

## Sustainability-Related Disclosures

### Article 10 SFDR – Sustainability-Related Information About Financial Products That Promote Environmental or Social Characteristics

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FMV First Momentum Ventures Management GmbH, LEI: 391200NFOQ6U1LCIW121, is the alternative investment fund manager of FMV Fund III GmbH & Co. KG (“**FMV Fund III**”), LEI: 529900K48TECCD5GJI58, within the meaning of the German Investment Code (*Kapitalanlagegesetzbuch*) and the EuVECA-Regulation and as such publishes the following information in light of the consideration of sustainability-related aspects in accordance with Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability disclosure requirements in the financial services sector (“**SFDR**”).

#### Summary

This financial product promotes environmental or social characteristics but does not have as its objective a sustainable investment within the meaning of Article 2 No. 17 SFDR. The promoted characteristics are investment restrictions. 100% of the investments will be in line with its investment strategy and investment restrictions.

No reference benchmark has been designated to attain the environmental or social characteristics promoted by the financial product.

#### *Zusammenfassung*

*Dieses Finanzprodukt bewirbt ökologische oder soziale Merkmale, strebt aber keine nachhaltigen Investitionen im Sinne der Definition des Artikel 2 Nr. 17 SFDR an. Bei den beworbenen Merkmalen handelt es sich um Ausschlusskriterien. 100% der Investitionen werden im Einklang mit der Anlagestrategie und den Anlagebeschränkungen getätigt.*

*Es wurde kein Referenzwert benannt, um die mit dem Finanzprodukt beworbenen ökologischen oder sozialen Merkmale zu erreichen.*

#### No Sustainable Investment Objective

This financial product promotes environmental or social characteristics, but does not have as its objective sustainable investment.

#### Environmental or Social Characteristics of the Financial Product

The promoted characteristics are investment restrictions.

FMV Fund III will not invest, guarantee or otherwise provide financial or other support, directly or indirectly, to companies or other entities:

- (a) whose business activity consists of an illegal economic activity (i.e., any production, trade or other activity, which is illegal under the laws or regulations applicable to FMV Fund III or the relevant company or entity), including without limitation, human cloning for reproduction purposes; or
- (b) which substantially focus on:
  - (i) the production of and trade in tobacco and distilled alcoholic beverages and related products;
  - (ii) controversial weapons, whereas “controversial weapons” shall mean controversial weapons as referred to in international treaties and conventions, United Nations principles and, where applicable, national legislation;
  - (iii) casinos and equivalent enterprises;
  - (iv) the research, development or technical applications relating to electronic data programs or solutions, which:
    - (A) aim specifically at:
      - (x) supporting any activity referred to under items (i) through (iii) of lit. (b) above;
      - (y) internet gambling and online casinos; or
      - (z) pornography; or
    - (B) are intended to enable to illegally enter into electronic data networks; or download electronic data.

In addition, when providing support to the financing of the research, development or technical applications relating to (i) human cloning for research or therapeutic purposes or (ii) genetically modified organisms (GMO), the Managing Limited Partner shall ensure the appropriate control of legal, regulatory and ethical issues linked to such human cloning for research or therapeutic purposes and/or GMOs.

FMV Fund III may not invest in companies where, based on information publicly available on the World Wide Web or in the national press, or based on investigations conducted with reasonable diligence prior to an investment, it is proven or there is a substantial suspicion that the respective company uses or supports child labor or forced labor, persistently discriminates against people on the basis of gender, ethnic origin, disability, nationality, political opinion, religious affiliation, social origin or sexual orientation, materially interferes with trade union activities or persistently violates employee rights or materially violates environmental requirements.

## **Investment Strategy**

The purpose of FMV Fund III is to build, hold, manage, and divest – in its own name and for its own account – a portfolio of equity and equity-related investments in companies. FMV Fund III's investments will have an emphasis on (pre-) seed financing rounds in technology-driven start-up companies with high growth potential as well as follow-on investments in portfolio companies of the Previous Funds mainly in Europe ("**Portfolio Companies**").

No investments are made in the area of exclusions. As part of the due diligence and ongoing investment management, the investment team for FMV Fund III will initially and continuously monitor whether the investment restrictions are abided by and whether the investment falls within the investment policies.

### **Policy to Assess Good Governance Practices of the Investee Companies**

As part of the due diligence and ongoing investment management, the investment team will review whether a potential investee company has good governance practices in place. This might include using ESG (environmental, social, and governance) criteria to evaluate companies' performance in areas such as labor practices, human rights, and corporate governance, conducting due diligence on investee companies to assess their management structures, employee relations, and tax compliance, engaging with investee companies to encourage improvements in governance practices, if necessary. The intensity of the assessment is carried out in accordance with the principle of proportionality. Where FMV Fund III sees higher risks of a non-compliance, the audit will be intensified.

## **Proportion of Investments**

FMV Fund III will invest fully in line with its investment strategy and investment restrictions. FMV Fund III will not invest a portion of its capital in any other asset class.

## **Monitoring of Environmental or Social Characteristics**

The investment team for FMV Fund III will initially and continuously monitor whether the investment restrictions are abided by and whether the investment falls within the investment policies. FMV Fund III will not make any investment in the excluded sectors unless previously approved by the advisory committee. Therefore, the achievement of the promoted ESG aspects – no investment within the excluded sectors – can be tracked in a simple way.

## **Methodologies for Environmental or Social Characteristics**

Any potential investment is assessed against the list of excluded sectors prior to an investment. FMV Fund III verifies on an ongoing basis that no investment falls within any of the sectors excluded under the fund's investment policy.

## **Data Sources and Processing**

FMV Fund III receives portfolio-related data as part of its due diligence process and on a regular basis following the investment. Where necessary or beneficial, FMV Fund III also makes use of publicly available data. Estimates of data are not made.

### **Limitations to Methodologies and Data**

FMV Fund III partially relies on the information gathered during the due diligence process. Moreover, in the post-investment phase, FMV Fund III is reliant on the reported data. In both cases, complete data may not always be available due to the nature of the investments. The information is verified only if and to the extent misrepresentations are suspected.

Since FMV Fund III's investments are made for a multi-year investment period, FMV Fund III places a high priority on establishing trust-based working relationships with all stakeholders to ensure that data is submitted reliably and completely and that the above restrictions are met.

### **Due Diligence**

FMV Fund III considers the promoted ESG aspects when sourcing new investments for FMV Fund III and during the due diligence on targeted investments. The due diligence is performed by obtaining all information relevant to FMV Fund III using a due diligence questionnaire, which is then reviewed internally. If necessary, further specific information is also obtained from the potential investments, should this still be necessary after the detailed questioning. The due diligence process is not externally monitored.

### **Engagement Policies**

FMV Fund III investments are made for a period of several years. Accordingly, FMV Fund III prioritizes building and maintaining a trust-based working relationship with them to ensure ongoing compliance with investment restrictions. In this context, FMV Fund III also seeks to establish or strengthen the integration of sustainability aspects at the portfolio level, but as a venture capitalist without majority ownership, the influence FMV Fund III can exert on the portfolio companies is limited.