

## Article 10 SFDR Sustainability-related website disclosures<sup>1</sup>

### ACE SWISS TECH OUTLIERS SCSp

The Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (the “**SFDR**”) and the Regulation (EU) 2020/852 on the establishment of a framework to facilitate sustainable investment and amending EU Regulation 2019/2088 (the “**Taxonomy Regulation**”) (together the “**Disclosure Regulations**”) aim at providing more transparency to investors on sustainability risks integration, on the consideration of adverse sustainability impacts in the investment processes and on the promotion of environmental, social and/or governance (“**ESG**”) factors. In particular, it requires fund managers and advisers to disclose specific ESG-related information to investors on their websites. The Disclosure Regulations has been complemented by the EU implementing measures (so-called regulatory and technical standards or “**RTS**”), as applicable from time to time.

The financial product that is the subject of this disclosure is a Luxembourg special limited partnership known as “ACE SWISS TECH OUTLIERS SCSp” (or the “**Fund**”) managed by IQ EQ Fund Management (Luxembourg S.A.) in its capacity as alternative investment fund manager (the “**AIFM**”). The Fund has appointed means ACE & Company S.A., as investment manager (the “**Investment Manager**”).

The Fund promotes environmental and social characteristics pursuant to article 8 of SFDR and while it does not have as its objective a sustainable investment, it will have a minimum portion of 30% of sustainable investments.

This disclosure has been prepared in accordance with the requirements of article 10 of SFDR as supplemented by the Commission Delegated Regulation (EU) 2022/1288 of 6 April 2022 (the “**SFDR RTS**”).

#### A. Summary

##### *No Sustainable investment objective*

This financial product promotes environmental and social characteristics but does not have as its objective a sustainable investment it will have a minimum portion of 30% of sustainable investments. The Fund will consider principal adverse impacts on sustainability factors for the purpose of Article 7 of SFDR (“**PAI**”) and follows a comprehensive impact and ESG assessment which includes the application of proprietary ESG assessment tools tailored to the investment strategy for screening ESG risks and factors.

##### *Environmental or social characteristics of the Fund*

Through its investment strategy which its financial aim is to gain value by investing in high growth tech start-ups, the Fund promotes the following environmental and social characteristics:

- Mitigate climate change;
- Contribute to climate change adaptation;
- Promote decent work;
- Promote equality and non-discrimination at work;
- Promote adequate living standards and wellbeing for end-users; and
- Promote inclusive and sustainable communities and societies.

##### *Investment strategy*

The Fund is a venture capital fund investing in early-stage tech start-ups building next generation technologies and products, inside and outside of Switzerland.

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<sup>1</sup> Defined terms used in this disclosure (unless defined herein) are as set out in the private placement memorandum of the Fund (the “**PPM**”). Terms used in the summary have the same meaning as in the rest of this website disclosure.

Through the investment strategy of the Fund, ESG and sustainability considerations are systematically integrated into the Fund's investment analysis and decision-making process, including the integration of sustainability risks and the consideration of PAI.

#### *Proportion of investments*

By the end of the Investment Period, the Fund plans to allocate at least 50% of its assets to investments which are aligned with the environmental and social characteristics promoted by the Fund and a minimum of 30% of its assets to sustainable investments. The Fund may invest up to 50% of its total assets in other investments, which include companies that did not meet the criteria promoted by the Fund.

#### *Monitoring of environmental or social characteristics*

In order to measure the attainment of each of the environmental or social characteristics promoted by the Fund, the AIFM, and the Investment Manager use a combination of clear and measurable indicators made of: (i) GHG emissions avoided or reduced; and (ii) the PAI indicators referred to in Annex I of the SFDR RTS.

Adverse sustainability impacts of Portfolio Companies are monitored by the Investment Manager who will periodically collect financial, business, operational, ESG data from its portfolio companies, generally on quarterly, and annual cadences. Information on the PAI Indicators will be included and available as part of the annual report of the Fund.

#### *Methodologies*

The methodology for measuring how the environmental or social characteristics promoted by the Fund are met is based on the binding criteria which are applied to the selection of underlying assets as part of the Fund's investment decision making process.

#### *Data sources and processing*

The Fund obtains data to assess PAI indicators directly from the portfolio companies. Where the Investment Manager cannot reasonably obtain data for a particular PAI, the Investment Manager may use reasonable complementary assessments and estimates on the basis of information from other sources. These complementary assessments and estimates will be kept under review and updated as and when better quality data becomes available.

