

Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

Product name: GP Bullhound Fund VI SCSp

Legal entity identifier:

213800JLFY7907ON4635

Environmental and/or social characteristics

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?



Yes

☐ It will make a minimum of **sustainable investments with an environmental objective**: ____%

☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy

☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

☐ It will make a minimum of **sustainable investments with a social objective**: ____%



No

☐ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of ____% of sustainable investments

☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy

☐ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

☐ with a social objective



It promotes E/S characteristics, but **will not make any sustainable investments**



What environmental and/or social characteristics are promoted by this financial product?

Fund VI will invest in software companies in societally significant sectors such as cybersecurity, AI/ machine learning and cleantech. In doing so, the Fund will invest in companies which respect the society and planet. The Fund promotes the environmental and social characteristics of excluding any investments that are considered as controversial, based on the following criteria:

- Avoid investing in companies deemed as high risk based on a normative restriction and sanctions list established by BullhoundCapital to prevent money laundering and terrorism financing,
- Prohibit investments in companies involved, directly or indirectly, in illegal economic activities,

- Excluding companies involved in the following sectors of activity: weapons and ammunition, private prisons, fossil fuels, tobacco, distilled alcoholic beverages and casinos,
- Prohibit investing or providing any kind of financial support to software companies providing electronic data programs which support any activity mentioned above as well as internet gambling and pornography and/or are intended to illegally enter electronic data networks or download electronic data,
- Ensuring that investments in the research, development and technical applications relating to human cloning for research or therapeutic purposes, or genetically modified organisms (GMOs) are subject to appropriate control of legal, regulatory and ethical issues.

No reference benchmark has been designated for the purpose of attaining the environmental and social characteristics promoted.

● ***What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?***

The following indicators will be used to measure the attainment of environmental and social characteristics promoted:

- % of investments determined as high risk according to the normative restriction and sanctions list established by BullhoundCapital to avoid money laundering and terrorism financing,
- % of investments in companies involved, directly or indirectly in illegal economic activities (i.e. any production, trade or other activity, which is illegal under the laws or regulations applicable to the investee company or the Fund, including without limitation, human cloning for reproduction purposes),
- % of investments in companies deriving more than 5% of revenues from the production of weapons, ammunitions or components thereof,
- % of investments in companies which manufacture nuclear weapons or components thereof,
- % of investments in companies deriving more than 5% of revenues from the production and retail of civil firearms and ammunitions,
- % of investments in companies deriving more than 5% of revenues from the production and/or trade of tobacco or distilled alcoholic beverages and related products,
- % of investments in companies that derive more than 5% of their revenues from casino activities or equivalent enterprises,
- % of investments in companies which own, operate or provide integral services to private prisons,

Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.

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- % of investments in companies which have expansion plans for coal extraction,
 - % of investments in companies deriving more than 5% of revenues from thermal coal activity (unless the company has/ plans to have a Science Based Target set or less than 10% capital expenditure related to thermal coal activities or more than 50% of capital expenditure dedicated to contributing activities),
 - % of investments in companies which have expansion plans for unconventional oil and gas,
 - % of investments in companies deriving more than 5% of revenues from unconventional oil and gas related activities (unless the company has/ plans to have a Science Based Target set or more than 50% of capital expenditure dedicated to contributing activities),
 - % of investments in companies deriving more than 5% of revenues from conventional oil and gas related activities (unless the company has/ plans to have a Science Based Target set or less than 15% of capital expenditure is related to oil and gas activities or more than 15% of capital expenditure dedicated to contributing activities),
 - % of investments in companies with a carbon intensity greater than 374 gCO₂/kWh,
 - % of investments in companies providing electronic data programs are involved in the following sectors of activity: weapons and ammunition, tobacco and distilled alcoholic beverages, casinos (on-site and online), internet gambling or equivalent enterprises, private prisons, fossil fuels (thermal coal, conventional and unconventional oil and gas supply, electricity generation) and pornography,
 - % of investments in companies providing electronic data programs which are intended to illegally enter electronic data networks or download electronic data.
- ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

Not applicable.

- ***How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?***



Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

Not applicable.

The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

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.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



Does this financial product consider principal adverse impacts on sustainability factors?

- ☐ Yes, _____
- ☒ No



What investment strategy does this financial product follow?

