

SFDR website disclosure for The Footprint Fund I K/S

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Summary (article 38)

The Footprint Fund I (the 'Fund') is a 'deep-green' Article 9 venture fund focused on pre-seed and seed investments. We seek to make sustainable change possible through investing in business models that are aimed at solving some of the world's most pressing environmental issues, and where commercial scaling is directly linked to the sustainability contribution.

All investments contribute to at least one of the selected environmental objectives:

- Climate change mitigation
- Sustainable use and protection of water and marine resources
- Pollution prevention and control
- Protection and restoration of biodiversity and ecosystems

In accordance with Article 9 under the Sustainable Finance Disclosure Regulation ('SFDR') the Fund allocates 95% of its assets to sustainable investments. We do not have a target for the proportion of investments that should be in Taxonomy-eligible industries. However, where portfolio companies generate revenue from activities that are Taxonomy eligible, we expect at least 50% of their eligible revenue to become Taxonomy aligned within 24 months of our investment. Where companies fail to meet this criterion, we will aim to divest within 24 months from that point.

The manager of the Fund (the 'Manager') is ultimately owned by The Footprint Firm Holding ApS ('FPF').

FPF is an advisory and investment company exclusively focused on sustainability. FPF will provide the following services in connection with new investments:

- Sourcing and screening of new prospective investments
- Initial due diligence as well as confirmatory due diligence for cases deemed relevant to proceed with
- Commercial and ESG due diligence
- Legal, IP, and Technical due diligence may be conducted contracting with outside services, but administered by FPF
- Negotiation of Term Sheets and Final Investment Documents

Sammenfatning på dansk

The Footprint Fund I ('fonden') er en 'deep-green' Artikel 9 venture fond fokuseret på pre-seed og seed investeringer. Vi søger at gøre bæredygtig forandring mulig gennem investering i forretningsmodeller, der har til formål at løse nogle af verdens mest presserende miljøproblemer, og hvor kommerciel skalering er direkte forbundet med bæredygtighedsbidraget.

Alle investeringer bidrager til mindst ét af de udvalgte miljømål

- Modvirkning af klimaforandringer
- Bæredygtig anvendelse og beskyttelse af vand- og havressourcer
- Forebyggelse og bekæmpelse af forurening
- Beskyttelse og genopretning af biodiversitet og økosystemer

I overensstemmelse med Artikel 9 i henhold til Sustainable Finance Disclosure Regulation ('SFDR') allokerer fonden 95% af sine aktiver til bæredygtige investeringer. Vi har ikke et mål for, hvor stor en andel af investeringerne, der er i taksonomi-kvalificerede industrier. I tilfælde hvor porteføljevirkksomheder genererer omsætning fra aktiviteter, der er taksonomi-kvalificeret, forventer vi at minimum 50% af deres kvalificeret omsætning er taksonomi-alignet inden for 24 måneder fra vores investering. Hvis porteføljevirkksomheder ikke opfylder dette krav, vil vi tilstræbe et frasalg inden for 24 måneder fra det tidspunkt.

Forvalteren af fonden ('forvalteren') ejes i sidste ende af The Footprint Firm Holding ApS ('FPF').

FPF er et rådgivnings- og investeringsselskab, der udelukkende fokuserer på bæredygtighed. FPF vil levere følgende ydelser i forbindelse med nye investeringer:

- Sourcing og screening af nye potentielle investeringer
- Indledende due diligence samt bekræftende due diligence for cases der vurderes som værende relevante at gå videre med
- Kommerciel og ESG due diligence
- Juridisk, IP og teknisk due diligence kan udføres af eksterne rådgivere, men administreret af FPF
- Forhandling af Term Sheets og endelige investeringsdokumenter

No significant harm to the sustainable investment objective (article 39)

In order to fulfill the DNSH criteria, the Fund includes the consideration of all mandatory Principal Adverse Impacts ('PAI') listed in the Annex I to the RTS in the investment decision-making process. These PAI indicators, comprising the 14 mandatory indicators under the EU SFDR regulation, form an integral part of the pre-investment assessment.