#### *Limitations to methodologies and data*

Limitations in both methodology and data include but are not limited to lack of industry standardization in respect of data and limited and inconsistent reporting by early-stage tech start-ups, the underlying portfolio companies.

#### *Due diligence*

In evaluating investment opportunities during the origination, due diligence process and ongoing monitoring, the Investment Manager assesses all investee companies on their potential to make a positive contribution to climate change mitigation or climate change adaptation, as well as a positive contribution towards the social characteristics of the fund. The Fund applies a target screening list of economic activities for their likelihood to align with the Fund's sector, data requirements and risk management safeguards.

#### *Engagement policies*

During the holding period, the Fund engages with the investee companies to help them reduce the adverse impacts of their business activities on sustainability-related controversies.

#### *Designated reference benchmark*

No index has been designated as a reference benchmark to meet the environmental or social characteristics promoted by the Fund.

#### *Alignment with the EU Taxonomy*

The Fund promotes Environmental and Social Characteristic and will make a minimum proportion of sustainable investments, but none of its investments will be aligned with the EU Taxonomy.

Hence, the minimum proportion of sustainable investments with an environmental objective aligned with the EU Taxonomy is 0%. Additionally, the Fund does not invest in fossil gas nor nuclear energy related

activities that comply with the EU Taxonomy. Hence, the minimum proportion of investment in fossil gas or nuclear energy related activities that comply with the EU Taxonomy is 0%.

## **B. No sustainable investment objective**

This financial product promotes environmental and social characteristics, and while it does not have as its objective a sustainable investment, it will have a minimum portion of 30% of sustainable investments within the meaning of Article 2(17) of SFDR.

For the Investments qualifying as sustainable in the meaning of SFDR, the Investment Manager assesses the portfolio companies against the mandatory principal adverse impacts on sustainability factors (“PAIs”) indicators, by setting qualitative and quantitative tests for each relevant indicator as follows:

- for certain indicators (e.g. “controversial weapons”) a binary pass/fail test is applied depending on whether the company has a relevant exposure or not;
- for certain indicators (e.g. “GHG intensity of investee companies”) quantitative thresholds are applied, generally on a relative basis to exclude the worst performers; and
- qualitative tests are also used for certain indicators, having regard to considerations such as whether the portfolio company has policies and procedures relevant to that indicator or controversies.

Therefore, each anticipated sustainable investment is tested by the Fund to address whether such investment harm any of the PAIs.

Guidelines and principles for minimum ESG safeguards are applied, along with the expertise of the Investment Manager, to ensure that investments made by the Fund are aligned with the principles set out in the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. In addition, the Investment Manager has identified a set of criteria to assess “good governance” of portfolio companies that take into account the early-stage nature of such businesses.

## **C. Environmental or social characteristics of the financial product**

In addition to its financial aim to gain value by investing in high growth tech start-ups, the Fund promotes the following environmental and social characteristics:

- (i) **mitigate climate change** by investing in companies that substantially contribute to the reduction of greenhouse gas (“GHG”) emissions, via their products or services. This includes companies developing technologies and products aimed at mitigating climate change by reducing greenhouse gas emissions. These start-ups operate in sectors such as: carbon removal, capture, storage and distribution (technology and nature-based solutions), carbon and GHG emissions tracking and offsetting, new energy technologies, energy optimization, food tech, sustainable transportation, restorative finance, low carbon alternatives of energy intensive products, energy optimization, renewables, data driven solutions for GHG emissions reduction, marketplace and other financial mechanisms for carbon credits purchasing among others;
- (ii) **contribute to climate change adaptation** to build resilience against the current effects of climate change and the predicted impacts in the future. This includes insurtech companies underwriting climate-related risks and reinsurance of climate risks, climate risk modelling software providers, among others.

