SFDR DISCLOSURES

Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (the SFDR) requires financial market participants such as Smartfin Ops NV (Smartfin Ops) to provide information to investors with regard to the integration of sustainability risks, the consideration of adverse sustainability impacts, the remuneration in relation to sustainability risks, the promotion of environmental or social characteristics, and sustainable investment.

Smartfin Ops acts as the statutory director and alternative investment fund manager of Smartfin Space and Defence CommV, private privak (Smartfin Space and Defence), and, in the future, of the other Smartfin funds listed in Schedule 1 (the Other Smartfin Funds).

The Other Smartfin Funds qualify as financial products within the meaning of article 6 of the SFDR and are currently managed by Smartfin Management BV as statutory director and alternative investment fund manager. They do not promote environmental or social characteristics in accordance with article 8 of the SFDR and do not have sustainable investment as their objective in accordance with article 9 of the SFDR.

We do believe that, in order to make good investments, environmental and social factors should not be overlooked. For Smartfin Space and Defence, we therefore promote certain environmental and social characteristics in accordance with article 8 of the SFDR.

To avoid any misunderstanding, we clarify that neither Smartfin Space and Defence nor any of the Other Smartfin Funds has sustainable investment, in accordance with article 9 of the SFDR, as its objective.

You will find under Part 1 the disclosures of Smartfin Ops at the level of the alternative investment fund manager, and under Part 2 the article 8 SFDR disclosures for the financial product Smartfin Space and Defence.

1. SMARTFIN OPS: AIFM LEVEL DISCLOSURES

The information below regarding the policies of Smartfin Ops on sustainability is made in accordance with articles 3, 4 and 5 of the SFDR (last updated in November 2026).

1.1 Integration of sustainability risks in the investment decision-making process

A sustainability risk means an environmental, social or governance event or condition that, if it occurs, could cause an actual or potential material negative impact on the value of the investment (article 2(22) of the SFDR) (a Sustainability Risk). For the funds managed by Smartfin Ops, Sustainability Risks are risks which, if they were to materialise, would cause a material negative impact on the value of their portfolio companies.

The consideration of Sustainability Risks is embedded in the decision-making and risk monitoring of Smartfin Space and Defence in accordance with article 3 of the SFDR, as set out in the ESG policy of Smartfin Space and Defence (the ESG Policy), which describes its approach to environmental, social and governance (ESG) matters in the context of the investment decision-making process. Sustainability Risks that are particularly relevant for Smartfin Space and Defence include regulatory and legal risks relating to export control, sanctions and licensing, reputational risks relating to the end-use of dual-use technologies, governance risks typical of early-stage companies, cybersecurity risks, and physical and operational risks affecting space assets.

As the Other Smartfin Funds neither promote environmental or social characteristics nor have sustainable investment as their objective, Smartfin Ops does not formally integrate an assessment of Sustainability Risks in its investment decision-making process for these funds in accordance with article 3 of the SFDR.

Prior to making any investment for Smartfin Space and Defence, we conduct a thorough due diligence on the target company. Alongside traditional due diligence information, Smartfin Ops incorporates relevant

ESG data and insights into its investment decision-making, including the screening against the exclusion list, the assessment of dual-use and end-use risks, and anti-money laundering (AML) and know-your-customer (KYC) checks. The consideration of Sustainability Risks does not imply that a fund has a sustainable investment objective, but describes how Sustainability Risks are considered as part of the overall investment process. The outcome of the due diligence is taken into account when an investment decision is made.

Smartfin Ops includes ESG information, where relevant or available, in (i) the initial screening of an investment opportunity, (ii) the due diligence in relation to a potential investment, (iii) the review by the investment committee, and (iv) the monitoring of the portfolio companies. This includes sector-specific sustainability information sourced from reliable sources and the input provided by the companies themselves, in order to identify, analyse and document sustainability matters. Smartfin Ops also considers sustainability criteria during post-investment monitoring.

1.2 Principal adverse impacts of investment decisions on sustainability factors

In accordance with article 4.1(b) of the SFDR, Smartfin Ops states that it does not consider the adverse impacts of investment decisions on the sustainability factors as referred to in article 4.1(a) of the SFDR and does not make the disclosures as described in article 4.1(a) of the SFDR.

Given that the investment scope of Smartfin Ops is primarily focused on start-ups in an early stage of their lifecycle, most of the portfolio companies are not able to provide the necessary data that would allow Smartfin Ops to report on what the adverse impacts of the investment decisions would be, based on the different criteria set forth in the SFDR and the legislation implementing the SFDR.