In addition, the following two voluntary PAIs from table 2 and 3 of the Annex I to the RTS have been selected:

- Lack of CO₂e emission reduction initiatives
- Lack of supplier code of conduct

Therefore, the FPF-team will evaluate the impact of the investee company on each PAI indicator, taking into account the presence of significant negative impact and the effectiveness of any mitigating actions in place.

Given the early stage of PCs and the overall challenge of data availability, The Fund will use best efforts to complete the values for each indicator and thus, may in some cases in order to calculate the corresponding indicator rely on data obtained by carrying out additional research, cooperating with third party data providers or external experts or making reasonable assumptions.

The Fund has a Good Governance policy for all investments informed by the Organization for Economic Co-Operation and Development (OECD) guidelines and UN Guiding Principles for Business and Human Rights (UNGP)

Sustainable investment objective of the financial product (article 40)

The sustainable investment objective of the Fund is formulated as follows:

'Making sustainable change possible through investing in business models that are aimed at solving some of the world's most pressing environmental issues, and where commercial scaling is directly linked to the sustainability contribution'.

The Fund impact KPIs are directly linked to the selected environmental objectives of which each PC will contribute to at least one and report on the associated KPIs:

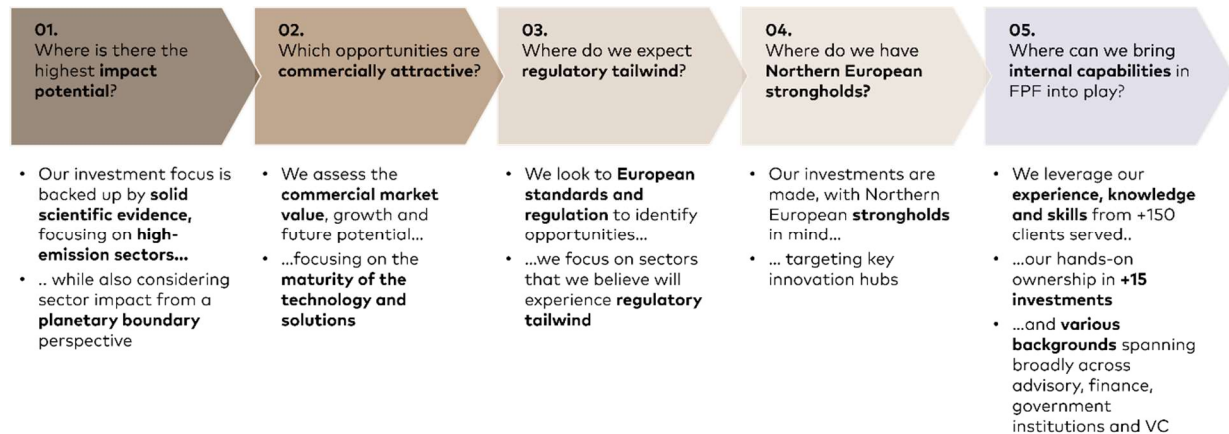
Environmental Objectives	At least one per investment			
	Climate change mitigation	Save water	Pollution prevention	Land use
Fund Impact KPIs ²	Avoided global warming potential (kg CO ₂ eq)	Avoided water scarcity (m ³ water eq. of deprived water)	Avoided freshwater ecotoxicity (CTUe)	Avoided degradation of soil quality (soil quality index)

Investment strategy (article 41)

The Fund focuses on pre-seed and seed investments delivering climate and environmental impact. This start-, and scale-up space is characterized by a high

level of innovative solutions that the global market needs in order to solve the climate and biodiversity crises, while also being underserved by the investment community. The Fund contributes to filling this gap, providing funding, knowledge and support that will enable maximization of both impact and return.

The Fund's investment focus is based on a 5-step assessment approach:



To meet the investment objective, the Fund focuses on key industries to decarbonize and frontier solutions to scale:

Key industries to decarbonize:

Energy: Energy use in buildings, transport, and industry account for almost three-quarters of emissions. We invest in solutions that support the decarbonization of the energy grid, the displacement of fossil fuels, and the reduction of energy use.

