CAPZA

Responsible Investment Policy

July 15, 2025

PARIS | MUNICH | MADRID | MILAN| AMSTERDAM

A. CAPZA'S STRATEGY AND GOVERNANCE ON SUSTAINABILITY

1. Our Strategy

Sustainable development has been a major concern for CAPZA for many years. We began our ESG adventure by signing the PRI (United Nations Principles for Responsible Investment), over 10 years ago now (in 2011). At the time, we were among the first to publicly commit to taking extra-financial criteria into account in the analysis of our investments. As early as 2016, we introduced an extrafinancial reporting and an annual analysis of the extrafinancial risk and maturity of our portfolio companies with the help of Reporting 21 a Leading ESG & sustainability-focused SaaS platform and consultancy. As part of our fiduciary duty, ESG criteria and risks were fully integrated at each step of the investment process.

Today, the term "ESG" has expanded to cover the search for "sustainability". From a vision focused on risks, we have moved on to the search for financial value creation and impact.

To maximize our impact we instill sustainability and impact in CAPZA's 4 domains of actions : providing sustainable solutions to our investors, supporting our portfolio companies, leading by example, collaborating with our ecosystem

Our 4 pillar approach to sustainability holds us as a management company to the same standards on our 3 sustainability priorities as our portfolio.

Although our approach to sustainability is holistic especially when it comes to risks, we defined three priorities to drive positive impact. These priorities are translated into specific targets for our portfolio and for CAPZA.

PORTFOLIO

	Targets	As of 2024
Cabon neutrality	Gradual alignment on a 1.5 C° trajectory	In progress
	Commitment to align with Net Zero in all our investments in equity funds	Achieved
	0% portfolio companies with very high risk on climate	Achieved
	70% amount invested in Equity funds on a net zero trajectory by 2030	63%
	50% amount invested in Debt funds on a net zero trajectory by 2030	23%
	100% of companies (equity) with average or higher risk on climate implement an action plan aligned with Net Zero by end of 2025	In progress
Biodiversity and water preservation	0% portfolio companies with very high risk on biodiversity or water	Achieved
	100% of companies (equity) with average or higher dependency or impact on biodiversity implement responsible purchasing by end of 2025 and action plan aligned with Kunming-Montreal global biodiversity framework by 2030	In progress
	100% of companies (equity) with average or higher impact or dependance on water implement water management policy by end of 2025	In progress
Inclusion and Value sharing	Within 2 years after investing (equity), at least one independent member, trying to increase board diversity.	In progress
	30% seats on Executive committees in companies with more than 500 employees held by women by 2030	In progress
	Promote employee shareholding	In progress

MANAGEMENT COMPANY

	Targets	As of 2024
Cabon neutrality	5% decarbonization per FTE and per year	-14,2%
	Provide climate training (La fresque du climat) to all employees and offer them to become facilitators	92% employees trained 13 facilitators
Biodiversity and water preservation	Implementation of a waste treatment solution with customized reporting	Achieved
	Limit the use of nonessential plastics	Achieved
Inclusion and Value sharing	A large Majority of employee shareholders	Achieved
	More than 30% seats on Executive committee held by women	45%
	Gender equality Index over 85 (Penicaud-Schiappa)	86
	30% women partners and 40% women in investment teams by 2030	16% women partners 28% women in investment

Decarbonisation: we are committed to better analyzing climate risks and contributing to carbon neutrality by 2050.

As an investor, for this purpose, we identify the materiality of climate risks before investment, we engage the company and the shareholders to decarbonize in line with Net Zero in the shareholders agreement and promote sustainability linked bond and equity with sustainability performance targets on climate, we finance a carbon diagnostic or footprint when needed, we monitor the climate risks and the energy management in the holding period, we provide training on climate, and we discuss action plan with the management.

Biodiversity & water preservation : we are committed to better analyzing nature related risks and impacts and contribute to preservation of the ecosystems especially water.

As an investor, for this purpose, we identify the materiality of nature related risks before investment, we promote sustainability linked bond and equity with sustainability performance targets on biodiversity, we monitor the biodiversity and the supply chain risks in the holding period, we provide training on biodiversity and water, and we discuss action plan with the management.

Inclusion and value sharing: we are committed to promote inclusion and profit sharing.