In addition, given the size of Smartfin Ops, with limited resources and personnel, we are currently not in a position to obtain and/or measure all the data which would be required by the SFDR, or to do so systematically, consistently and at a reasonable cost with respect to all our investment strategies.

1.3 Integration of Sustainability Risks in the remuneration policy

Smartfin Ops, as a sub threshold manager of alternative investment funds below the thresholds set out in the Belgian law of 19 April 2014 on alternative investment funds and their managers (the AIFM Law), is not required to adopt a formal remuneration policy in accordance with the remuneration rules of the AIFM Law that apply to licensed managers.

In practice, in accordance with general private equity and venture capital remuneration practices, a significant portion of the compensation of an investment professional consists of carried interest and other deferred instruments aligned with the performance of the investments. As a result, the value of that compensation is negatively affected by a Sustainability Risk that affects the value of the underlying investment.

2. SMARTFIN SPACE AND DEFENCE: ARTICLE 8 SFDR DISCLOSURES

2.1 Summary

Smartfin Space and Defence CommV, private privak (the Fund) is a financial product that promotes environmental and social characteristics, but does not have sustainable investment as its objective and does not commit to making sustainable investments. No reference benchmark has been designated for the purpose of attaining the environmental and social characteristics promoted by the Fund.

The Fund is a venture capital fund that invests in early-stage and growth-stage companies developing space-related technologies and other strategically relevant deep-tech domains, such as secure communications, cybersecurity and advanced hardware, that strengthen European strategic autonomy, the resilience of critical infrastructure and technological independence. Defence, security and dual-use

applications of these technologies are within the investment scope, but the Fund does not invest in the development, production or distribution of offensive weapons or ammunition.

The Fund promotes the responsible use of space and of the orbital environment, the responsible development and commercialisation of dual-use technologies, and sound social practices within its portfolio companies, and applies a binding exclusion list. All investments of the Fund in portfolio companies are subject to the binding elements of its investment strategy. The Fund monitors these characteristics through its due diligence and an annual follow-up of each portfolio company, mainly on the basis of data provided by the portfolio companies themselves. Given the early stage of these companies, the available data are limited and not always representative. The Fund engages with its portfolio companies through board or observer seats and through ESG undertakings in the transaction documentation.

2.2 No sustainable investment objective

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

2.3 Environmental or social characteristics of the financial product

The Fund promotes the following environmental and social characteristics:

a) the responsible use of space and of the orbital environment, including the mitigation of space debris, and the development of space-based data and services that support climate, environmental and natural-hazard monitoring;
b) the responsible development and commercialisation of dual-use technologies, but subject to the exclusions set forth in the internal regulations of the Fund (the Internal Regulations):
c) sound social practices within the portfolio companies, including the treatment of employees, health and safety, human rights, diversity and inclusion, and data protection and cybersecurity; and
d) in general, the exclusion of the activities and sectors set out in the Internal Regulations.

2.4 Investment strategy

In accordance with articles 2 and 8 of the Internal Regulations, the Fund intends to make ten (10) to fifteen (15) investments in early-stage and growth-stage companies, with a focus on technologies that strengthen strategic autonomy, critical infrastructure and technological independence. This includes space-related technologies, secure communications, cybersecurity, advanced hardware and other strategically relevant deep-tech domains that contribute to resilient and sovereign technological ecosystems.

The Fund does not directly or indirectly invest in, guarantee or otherwise provide financial or other support to companies or other entities that engage in the activities and sectors excluded under article 8.3(c) of the Internal Regulations, as reproduced in the ESG Policy. These exclusions include, but are not limited to, companies which:

- are engaged in the production, trade, stockpiling, sale, transfer, import, export, of, or any other activity or services (including technological research) associated with, weapons within the meaning of the weapons control legislation applicable to the relevant portfolio company that are intended for entities other than governments or enterprises authorized by governments;
- are engaged in the production, trade, stockpiling sale, transfer, import, export or any other activity or service associated (including technological research) with controversial weapons;

- manifestly violate human rights (e.g., child labor, exploitation of workers, human trafficking, violation of internationally recognized human rights, discrimination based on racial reasons, religion and especially gender discrimination);
- (i) are resident in, organized under the law of, operate from, or act on behalf of persons or entities resident in, organized under the law of, or operating from countries or territories subject to sanctions in contravention of the applicable international sanctions frameworks, or (ii) that are directly or indirectly targeted or affected by sanctions that inhibit their financial and/or business operations;
- do not undertake to operate in compliance with applicable domestic and international laws and conventions, or which use child or forced labour;
- are active in gambling, prostitution, pornography, racist or anti-democratic media, tobacco or distilled alcoholic beverages;
- are active in coal, unconventional oil and gas, palm oil, wood pulp, nuclear power plants, mining projects, or substantially focus on fossil fuel-based energy production or energy-intensive and high CO2-emitting industries, save as permitted under the Internal Regulations;
- are established in, or structured through, a tax haven jurisdiction; or
- are designated under EU restrictive measures or fall within the EIF restricted sectors.