((i) and (ii) the “**Environmental Characteristics**”)

- (iii) **promote decent work** by investing in companies that substantially contribute to ensure fair work conditions, ensuring pay levels for workers are set in a predictable and transparent way, providing excellent health and safety for workers, and running extensive programs for skills and life-long learning, job transition, and employment generation;

- (iv) **promote equality and non-discrimination at work** by investing in companies that contribute towards equal employment opportunities for women, particularly at board and management level or entrepreneurs, attract women and minorities to the workforce, and ensuring a living income for farmers;
- (v) **promote adequate living standards and wellbeing for end-users** by investing in companies providing and facilitating cybersecurity and protection of personal data privacy, engaging in responsible marketing practices, ensuring access to quality healthcare, healthy and nutritious food, good quality-housing and education and lifelong learning; and
- (vi) **promote inclusive and sustainable communities and societies** by investing in companies promoting or facilitating equality and inclusive growth by improving access for target populations and/or areas to basic economic infrastructure such as transport, telecommunications (including the internet), financial services, and electricity, creating and preserving decent jobs and promoting or facilitating local employment and local suppliers.

((iii), (iv), (v) and (vi) the **“Social Characteristics”**, together with the Environmental Characteristics, the **“Characteristics Promoted”**)

No reference benchmark has been designated for the purpose of attaining the Characteristics Promoted by the Fund.

#### **D. Investment strategy**

*Investment strategy used to meet the environmental or social characteristics promoted by the financial product*

The Fund is a venture capital fund investing in early-stage tech start-ups, building next generation technologies and products, inside and outside of Switzerland.

The scope of the investments of the Fund includes notably: Swiss-based startups, startups founded by Swiss entrepreneurs and Swiss-educated alumni, and startups with substantial operations in Switzerland including hirings from the technical universities in the country.

The Fund will invest in the following sectors:

- Climate Tech: this also coincides with the 30% sustainable investment with an environmental objective of the fund, the objective being climate change mitigation or climate change adaptation.
- Fintech: software and other technologies used to support or enable banking and financial services, particularly if underpinned by machine learning, blockchain, cloud computing, and big data.
- Artificial intelligence: enterprise software preferred, underpinned by native artificial intelligence technology.
- Deeptech: robotics, industrial automation, biotechnology, advanced materials and nanotechnology, quantum computing, space technology.

*Policy to assess good governance practices of the investee companies*

All investments are screened to exclude known violators of good governance practices. In addition, the Fund will assess whether the investee companies have adopted relevant corporate governance guideline to reinforce areas where good governance practices can be improved. The Fund will reference and apply this policy framework to guide its review for indicators of good governance across potential investments, as supplemented by additional third-party legal reviews where needed.

## E. Proportion of investments

<b>#1</b> Investments 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	50%
<b>#1A - Sustainable</b>	30%
<b>#1B - Other E/S characteristics – covers investments aligned with the environmental or social characteristics that do not qualify as Sustainable Investments</b>	20%
<b>#2</b> Other Investments that include the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as Sustainable Investments	50%

By the end of the Investment Period, the Fund plans to allocate at least 50% of its assets to direct investments which are aligned with the Characteristics Promoted and a minimum of 30% of its assets to sustainable investments. The Fund would look to have equity and/or equity related investments in the portfolio companies that would all be direct.

For the avoidance of doubt, the above percentage refers to the investments made by the Fund, however not including cash which is used for efficient liquidity and efficient portfolio management or cost management purposes which are not actually part of the investment portfolio. The cash will constantly fluctuate and will not affect the ESG profile of the Fund.

The above asset allocation planned does not apply during the Investment Period and the winding-up of the Fund.

## F. Monitoring of environmental or social characteristics

In order to measure the attainment of each of the environmental or social characteristics promoted by the Fund, the Investment Manager and the AIFM use a combination of clear and measurable indicators which will be the percentage of investments which pass the Investment Manager's qualitative or quantitative assessment to determine whether an Investment promotes the Environmental Characteristics and/or the Social Characteristics.

With respect to the Characteristics Promoted and the Investments considered as sustainable investments (*i.e.* climate change mitigation or climate change adaptation), the Investment Manager shall assess such investments against the below sustainability indicators:

### **Characteristics Promoted / Sustainability Indicators** **Sustainable Investments**

#### **Climate change mitigation (sustainable investments)**

The main indicator used by the Investment Manager to measure and assess the attainment of the contemplated portion of sustainable investments in

respect with climate change mitigation is GHG emissions avoided, reduced or removed (“**Scope 4 emissions**”).

