



Article 10 (SFDR)

Website disclosure for an Article 8 fund

**PONTIS FUTURUM Capital SCSp, SICAV-FIAR – PONTIS FUTURUM
Debt Fund (the "Compartment")**

Version	Date	Explanation
1.0	02.04.2026	First publication

Product name: PONTIS FUTURUM Capital SCSp, SICAV-FIAR – PONTIS FUTURUM Debt Fund (the "Compartment")		Legal entity identifier : N/A ISIN codes : LU3364780067 – A1 LU3401954261 – A2 LU3401954345 – B1 LU3401954428 – B2 LU3401954691 – C1 LU3401954774 – C2 LU3401954587 – D1 LU3401954931 – D2
Does this financial product have a sustainable investment objective?		
☐ Yes		☒ No
☐ 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: __%		☐ 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



A. Summary

No sustainable investment objective

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

Environmental or social characteristics of the financial product

The Compartment promotes environmental and social (E/S) characteristics by integrating environmental, social and governance (ESG) considerations into its real estate lending process and by applying a sector-based exclusion approach.

Investment strategy

The Compartment pursues a real estate debt investment strategy, providing senior, mezzanine and development loans secured by property assets primarily located in the EU and OECD countries. It applies a binding exclusion strategy covering, inter alia, thermal coal, oil sands extraction, unconventional hydrocarbons, controversial weapons, tobacco production, gambling, adult entertainment, land use and ecosystem degradation, and governance violations. Each loan also undergoes a qualitative ESG assessment as part of the credit approval process, covering energy performance, tenant well-being, and compliance with environmental and safety standards. The binding elements of the investment strategy are: (i) exclusion of borrowers that do not comply with the exclusion criteria; (ii) written confirmation by investee borrowers that their activities do not cause severe environmental harm; (iii) completion of pre-investment governance and compliance

checks; and (iv) inclusion of an ESG review in each Investment Committee decision. Borrowers must maintain sound management structures, transparent ownership, anti-bribery and AML compliance, fair employee relations, and responsible tax practices, as verified through KYC, AML, due diligence documentation, and contractual representations. The Compartment does not consider principal adverse impacts (PAIs) at product level.

Proportion of Investments

At least 70% of the Compartment's portfolio will be invested in loans that meet the E/S characteristics promoted (#1 Aligned with E/S characteristics). The remaining up to 30% may be held in cash or cash equivalents for liquidity purposes (#2 Other). No minimum environmental or social safeguards are applied to those investments. The Compartment does not commit to making any EU Taxonomy-aligned investments.

Monitoring of environmental or social characteristics

The attainment of the E/S characteristics is measured through the following sustainability indicators, which are monitored on an ongoing basis at the pre-investment stage and throughout the lifecycle of the Compartment, including through repeated exclusion screening and escalation of material changes:

- Percentage of investments complying with the exclusion criteria of the Compartment;
- Percentage of investments in borrowers providing written confirmation of no severe environmental harm;
- Percentage of investments in borrowers that confirm having implemented the governance and compliance procedures;
- Presence of an ESG review in every credit memorandum prior to Investment Committee approval.

Methodologies

The Compartment applies a two-step methodology: (i) systematic exclusion screening of all prospective borrowers, material tenants and collateral assets against the Compartment's binding exclusion list; and (ii) a qualitative ESG assessment embedded in the credit approval process, reviewing energy performance, tenant well-being, and compliance with environmental and safety standards. Good governance is assessed through KYC, AML, and contractual representations.

Data sources and processing

Data is sourced primarily from borrower-provided documentation (KYC/AML files, self-declarations, contractual representations), third-party screening tools (including sanctions and reputational screening databases), and independent due diligence reports. ESG data quality is ensured through contractual obligations and standard diligence procedures maintained throughout the investment lifecycle.

Limitations to methodologies and data

The primary limitation relates to the availability of standardised ESG data for private real estate debt borrowers. This is addressed through contractual requirements, self-declarations, and ongoing monitoring. These limitations do not affect the attainment of the E/S characteristics, as the exclusion criteria and binding elements remain enforceable throughout the investment lifecycle.

Due diligence

The Compartment applies a structured due diligence process at the pre-investment stage and throughout the monitoring period. Each borrower, material tenant and collateral asset is screened against the exclusion list. An ESG review is included in every Investment Committee decision. Good governance checks are carried out through KYC, AML screening, and contractual representations.

Engagement policies

Engagement is not a formal part of the environmental or social investment strategy of the Compartment.