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

As part of its investment strategy, the Fund will apply and exclude any investee companies in the scope of BullhoundCapital’s normative restriction and sanctions list. This list has been constituted, among others, to avoid money laundering and terrorism financing and is based on the following elements:

- High risk states and jurisdictions:
 - Financial Action Task Force (FATF): high-risk jurisdictions and jurisdictions under supervision,
 - European Commission: list of third countries with insufficient anti-money laundering and anti-terrorist financing measures,



- Council of the European Union: European Union list of non-cooperative countries and territories for tax purposes,
- National and international sanctions list:
 - European External Action Service (EEAS) Sanctions list,
 - International financial Sanctions list issued by the French Treasury (MINEFI),
 - Sanctions Programs and Country Information List issued by the Office of Foreign Assets Control (OFAC), which is overseen by the U.S. Treasury Department,
 - United Nations Security Council (UNSC) Sanctions List,
 - United Kingdom Treasury Sanctions and Assets Freeze List (UK HMT),
 - Commission de Surveillance du Secteur Financier (Grand Duchy of Luxembourg) financial sanctions list.

The Fund will not invest or provide any kind of support to companies involved, directly or indirectly, in illegal economic activities (i.e. any production, trade or other activity, which is illegal under the laws or regulations applicable to the investee company or the Fund, including without limitation, human cloning for reproduction purposes).

In addition, the Fund will apply an exclusion list based on sector-specific restrictions. Prospective and investee companies exposed to exclusionary rules and thresholds (as set out in the binding elements section below) will be excluded from the Fund's investments.

During the investment screening process, the Fund will carry out controls and exclude all companies deemed incompatible with the exclusions set out above. These controls will be carried out at least every two years. Documented audit trail of these assessments will be made available to auditors, regulators and prospective investors (subject to BullhoundCapital agreement).

In addition, if the Fund invests in the research, development or technical applications relating to human cloning for research and therapeutic purposes or GMOs, the Fund will make sure that such activities are subject to appropriate control of legal, regulatory and ethical issues.

● ***What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?***

The following binding elements have been selected to attain each of the environmental characteristics promoted by the Fund:

- No investments in companies, or related to individuals, which are in the scope of BullhoundCapital's normative restriction and sanctions list,
- No investments in companies involved, directly or indirectly in illegal economic activities (i.e. any production, trade or other activity, which is illegal under the laws or regulations applicable to the investee company or the Fund, including without limitation, human cloning for reproduction purposes),

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

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- No investments in companies deriving more than 5% of revenues from the production of weapons, ammunitions or components thereof,
- No investments in companies which manufacture nuclear weapons or components thereof,
- No investments in companies deriving more than 5% of revenues from the production and retail of civil firearms and ammunitions,
- No investments in companies deriving more than 5% of revenues from the production and/or trade of tobacco or distilled alcoholic beverages and related products,
- No investments in companies that derive more than 5% of their revenues from casino activities or equivalent enterprises,
- No investments in companies which own, operate or provide integral services to private prisons,
- No investments in companies which have expansion plans for coal extraction,
- No investments in companies deriving more than 5% of revenues from thermal coal activity (unless the company has/ plans to have a Science Based Target set or less than 10% capital expenditure related to thermal coal activities),
- No investments in companies which have expansion plans for unconventional oil and gas,
- No investments in companies deriving more than 5% of revenues from unconventional oil and gas related activities (unless the company has/ plans to have a Science Based Target set),
- No investments in companies deriving more than 5% of revenues from conventional oil and gas related activities (unless the company has/ plans to have a Science Based Target set or less than 15% of capital expenditure is related to oil and gas activities),
- No investments in companies with a carbon intensity greater than 374 gCO₂/kWh. If the data is unavailable or cannot be accurately quantified, the following exclusion criteria will apply:
 - More than 5% of MWh generation is derived from thermal coal,
 - More than 30% of MWh generation is derived from oil,
 - More than 30% of MWh generation is derived from natural gas,
 - More than 30% of MWh generation is derived from nuclear sources.
- No investments in companies providing electronic data programs are involved in the following sectors of activity: weapons and ammunition, tobacco and distilled alcoholic beverages, casinos (on-site and online), internet gambling or equivalent enterprises, private prisons, fossil fuels (thermal coal, conventional and unconventional oil and gas supply, electricity generation) and pornography,



- No investments in companies providing electronic data programs which are intended to illegally enter electronic data networks or download electronic data.

In addition to the exclusionary criteria set out above, whenever providing financial support to the research, development or technical applications relating to human cloning for research or therapeutic purposes or GMOs, the Fund will ensure that such investments are subject to appropriate control of legal, regulatory and ethical issues.

- ***What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?***

Not applicable.

- ***What is the policy to assess good governance practices of the investee companies?***

As part of its due diligence, the Fund will determine whether a prospective investee company follows good governance practices such as board independence, accountability and composition, as well as culture, remuneration, tax practices amongst others.

