Table of Content

***

Disclosures under SFDR article 3, 4 and 5

1. Purpose

The purpose of this document is to describe how Scale Leap Management ("Scale Leap") works to ensure that the assets under our management contribute to sustainable growth with a net positive impact with purpose, people and planet, in compliance with the European Union Sustainable Financial Disclosure Regulation ("SFDR").

2. The Sustainable Financial Disclosure Regulation ("SFDR")

The Sustainable Finance Disclosure Regulation ("SFDR") is a European Union regulation that requires financial market participants such as Scale Leap to, among other things, disclose information about the integration of sustainability risks in their operations, whether they consider principal adverse impacts of their products and services on sustainability factors and how their remuneration policies are consistent with the integration of sustainability risks. The SFDR is designed to promote transparency and accountability in the financial sector and to encourage sustainable investment.

It is important for Scale Leap to be transparent and accountable in its ESG policies, as this will build trust with investors and other stakeholders and support long-term financial performance. The below information is disclosed in compliance with SFDR articles 3, 4, and 5.

3. Scale Leap's integration of sustainability risks – SFDR article 3

SFDR Article 3 requires fund managers such as Scale Leap to publish on their websites information about their policies on the integration of sustainability risks in their investment decision-making process.

Sustainability risks are defined in the SFDR as environmental, social or governance events or conditions that, if they occur, could cause an actual or a potential material negative impact on the value of the investment.

ESG factors, including a set of checks and measures, are a clearly defined part of Scale Leap's entire investment and ownership processes. Scale Leap accordingly identifies sustainability risks as parts of the due diligence performed in the screening process for potential invesmtments for funds under management.

Scale Leap acknowledges the fact that all investments to some degree are exposed to sustainability risks, and assesses the likely impacts of the sustainability risks on the returns of the investment. If Scale Leap through the ESG due diligence process identifies sustainability risks it deems unmanageable, Scale Leap will refrain from making the investment. Whether the risks are unmanageable is determined on the basis of an overall assessment, and exclusions and the parameters applied will in each case be documented in Scale Leap's internal systems.

4. No consideration of principle adverse impacts – SFDR article 4

SFDR article 4 requires financial market participants such as Scale Leap to publish to publish and maintain on their websites information on whether they consider principal adverse impacts of investment decisions on sustainability factors and, if they do not consider principal adverse impacts, clear reasons why, including, where relevant, information as to whether and when they intend to do so.

Sustainability factors are environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters, and principal adverse impacts are the most significant negative impacts of investment decisions on these factors.

Scale Leap has currently chosen not to consider principal adverse impacts of its investment decisions on sustainability factors.

In this decision, we have taken into consideration the nature and scale of our activities. Our view is that the activities of early-phase companies with business models built on software technology (such as platform companies, marketplaces and B2B SaaS) generally have a low principal adverse impact on sustainability factors. Therefore, Scale Leap believes that its resources are better allocated to other areas, such as ongoing interaction with the management of its portfolio companies to improve their sustainability profile, including by setting, implementing and following up on ESG-related KPIs and requiring ongoing reporting from investments in relation to ESG factors, and thereby improve the companies' value creation through such engagement.

We will however, especially in parallel with the scaling of our portfolio companies' activities, keep our decision not to consider principal adverse impacts under SFDR article 4 under regular review, and may revaluate the decision at a later stage.

5. Transparency of remuneration policies in relation to the integration of sustainability – SFDR article 5

SFDR article 5 requires financial market participants such as Scale Leap to publish on their website information on how their remuneration policies are consistent with the integration of sustainability risks.

ESG-factors are an integral part of ensuring long term sustainable value creation and is a natural part of both investment processes and in developing the portfolio companies in Scale Leap. Even though there are no KPIs directly linked to our remuneration policies, ESG-factors is one of many facets in the assessment of performance and remuneration reviews.

Our remuneration policy is reviewed on a yearly basis. This policy applies to employees with importance for the risk profile of Scale Leap and funds under Scale Leap's management. Sustainability risks are included in the following principles, which are the basis for awarding remuneration:

- The remuneration policy shall promote sound and efficient risk management, including in relation to sustainability risk and be in line with the investment strategies, risk-tolerance and long term objective of Scale Leap Management and funds under management in total.
- The remuneration policy shall secure long-term values for the investors, as the people and society in total.
- Remuneration shall not encourage excessive risk taking with respect to sustainability risk.
- When assessing performance in relation to variable remuneration, current and future risks, for Scale Leap and funds under management must be taken into account.
- The effect that the remuneration scheme may have on conflicts of interest in relation to activities that involve greenwashing, incorrect presentation of investment strategies or other incorrect marketing, is considered.