Designated reference benchmark

No specific index has been designated as a reference benchmark to determine whether the Compartment is aligned with the environmental or social characteristics it promotes.



B. No sustainable investment objective

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



C. Environmental or social characteristics of the financial product

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

The Compartment's environmental and social ("E/S") characteristics promoted consist of integrating environmental, social and governance ("ESG") considerations into its real estate lending process and by applying a sector-based exclusion approach.

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



D. Investment strategy

What investment strategy does this financial product follow?

The Compartment pursues a real estate debt investment strategy, providing senior, mezzanine and development loans secured by property assets primarily located in the EU and OECD countries. The Compartment applies an exclusion investment strategy by excluding investments in activities that are incompatible with its E/S characteristics, as further detailed in the Compartment's exclusion policy, available upon request from the General Partner.

The excluded activities include, without limitation:

- Thermal coal (mining and coal-fired power);
- Oil sands/tar sands;
- Unconventional hydrocarbons (fracking);
- Manufacture of tobacco products;
- Commercial gambling/casinos;
- Adult entertainment (pornography/live adult venues);

- Conversion of high-conservation land (including primary tropical forest, peatlands, mangroves, and IUCN I–IV protected areas);
- Peatland drainage/peat extraction;
- Severe contamination/hazardous operations;
- Severe human rights violations (including forced labour and systemic child labour);
- Indigenous rights violations (lack of Free, Prior and Informed Consent);
- Sanctions/restricted parties (EU/UN/OFAC or other relevant sanctions lists);
- Money-laundering, serious financial crime, or corruption;
- Tax evasion/aggressive tax avoidance;
- Controversial weapons;
- Assets supporting heavy industrial processes with unmitigable environmental risks; and
- Material breach of governance obligations.

These exclusions are binding for all lending activities of the Compartment and are maintained and reviewed by the AIFM as part of its standard investment and risk management procedures. Each prospective borrower, material tenant and collateral asset will be screened against the exclusion list during initial screening and throughout the monitoring period.

As part of the ESG integration process, each loan also undergoes a qualitative ESG assessment considering energy performance, tenant well-being, and compliance with environmental and safety standards. Borrowers are required to maintain good governance standards, including transparent ownership, anti-bribery and AML compliance, and responsible tax practices.

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

The binding elements of the investment strategy are the following:

- The Compartment excludes borrowers that do not comply with the exclusion criteria;
- Investee borrowers provide written confirmation that their activities do not cause severe environmental harm;
- Pre-investment governance and compliance checks of investee borrowers are completed;
- An ESG review is included in each Investment Committee decision.

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

Borrowers must maintain sound management structures, transparent ownership, anti-bribery and AML compliance, fair employee relations, and responsible tax practices. These aspects are verified through KYC, AML, due diligence documentation, and contractual representations.

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

☐ Yes

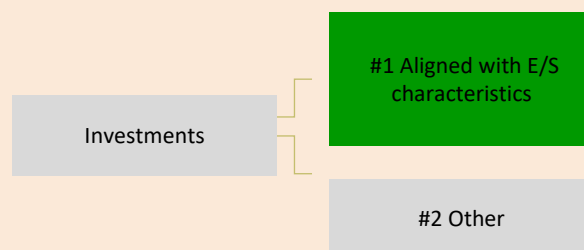
☒ No



E. Proportion of investments

What is the asset allocation planned for this financial product?

The Compartment invests at least 70% of its portfolio in investments to meet the E/S characteristics that it promotes (#1 Aligned with E/S characteristics). These investments consist of direct exposures in investee entities in the form of senior, mezzanine and development loans extended directly to borrowers. The remaining portion of investments will be in cash or cash equivalents held for liquidity purposes (#2 Other), which do not constitute direct exposures in investee entities.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other 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 Compartment does not commit to making a minimum portion of sustainable investments with an environmental objective aligned with the EU Taxonomy.

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.