Food & agriculture: As the world population grows, global demand for food will increase by 50% by 2050, increasing pressure on land use and freshwater. Yet, one-third of all food produced is wasted. We invest to fuel the transition to a regenerative, protective and waste-free food system.

Built environment: The construction industry makes up half of all raw materials extracted from earth and half of all waste generated². We invest in solutions that accelerate sustainable construction and living to enable a decarbonisation of the world's largest asset class.

Solutions to scale:

Enabling climate tech: About 90% of the global economy is today covered by pledges to cut climate-changing emissions, and technology play a key role in meeting these. We invest in climate technologies that help us reduce GHG emissions and save earth's resources.

Biosolutions: The pace that societies produce and release chemicals and other novel entities into the environment is not consistent with staying within a safe operating space for humanity. We invest in new materials that can replace key drivers of pollution and emissions.

Circular economy: Our current linear 'take-make-waste' system uses 60% more resources than the earth can generate every year, and we systematically accelerate ocean acidification, groundwater depletion and environmental deterioration. We invest in solutions that enable reuse, upcycling and recycling of waste streams to enable a circular economy.

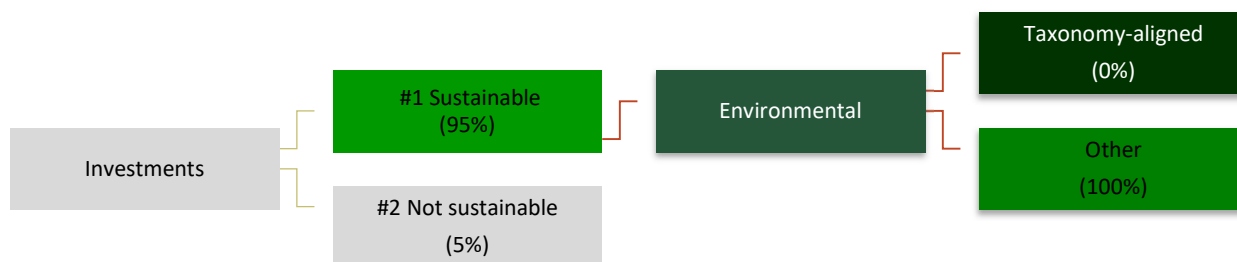
These focus areas will help ensure that we address the climate and biodiversity crises from multiple angles, each being crucial to delivering needed solutions to high-emitting, polluting, and resource-intensive industries.

FPF's combined sustainability advisory and investment experience enable the Fund to identify, scale and grow investments. As FPF works exclusively with sustainability in all advisory projects and thus bringing industry expertise across multiple sectors to the Fund that we apply during due diligence and ownership of our startup investments.

To ensure Good Governance, an evaluation of sound management structures, employee relations, remuneration of staff, tax compliance, and anti-bribery & corruption is performed and supplemented with other material topics defined by the OECD guidelines, if relevant. As part of the data request during due diligence, all companies will be asked to provide relevant policies and code of conducts. If a company does not have documentation in place, the Fund will use best efforts to assess whether the company can demonstrate sound management practices through other means of documentation or as part of interviews. Since the Fund invests in pre-seed and seed companies that are relatively immature, documentation of Good Governance practices will be one focus area during ownership.

Proportion of investments (article 42)

In accordance with Article 9 under the Sustainable Finance Disclosure Regulation ('SFDR') the Fund allocates 95% or more of its assets to sustainable investments. The remaining share of maximum 5% that is not sustainable is currently only held for liquidity and cash management purposes.



The reason for '0% Taxonomy-alignment' is to maintain The Fund's ability to invest in highly sustainable start- and scaleups for which the EU has not (yet) defined sustainability criteria for their particular business models and economic activities.

Monitoring of the sustainable investment objective (article 43)

During the ownership period, monitoring of the sustainable investment objective is carried out through representation on the Boards when possible, dialogue with the management teams, as well as through monitoring of the KPIs that each startup is required to report on and which FPF will quality assure as part of the ongoing dialogue with the PCs.

