

## **Article 10 (SFDR)**

### **Website disclosure for an Article 8 fund**

#### **Sustainability-related disclosure**

#### **Deep Tech Defense Innovation Fund GmbH & Co. KG**

##### **1. Summary**

The Deep Tech Defense Innovation Fund GmbH & Co. KG (the "**Fund**") promotes social characteristics in accordance with Article 8 of Regulation (EU) 2019/2088 ("**SFDR**").

The social characteristics promoted will be resilience and security by making investments focusing predominately on deep-tech companies specialising in defence-related technologies that have transformative and disruptive potential for national security as well as commercialisation objectives, with potential defence and security applications that may be adopted by the German Federal Ministry of Defence, NATO and/or NATO allies.

The Fund does not have sustainable investment as its objective and does not commit to making sustainable investments as defined by the SFDR.

In accordance with the Fund's overall risk management processes the Fund will on a voluntary basis consider in relation to the economic activity of its portfolio companies the relevant principal adverse impact ("**PAI**") indicators set out in Commission Delegated Regulation (EU) 2022/1288 supplementing the SFDR to establish whether an investment is harmful. In particular, a negative screen will be utilised to exclude investments in companies with exposure to controversial or prohibited weapons.

No reference benchmark has been designated for the purpose of attaining the social characteristics promoted by the Fund.

##### **2. No sustainable investment objective**

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

##### **3. Environmental or social characteristics of the financial product**

The social characteristics promoted will be resilience and security by making investments focusing predominately on deep-tech companies specialising in defence-related technologies that have transformative and disruptive potential for national security as well as commercialisation objectives, with potential defence and security applications that may be adopted by the German Federal Ministry of Defence, NATO and/or NATO allies.

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

The Fund will invest in target companies that consider the social theme "defence" / "resilience". On 17 June 2025, the European Commission adopted the Defence Readiness Omnibus, containing inter alia guidance on the sustainable finance relevance of defence. In the view of the European Commission the "defence industry is a crucial contributor to the

resilience and the security of the Union, and therefore to peace and social sustainability. Given its contribution to resilience, security and peace, the EU defence industry enhances sustainability": The Fund will develop a mechanism to measure the attainment of the social characteristics promoted (the "**Indicators**"). The list of Indicators can be reviewed and improved each year to comply with stakeholders' and regulatory requirements or new material sustainability topics identified.

#### **4. Investment strategy**

The Fund will make investments focusing predominately on deep-tech companies specialising in de-fence-related technologies that have transformative and disruptive potential for national security as well as commercialisation objectives, with potential defence and security applications that may be adopted by the German Federal Ministry of Defence, NATO and/or NATO allies.

Sustainability risk management is embedded in the way the investment team seeks to originate investments and make investment decisions, as well as in ongoing portfolio and asset management activities. The investment team recognises the importance of identifying, assessing and managing material sustainability risks as an integral part of conducting business.

A sustainability risks policy ("**Sustainability Risks Policy**") shall be implemented and shall set out expectations in respect of the integration of sustainability risks in the investment decision-making process, as required by the SFDR. The Sustainability Risks Policy provides a comprehensive framework for integrating sustainability risk management into the investment decision-making process.

Sustainability Risks and good governance are considered at all stages of the investment process, in respect of each individual investment opportunity. The investment team is required to ensure a due diligence questionnaire is completed as part of the investment committee paper submitted to the Investment Committee for consideration. The due diligence questionnaire is a tool used to assess initial sustainability risks and governance practices for a number of chosen areas relevant to the product in question, and to identify where additional investigation or due diligence into these risks is required. This seeks to ensure all relevant risks are identified and mitigated during the investment process. The due diligence questionnaire requires an assessment of each deal to be conducted prior to the final investment approval.

#### **5. Proportion of investments**

The intended asset allocation of the Fund can be found in the investment limits and guidelines of the Limited Partnership Agreement of the Fund. The Fund aims to allocate up to 100% of its capital in target companies, which qualify as assets promoting "Other E/S characteristics". Other E/S characteristics covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

The Fund will promote social characteristics, but it does not commit to making sustainable investments. Hence, it is expected that 100% of its investments will not be aligned with the EU Taxonomy.

## 6. **Monitoring of environmental or social characteristics**

The Fund will develop a mechanism to measure the attainment of the social characteristics promoted (the "**Indicators**"). The list of Indicators can be reviewed and improved each year to comply with stakeholders' and regulatory requirements or new material sustainability topics identified.

Sustainability risk management is embedded in the way the investment team seeks to originate investments and make investment decisions, as well as in ongoing portfolio and asset management activities. In accordance with the Fund's overall risk management processes the Fund will on a voluntary basis consider in relation to the economic activity of its portfolio companies the relevant principal adverse impact ("**PAI**") indicators set out in Commission Delegated Regulation (EU) 2022/1288 supplementing the SFDR to establish whether an investment is harmful. In accordance with the Commission Notice (cf. 3.2.1, (2) on page 8) the Managing Limited Partner will establish a risk management process to consider and respect the relevant PAI indicators in Table 1 of Annex I: PAI 10 "Violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises", PAI 11 "Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises", and PAI 14 "Exposure to controversial weapons". In particular, a negative screen will be utilised to exclude investments in companies with exposure to controversial or prohibited weapons.

## 7. **Methodologies**

The Fund will develop a mechanism to measure the attainment of the social characteristics promoted (the "**Indicators**"). The Indicators constitute the methodology used to measure the attainment of the social characteristics promoted by the Fund. The list of Indicators can be reviewed and improved each year to comply with stakeholders' and regulatory requirements or new material sustainability topics identified.

The sustainability risks are identified using guidance from the Sustainability Accounting Standards Board framework, which identifies financially material ESG risks by asset class / based on IFC Performance Standards etc. in accordance with Article 6 of SFDR.

Any limitations to the chosen methodologies and data are described separately under "Limitations to methodologies and data".

## 8. **Data sources and processing**

Data will be sourced from portfolio companies, public disclosures, and relevant third-party sources. The Fund will process this data internally to assess compliance with the promoted social characteristics and to monitor principal adverse impacts.

Measures taken to ensure data quality may include obtaining data directly from portfolio companies, cross-checking against publicly available information where appropriate, and reviewing the completeness and consistency of the data used for the Fund's internal assessment.

The Fund may use externally sourced sustainability data as an input for internal assessments, including the preparation of internal ratings, scores or other internal assessments, and will process such data internally for the purposes described above.

Any limitations to the chosen data sources and data are described separately under "Limitations to methodologies and data".

**9. Limitations to methodologies and data**

Limitations may include incomplete or inconsistent data from portfolio companies, reliance on self-reported information, and evolving regulatory expectations. The Fund will seek to address these limitations through ongoing engagement with portfolio companies and regular review of its methodologies.

**10. Due diligence**

Sustainability Risks and good governance are considered at all stages of the investment process, in respect of each individual investment opportunity. The investment team is required to ensure a due diligence questionnaire is completed as part of the investment committee paper submitted to the Investment Committee for consideration. The due diligence questionnaire is a tool used to assess initial sustainability risks and governance practices for a number of chosen areas relevant to the product in question, and to identify where additional investigation or due diligence into these risks is required. This seeks to ensure all relevant risks are identified and mitigated during the investment process. The due diligence questionnaire requires an assessment of each deal to be conducted prior to the final investment approval.

**11. Engagement policies**

No engagement policy/activities are applied to the Fund.

**12. Designated reference benchmark**

No specific index or reference benchmark has been designated for the purpose of attaining the promoted social characteristics.