



RESPONSIBLE INVESTMENT POLICY SEVENTURE

SEVENTURE PARTNERS A RESPONSIBLE INVESTOR

OUR VISION

This section outlines Seventure's dedication as an ethical venture capital company to integrate environmental, social, and governance (ESG) considerations into its investment decision-making processes. By emphasizing responsible investment, we aim to generate both financial returns and positive outcomes for society and the planet. Our goal is to support innovative solutions, mitigate environmental risks, drive social progress, and promote good governance practices.

With rigorous due diligence, we seek to identify companies with strong ESG performances, and the potential to generate positive contribution in their respective industries.

Through active dialogue and collaboration, we encourage the adoption of responsible business practices, and the establishment of robust reporting frameworks. We seek to foster a culture of continuous improvement, where our portfolio companies embrace ESG as a core value.

Transparency and accountability are integral to our responsible investment approach. We

regularly communicate and report on our ESG activities, progress, and positive contribution to our stakeholders. By providing clear and comprehensive information, we aim to cultivate trust and ensure that our investors are well-informed about our sustainability efforts.

We recognize that responsible investment is a collective endeavor. We actively seek opportunities for collaboration and engagement with like-minded investors, industry partners, and organizations dedicated to sustainable development. By working together, we can drive positive change and shape a more sustainable future.



In summary, our Responsible Investment Policy underscores our unwavering commitment to sustainable investment practices.

We are dedicated to seeking out investments that align with our values, generate financial returns, and contribute to a more sustainable, equitable, and resilient world for future generations.

Sabrina Samarou, ESG Manager

SEVENTURE PARTNERS ESG MEMBERSHIPS

ESG KEY MILESTONES

Because ESG is a collective journey, we dedicate a **wholehearted commitment** to a selected number of industry initiatives. Participating in workshops, integrating best-practices in our processes, getting access to information and business regulation updates, benefiting from in-depth advice on our portfolio companies' alignment to Sustainable Development Goals are among the added-value of these memberships and partnerships.



PRI membership:
A United Nations-supported international network of financial institutions working together to implement its six principles to contribute to the development of a more sustainable global financial system.



2016



2017

Signatory of the France Invest charter

2019

Definition of an ESG policy and first ESG report released



iCI membership: The Initiative Climat International (iCI) is a global, practitioner-led community of private equity firms and investors that seek to better understand and manage the risks associated with climate change.

TCFD membership: The Task Force on Climate Related Financial Disclosures (TCFD) provides information to investors about what companies are doing to mitigate the risks of climate change, as well as be transparent about the way in which they are governed.

2020



Sustainable Blue Economy membership: the Sustainable Blue Economy Finance Initiative, is an UN-convened global community focused on the intersection between private finance and ocean health, supporting the implementation of the Sustainable Blue Economy Finance Principles.

2022



Joined France Invest Climate Working Group: Goal of the group: release a guide to help companies launching a climate initiative

OUR RESPONSIBLE INVESTMENT POLICY

PRE-INVESTMENT PHASE:

Our extended exclusion policy

ESG consideration starts as early as target identification. Investment candidates are tested to make sure that they are not significantly involved in controversial activities and otherwise are rejected. This step ensures that all portfolio companies are aligned with Seventure's core values. In 2021, Seventure's exclusion list was updated.

- **Arms**
- **Pornography**
- **Tobacco trade, alcohol, clairvoyance, gambling, sex, narcotics, and illicit substances trade**
- **Fossil fuels**
- **Products subject to international bans**
- **Companies with R&D activities involving the use of cloning technologies to create humans**
- **Companies with R&D activities consisting in the creation of genetically modified animals**

ESG due diligence:

• ESG Due diligence questionnaire:

Companies that pass the exclusions filter are further investigated to get advanced knowledge of their key social, environmental and governance risks, opportunities, and performance. The ESG due diligence questionnaire contains over 25 indicators covering various topics such as diversity in the board of directors, carbon reduction initiatives and workplace accidents frequency. Moreover, the questionnaire includes fund-specific questions to tailor the analysis to each industry's ESG material topics. For instance, all Health for Life targets are evaluated on the level of health benefits that their solutions bring on a scale from 1 to 5. Based on the answers to the questionnaires and additional information collected during its due diligence, Seventure's Investment Teams perform an analysis that is included in the investment memo and that can be submitted to the ESG Manager's opinion (Saisine ESG for Article 9 financial products).

