

Article 10 (SFDR)

Website disclosure for an article 8 fund

Bootstrap 4F SCSp

A	SUMMARY
	<i>The Partnerships primary purpose will be to make investments by financing, through the subscription, acquisition or any other form of investment into women led UK Venture Investors. At a secondary level, these Venture Investors are investing in innovative Portfolio companies (“Portcos”) with a UK first approach: managers have to have actively invest in the UK, with a strong UK presence, a UK office and invest part of their AuM in the UK Managers can be headquartered globally.</i> <i>The core social characteristic being promoted by this product is one of gender/diversity; ensuring that women owned businesses are promoted and at the forefront of the product.</i> <i>At the primary level, Bootstrap 4F will back 20–25 top-quartile VC and growth funds that have a strong UK presence and at least one female General Partner with 10% or more GP equity ownership. The portfolio will be diversified across vintage, stage (from pre-seed to growth), and sector, with a particular focus on the Fourth Industrial Revolution — including AI, deeptech, climate tech, healthtech, and frontier innovation.</i> <i>We reserve 30% of capital for opportunistic investments — such as secondaries, and passive co-investments — to provide liquidity early in the fund’s life and help flatten the J-curve.</i> <i>At the secondary level, or at the Portco level, a broader view is taken, assessing and promoting the environmental, social and governance performance of said company. There will be a specific focus on the gender and broader diversity of said Portco. On a yearly basis an assessment is performed of each investment and a score is assigned using amount others, the below group of metrics:</i> <i>- Environmental: establishment of an environmental policy; tracking of ESG initiatives with KPIs and reports; having a policy and programme in place to achieve net zero / reduced GHG emissions; measuring of carbon footprint; measuring and reductions of non-renewable electrical energy consumption; measuring of water consumption and generating of any hazardous waste.</i> <i>- Social: establishment of corporate social responsibility (CSR) policy; establishment of a company value sharing scheme; provision of ESG training to staff; and gender pay gap percentage.</i> <i>- Governance: percentage of women and ethnic minorities on Board; coverage of sustainability in Board meetings and establishment of corporate code of ethics / good business conduct policy.</i> <i>While the Fund uses the term ‘sustainable’ to describe certain investments and practices, it does not intend to make ‘sustainable investments’ within the meaning of SFDR.</i> <i>No index has been designated as a reference benchmark for the purposes of meeting the environmental and/or social characteristics promoted by this financial product.</i> <i>The framework to achieve this is set out through the following below sections:</i> <i>a. Summary</i> <i>b. Sustainable investment objective</i>

	c. <i>Environmental/social characteristics</i> d. <i>Investment strategy</i> e. <i>Proportion of investments</i> f. <i>Monitoring of environmental/social characteristics</i> g. <i>Methodologies</i> h. <i>Data sources and processing</i> i. <i>Limitations to methodologies and data</i> j. <i>Due diligence</i> k. <i>Engagement policies</i> <i>The Fund's exclusion policy is enforced from the outset of the investment process and remains in effect throughout the entire lifespan of the Fund. The financial product is aligned with strict exclusion criteria based on the European Investment Fund (EIF) and International Finance Corporation (IFC) exclusion lists.</i>
B	<u>NO SUSTAINABLE INVESTMENT OBJECTIVE</u>
	<i>This financial product promotes environmental or social characteristics but does not have as its objective sustainable investment.</i>
C	<u>ENVIRONMENTAL OR SOCIAL CHARACTERISTICS OF THE FINANCIAL PRODUCT</u>
	<i>The Partnership promotes diversity as is specific social characteristic though investment in Women led UK based venture Funds. The key sustainability indicator used in the pursuit of this objective is to ensure that each one of the investee Funds has at least one female General Partner with 10% or more GP equity ownership. This will be assessed at the outset, monitored throughout the in lifecycle of the investment, and reassessed on realisation.</i> <i>The Partnership further promotes environmental and social characteristics by ensuring that the underlying investee funds are strategically investing in innovative companies across key sectors, including healthcare, information technology, fintech, and sustainable manufacturing. These sectors were selected based on their potential to drive positive environmental and social impact, aligning with the broader objectives of the EU Sustainable Finance Disclosure Regulation (SFDR) Article 8. Given the Partnership is a Fund of Funds, control over the companies in which the underlying Fund managers invest in is limited. The Partnership will monitor and encourage at an indirect level.</i> <i>The fund applied strict exclusion criteria based on the European Investment Fund (EIF) and International Finance Corporation (IFC) exclusion lists. This screening process ensured that investments were not</i>