Dual-use technologies, being technologies that may serve both civilian and military applications, are within the investment scope of the Fund, provided that they are developed and commercialised in compliance with applicable law, export control regulations and international sanctions regimes. The Fund therefore performs a risk analysis of the dual-use and end-use aspects of each relevant opportunity.

A pre-investment assessment of the good governance practices of investee companies is an integral part of the due diligence. The Fund pays particular attention to sound management structures, employee relations, remuneration of staff, tax compliance, anti-bribery and corruption measures and, for companies dealing in dual-use or military items, export control and sanctions compliance. For this purpose, the Fund relies on the input provided by the companies themselves and on its experience and in-depth sector knowledge. Based on this screening, an evaluation is made and, where necessary, concrete agreements are made for future monitoring and reporting.

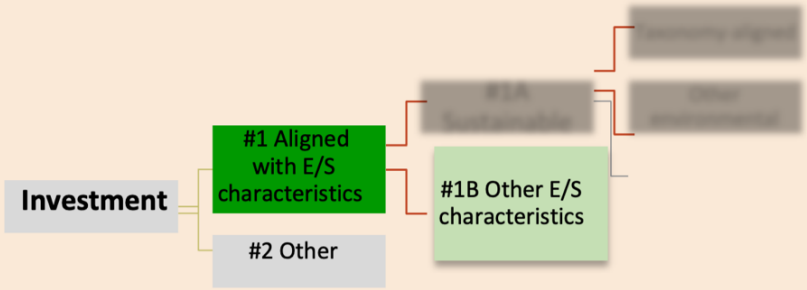
Post-investment, good governance is monitored as part of the annual ESG follow-up and at the meetings of the board of directors of the portfolio companies, as the Fund ensures active involvement in its portfolio companies through a board or observer seat or committee membership. This allows the Fund to monitor the compliance of the portfolio companies and to advise them on appropriate governance standards, taking into account their stage and size.

A detailed overview of our approach is provided in the ESG Policy.

2.5 Proportion of investments

All investments of the Fund can be categorized as "#1 Aligned with E/S characteristics". None of the Fund's investments are included under "#2 Other".

The Fund does not commit to a minimum proportion of investments aligned with the EU Taxonomy (0%). The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

Our investment strategy leads us to invest in companies at an early stage of development. As a result, we consider the direct impact of most portfolio companies on environmental factors to be relatively limited at the time of investment, and we expect the measurable contribution of the portfolio companies to the characteristics promoted by the Fund to evolve over time as these companies grow.

Our ESG policy and assessment are tailored to the needs of, and requirements for, early-stage companies. Our approach is detailed in two procedures: an ESG assessment (pre-investment) and an ESG monitoring and reporting (post-investment).

2.6 Monitoring of environmental or social characteristics

We believe that following ESG guidelines not only mitigates business risks, but also creates long-term value for businesses, resulting in a better financial return for the Fund. The Fund therefore strongly encourages its portfolio companies, their founders and CEOs to actively incorporate ESG principles in their daily business activities.

Through an annual follow-up of the ESG performance of its portfolio companies, the Fund uses its reasonable best efforts to identify and improve, as the case may be, the environmental consequences and social and human rights issues of an investment, the observation of fundamental employees' rights, the absence of corruption and bribery, and compliance with applicable environmental, human rights, labour and export control rules.

The monitoring of the ESG commitments of a portfolio company is assigned to the member of the investment team of Smartfin Ops dedicated to that portfolio company (the Portfolio Manager). The Portfolio Manager monitors the performance of the portfolio company against the indicators applicable to it. If the performance of a portfolio company is considered not to comply with the ESG Policy, the Portfolio Manager proactively engages with the portfolio company to address the issue and find a solution. If no solution is found, the matter is escalated and addressed at the board of directors of the relevant portfolio

company. The results of the monitoring are reported to the limited partners of the Fund in the annual report, in accordance with the Internal Regulations.

