LION-S GP S.à r.l.

Sustainability-related disclosures

Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector ("SFDR")

LION-S GP S.à.r.l. · *Société à responsabilité limitée* · Registered office : 99, Grand-Rue, L-1661 Luxembourg, Grand Duchy of Luxembourg · RCS Luxembourg : B303061

This page contains the sustainability-related disclosures of LION-S GP S.à.r.l. (the "**General Partner**"). The General Partner acts as alternative investment fund manager ("**AIFM**") of LION-S FUND SCSp (the "**Partnership**"), a Luxembourg special limited partnership (*société en commandite spéciale*) qualifying as an alternative investment fund, under the registration regime provided for in Article 3(2)(a) of the Luxembourg law of 12 July 2013 on alternative investment fund managers, as amended (the "**AIFM Law**").

These disclosures are made pursuant to Articles 3, 4(1)(b) and 5 of the SFDR and are publicly accessible without registration or access credentials.

Article 3 SFDR

Integration of sustainability risks in the investment decision-making process

A "sustainability risk" within the meaning of Article 2(22) of the SFDR is 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 an investment.

The General Partner integrates sustainability risks in its investment decision-making process to the extent that such risks are material and, in the General Partner's reasonable assessment, likely to have a material adverse impact on the financial value of the Partnership's investments.

The Partnership's investment strategy is implemented primarily through systematic, rules-based, data-driven processes. Within that process, the General Partner may use environmental, social or governance-related data and analytics (including proprietary quantitative analytics generated by the S-Factor® System) which are incorporated into the investment process as one of a number of financial inputs, factors and risk and return signals in the construction and management of the portfolio. Any such use is made solely for the purpose of seeking to enhance risk-adjusted financial returns and/or to identify, assess and manage financial risk, and such data and analytics are treated by the General Partner as financial signals only.

Where a sustainability risk is assessed as financially material to a position or to the portfolio, it is considered in the same manner as any other financial risk factor and may result in an exposure being adjusted, hedged, reduced or not entered into. Conversely, where the General Partner assesses that financially material operational, governance or social information has not yet been fully reflected in market prices, such signals may also be used to identify potential investment opportunities. In each case, the objective pursued is exclusively financial. The integration of sustainability risks does not mean that the Partnership pursues any environmental or social objective: the Partnership is a financial product falling under Article 6 of the SFDR, as described below.

Article 4(1)(b) SFDR

No consideration of adverse impacts of investment decisions on sustainability factors

In accordance with Article 4(1)(b) of the SFDR, the General Partner does not consider the principal adverse impacts of investment decisions on sustainability factors within the meaning of Article 4 of the SFDR, whether at the level of the General Partner or at the level of the Partnership.

The reasons for this position are the following:

- The General Partner is a registered (sub-threshold) AIFM under Article 3(2)(a) of the AIFM Law, managing a single alternative investment fund with a limited internal organisation. It does not exceed, and does not form part of a group exceeding, the average number of 500 employees referred to in Articles 4(3) and 4(4) of the SFDR, so that the mandatory consideration of principal adverse impacts does not apply to it.
- The Partnership pursues exclusively financial objectives. It does not promote environmental or social characteristics within the meaning of Article 8 of the SFDR, does not have sustainable investment as its objective within the meaning of Article 9 of the SFDR and does not commit to making “sustainable investments” within the meaning of the SFDR.
- Compliance with the principal adverse impact regime - including the collection of data on the mandatory indicators and the preparation of an annual statement in the format prescribed by Commission Delegated Regulation (EU) 2022/1288 - would impose costs and data and reporting burdens that are disproportionate to the size, nature and scale of the General Partner’s activities.
- For the avoidance of doubt, the use of environmental, social or governance-related data as financial inputs, as described in the section on Article 3 above, does not constitute consideration of principal adverse impacts within the meaning of Article 4 of the SFDR.

The General Partner will keep this position under review at least annually and in the event of any material change in the size, nature, scale or organisation of its activities, including any authorisation of the General Partner as a fully licensed AIFM or any relevant change in the applicable regulatory framework. Should the General Partner decide to consider principal adverse impacts in the future, it will publish the statement required under Article 4(1)(a) of the SFDR and update this page accordingly.

Article 5 SFDR

Remuneration policy and the integration of sustainability risks

As a registered (sub-threshold) AIFM, the General Partner is not subject to the remuneration requirements applicable to authorised AIFMs and, in view of its size and internal organisation (the General Partner is managed by its sole manager (*gérante unique*)) it does not maintain a separate remuneration policy. To the extent any remuneration is paid by the General Partner, its structure does not include variable components that could encourage excessive risktaking, including with respect to sustainability risks, and is consistent with the approach to the integration of sustainability risks described on this page.

Article 6 SFDR · LION-S FUND SCSp

Product classification of the Partnership

The Partnership is classified as a financial product falling within the scope of Article 6 of the SFDR. It does not promote environmental or social characteristics within the meaning of Article 8 of the SFDR and does not have sustainable investment as its objective within the meaning of Article 9 of the SFDR. The Partnership does not use any ESG, sustainability, responsible-investment or impact label or designation and is not marketed as such a product. Accordingly, no product-level website disclosure under Article 10 of the SFDR is required in respect of the Partnership.

The investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Article 12 SFDR

Review and updates

The General Partner keeps the information published on this page under review and up to date. Where information published on this page is amended in a material way, a clear explanation of the amendment will be provided on this page. The date of first publication and the current version are indicated below.

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First published: 30 July 2026 · Version 1.0