

SEVENTURE PARTNERS

RESPONSIBLE INVESTMENT POLICY



“Our mission is to engage with and support innovative French and European companies, from seed funding to expansion capital.

Today that mission embraces a new paradigm: the inclusion of new sustainability factors, exemplified by actively incorporating ESG criteria into our investment process.”

Isabelle de Crémoux – CEO and Managing Partner

INTRODUCTION:

OUR VALUES ARE EMBODIED IN OUR RESPONSIBLE INVESTMENT POLICY

Rigor - Integrity - Transparency - Professionalism: these are Seventure Partners' main values, which are also tangibly expressed in our responsible investment procedures.

1. OVERVIEW OF OUR RESPONSIBLE INVESTMENT STRATEGY

INTEGRITY

Seventure Partners has been a signatory to the [Principles for Responsible Investment](#) since 2016 and the AFIC (now France Invest) Charter of Commitments for Investments in Growth since 2017 (<http://www.franceinvest.eu/>). As an actor in the private equity market, Seventure Partners has a particular responsibility in directing its investments toward projects, companies and sectors that, by nature, present relatively few ESG (Environmental, Social, Governance) risks and that support the development of a more sustainable economy. That is reflected in the unwavering focus on value creation over the long term, while preserving social and environmental capital.

Our convictions on this subject are founded on our experience in the field, alongside entrepreneurs, as well as on **three key fundamentals** in our positioning:

- **Seventure Partners is a long-term investor that actively supports innovative companies** for periods that can exceed ten years. By taking significant minority positions, we can influence governance bodies and thereby help those companies become world leaders in their fields.
- **Seventure Partners targets companies that have a technology or expertise that gives them a decisive and sustainable competitive advantage that encourages job creation:** as a result, since our founding in 1997, more than 5,000 jobs have been created in Europe in portfolio companies in cutting-edge sectors.
- **Seventure Partners has focused our investment strategy on Life Sciences and Digital Technologies, two areas that have drivers to produce positive social and environmental impacts.** For example:
 - **Healthcare, nutrition and food, especially through financing microbiome research,** the prevention aspect of which is intended to improve human health, and which can be applied to other sectors, such as animals, agriculture and even the environment, for example, to reduce pollution from animal emissions (notably CH₄ and CO₂ from fermentation);

- **Industrial biotechnologies and cleantechs offering real environmental solutions**, for example, via financing green chemical solutions that provide alternatives to fossil fuels, biopesticides and non-chemical fertilizers, or even treating wood to limit deforestation;
- **Some companies in the digital sector** helping to reduce the environmental footprint of the entire lifecycle, for example, by investing in business models based on recycling electronics products or even digitization solutions to reduce reliance on paper documents.

2. RESPONSIBLE GOVERNANCE AND RI/ESG BENCHMARKS

PROFESSIONALISM

Convictions and Objectives

Beyond financing business models that are, for the most part, sustainable by nature, our commitment is to gradually introduce ESG issues into all of the companies that we want to support, through all stages of investment. We are convinced that **foresight and the proper management of ESG risks that could hinder the growth of our investments are factors that are appealing and create value over the long term. This responsible business conduct, combined with more global risk management, will increase value upon exit through a convergence of interests with the company's various stakeholders.**

Therein lies the entire mission of our Responsible Investment Policy. It aims to support the integration of ESG issues within the portfolio companies, our clients and partner co-investors, which may have different motivations, such as the desire to contribute to the growth of a sustainable economy, compliance with regulatory developments, or upholding fiduciary responsibility.

As a recognized player in the private equity arena, and in the context of developing our ESG integration practices, we have formally document this Policy to:

- **Define our responsible investment approach and our application principles**
- **Explain the way in which we are integrating ESG issues into our investment process**
- **Involve the companies in which we invest in this principled approach**
- **Work in a concerted manner alongside the companies and our co-investors to achieve the objective of realizing sustainability in our investments.**

Steering, operational rollout and scope

In 2016, Seventure Partners launched a study to promote responsible investment, and sought **the support of Efires**, an advisory firm with expertise in responsible investment and corporate social responsibility. Efires' mission is to support operational actors and monitor the success of the approach.

This work relies on two key bodies for the steering and rollout of the initiative:

- an internal **RI/ESG Steering Committee** created in 2016: this body is composed of the Head of Business Development, the Head of Compliance, Risks and Internal Control, and a Partner from each team (Life Sciences and Digital Technologies). The mission of this committee is to make all strategic and operational decisions related to RI/ESG positioning, with the agreement of the CEO and Managing Partner, and to organize the internal rollout of the following aspects:
 - ESG investment and monitoring process (definition, implementation and integration, tracked in internal tools)
 - Integration of the RI/ESG approach into contractual documentation and external communication
 - ESG reporting (clients, regulatory and normative)
 - Mobilization of internal teams for the implementation of the RI/ESG approach
- the **Partners' Committee of Seventure Partners**, which has been approving and monitoring the proper application of decisions to invest/not invest and to support investments based on ESG criteria, since the 1st January, 2018.