2.7 Methodologies

Qualitative monitoring of ESG matters takes place on a regular basis through the contacts that the Portfolio Managers maintain with the portfolio companies. Observations or incidents at a portfolio company relating to the matters covered by the ESG Policy are followed up by the Portfolio Manager and, where necessary, escalated within the relevant governance structure. In addition, an annual formal screening takes place, in which the ESG risk and performance results are analysed and, where necessary, a dialogue is opened with the portfolio company to realise improvements or to report positive results correctly.

Compliance with the exclusion list and the outcome of the dual-use and end-use risk analysis are verified before each investment and reassessed in the annual follow-up, in particular where the activities, products, customers or target markets of a portfolio company change.

2.8 Data sources and processing

To measure the ESG performance of the Fund, data on the products, services and organisation of the portfolio companies are mainly sourced from the companies themselves, through questionnaires and interviews, and supplemented by information gathered by the investment team on the basis of its sector knowledge.

Pre-investment, the ESG-related risk assessment and the gathering of data are an integral part of the due diligence on prospective portfolio companies. The activities of the company are screened against the exclusion criteria, dual-use and end-use risks are analysed, its ESG risk factors are documented, and AML and KYC checks are performed on all parties involved, in accordance with the procedure described in the ESG Policy. Based on this screening, an evaluation is made, which is taken into account in the investment decision.

Where no specific data are available, for example on production processes and resources used, assumptions may be made on the basis of available scientific studies or real-world baseline data. Given the early stage of the companies, forward-looking assumptions may also be made on their growth potential.

Post-investment, the ESG data of all portfolio companies are updated annually to reflect changes in their processes, products, customers or management structure. These data are consolidated in the annual report of the Fund to its limited partners. AML and KYC checks are performed annually or in the context of any follow-on investment. Reporting on the investments of the Fund is also made in accordance with Annex IV to Delegated Regulation (EU) 2022/1288.

2.9 Limitations to methodologies and data

The quality and reliability of the data largely depend on the information provided by the portfolio companies themselves and on the analyses of the Portfolio Managers, which are based on a limited set of comparable data.

Given the early stage of the portfolio companies, which have not yet reached scale, the relevance of the data is relative and their impact on the environmental and social characteristics promoted by the Fund is not always representative. In addition, information on customers, end-users and certain products of companies active in the defence and security sector may be subject to confidentiality or security restrictions, which may limit the data that can be collected or disclosed.

These limitations do not affect the attainment of the environmental and social characteristics promoted by the Fund, as the binding elements of the investment strategy, in particular the exclusion list and the dual-use and end-use risk analysis, are applied to every investment.

2.10 Due diligence

The Fund conducts due diligence on the technology, team, commercial roadmap, financial and legal status, intellectual property strategy and regulatory position (including export control and sanctions) of the company, as well as on ESG aspects. An ESG-related risk assessment is therefore an integral part of the due diligence performed by the Fund.

Please refer to the sections "Investment strategy" and "Data Sources and Processing" above for a further description of the due diligence of the Fund.

2.11 Engagement policies

Following an investment and during the holding period, the Portfolio Managers monitor the ESG compliance of the portfolio companies as well as their financial and non-financial performance, taking into account the stage of maturity of each portfolio company. The Fund ensures active involvement in its portfolio companies through a board or observer seat or the membership of strategic, investor or similar committees.

In the transaction documentation, each portfolio company is asked to agree to ESG-related undertakings, as described in the section "Data sources and processing" above.

2.12 Designated reference benchmark

Not applicable. No reference benchmark has been designated for the purpose of attaining the environmental and social characteristics promoted by the Fund.

SCHEDULE 1

FUNDS TO BE MANAGED IN THE FUTURE BY SMARTFIN OPS AND THEIR CLASSIFICATION UNDER THE SFDR

Fund	Legal form	SFDR classification	Remarks
SmartFin Capital NV	Private privak (NV)	Article 6	Company number 0507.713.440 Formed before 10 March 2021
SmartFin Capital II CommV	Private privak (CommV)	Article 6	Company number 0737.910.771 Formed before 10 March 2021
SmartFin Capital III CommV	Private privak (CommV)	Article 6	Company number 0800.554.064 Formed after 10 March 2021
SmartFin Ventures NV	Private privak (NV)	Article 6	Company number 0671.644.727 Formed before 10 March 2021
SmartFin Ventures II CommV	Private privak (CommV)	Article 6	Company number 0760.460.402; Formed before 10 March 2021

The funds classified as article 6 in the table above do not promote environmental or social characteristics and do not have sustainable investment as their objective. The investments underlying these financial products do not take into account the EU criteria for environmentally sustainable economic activities.