

Compliance

OWNERSHIP AND MANAGERS

The Maki.vc Fund I KY and Maki.vc Fund II Ky are limited partnerships incorporated and existing under the laws of Finland and are managed by their General Partner Maki.vc Fund I GP Oy and Maki.vc Fund II GP Oy respectively, which in turn are owned by and have appointed Maki Ventures Oy (Maki.vc) to manage the partnership. Maki.vc is owned by the partners Ilkka Kivimäki and Pirkka Palomäki, Paavo Räisänen and Pauliina Martikainen-Rahnu.

SHORT DESCRIPTION OF THE FUND AND ESTABLISHMENT

Maki.vc is a seed-stage VC firm in Helsinki, that champions the entrepreneurs who rewrite the future. The firm invests in deep tech and brand-driven companies across consumer and enterprise spaces. The first closing of the Fund I was in December 2017 and investments to portfolio companies started in the beginning of 2018. For the Fund II, the first closing was in December 2020, and investing began in December 2020.

CONTACT FOR MEDIA ENQUIRIES

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DETAILS OF ALL FUNDS

We currently actively invest from a 100M€ Maki.vc Fund II Ky (the Fund or Fund II below) in terms of new initial investments. The initial investment period of the 80M€ Fund I Ky has ended, and the fund continues to do only selective follow-on investments to the fund's existing portfolio companies.

	Fund I	Fund II
Government agencies	13%	15%
Family Offices & Private Individuals	35%	35%
Corporate Investors	5%	1%
Fund of Funds, Other Asset Managers	16%	11%
Pension Funds	20%	23%
Academic Institutions, Endowments, Foundations	1%	2%
Banks	0%	0%
Insurance Companies	9%	12%
Other (incl. Capital Markets, Sovereign, Wealth Funds)	0%	0%

	Fund I	Fund II
Finland	79%	85%
Rest of Europe	14%	8%
Outside of Europe	7%	7%

VALUATION GUIDELINES

We follow IPEV, International Private Equity and Venture Capital, valuation guidelines.

GUIDELINES FOR REPORTING INVESTMENTS

We follow IPEV reporting guidelines.

RESPONSIBLE INVESTMENT POLICY

We follow our Responsible Investment Policy, which describes the ESG criteria and practices when investing and working with companies.

INFORMATION ON THE AIFM LICENCE

Maki.vc (Maki Ventures Ltd) is a registered Alternative Investment Fund Manager.

SUSTAINABLE FINANCE DISCLOSURE REGULATION – WEBSITE DISCLOSURE FOR FUND I AND FUND II

INTEGRATION OF SUSTAINABILITY RISKS IN THE INVESTMENT DECISION-MAKING PROCESS (SFDR ART. 3)

In this context, sustainability risk means an environmental, social, or governance event, or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of the investment arising from an adverse sustainability impact.

Maki.vc has an ESG checklist in place to go through in the investment process. The ESG checklist enables us to assess possible environmental, sustainability and governance risks and opportunities in each investment. Analysis of the ESG issues and risks is a standard part of the Fund's investment process and due diligence, including the appropriate consideration of environmental, social and governance issues. No investments are made if a potential investee company fails to meet the requirements of the Fund's principles for responsible investing. The Fund pay special attention to identifying issues that are impossible to amend (e.g., companies operating in an unacceptable industry) and refrain from investing them. The Fund also identify possible ESG issues (e.g., improving the Responsible Employer Policy) that need to be corrected and will help portfolio companies addressing them. In the Investment Memorandum for an initial or follow-on investment, ESG considerations are covered as a part of the risk and development analysis. As ESG related opportunities and risks vary in different industries, markets, and countries, the Fund analyses them on a case-by-case basis, focusing on the issues that are relevant to the potential investment and its operating environment.

Sustainability risks are also managed by excluding specific industries. The Fund does not invest in companies operating in fossil fuel, weapons, pornography, alcohol, tobacco or gambling industries, companies conducting illegal activities or companies, which the Management Company or General Partner determines to operate unethically. In addition, the Fund does not invest in companies with founders or co-invest with investors, which the Management Company or General Partner determines to have serious reputational issues, such as a criminal record. However, most ESG considerations are more nuanced than the previously listed and therefore require careful evaluation.

STATEMENT OF NO CONSIDERATION OF ADVERSE IMPACTS ON SUSTAINABILITY FACTORS (SFDR ART. 4)

Maki.vc does not currently consider adverse impacts of investment decisions on sustainability factors as meant in Article 4(1) of the EU Regulation 2019/2088 on sustainability-related disclosures in the financial services sector ("SFDR") due to the following reasons:

The more detailed requirements relating to the consideration of adverse impacts of investments decisions on sustainability factors are still rather unclear due to the related regulatory technical standards being still in draft form. There is also little official guidance on the topic.

Due to the foregoing there is also uncertainty as to whether the adverse impacts can be measured as required by (the still evolving) regulation. Considering that the portfolios of the managed funds consist of a number of minority investments in unlisted companies, it is also not certain whether sufficient data can be obtained with respect to each portfolio company.

Once there are more detailed regulations regarding measuring, considering and reporting adverse impacts on sustainability factors, Maki.vc intends to reconsider its approach to the foregoing.

REMUNERATION POLICIES (SFDR ART. 5)

Maki.vc's remuneration policies are structured to the effect that these do not encourage excessive risk-taking with respect to sustainability risks.