The assessment of good governance practices is supported by regular exchanges between the portfolio management team and the prospective investee companies.

Governance assessments and information are taken into consideration as part of the due diligence processes and also ongoing monitoring of investee companies.



What is the asset allocation planned for this financial product?

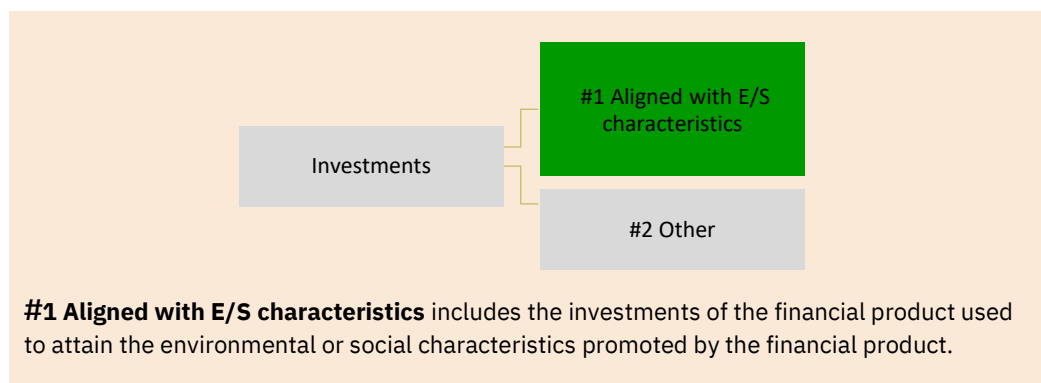
Asset allocation

describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

The Fund will invest at least 60% of its portfolio in assets which fall in the category “#1 Aligned with E/S characteristics”. Up to 40% of the portfolio will be made of assets falling in the category “#2 Other”. This category may include cash and cash equivalents for liquidity purposes. It may also include any investments where the data to measure the environmental and social characteristics is not available, is not used to meet the environmental and social characteristics or does not meet the environmental or social characteristics promoted by the Fund. These investments do not have any minimum environmental or social safeguards.



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#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.

- ***How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?***

Not applicable.



To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The Fund promotes environmental and social characteristics but does not currently commit to invest in any sustainable investments within the meaning of the SFDR. The minimum share of sustainable investments aligned with the EU Taxonomy is 0%.

- **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy¹⁷?**

☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☐ No

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

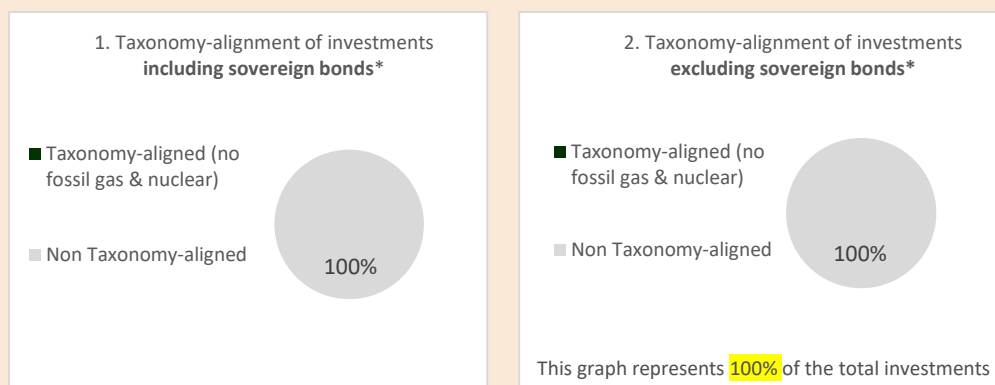
Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

¹⁷ Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory note in the left-hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.

● **What is the minimum share of investments in transitional and enabling activities?**

The Fund promotes environmental and social characteristics but does not commit to making any sustainable investments. Accordingly, the minimum share of investments in transitional and enable activities is 0%.



What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

As the Fund does not commit to making any sustainable investments, the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is equal to 0%.



What is the minimum share of socially sustainable investments?

Not applicable.



What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

The Fund will invest a maximum of 40% of its assets in “#2 Other” investments. This category may include cash and cash equivalents for liquidity purposes. It may also include any investments where the data to measure the environmental and social characteristics is not available, is not used to meet the environmental and social characteristics or does not meet the environmental or social characteristics promoted

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by the Fund. These investments do not have any minimum environmental or social safeguards.



Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

Not applicable.



Where can I find more product specific information online?

More product-specific information can be found on the website:
<https://www.gpbullhound.com/responsibility/#investment-strategy>

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