Methodologies (article 44)

The degree of attainment of the sustainable investment objective will be measured through the KPIs selected for each PC. Depending on which environmental objectives that the PCs contribute to, the KPIs measure avoided GHG emissions, avoided land use, avoided water use, and avoided pollution as described under 'Sustainable investment objective of the financial product (article 40)'.

Data sources and processing (article 45)

The data used to measure the attainment of the sustainable investment objective is obtained from the PCs through an annual data request made by the PC responsible at FPF. To ensure data quality, the PC responsible will review and quality assure the data and calculations. FPF is a market leader in sustainability advisory and all consultants are experienced in collecting, assessing, and using data to quantify climate and environmental impacts.

The principal adverse impacts are measured through an annual quantification of all 16 PAI indicators. To read more about what we require from the PCs in

terms of data on PAI indicators, see 'No significant harm to the sustainable investment objective (article 39)'.

In addition to collecting KPIs related to the environmental objectives, the Fund collects monthly financial data in order to track the commercial development of the PCs. Part of the sustainable investment objective is to invest in companies where commercial scaling is directly linked to the sustainability contribution, and thus tracking financial performance is an important part of ensuring that the PCs create climate and environmental impact.

There is no fixed proportion of data that is estimated. The Fund will strive to minimize estimations as much as possible, but also acknowledge that early stage startups may lack complete data for some KPIs and PAI indicators.

Limitations to methodologies and data (article 46)

In some cases, it might not be possible to obtain the necessary data points to calculate the selected KPIs and mandatory PAI indicators. If this is the case, the Fund will advise the PC on how to capture these data points going forward.

The lack of data points to measure the impact KPIs does not prevent the PC from attaining the sustainable investment objective in a given year. However, efforts should be made to ensure progress can be tracked going forward.

Given the early stage of portfolio companies ('PCs') and the overall challenge of data availability, The Fund will use best efforts to complete the values for each indicator and thus, may in some cases in order to calculate the corresponding indicator rely on data obtained by carrying out additional research, cooperating with third party data providers or external experts or making reasonable assumptions.

Due diligence (article 47)

The Fund leverages its internal capabilities as well as capabilities by the FPF-team to identify risks and validate the sustainability contribution and commercial prospects of potential investments. The initial due diligence includes the following: Assessment made by FPF team based on competencies and sector knowledge

- Sustainability impact is thoroughly evaluated including Article 9 alignment and EU Taxonomy alignment if the economic activity is eligible
- The PAI indicators are assessed along with potential mitigating actions in place
- Potential commercial and impact risk areas are identified in preparation of the confirmatory detailed due diligence

The following confirmatory due diligence includes the following:

- A detailed analysis of company financials and business model
- An assessment of the maturity of the solution and the team, leveraging FPF extensive industry network
- An in-depth analysis of company values, ESG initiatives and impact, KPIs/metrics to quantify the company's product and business model's impact on the climate, environment and other externalities
- Final assessment is presented to The Investment Committee

And lastly, if a case passes the confirmatory due diligence, negotiations and signing will take place which includes the following:

- Embed ESG commitments including formal monitoring and strategic planning within the term sheet to enable Article 9 alignment
- Key financial and commercial milestones identified in value creation plan
- Final investment decision is made by The Investment Committee

Engagement policies (article 48)

The Fund has a commitment to promoting sustainability and ethical practices in all of its investments. As part of this commitment, we have established an engagement policy that ensures sustainability is always a key consideration in our investment decisions.

One of the key elements of our engagement policy is to take a seat on the Boards when possible. This enables us to have a voice in the decision-making process of our portfolio companies and to ensure that sustainability considerations are considered.

We collaborate closely with our portfolio companies to identify both sustainability concerns and opportunities and devise effective strategies to tackle them. In instances where an investment falls short of our sustainability standards, we engage with the company to determine the underlying causes of non-compliance and jointly create a remedial plan. If the company is unwilling or unable to implement the necessary changes, we may choose to divest from the investment as a last resort.

Attainment of the sustainable investment objective (article 49)

An index has not been designated as a reference benchmark.