	<i>directed toward industries or business activities that pose significant environmental or social risks, such as fossil fuels, weapons manufacturing, gambling, or industries with poor labor practices.</i> <i>Other characteristics that will be measured:</i> <i>• Diversity: what percentage of the workforce, senior management and the board are from a minority background, and based also on gender.</i> <i>• Energy Consumption: various metrics tracked including water usage (Litres), energy consumption (scope 1 /2 where relevant)</i> <i>• Engagement with ESG topics: what proportion have sustainability as a topic on their board, have an ESG policy, Have a sustainability officer etc</i> <i>• Gender pay gap: difference in the average earnings between all men and women across an organization</i>
D	<u>INVESTMENT STRATEGY</u>
	<i>The Partnerships primary purpose will be to make investments by financing, through the subscription, acquisition or any other form of investment into women led UK Venture Investors. At a secondary level, these Venture Investors are investing in innovative Portfolio companies (“Portcos”) with a UK first approach: managers have to have actively invest in the UK, with a strong UK presence, a UK office and invest part of their AuM in the UK Managers can be headquartered globally.</i> <i>The core social characteristic being promoted by this product is one of gender/diversity; ensuring that women owned businesses are promoted and at the forefront of the product.</i> <i>At the primary level, Bootstrap 4F will back 20–25 top-quartile VC and growth funds that have a strong UK presence and at least one female General Partner with 10% or more GP equity ownership. The portfolio will be diversified across vintage, stage (from pre-seed to growth), and sector, with a particular focus on the Fourth Industrial Revolution — including AI, deeptech, climate tech, healthtech, and frontier innovation.</i> <i>We reserve 30% of capital for opportunistic investments — such as secondaries, and passive co-investments — to provide liquidity early in the fund’s life and help flatten the J-curve.</i> <i>At the secondary level, or at the Portco level, a broader view is taken, assessing and promoting the environmental, social and governance performance of said company. There will be a specific focus on the gender and broader diversity of said Portco</i> <i>While the Fund uses the term ‘sustainable’ to describe certain investments and practices, it does not intend to make ‘sustainable investments’ within the meaning of SFDR.</i>

	<i>No index has been designated as a reference benchmark for the purposes of meeting the environmental and/or social characteristics promoted by this financial product.</i> <i>The Partnership is committed to ensuring good governance practices among its investee Funds, recognizing that robust governance forms the backbone of sustainable, long-term value creation. To this end, our due diligence process assesses potential investments' governance frameworks, reviews management structures to ensure they are effective and capable of driving responsible corporate behaviour and decision-making, and, where relevant, creates a new Board of experienced industry operators and investors to guide the business as it scales.</i> <i>Employee relations are another focal point, as we believe that fair and equitable treatment of staff is indicative of a company's moral compass and is integral to its ultimate success. We delve into staff remuneration policies, ensuring they are not only competitive but also fair and aligned with industry standards and best practices. This alignment is crucial for fostering a motivated, dedicated workforce and minimizing staff turnover, which can be costly.</i> <i>Tax compliance is a key indicator of a company's commitment to lawful and ethical behaviour. We thoroughly vet potential investments for their adherence to all applicable tax laws and regulations, understanding that compliance is fundamental to corporate responsibility and good citizenship.</i> <i>Furthermore, recognizing the importance of alignment with international standards for responsible business conduct, our assessment incorporates checks against the principles concerning human rights, labour, environment, and anti-corruption.</i> <i>We continuously monitor governance practices post-investment, ensuring that our investee companies remain steadfast in their commitment to the high standards we expect.</i>
E	<u>PROPORTION OF INVESTMENTS</u> <i>The Fund does not make sustainable investments (within the meaning of the SFDR)</i> <i>The Fund expects that a minimum of 90% of its investments will promote E/S characteristics. The Fund is anticipated to make investments in accordance with the following approximate asset allocation targets (subject to change based on the availability of investment opportunities)</i>
F	<u>MONITORING OF ENVIRONMENTAL OR SOCIAL CHARACTERISTICS</u> <i>Women led Fund:</i> <i>Throughout the lifecycle of the product there will be annual assessment of the underlying characteristics through ongoing engagement and questionnaire with the investee Fund. This will then form part of the annual ESG report to Limited Partners. The aforementioned indicator of 10% of GP equity is tracked through this process as well</i> <i>Underlying portfolio company:</i>