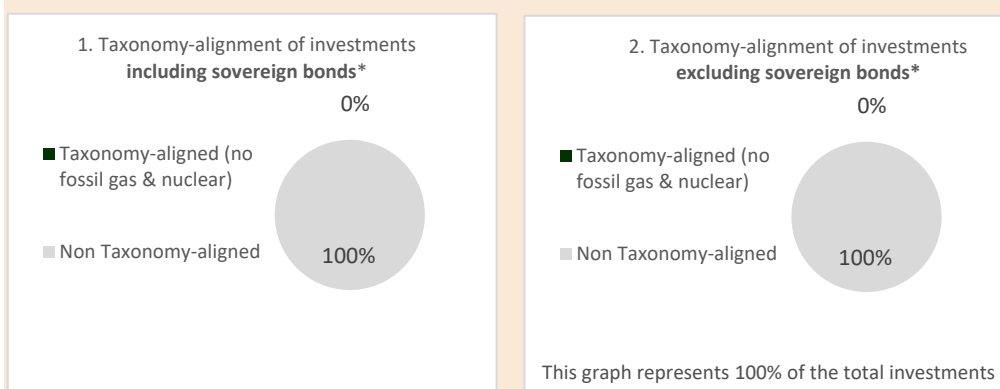
Does the financial product invest in fossil gas and/ or nuclear energy related activities that comply with the EU Taxonomy¹?

☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

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?

As the Compartment does not commit to investing in any sustainable investment within the meaning of the EU Taxonomy, the minimum share of investments in transitional and enabling activities within the meaning of the EU Taxonomy is therefore also set at 0%.

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

The Compartment promotes E/S characteristics but does not commit to making any sustainable investments. As a consequence, the Compartment does not commit to a minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy.

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

The Compartment may hold cash and cash equivalents for liquidity purposes. No minimum environmental or social safeguards are applied to those investments.

¹ 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. 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.



F. Monitoring of environmental or social characteristics

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

The sustainability indicators used to measure the attainment of the E/S characteristics promoted are the following:

- Percentage of investments complying with the exclusion criteria of the Compartment;
- Percentage of investments in borrowers providing written confirmation of no severe environmental harm;
- Percentage of investments in borrowers that confirm having implemented the governance and compliance procedures;
- Presence of an ESG review in every credit memorandum prior to Investment Committee approval.

How are the environmental or social characteristics and the sustainability indicators monitored throughout the lifecycle of the financial product?

The E/S characteristics and the sustainability indicators are monitored on an ongoing basis throughout the lifecycle of the Compartment.

At the pre-investment stage, each prospective borrower, material tenant and collateral asset is screened against the Compartment's exclusion criteria and assessed for compliance with the binding elements of the investment strategy. An ESG review is prepared and included in every credit memorandum submitted to the Investment Committee prior to any lending decision.

Following investment, the AIFM maintains records of borrower confirmations, governance checks and exclusion screening results as part of its standard portfolio monitoring procedures. Exclusion screening is repeated throughout the monitoring period to ensure continued compliance. Any material change in the activities or status of a borrower is identified and escalated by the portfolio management team.

Internal controls are maintained by the AIFM's investment and risk management teams, who are responsible for reviewing ESG compliance at investment and portfolio level. The Investment Committee oversees the application of the exclusion criteria and the consistency of the ESG integration process.



G. Methodologies

What are the methodologies used to measure the attainment of the environmental or social characteristics promoted by the financial product?

The Compartment applies a two-step methodology to measure the attainment of the E/S characteristics it promotes:

Step 1: Exclusion screening: All prospective borrowers, material tenants and collateral assets are systematically screened against the Compartment's binding exclusion list prior to investment and on an ongoing basis throughout the monitoring period. The exclusion list covers activities considered incompatible with the Compartment's E/S characteristics, including thermal coal, oil sands, unconventional hydrocarbons, controversial weapons, tobacco production, gambling, adult entertainment, land use and ecosystem degradation, and governance violations, as further described in the Compartment's exclusion policy. An activity is considered excluded where it meets

the operational definitions and applicable revenue or activity thresholds specified in the exclusion policy.

Step 2: Qualitative ESG assessment: Each loan undergoes a qualitative ESG review as part of the credit approval process, assessing energy performance of collateral assets, tenant well-being, and compliance with environmental and safety standards. Good governance aspects, including management structure, anti-bribery compliance, AML standards, and responsible tax practices, are assessed through KYC procedures and contractual representations. The outcome of this assessment is documented in the credit memorandum submitted to the Investment Committee.

The sustainability indicators listed in Section F above are used as the key metrics for tracking attainment of the E/S characteristics across the portfolio over time.



H. Data sources and processing

What are the data sources used to attain each of the environmental or social characteristics?

The Compartment relies on the following data sources to attain its E/S characteristics:

- Borrower-provided documentation, including KYC/AML files, corporate governance documentation, audited financial statements and technical reports;
- Written self-declarations from borrowers confirming the absence of excluded activities and compliance with governance and compliance requirements;
- Third-party screening tools, including sanctions screening databases and reputational screening tools (e.g. World Check or equivalent);
- Independent legal and technical due diligence reports prepared in connection with each loan transaction;
- Collateral asset information, including energy performance certificates and tenancy documentation.