Given the heterogeneity of the portfolio, the Fund considers that a portfolio company qualifies to contribute on these criteria among the Fund’s Investments if:

- for portfolio companies in the carbon capture, removal and storage space: the portfolio company’s products remove GHG emissions from the environment;
- for portfolio companies in the climate offsetting and tracking: the portfolio company’s products offset GHG emissions or monitor and consequently help clients reduce their GHG emissions;
- for portfolio companies providing enabling technologies: the portfolio company’s products directly enable other activities to make a substantial contribution towards GHG emissions reductions. Examples: energy optimization or energy efficiency technologies; and
- for all the other sectors, we consider portfolio companies that reduce GHG emissions by displacing existing products and solutions with low-carbon solutions. Examples are renewable vs fossil fuel generated energy, conventional materials vs sustainable materials, traditional vs plant-based foods, etc.

If a portfolio company qualifies as contributing to the reduction and offsetting of GHG emissions, then the amount invested in such portfolio company will be used in the calculation of the proportion of sustainable investment (i.e pass/fail approach).

As a result, if a portfolio company does not qualify, then this participation counts for 0% to the Fund’s sustainable investments with respect to climate change mitigation.

### **Climate change adaptation (sustainable investments)**

Given the heterogeneity of the sector and the different type of businesses that are contributing to climate change adaptation, the Fund will measure contributions to climate change adaptation using the following sustainability indicators, according to the sector of the portfolio companies considered:

- For insurtech companies: the contract value of climate-related risks and reinsurance of climate risks, aimed at insure, reinsure and ultimately increase recovery speed following natural disasters caused by climate change; or

- For climate risk modelling software providers, or other software providing information and decision-making relating to climate risk: inclusion of data to include future climate risks in decision-making; or
- For companies active in building infrastructure resilience and adaptability to climate change: Water conserved, or repairs (in pecuniary value) or reliability of service (in days without disruption) - depending on the type of infrastructure considered, like power, transport and communication systems.

The Investment Manager may refer to other sustainability indicators depending on the focus of the portfolio companies and sectors covered.

If a portfolio company qualifies as contributing to climate change adaption, then the amount invested in such portfolio company will be used in the calculation of the proportion of sustainable investment (i.e. pass/fail approach).

As a result, if a portfolio company does not qualify, then this participation counts for 0% to the Fund's sustainable investments with respect to climate change adaptation.

**Decent work**

The indicators used by the Investment Manager to measure and assess the attainment of the promotion of decent work are related to social and employee matters listed in the PAIs. The Fund aims at investing in portofolio companies with:

- workplace accident prevention policies;
- supplier code of conduct;
- grievance/complaints handling mechanism related to employee matters; and
- whistleblower protection.

**Equality and non-discrimination at work**

The indicators used by the Investment Manager to measure and assess the attainment of the promotion of equality and non-discrimination at work are related to social and employee matters listed in the PAIs. The Fund aims at investing in portofolio companies with:

- no incidents of discrimination;
- no Excessive CEO pay ratio;
- adjusted gender pay gap; and
- board gender diversity.

**Adequate living standards and wellbeing for end-users**

The indicators used by the Investment Manager to measure and assess the attainment of the promotion

of adequate living standards and wellbeing for end-users are related to social and human rights matters. The Fund aims at investing in portfolio companies with:

- processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises;
- human right policy;
- no significant risk of incidents of child labour;
- no significant risk of incidents of forced or compulsory labour; and
- no case of severe human rights issues and incidents.

### **Inclusive and sustainable communities and societies**

The indicators used by the Investment Manager to measure and assess the attainment of the promotion of inclusive and sustainable communities and societies are related to social and human rights matters listed in the PAIs. The Fund aims at investing in portfolio companies with:

- no exposure to countries subject to social violations;
- no incident of discrimination;
- no case of severe human rights issues and incidents;
- high freedom of expression score; and
- low income inequality score.

Regarding the investments that either promote the Characteristics Promoted or that are considered sustainable investments, the Investment Manager (as internal control) will periodically collect financial, business, operational, ESG data from its portfolio companies, generally on quarterly, and annual cadences. In certain instances, the Investment Manager will have enhanced access to portfolio company materials, including board presentations, strategy documents, and proprietary customer data. The Investment Manager expects to use this information, where permissible and where deemed appropriate, to help proactively monitor the performance of its portfolio companies, manage risks, and identify opportunities for value add. These ESG topics are subject to review and change and it is anticipated they will take account of regulatory and market standards, and data availability.

The Investment Manager does not involve external audit firms in the monitoring of environmental or social characteristics.

## **G. Methodologies**

The methodology for measuring how the environmental or social characteristics promoted by the Fund are met is based on its binding investment strategy, as outlined below.