	Beyond exclusionary screening, the Partnership used a proprietary ESG scoring mechanism to evaluate, monitor, and improve the ESG performance of its portfolio companies. The scoring system assessed various factors, including carbon footprint reduction initiatives, diversity and inclusion efforts, governance structures, and corporate sustainability commitments. This approach enabled a data-driven evaluation of each investment's ESG alignment and allowed for targeted engagement to improve sustainability performance over time. • Environmental: energy use, emissions, product lifecycle • Social: diversity, labor, privacy • Governance: board structure, compliance, ethics
G	<u>METHODOLOGIES</u>
	<i>Women led Fund:</i> Annual assessment of the underlying characteristics through ongoing engagement and questionnaire with the investee Fund. This will then form part of the annual ESG report to Limited Partners. This will allow us to see whether we have achieved the goal set to promote the aforementioned sustainability indicator <i>Underlying portfolio company:</i> To enhance transparency and accountability, the Partnership adopted a 'scorecard' approach to measure and report ESG performance across its portfolio. This methodology consolidated multiple ESG metrics into a single weighted score, providing investors with a clear and comparable assessment of ESG progress across different companies. Through these combined efforts, sector-focused investment, exclusion criteria, ESG scoring, and structured performance monitoring, the Partnership actively supported the promotion of environmental and social characteristics within its investment portfolio, reinforcing its commitment to sustainable growth and responsible investing.
H	<u>DATA SOURCES AND PROCESSING</u>
	<i>Data sources</i> - Due diligence when screening an investment - Further due diligence on onboarding of an asset - Annual questionnaire - General, ongoing and ad-hoc data gathering <i>Quality of data</i> - Quality of data is ensured through collaboration with the underlying investee company and ensuring enshrined as a legal obligation as part of the underlying legal agreements - A deminimus amount of data is estimated, however it must be viewed in line with the limitations outlined in I below
I	<u>LIMITATIONS TO METHODOLOGIES AND DATA</u>

	<i>Women led Fund:</i> <i>Funds are likely to be in their nascent stages, which creates limitations around the amount of resource that can be dedicated to the above. This doesn't, however, prevent the attainment of the characteristics, as even from the most basic of levels development can begin</i> <i>Underlying portfolio company:</i> <i>Methodology and data are limited by the asset class within which we sit. No board seat or direct involvement with management undertaken.</i> <i>This doesn't impact how the Partnership promotes environmental/social characteristics, as the outlined limitations are built into how we promote the product. This is a limitation that is industry wide</i>
J	<u>DUE DILIGENCE</u>
	<i>Women led Fund:</i> <i>The partnership's due diligence process assesses potential investments' governance frameworks, reviews management structures to ensure they are effective and capable of driving responsible corporate behaviour and decision-making, and, where relevant, creates a new Board of experienced industry operators and investors to guide the business as it scales. This is on top of ensuring The investee Funds have at least one female General Partner with 10% or more GP equity ownership. Investee Funds will comply with the aforementioned exclusion criteria</i>
K	<u>ENGAGEMENT POLICIES</u>
	<i>The Partnership engages with its investee funds on an ongoing and holistic basis. The investment thesis of the Partnership ensures that the promotion of predominantly social characteristics is embedded on entry. There is ongoing support to the Fund managers around this topic and more formal engagement annually as the partnership. Open dialogue and collaboration is maintained.</i>
L	<u>DESIGNATED REFERENCE BENCHMARK</u>
	<i>N/A - no benchmark designated</i>

References & Guiding notes

SFDR Delegated Regulation : [C 2022 1931 1 EN ACT part1 v6 \(1\).pdf](#)
(europa.eu)

Article 24

Sections of website product disclosure for financial products that promote environmental or social characteristics

For financial products that promote environmental or social characteristics, financial market participants shall publish the information referred to in Article 10(1) of Regulation (EU) 2019/2088 and Articles 25 to 36 of this Regulation in the following order and made up of all of the following sections titled:

- (a) 'Summary';
- (b) 'No sustainable investment objective';
- (c) 'Environmental or social characteristics of the financial product';
- (d) 'Investment strategy';
- (e) 'Proportion of investments';
- (f) 'Monitoring of environmental or social characteristics';
- (g) 'Methodologies';
- (h) 'Data sources and processing';
- (i) 'Limitations to methodologies and data';
- (j) 'Due diligence';
- (k) 'Engagement policies';
- (l) where an index is designated as a reference benchmark to attain the environmental or social characteristics promoted by the financial product, 'Designated reference benchmark'.

Article 25

Website section ‘Summary’ for financial products that promote environmental or social characteristics

1. In the website section ‘Summary’ referred to in Article 24, point (a), financial market participants shall summarise all the information contained in the different sections referred to in that Article about the financial products that promote environmental or social characteristics. The summary section shall have a maximum length of two sides of A4-sized paper when printed.
2. The website section ‘Summary’ referred to in Article 24, point (a), shall be provided in at least the following languages:
 - (a) one of the official languages of the home Member State and, where different and where the financial product is made available in more than one Member State, in an additional language customary in the sphere of international finance;
 - (b) where the financial product is made available in a host Member State, one of the official languages of that host Member State.