• ESG clause in the shareholder agreement:

To get started on the sustainability journey from the beginning of the relationship, Seventure includes a specific ESG clause in shareholder agreements –or equivalent– signed with all future portfolio companies. The clause announces to the portfolio companies' management Seventure's ESG priorities and legally binds the company to improve its ESG profile and to report to Board meetings and to Seventure through a dedicated online tool.

INVESTMENT PHASE:

Monitoring:

• Sustainability action plans:

Once in the fund's portfolio, each portfolio company is invited to define its ESG roadmap to ensure the best-practices adoption whenever relevant for its activities. Seventure teams will support companies in this exercise and help them find the most adequate KPIs to track improvements along the way. After the elaboration of the roadmap, Seventure will continue to work closely with companies as the roadmap will be reviewed annually to monitor progress and foster further work on ESG topics.

• Annual board discussion of ESG topics:

Stewardship to encourage our portfolio companies to discuss ESG topics during board meetings.

Reporting:

• Annual collection of KPIs:

We collect ESG data on an annual basis with the purpose of monitoring the companies performances and have the overview of our portfolio's contribution to sustainability and ESG matters. In 2021 Seventure improved and facilitated the process for companies and data consolidation by digitalizing the questionnaire. This annual questionnaire also helps Seventure to comply with its regulatory obligations as it includes the Principal Adverse Impacts indicators (PAI) required by the SFDR.

• New 2023:

Seventure included in its annual ESG campaign a module that allow each of its portfolio company to make an proxy of its carbon footprint (scope 1,2) based on its energy consumption.

• Fund-specific reporting:

ESG KPIs (and PAI when mandatory) included in reporting to investors.

The review of the ESG process and its proper implementation is assessed yearly by the Risk and Internal Control department. In 2022 the following items were included in the second level control plan:

- **review of the governance of the ESG framework (steering committee, procedural corpus, training),**
- **ensuring the accurate deployment of the ESG framework, including the specificities related to article 8 and 9 funds,**
- **assessment of the regulatory information provided to the public, clients and third parties (compliance with reporting deadlines, information contents),**
- **training of employees involved in ESG issues.**

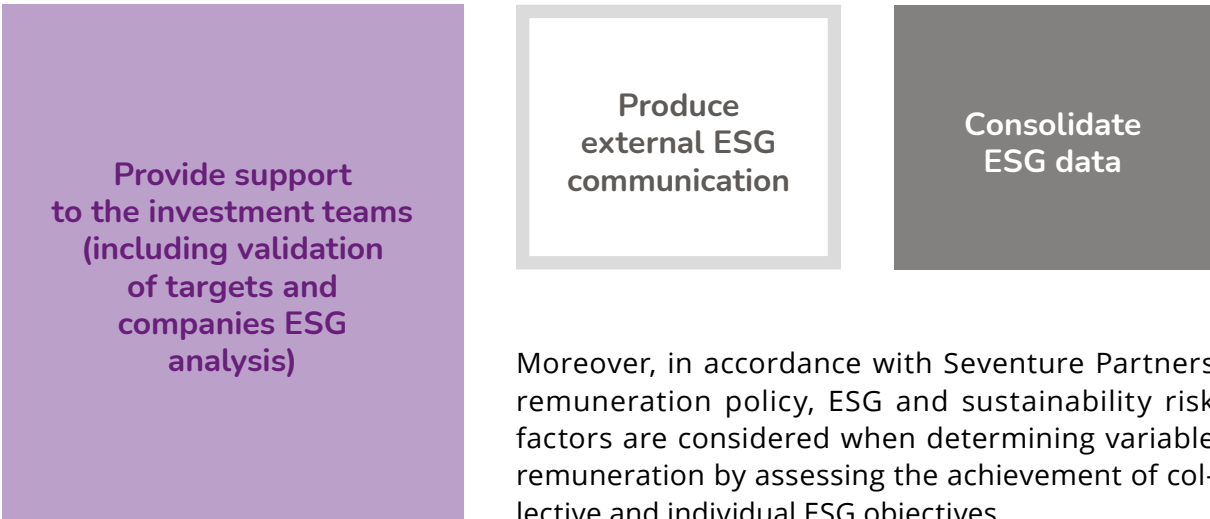
This responsible investment policy concerns all investments made by Seventure Partners, with the exception of FIPs (Fonds d'Investissement de Proximité), which represent less than 10% of Seventure Partners' assets under management.