To support the gradual implementation of this Policy, Seventure Partners' RI/ESG Steering Committee has approved a **2017-2018 RI/ESG Road Map**. As a result, we have defined a **preliminary scope of coverage for the RI Policy: although the Policy is applicable to all our investments, we have prioritized implementation for the 2017-2018 period. Consequently, the ESG analysis will be conducted first and foremost:**

- **for any new investment**
- for existing investments when refinancing is requested.

In addition, the ESG analysis coverage will be applicable to a selection of existing investments for which exit is not expected within 24 months, and for which there are significant ESG issues, in terms of both risks and opportunities. These companies will be selected first according to the opportunities they contribute with regard to sustainable business models, and second according to the relevance of a CSR initiative in light of criteria such as staff and revenue size, the projected remaining holding period, the nature of the business, and the exposure to material environmental and/or social and/or governance issues.

Our Responsible Investment Policy Guidelines

⇒ Benchmarks:

Our Responsible Investment Policy is based on regulatory and normative benchmarks recognized in France, Europe and internationally with regard to:

- **Responsible Investment Practices:** Principles for Responsible Investment (PRI), AFIC’s Charter of Commitments for Investments in Growth, Art. 173 of the Energy Transition for Green Growth Act (France)
- **ESG Analysis, monitoring and reporting:** The United Nations Global Compact, AFIC’s annual ESG report, Invest Europe’s (ex EVCA) “Due Diligence Questionnaire for Private Equity Investors and Their Portfolio Companies,” art. 225 of the *Grenelle de l’environnement* environmental law (France), the European Directive on non-financial reporting (Europe).

⇒ Exclusion criteria and increased oversight

Since the 1st January 2018, Seventure Partners endeavors to avoid investments that would be contrary to our investment ethics or those of our clients. We have therefore defined general and specific exclusion criteria for our two areas of investment. In addition, independently from our business sectors, we have also implemented exclusion criteria and increased oversight in connection with poor ESG practices.

NATURE OF CRITERIA	EXCLUSION CRITERIA*	INCREASED OVERSIGHT THAT COULD LEAD TO IMMEDIATE DISINVESTMENT**
SECTORAL	=>Controversial weapons (antipersonnel landmines, cluster bombs) =>Pornography =>Tobacco =>Psychic or meeting websites	
CONNECTED TO POOR ESG PRACTICES	=> Companies with R&D activities for applications to: (a) use cloning technology to create humans; (b) create genetically modified animals for human consumption or medical applications like organ transplants;	=>Human rights violations =>Severe environmental damage =>Forced labor or child labor =>Violation of regulations stemming from environmental or labor rights =>Corruption <i>These criteria are included in the ESG analysis grid for investments, especially intended to ensure the absence of major controversies or litigation in these areas.</i>

***Our doctrine on sectors and practices that could lead to a refusal to invest (i.e. exclusion)**

Seventure Partners has focused its investment strategy on two macro-sectors: Life Sciences and Digital Technologies.

As an investor in Life Sciences, we are committed to respecting the medical ethics rules in effect, and in particular the Convention for the Protection of Human Rights and the Dignity of the Human Being^[1] with Regard to the Application of Biology and Medicine.

For Seventure Partners, investing in the Life Sciences field is, above all, financing solutions aimed at: 1/ Preserving the health and quality of human or animal life by investing in pioneering medical research (for example, via Microbiome research^[2] and its applications in all fields, Agtech or digital for the benefit of the agricultural world to make it more competitive and sustainable, Biotech and medicines, medtech/diagnostic/surgery solutions and industrial biotechnologies), and 2/ Promoting wellbeing of human and animal by discovering innovations in health, wellness product and services and food (for example, via innovations in connected and digital healthcare or in the area of food, Foodtech, digital food and nutrition).

With respect to Digital Technologies, Seventure Partners is especially vigilant to ensure that the subject of websites, messages and practices are not likely to upset visitors or prove to be intrusive or contrary to the interests of the consumer or citizen. As a precautionary measure, this is the reason we refrain from investing in dating, psychic or gambling websites. More widely, we believe that some sectors and practices are contrary to this mission and to the ethics rules that we scrupulously follow. As such, we refuse to invest in activities related to the production or marketing of controversial weapons (anti-personnel landmines, cluster bombs), tobacco, pornography, cloning technology, etc.

The concerned funds' LPs may be consulted before any investments decision if necessary.