Article 26

Website section ‘No sustainable investment objective’ for financial products that promote environmental or social characteristics

1. In the website section ‘No sustainable investment objective’ referred to in Article 24, point (b), financial market participants shall insert the following statement: “This financial product promotes environmental or social characteristics, but does not have as its objective sustainable investment.”
2. Where the financial product commits to making one or more sustainable investments, financial market participants shall in the website section ‘No sustainable investment objective’ referred to in Article 24, point (b), explain how the sustainable investment does not significantly harm any of the sustainable investment objectives, including all of the following:
 - (a) how the indicators for adverse impacts in Table 1 of Annex I, and any relevant indicators in Tables 2 and 3 of that Annex I, are taken into account;
 - (b) whether the sustainable investment is aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

Article 27

Website section ‘Environmental or social characteristics of the financial product’ for financial products that promote environmental or social characteristics

In the website section ‘Environmental or social characteristics of the financial product’ referred to in Article 24, point (c), financial market participants shall describe the environmental or social characteristics that the financial products promotes.

Article 28

Website section ‘Investment strategy’ for financial products that promote environmental or social characteristics

In the website section ‘Investment strategy’ referred to in Article 24, point (d), financial market participants shall describe all of the following:

- (a) the investment strategy used to meet the environmental or social characteristics promoted by the financial product;
- (b) the policy to assess good governance practices of the investee companies, including with respect to sound management structures, employee relations, remuneration of staff and tax compliance.

Article 29

Website section ‘Proportion of investments’ for financial products that promote environmental or social characteristics

In the website section ‘Proportion of investments’ referred to in Article 24, point (e), financial market participants shall insert the information referred to in Article 14 and shall distinguish between direct exposures in investee entities and all other types of exposures to those entities.

Article 30

Website section ‘Monitoring of environmental or social characteristics’ for financial products that promote environmental or social characteristics

In the website section ‘Monitoring of environmental or social characteristics’ referred to in Article 24, point (f), financial market participants shall describe how the environmental or social characteristics promoted by the financial product and the sustainability indicators used to measure the attainment of each of those environmental or social characteristics promoted by the financial product are monitored throughout the lifecycle of the financial product and the related internal or external control mechanisms.

Article 31

Website section ‘Methodologies for environmental or social characteristics’ for financial products that promote environmental or social characteristics

In the website section ‘Methodologies for environmental or social characteristics’ referred to in Article 24, point (g), financial market participants shall describe the methodologies to measure how the social or environmental characteristics promoted by the financial product are met.

Article 32

Website section ‘Data sources and processing’ for financial products that promote environmental or social characteristics

In the website section ‘Data sources and processing’ referred to in Article 24, point (h), financial market participants shall describe all of the following:

- (a) the data sources used to attain each of the environmental or social characteristics promoted by the financial product;
- (b) the measures taken to ensure data quality;
- (c) how data are processed;
- (d) the proportion of data that are estimated.

Article 33

Website section ‘Limitations to methodologies and data’ for financial products that promote environmental or social characteristics

In the website section ‘Limitations to methodologies and data’ referred to in Article 24, point (i), financial market participants shall describe all of the following:

- (a) any limitations to the methodologies referred to in Article 24, point (g), and to the data sources referred to in Article 24, point (h);
- (b) how such limitations do not affect how the environmental or social characteristics promoted by the financial product are met.

Article 34

Website section ‘Due diligence’ for financial products that promote environmental or social characteristics

In the website section ‘Due diligence’ referred to in Article 24, point (j), financial market participants shall describe the due diligence carried out on the underlying assets of the financial product, including the internal and external controls on that due diligence.

Article 35

Website section ‘Engagement policies’ for financial products that promote environmental or social characteristics

In the website section ‘Engagement policies’ referred to in Article 24, point (k), financial market participants shall describe the engagement policies implemented where engagement is part of the environmental or social investment strategy, including any management procedures applicable to sustainability-related controversies in investee companies.

Article 36

Website section ‘Designated reference benchmark’ for financial products that promote environmental or social characteristics

1. In the website section ‘Designated reference benchmark’ referred to in Article 24, point (l), financial market participants shall describe whether an index has been designated as a reference benchmark to meet the environmental or social

characteristics promoted by the financial product, and how that index is aligned with the environmental or social characteristics promoted by the financial product, including the input data, the methodologies used to select those data, the rebalancing methodologies and how the index is calculated.

2. Where part or all of the information referred to in paragraph 1 is published on the website of the administrator of the reference benchmark, a hyperlink shall be provided to that information.