As part of its due diligence and ongoing monitoring, the Investment Manager assesses all investee companies on their potential to make a positive contribution to climate change mitigation or climate change adaptation.



In order to attain each of the Characteristics Promoted by the Fund, binding criteria are applied to the selection of underlying assets as part of the investment decision making process. The selection criteria may not be disapplied or overridden by the Investment Manager.

During the due diligence phase performed by the Fund to source Investments, an investment candidate:

- Needs to be willing to communicate and share information regarding the relevant ESG metrics and risk factors; and
- Cannot be responsible for a breach of human rights in the past three (3) years, as stated in the UNGC principles and OECD Guidelines; and
- where applicable, sells products that either reduce GHG emissions, offset GHG emissions, directly enable other activities to make a substantial contribution towards GHG emissions reductions, or build awareness, adaptability, and resilience with regard to climate change.

An enhanced framework is then applied to sustainable investments (in relation to climate change mitigation or climate change adaptation), which requires investments to be assessed through binding criteria (which incorporate quantitative KPIs for tracking positive climate change mitigation or climate change adaptation contribution, and the “do not significant harm” test for sustainable investments under the SFDR).

The Fund will firstly assess prospective investment opportunities for their likelihood to align with the Fund’s sector, data requirements and risk management safeguards (“screening”). The investment strategy focuses on technologies that deliver or have the potential to deliver sustainable outcomes by enabling enterprises and consumers to meaningfully prevent or reduce the emission of GHGs into the environment.

During the due diligence phase, the Fund will then conduct a deeper analysis of the investment opportunity against the criteria described below to assess whether the investment can be appropriately classified as a sustainable investment:

### **Sustainable Investments**

#### **Climate change mitigation**

The Fund will measure contributions to climate change mitigation using the sustainability indicators defined above. The Investment Manager may refer to other sustainability indicators depending on the focus of the specific portfolio company and sectors covered.

#### **Climate change adaptation**

The Fund will measure contributions to climate change adaptation using the sustainability indicators defined above. The Investment Manager may refer to other sustainability indicators depending on the focus of the specific portfolio company and sectors covered.

### **H. Data sources and processing**

#### *Data sources used to attain each of the environmental or social characteristics promoted this financial product*

The data sources used to measure and attain the E/S characteristics promoted by the Fund consist of the results provided through the regular monitoring of the indicators described in section "Methodologies", above.

The Fund obtains data to assess PAI indicators directly from the portfolio companies.

#### *Measures taken to ensure data quality*

The Fund uses data collected from portfolio companies, and, where actual data is not available, has developed techniques to estimate data to ensure that it can assess and monitor alignment with the E/S characteristics promoted by the Fund, as described in the following paragraphs.

### *Process of Data*

In respect of data processing, once the Fund receives ESG data, the Fund performs its own internal process in an attempt to ensure accuracy and completeness, and proactively follows up with portfolio companies if the Fund identifies significant discrepancies or needs more information to improve the quality or completeness of the data.

### *Proportion of Estimated Data*

Whilst the Fund seeks to obtain as much actual data as possible from the portfolio companies, where the Investment Manager cannot reasonably obtain data for a particular PAI, the Investment Manager may use reasonable complementary assessments and estimates on the basis of information from other sources. These complementary assessments and estimates will be kept under review and updated as and when better quality data becomes available.

A % of the ESG data reported might be estimated depending on the quality and availability of the data provided.

## **I. Limitations to methodologies and data**

### *Limitations to the methodologies and data sources*

Limitations in both methodology and data include but are not limited to lack of industry standardization in respect of data and limited and inconsistent reporting by early-stage tech start-ups, the underlying portfolio companies.

### *How such limitations do not affect the environmental and social characteristics promoted by the Fund*

The Investment Manager's adoption of these data estimate methods ensures that the limitations in collecting data does not impact the alignment with the E/S characteristics promoted by the Fund and the sustainable investments the Fund intends to make.

Notwithstanding the challenges in data collection as described above, measures to find efficiencies and improve data collection methodologies will be deployed by the Fund.

Sustainability factors continue to evolve and therefore methodologies and how data are collected are periodically reviewed.

## **J. Due diligence**

In evaluating investment opportunities during the origination / due diligence process, the Fund applies a target screening list of economic activities for their likelihood to align with the Fund's sector, data requirements and risk management safeguards.