**** Seventure Partners' rules concerning disinvestment**

Disinvestment is decided by our Partners' Committee according to two factors: the level of the company's involvement in the incident (for example, direct or indirect connection with the supply chain) and the quality of corrective actions implemented. As a preliminary, an active dialogue with the company will be initiated, planned and followed up to have all information useful to the committee and for making the disinvestment decision, if necessary.

[1] Convention on Human Rights and Biomedicine (ETS no. 164), open for signature on April 4, 1997 in Oviedo (rm.coe.int/168030751b). Its goal is to protect the dignity and identity of human beings and guarantee every person, without discrimination, the respect for his integrity and his other basic rights and freedoms with regard to applications of biology and medicine. Considered to be the European treaty on patients' rights, the convention also deals specifically with biomedical, genetic, and organ and tissue transplant research.

[2] To learn more about the Microbiome: <http://www.seventure.fr/en/life-sciences/>

⇒ ESG issues and criteria for analyzing and monitoring investments

ENVIRONMENT

With respect for the competitive position of the companies we support, Seventure Partners wants to encourage the companies in which we invest, as well as our suppliers and partners, to be models for the inclusion of environmental issues. As a shareholder, Seventure Partners is committed to motivating our investments to manage their impacts and prevent possible damage to the environment identified along their entire value chain.

- **Our environmental criteria:** existence of an environmental policy and an environmental management system (ideally, certified); coverage of key issues (eco-design, greenhouse gas emissions, energy and water consumption, water/air/ground pollution, waste production, impacts on ecosystems and biodiversity, etc.). Our ESG analysis grid includes in particular a specific focus on carbon-related issues and monitoring possible environmental events.

SOCIAL AND CORPORATE

Seventure Partners is convinced that the company's performance and, as a result, job creation, occur through attentive human resource management, with respect for the rights of employees while fostering a stimulating and appealing work environment. Accordingly, through the social pillar of our ESG policy, Seventure Partners is committed to promoting and supporting all social practices that preserve this work environment. On the corporate level, Seventure Partners' ESG policy is realized through good relationships with the company's two key stakeholders: suppliers and the public.

- **Our social criteria:** preserving and developing employment; attracting/monitoring/developing talent and skills, especially through training; compensation and sharing value; health and safety; social dialog; diversity/equal treatment/fighting against discrimination; respect for social regulations and basic labor rights. Our corporate criteria: working conditions and respect for basic rights in the supply chain; safety of products and services; patronage.

GOVERNANCE

Since the beginning, Seventure Partners has supported our investments by implementing modern and appropriate governance systems that contribute to the success and sustainability of the portfolio companies. In this regard, we act to foster smooth operation and balance in the various governance bodies of the companies, in which the leadership, independent directors and shareholders will fully exercise their roles and responsibilities. Seventure Partners is also committed to fully integrating the ethical and CSR dimensions at the heart of the governance of its investments.

Our governance criteria:

- **Governance bodies:** balance of powers, independence and diversity on the board of directors/supervisory board, efficient functioning of governance bodies, especially through specialized committees, etc.
- **CSR governance:** sensitivity of the managers to environmental/social issues; steering bodies for CSR approach; dedicated resources; transparency of ESG approach and practices.
- **Business ethics:** Preventing corruption and money laundering, monitoring possible events in these areas.

Note that our ESG analysis and monitoring grid (eventually including an ESG report for investments) is intended to put the issues and key performance indicators in perspective. To illustrate:

ISSUE	KPI	METRIC / UNIT OF MEASURE
Environment: Climate change	Incorporation of climate issues by the portfolio companies	Ex.: Percentage of investments conducting a carbon review of their business
Social: Attracting and retaining employees	Degree of development of employee qualifications	Ex: Percentage of employees that have benefited from training
Governance: Balance on the Board of Directors/Supervisory Board	Diversity of director profiles	Ex: Percentage of women directors; Percentage of independent directors

