SURMOUNT

SFDR Statement

Introduction/Sustainability Risk

On March 10, 2021, an EU Regulation came into force requiring AIFM ´light´ managers, such as Surmount Ventures Management B.V. (‘**The Manager’**, or ‘**SVM’),** to provide information on sustainability in their investment decisions. This regulation, the Sustainable Finance Disclosure Regulation (SFDR), requires SVM to provide information on how sustainability risks (as defined below) are integrated into the investment decision-making process.

Transparency of sustainability risk policies

According to article 2 SFDR, a “sustainability risk” is an environmental, social or governance event or condition which, if it occurs, could cause an actual or potential material negative impact on the value of an investment. Before any investment decisions are made on behalf of Surmount Growth and Innovation Fund I (**SGIF I),** SVM performs general confirmatory due diligence which covers financial, legal, fiscal and environmental issues and involves external advisors when necessary. SVM considers environmental, social and governance to be standard subjects covered during the due diligence process.

Transparency of adverse sustainability impacts

In accordance with article 4(1)(b) of the SFDR, the Manager states that it does not consider adverse impacts of investment decisions on sustainability factors as set forth in article 4(1)(a) of the SFDR and therefore does not make the disclosures as described in article 4(1)(a) and 4(2) of the SFDR. Given the size of the organization of SVM, the Manager considers it not proportional - in terms of investment in time, costs, and capacity and in light of the complexity involved with it - to provide the detailed information in accordance with Article 4(1)(a) and 4(2) of the SFDR.

Remuneration policies in relation to the integration of sustainability risks

SVM’s remuneration policy aims to ensure that the interests of employees are aligned with the interests of investors in the funds of SVM, avoiding as far as possible incentives that could result in excessive risk-taking behavior. SVM pays staff a combination of fixed remuneration and variable remuneration (including a possible bonus). In this respect, compliance with our [ESG/CSR] policy regarding the integration of sustainability risks into the investment decision-making process can be part of the assessment of the performance of SVM’s staff.

SVM does not manage funds which fall under article 8 or 9 SFDR, and therefore article 10 SFDR is not applicable.