The objective of the sustainable investments of the Fund is to mitigate and adapt climate change by investing in companies that substantially contribute to the reduction of GHG emissions, via their products or services.

- In order to measure the attainment of each of the environment or social characteristics promoted by the Fund, the AIFM, and the Investment Manager use a combination of clear and measurable sustainability indicators made of: (i) GHG emissions avoided or reduced; and (ii) the PAI indicators referred to Annex I of the SFDR RTS as described below: for certain indicators (e.g. "controversial weapons") a binary pass/fail test is applied depending on whether the company has a relevant exposure or not;
- for certain indicators (e.g. "GHG intensity of investee companies") quantitative thresholds are applied, generally on a relative basis to exclude the worst performers; and
- for certain indicators actions, controls or targets might be established to ensure that the investee companies do not harm the concerned indicators at time of investment and on a continuous basis. These controls, actions or targets shall be subject to continuous review to address potential changes related to the investee companies (e.g. "investee companies' size"), as well as changes related to sustainability matters or any other factors that may affect their pertinence.
- qualitative test are also used for certain indicators, having regard to considerations such as whether the portfolio company has policies and procedures relevant to that indicator or controversies.

Therefore, each anticipated sustainable investment is tested by the Fund to address whether such investment harm any of the following PAIs:

- 1) GHG emissions.
- 2) Carbon Footprint.
- 3) Weighted average GHG intensity of investee companies.
- 4) Exposure to companies active in the fossil fuel sector.
- 5) Share of non-renewable energy consumption and production.
- 6) Energy consumption intensity per high impact climate sector.
- 7) Activities negatively affecting biodiversity-sensitive areas.
- 8) Emissions to water.
- 9) Hazardous waste and radioactive waste ratio.
- 10) Violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises.
- 11) Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact and OECD Guidelines for Multinational Enterprises.
- 12) Unadjusted gender pay gap.
- 13) Board gender diversity.
- 14) Exposure to controversial weapons.

#### **K. Engagement policies**

After the initial closing, the Fund's engagement policy ("Engagement Policy") will be available to investors upon request.

#### **L. Designated reference benchmark**

No index has been designated as a reference benchmark to meet the environmental or social characteristics promoted by the Fund.

#### **M. Alignment with the EU Taxonomy**

The Fund promotes Environmental and Social Characteristic and will make a minimum proportion of sustainable investments, but none of its investments will be aligned with the EU Taxonomy, although the Fund promotes two environmental objectives (i.e., climate change mitigation and climate change adaptation) that coincides with two of the six environmental objectives in the EU Taxonomy.

Hence, the minimum proportion of sustainable investments with an environmental objective aligned with the EU Taxonomy is 0%. Additionally, the Fund does not invest in fossil gas nor nuclear energy related activities that comply with the EU Taxonomy. Hence, the minimum proportion of investment in fossil gas or nuclear energy related activities that comply with the EU Taxonomy is 0%.

## A. Résumé – Français

### *Pas d'objectif d'investissement durable*

Ce produit financier promeut des caractéristiques environnementales ou sociales, mais n'a pas pour objectif l'investissement durable. Cependant, le Fonds investira au moins 30% en investissement durable.

Le Fonds prendra en compte les principales incidences négatives de ses investissements sur les facteurs de durabilité en vertu de l'article 7 du règlement SFDR (« PIN ») et l'intègre dans son analyse et son évaluation complète d'ESG et de durabilité selon une grille d'évaluation propriétaire créée pour les besoins de la stratégie d'investissement dans le cadre de la revue des risques et facteurs ESG.

### *Caractéristiques environnementales ou sociales du Fonds*

A travers sa stratégie d'investissement qui a pour but de créer de la valeur en investissant dans des start-ups technologiques à forte croissance, le Fonds promeut les caractéristiques environnementales et sociales suivantes :

- Atténuer le changement climatique ;
- Contribuer à l'adaptation au changement climatique ;
- Promouvoir le travail décent ;
- Promouvoir l'égalité et la non-discrimination au travail ;
- Promouvoir des standards de vie adéquates et de bien-être pour les utilisateurs finaux ; et
- Promouvoir des villes et communautés inclusives et durables.

### *Stratégie d'investissement*

Le Fonds est un fonds de venture capital qui a pour but d'investir dans des sociétés start-ups technologiques à un stade précoce, qui veulent créer la nouvelle génération de produits et de technologies, dans et en dehors de la Suisse.