⇒ **Special treatment of the climate issue**

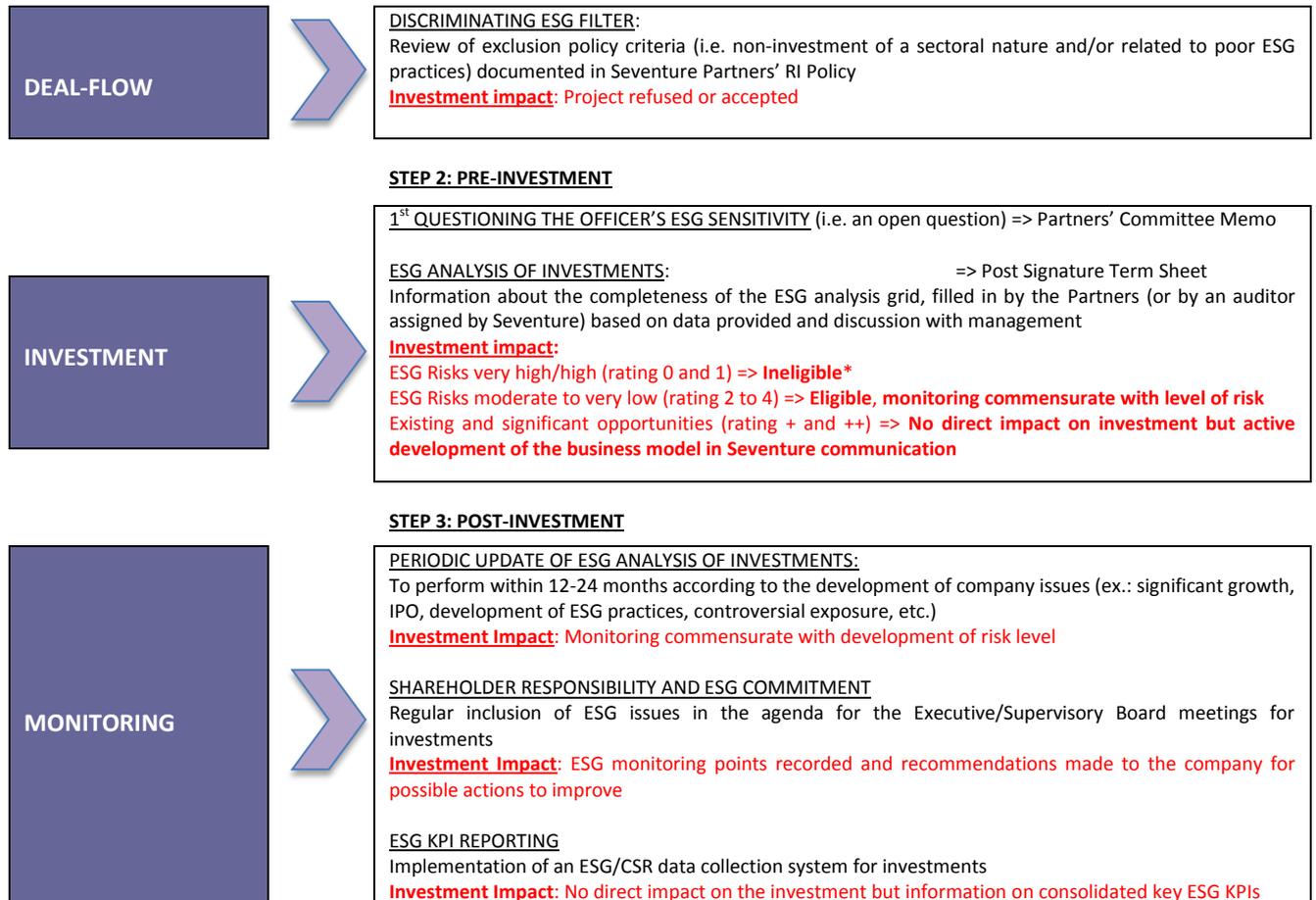
Seventure Partners seeks to limit the carbon impact of the activities of companies in which we invest, in the context of monitoring/supporting our investments, including identifying those that might provide active solutions to help limit global warming.

Seventure Partners is especially attentive to this problem driven by France at the COP 21 and supported by regulation through article 173 of the French Energy Transition for Green Growth Act. Accordingly, as a first step, the company wanted to have an upstream partnership dialog with our partner co-investors to more closely gauge what solutions they could provide to the companies, and especially to guide them toward measuring the carbon footprint of their business.

3. OUR APPROACH TO INTEGRATING ESG INTO THE INVESTMENT PROCESS

RIGOR

⇒ Features



⇒ Organization of traceability

Our investment activity is guided by the enforceability of our practices at all stages of investment. As a consequence, our ESG integration approach is incorporated into our investment process via:

- creating new tools for analyzing and monitoring ESG risks and opportunities (ex.: creating an ESG analysis grid for our investments)
- including an ESG section in our existing internal tools (ex.: deal-flow monitoring tools, questionnaire for evaluating the risks related to investments, opportunity scores, etc.) and contractual and commercial documentation (letters of intent, shareholder pact, marketing brochure, etc.)
- implementing an ESG/CSR data collection system within the investments, in compliance with the ESG/CSR clauses that will appear in the new shareholder pacts and the letter of intent.

4. DIALOG AND REPORTING ON ESG TO OUR CLIENTS

TRANSPARENCY

All the internal ESG data collected throughout the investment process enable dialog with our subscribers, as well as the production of ESG reports they may require within the context of their own responsible investment approach. Like companies in which we invest, our preference is for a constructive exchange of ideas and close cooperation with our clients about ESG issues during our discussions in the advisory meetings for our investment vehicles.

In addition, as a signatory to the PRI since December 2016, we are committed to meeting our annual obligation to report and produce a public RI Transparency Report beginning with the 2017-2018 period.