EU SFDR Disclosure

Rockaway Venture Partners (GP) S.à r.l. ("**GP**") is an investment fund manager **registered** by the Commission de Surveillance du Secteur Financier (the "CSSF") in Luxembourg **according to Article 3(3)** of the Law of 12 July 2013 relating to alternative investment managers, **and does not benefit from any of the rights granted under that Law.**

Under Regulation (EU) 2019/2088 ("**SFDR**"), GP is defined as a "financial market participant". Therefore, in view of allowing investors of the Rockaway Ventures Fund to have access to all information as prescribed by SFDR, please find below the GP sustainability disclosures.

The conduct of our business is governed by, inter alia:

− the 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 ("**SFDR**").

− the Commission Delegated Regulation of 6 April 2022 supplementing SFDR (the "**Delegated Act**").

− the Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment and amending Regulation (EU) 2019/2088 (the "**TR**").

(Together the "**ESG Rules**").

Integration of sustainability risks into the investment process (Article 3)

As per Article 3 of the SFDR, the GP is required to publish information about how sustainability risks are integrated into the investment process.

The level of integration of sustainability risks for all funds is defined by the GP and the Investment Advisor of the respective fund with the minimum requirement to follow Article 8 regulation and guidance.

The GP oversees the risk management function. The GP hence integrated the sustainability risks in its risk management process demanding clear sustainability risk assessment analysis, either explaining the non-relevance of the risks or requiring the need for adjustment.

The GP integrates the sustainability risks in its investment policies and procedures and requires that sustainability risks will be integrated into the investment process of each of its funds. The level of integration, and the methodology applied, depend on the investment strategy of the fund. In general, this methodology includes the following requirements:

- During the initial due diligence, the GP shall request and review the investment process to be applied by the manager of the respective fund, which consists of reviewing good governance practices using EBRD-based exclusionary screening focused on Environmental, Social and Governance criteria;
- Further positive screening is then applied where possible, which includes an assessment of Environmental, Social and Governance (ESG) risks and opportunities, with a clear investment recommendation.

The risk assessment conducted as part of the positive screening is only carried out for portfolio companies who have the resources and capacity to provide data in response to our in-house ESG questionnaire, which will be revised to align with the PAI indicators of the SFDR. For the remaining companies, the management of ESG risk is mainly covered by the exclusionary screening.

The GP doesn't expect the investments of its funds to be aligned with the EU Taxonomy provided by the regulation (EU) 2020/852 of the European Parliament and of the council of 18 June 2020 on the establishment of framework to facilitate sustainable investment and amending regulation (EU) 2019/2088 (the "**Taxonomy Regulation**").

The GP reviews and approves the ESG Policy and Statement of each fund including their templates which are requested to be filled in and submitted as part of the investment process. The GP has put in place controls to monitor the activities of the Portfolio Manager of each of its funds on an ongoing basis.

No consideration of adverse impacts of investment decisions on sustainability factors (Article 4)

As per the above, the GP qualifies as financial market in accordance with SFDR, for the fund under its management and therefore, is subject to the obligations of disclosing whether it considers principal adverse impacts on its investment decisions, and if so, provide the required information as required under Article 4 of the SFDR.

As a principle, the GP does not take into account principal adverse impacts on its investment decisions. The reasons for this are:

- The GP does not currently surpass the 500 employee threshold that would make the reporting of principle adverse impacts of its investment decisions mandatory, as per Article 4(3) of the Regulation (EU) 2019/2088.
- The collection of data on the Principle Adverse Impact (PAI) indicators is currently not consistently possible due to the small size and limited resources of the portfolio companies in our funds, who are primarily startups and SMEs.

However, our funds do provide their portfolio companies with an ESG questionnaire containing sustainability indicators that they may report on a best-efforts basis. This questionnaire was formulated in collaboration with ESG Ventures and other business partners, and in coming years will be aligned with the PAIs of the SFDR. Nevertheless, most of the portfolio companies do not currently have the resources and processes in place to collect data on all indicators.