A travers la stratégie d'investissement du Fonds, les critères d'ESG et de durabilité sont systématiquement intégrés dans le processus de décision d'investissement du Fonds, tel que l'intégration des risques de durabilité et la prise en compte des PIN.

### *Proportion d'investissements*

A la fin de la période d'investissement, le Fonds prévoit d'allouer au moins 50% de son portefeuille à des investissements qui sont alignés sur les caractéristiques environnementales et sociales promues par le Fonds et au moins 30% du portefeuille à des investissements durables. Le Fonds a la possibilité d'investir jusqu'à 50% de son portefeuille dans d'autres actifs, incluant des sociétés qui ne respectent pas les critères promus par le Fonds.

### *Suivi des caractéristiques environnementales ou sociales*

Pour mesurer l'atteinte de chacune des caractéristiques environnementales et sociales promues par le Fonds, l'AIFM et le Gestionnaire du Fonds utilisent une combinaison d'indicateurs clairs et mesurables composés de : (i) réduire ou éviter les émissions de gaz à effet de serre et (ii) appliquer les indicateurs PIN selon les normes techniques de réglementation (RTS) visées à l'annexe 1 du règlement SFDR.

Les impacts défavorables en termes de durabilité des entreprises du portefeuille sont surveillés par le gestionnaire du Fonds, qui collectera périodiquement des données financières, commerciales, opérationnelles et ESG de ses entreprises du portefeuille, généralement de manière trimestrielle et/ou annuelle. Les informations sur les indicateurs PIN seront incluses et disponibles dans le cadre du rapport annuel du Fonds.

### *Méthodologies*

La méthodologie pour mesurer comment les caractéristiques environnementales ou sociales promues par le Fonds sont respectées repose sur des éléments contraignants établis à la sélection des actifs sous-jacents dans le cadre du processus de décision des investissements du Fonds.

### *Sources et traitement des données*

Le Fonds collecte les données directement auprès des sociétés en portefeuille afin d'évaluer les indicateurs PIN. Lorsqu'il ne serait raisonnablement pas possible d'obtenir des données sur un PIN en particulier, le gestionnaire de Fonds pourra utiliser avec un effort raisonnable des analyses supplémentaires ou recourir à des estimations en s'appuyant sur d'autres sources de données. Ces analyses supplémentaires et estimations seront conservées et revues périodiquement, et mises à jour dès que des données plus précises deviennent disponibles.

### *Limites des méthodologies et des données*

Il existe des limites quant à la méthodologie et aux données des sociétés start-ups du portefeuille, tant par l'absence de normes communes au niveau de l'industrie en ce qui concerne les données, que la limitation de celles-ci ainsi que la disparité dans les rapports fournis par les start-ups technologiques au premier stade de leur développement.

### *Due diligence*

En examinant les opportunités d'investissement au cours du sourcing, du processus de Due Diligence et du maintien en portefeuille, le Gestionnaire de Fonds évalue chaque société en portefeuille selon leur potentiel à contribuer de manière positive sur l'atténuation du changement climatique et l'adaptation au changement climatique, ainsi que leur contribution positive aux caractéristiques sociales promues par le Fonds. Le Fonds utilise une liste de référence afin de sélectionner les activités économiques qui ont la possibilité de se rapprocher du secteur du Fonds, des données requises, et une gestion appropriée de protection des risques.

### *Politiques d'engagement*

Durant la période de détention, le Fonds s'engage auprès des sociétés en portefeuille pour les aider à réduire les impacts négatifs de leurs activités professionnelles.

### *Indice de référence*

Le Fonds n'a pas recours à un indice de référence pour répondre aux caractéristiques environnementales ou sociales promues par le Fonds.

### *Alignement avec la Taxinomie de l'UE*

Le Fonds promeut des caractéristiques environnementales et sociales et investira une certaine proportion de ces investissements dans des investissements durables, sans pourtant que ces investissements ne soient alignés sur la Taxinomie de l'UE. Ainsi, l'alignement minimal des investissements durables du Fonds sur la Taxinomie est de 0 %. Qui plus est, le Fonds n'investit pas dans les domaines du gaz fossile ni de l'énergie nucléaire qui sont alignés avec la Taxinomie de l'UE. Ainsi l'alignement minimal des investissements dans les activités en lien avec le gaz fossile ou les énergies nucléaires sur la taxinomie de l'UE est de 0%.