SEVENTURE PARTNERS ESG GOUVERNANCE

Seventure’s ESG commitment is shared throughout the whole organization, starting from our CEO and Managing Partner to every member of the investment team who applies daily the ESG process:



An ESG manager has been recruited to:



Seventure’s responsible investment policy is steered by several internal bodies:

- **The Partners’ Committees:**
 - ☑ Approve and monitor the proper application of decisions to invest/not invest based on a set of criterias that include, amongst others, ESG and sustainability factors.
- **The ESG steering committee:**
 - ☑ Define the ESG strategy updates (e.g., funds’ SFDR classification)
 - ☑ Renew ESG processes (e.g., exclusion list)
 - ☑ Choose external ESG service providers
 - ☑ Validate the main ESG communications (e.g., ESG report)



Isabelle de Crémoux,
CEO and
Managing Partner



Bruno Rivet,
Senior Partner



Laëtitia Gerbe,
Partner



Alexandre Aslanis,
Head of Compliance,
Risks and Internal
Control



Olivier Mespoulet,
Head of Business
Development, ESG
and Communication



Sabrina Samarou,
ESG Manager

- **The Advisory Sustainability Committee** (for SFDR Article 9 funds) including external members which:
 - ☑ Validate the companies’ sustainability action plans (including KPIs and targets)
 - ☑ Monitor the companies’ ESG performance (including the achievement of targets that needs to be met to unlock ESG carried interest)

MANAGING NEGATIVE IMPACTS AND CONTROVERSIES:

Seventure Partners has set up a binding process to ensure in-depth analysis and ongoing monitoring of the ESG issues and the promotion of environmental and social criteria. This process integrates the steps/filters described below:

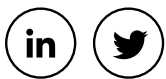
- **A general exclusions policy** which applies to all funds managed by Seventure Partners.
- **A pre-investment analysis process:**
Prior to investment, the management of the targeted company completes a pre-investment ESG questionnaire comprising 3 categories: Principle Adverse Impacts (PAI), governance and thematic/sectoral questions.

Responses to the questionnaire are analyzed by Seventure’s investment team, which draws up an ESG summary in the investment memo presented to the decision-making committee. This ESG assessment includes both the target company’s strengths in terms of E, S and G characteristics, as well as areas for improvement, particularly in terms of the PAI and Social, Environmental and Governance criteria promoted by Seventure Partners.
- **A step-by-step, collegial validation process for investments:** the dynamic process includes various decision-making and potentially exclusionary stages, notably:
 - For each thematic fund, a dedicated committee meets every 15 days to review investments, several topics are discussed including ESG analysis. The ESG team can be called upon by the investment teams at this stage.
 - The Partners’ Committee: a collegial decision to invest takes ESG factors into account in the same way as other criteria.
- **Reinforced post-investment monitoring:**
Each year, the ESG profile of portfolio companies is updated to enable monitoring their progress on the identified KPIs. In addition, an open-ended question on spontaneous initiatives is included to capture positive commitments made by the companies and not identified in the questionnaire.

In the event of an ESG / sustainability risk for one of the investments, whether it is a continuous deterioration or an isolated incident, Seventure has developed a progressive controversy management policy suitable for non-listed illiquid asset where violent disengagement, is not possible for liquidity, contractual or conflict of interest reasons.

This progressive approach consists of 3 stages :





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SEVENTURE PARTNERS

AMF authorization n° GP 01-040

5/7, rue de Monttessuy 75007 Paris - FRANCE

Phone : +33 1 5819 2272 - Fax : + 33 1 5819 2280

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