Data quality is ensured through the following measures:

- Contractual representations and warranties are obtained from each borrower regarding the accuracy and completeness of the information provided;
- KYC and AML procedures are applied in accordance with applicable regulatory standards;
- Third-party sanctions and reputational screening databases are used to cross-check borrower information;
- The AIFM reviews the accuracy and completeness of borrower information as part of its standard credit approval process, with verification repeated during ongoing monitoring.

Data collected from borrowers, third-party reports and screening databases is compiled and reviewed as part of the credit approval and ongoing monitoring process. Exclusion screening results and ESG assessment outcomes are documented in the credit memorandum submitted to the Investment Committee. Portfolio-level monitoring data is maintained by the AIFM's portfolio management team and used to track the sustainability indicators described in Section F above.

The Compartment primarily relies on directly sourced data from borrowers and independent third-party reports. A limited proportion of ESG-related data may be estimated or based on borrower self-declarations in cases where private borrowers do not produce standardised ESG disclosures. In such cases, the AIFM relies on contractual representations and, where possible, cross-references with publicly available information.



I. Limitations to methodologies and data

What are the limitations to the methodologies and data sources?

The Compartment acknowledges the following limitations to its methodologies and data sources:

Methodological limitations :

- The exclusion-based approach relies primarily on borrower self-declarations and screening against publicly available databases. These may not capture all relevant ESG information with complete accuracy, in particular for private counterparties that are not subject to mandatory sustainability reporting requirements.
- The qualitative ESG assessment embedded in the credit approval process is based on information available at the time of assessment. Material changes in borrower activities or the status of collateral assets may not always be detected immediately between monitoring reviews.

Data limitations :

- Private real estate debt borrowers typically do not produce standardised ESG disclosures, which limits the availability of comparable, independently verified ESG data across the portfolio.
- Reliance on borrower self-declarations introduces a degree of subjectivity. The AIFM mitigates this through contractual representations, KYC procedures, and third-party screening.
- Third-party screening databases may not capture all reputational or ESG-related concerns, particularly for smaller or unlisted counterparties.

These limitations do not affect the attainment of the Compartment's E/S characteristics because:

- The exclusion criteria are legally binding and enforceable throughout the investment lifecycle through contractual representations and warranties included in loan documentation;
- Governance and compliance checks are embedded in the credit approval process as a pre-condition to any lending decision;
- The Investment Committee review process ensures that an ESG assessment is conducted for every lending decision, regardless of data availability from third-party sources;
- The ongoing monitoring framework enables the AIFM to identify any material changes in borrower or collateral status and to take remedial action, including termination of contractual arrangements, where required.



J. Due diligence

What is the due diligence carried out on the underlying assets?

The Compartment applies a structured due diligence process at the pre-investment stage and throughout the monitoring period to ensure compliance with its binding exclusion criteria and ESG integration requirements.

Pre-investment due diligence:

- Each prospective borrower, material tenant and collateral asset is screened against the Compartment's binding exclusion list prior to investment;

- A qualitative ESG assessment is conducted as part of the credit approval process, covering energy performance of collateral assets, tenant well-being, and compliance with environmental and safety standards;
- Good governance checks are carried out through KYC and AML procedures, review of corporate governance documentation, and assessment of management structures, anti-bribery and AML compliance, and responsible tax practices;
- Written confirmation is obtained from each borrower that its activities do not cause severe environmental harm;
- An ESG review is included in every credit memorandum submitted for Investment Committee approval.

Ongoing monitoring:

- Borrowers are subject to ongoing monitoring throughout the investment period;
- Exclusion screening is repeated during the monitoring period to detect any material changes in borrower activities or status;
- Contractual representations and warranties enable the AIFM to take remedial action in the event of breach.

Internal and external controls:

- Internal controls are maintained by the AIFM's investment and risk management teams, who are responsible for overseeing ESG compliance at investment and portfolio level;
- External controls include independent legal and technical due diligence reports commissioned for each transaction, and third-party sanctions and reputational screening.



K. Engagement policies

Is engagement part of the environmental or social investment strategy?

- ☐ Yes
☒ No



L. Reference benchmark

Has a specific index designated as a reference benchmark to meet the environmental or social characteristics promoted by the financial product?

- ☐ Yes
☒ No

Where can more product-specific information be found?

More product-specific information can be found in the periodic reports:

Not applicable.