

## **Article 10 SFDR – Promotion of environmental or social characteristics**

Alpine Space Ventures Management GmbH (the “**Manager**”) is the alternative investment fund manager of Alpine Space Ventures Fund I GmbH & Co. KG (the “**Fund**”) within the meaning of the German Investment Code (*Kapitalanlagegesetzbuch*, KAGB) 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 (the “**SFDR**”).

### **Summary**

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

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the financial product.

### **What environmental and/or social characteristics are promoted by this financial product?**

#### **Investment Restrictions:**

Without the consent of the Advisory Committee, the Fund shall not make any Portfolio Investments in any Person that derives a majority of its revenue from the production of, use of, trade in or distribution of tobacco products, pornography, weapons of mass destruction, animal testing, modern slavery or child labor.

### **Does this financial product consider principal adverse impacts on sustainability factors?**

The Manager does not consider principal adverse impacts of investment decisions on sustainability factors. ‘Sustainability factors’ mean environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters. The Manager does not use sustainability indicators. Considering the numerous legal uncertainties currently related to the application of the provisions of the SFDR and the Regulatory Technical Standards (“RTS”) – in particular with respect to the consideration of adverse impacts – and the administrative burden resulting from such uncertainties, the Manager is not in a position to commit to such standard in light of its fiduciary duty to the Fund and its investors. The Manager will constantly monitor and review the evolution around such regulations and standards and intends to change its position on adverse impacts once (i) a best practice has evolved among market participants, (ii) there is clear guidance by the administrations 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.

**What investment strategy does this financial product follow?**

The purposes of the Fund are (a) to seek long-term capital appreciation by acquiring, holding and disposing of Securities in venture capital and growth stage investments primarily structured as equity and equity-related investments in companies in the space and space-adjacent sectors, in accordance with and subject to the other provisions of this Agreement, (b) to engage in such other activities as the Managing LP deems necessary, advisable, convenient or incidental to the foregoing and (c) to engage in any other lawful acts or activities consistent with the foregoing for which limited partnerships may be formed under the German Commercial Code.

**What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?**

The investment strategy is described in section 1.4 lit. (a) of the partnership agreement of the Fund (the “LPA”). Further binding elements of the investment strategy can be found in section 4.1 of the LPA. The investment restrictions regarding ESG aspects are set out in section 4.2 lit. (c) of the LPA.

**How is that strategy implemented in the investment process on a continuous basis?**

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

**What is the 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.

**What is the asset allocation planned for this financial product?**

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

## **Methodologies and Due Diligence**

The Manager considers the promoted ESG aspects when sourcing new portfolio companies for the Fund and during the due diligence on targeted portfolio companies. The investment team for the Fund will initially and continuously monitor whether the investment restrictions are abided by and whether the investment falls within the investment policies. The Fund will not make any investment in the excluded sectors unless previously approved by the advisory committee. Therefore, achievement of the promoted ESG aspects – no investment within the excluded sectors – can be tracked in a simple way.

## **Data sources and processing and limitations to methodologies and data**

The Manager is partly reliant on the information provided by portfolio companies during the due diligence process. Moreover, in the post-investment phase, the Fund is reliant on the company's reported data. In both cases, complete data may not always be available due to the nature of investments. The information is verified only if and to the extent, misrepresentations are suspected.