegal Economic Activities.** Any production, trade or other activity, which is illegal under the laws or regulations of the home jurisdiction for such production, trade or activity. Human cloning for reproduction purposes is considered an Illegal Economic Activity in the context of these Guidelines;
  2. **Production of and Trade in Weapons and Ammunition.** The financing of the production of and trade in weapons and ammunition of any kind. This restriction does not apply to the extent such activities are part of or accessory to explicit European Union policies. Moreover, goods, software and technology that can be used for both civilian and military applications (with the exception of goods that are directly aimed at disabling people or taking their lives) are not de facto excluded;
  3. **Production of tobacco products, as well as producers, wholesalers and traders whose revenue is derived mainly from tobacco;**
  4. **Production of distilled alcoholic beverages, as well as producers, wholesalers and traders whose revenue is derived mainly from distilled alcoholic beverages;**
  5. **Casinos and equivalent enterprises;**
  6. **IT Sector Restrictions** Research, development or technical applications relating to electronic data programs or solutions, which:
    1. aim specifically at:
      1. supporting any activity included in this list of activities qualifying as Restrictive Investments;
      2. internet gambling and online casinos; or
      3. pornography,
      4. or which
    2. are intended to enable to illegally:
      1. enter into electronic data networks; or
      2. download electronic data
  7. **providing support to the financing of the research, development or technical applications relating to:**
    1. human cloning for research or therapeutic purposes; or
    2. Genetically Modified Organisms ("GMOs")
-