

**3VC II SCSp****1. Website product disclosure for financial products that promote environmental or social characteristic****2. (a) Summary**

3VC II SCSp (the "Fund") incorporates ESG principles within its investment processes and within its monitoring processes, but does not have as its objective sustainable investment. The Fund shall not invest in predefined prohibited sectors. The AIFM subjects the Fund to the GP's and its Investment Advisor's (3VC) ESG Policy, focusing on sustainability, diversity and governance.

As part of the investment decision-process a pre-investment questionnaire tackles ESG characteristics, thus, becoming part of the investment memorandum. Throughout the lifecycle of the Fund, 3VC uses its ESG framework that includes questions and KPIs to assess ESG matters including potential or existing adverse sustainability impacts. If the Fund determines any potential issues relating the environmental or social characteristics, it will engage the portfolio company's manager in discussions with a view to resolving, reducing, or mitigating such effects.

**3. (b) No sustainable investment objective**

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

**(c) Environmental or social characteristics of the financial product**

The Fund shall not invest, guarantee or otherwise provide financial or other support, directly or indirectly, to any portfolio company:

- which FundRock LIS S.A. (the AIFM), the GP or the Investment Advisor to the GP (3VC) is aware is involved in illegal activities;
- which is engaged in the manufacturing, distribution, or sale of arms or ammunition (other than for game hunting purposes);
- which is engaged in the manufacturing, processing, distribution, or sale of tobacco products or hard spirits (other than the distribution in an ancillary capacity through retailers such as supermarkets or restaurants);
- which is engaged in human cloning or genetically modified organisms; or
- which is directly linked to gambling.

The AIFM subjects the Fund to the 3VC [ESG Policy](#) focusing on sustainability, diversity and governance, and committing to actively evaluate and measure the impact of its work and of the companies the Fund partners with in order to ensure responsible investments.

**(d) Investment strategy**

The Fund invests in companies with innovation capacity and growth potential that are active in software technology across industries, e.g., AI, Dev-Tools, Deep-Tech, Security, AR/VR, Data/Analytics, Digital Health, and App/Mobile. The Fund intends to invest in Series A investment rounds with a ticket size for the Fund of EUR 1,000,000 or more. The Fund intends to invest in portfolio companies domiciled, targeting, or active in Europe, with a focus on Germany, Switzerland, and Austria (GSA) and Central and East Europe.

The investment analysis performed by the External AIFM aims at proactively integrating ESG screening, monitoring and engagement as a way to recognize, analyse and tackle factors of long-term risk that may affect the performance of portfolio companies.

**(e) Proportion of investments**

## **3VC II SCSp**

The Fund does not invest a fixed percentage in portfolio companies aligned with environmental and/or social characteristics. The Fund will invest fully in line with its investment strategy. No portion of the Fund's capital will be allocated to other asset classes.

### **(f) Monitoring of environmental or social characteristics**

3VC monitors for the Fund ESG compliance on an ongoing basis. Annually, 3VC uses its ESG framework that includes questions and KPIs to assess ESG matters including potential or existing adverse sustainability impacts. 3VC carefully reviews such completed questionnaires upon receipt. Furthermore, 3VC applies best efforts following the closing of investment of the Fund, to have the management of the respective portfolio company commit to (1) adopting a climate policy and implementing measures to improve the CO2 footprint of such portfolio company, (2) evaluating and establishing best practices of its business activities in regards to the environment, society and governance (ESG), provided that any such effort shall always respect the principle of proportionality in particular with respect to the investment's strategic relevance, the expected materiality of such adverse impacts in light of the target company's business model and trajectory as well as the transactional context of that investment.

### **(g) Methodologies**

Currently, the methodologies applied comprise collecting information via a questionnaire from the portfolio companies prior to the investment, i.e., within the due diligence process, and on an ongoing basis following the investment. The fund uses a framework of both questions and KPIs to assess environmental, social, and governance matters.

### **(h) Data sources and processing**

The qualitative and quantitative questions provided via the framework are completed by the portfolio company.

### **(i) Limitations to methodologies and data**

The information collected via the questionnaire as part of 3VC's due diligence on behalf of the Fund is externally verified only if and to the extent misrepresentations are suspected. Thus, it cannot be ruled out completely that false information may remain undetected in certain cases. As the Fund's investment is made for several years, 3VC considers it a priority to establish and maintain trust within a good working relationship with the portfolio company as a safeguard in light of the limitations described in this section.

### **(j) Due diligence**

Initially, the assessment of how the Fund's investment in the portfolio company relates to the environmental or social characteristics mentioned above is carried out as part of the due diligence process using a questionnaire. Via the questionnaire, qualitative statements of an environmental or social nature or relating to corporate governance are requested from the portfolio companies and then taken into account in the investment decision-making process. The findings relating to the environment or social or governance aspects are non-binding and being considered in light of all circumstances including the size of the investment, its strategic importance, its envisaged trajectory as well as the transactional context.

### **(k) Engagement policies**

Should 3VC on behalf of the Fund determine any potential issues relating the environmental or social characteristics, it will engage the portfolio company's manager in discussions with a view to resolving, reducing, or mitigating such effects, provided that such efforts will always remain within a scope considered by 3VC in its absolute discretion to be proportionate in light of the size and strategic importance of the respective investment in the portfolio companies and shall take into account the respective bargaining positions and transactional context.

### **(l) Designated reference benchmark**

**3VC II SCSp**

No index has been designated as a reference benchmark.

**No consideration of adverse impacts of investment decisions on sustainability factors**

In accordance with Article 7(2) SFDR, the External AIFM does not currently consider the principal adverse impacts of investment decisions on sustainability factors at the time of the Agreement. The relevant data needed to identify and weight principal adverse sustainability impacts is not yet available in the market to a sufficient extent or of the required quality for the External AIFM to consider principal adverse effect on sustainability factors.

The External AIFM will review the availability of data on a regular basis and, if necessary, decide again on this basis on the possibility of taking into account principal adverse impacts of investment decisions on sustainability factors as part of the investment strategy.

**3VC II SCSp**

Version	Publication date	Changes
Version 2	12.03.2025	Updated ESG Policy link
Version 1	02.12.2022	