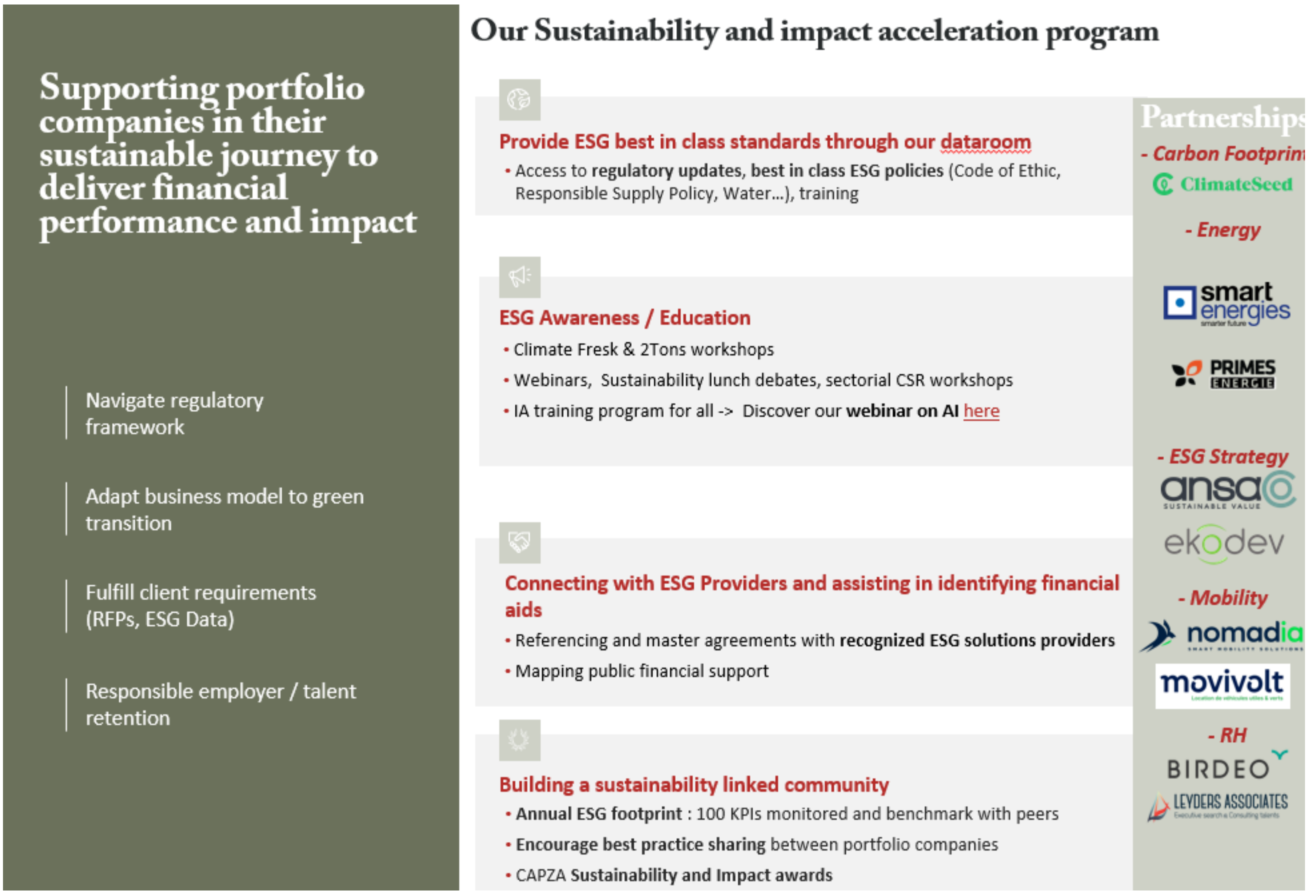
As an investor, for this purpose, we identify social risks, we promote sustainability linked bond and equity with Sustainability performance targets on social characteristics, we monitor social risks (employment, working conditions, training, social dialogue, equality and diversity) during the holding period , we provide training, and we discuss action plan with the management.

a. Support our portfolio companies

As a shareholder or lender, we are committed to helping companies create financial and extrafinancial value during our holding period.

– We can support companies in the development and implementation of sustainability roadmaps and monitor their progress.

– We seek to align interest by integrating sustainability performance targets in transaction structuring whether it is financing instruments or management incentive structures.



b. Provide sustainable investment solutions to our investors

We seek to embed sustainability at every stage of our investment process. All our funds are classified as Article 8 or 9.

We can offer investors tailor-made sustainable solutions:

- Flex equity Mid Market II: CAPZA launched a mid-cap LBO fund aiming to support companies in accelerating their growth internationally and decarbonize in line with Carbon neutrality in 2050 so that they can seize the opportunities and be "best in class" by the time they exit the fund. To achieve its objective,
  - CAPZA ensures that CSR governance and significant alignment of interests related to ESG and decarbonisation are put in place at the time of investment
  - CAPZA provides the company with financial and human resources to define and implement its CSR and decarbonisation roadmap
  - ESG is fully integrated into CAPZA's investment process, and our Head of Sustainability & Impact is a voting member of our investment committee
  - The fund has an ambitious carbon intensity reduction target of between 5% and 7% per year. 20% of carried interest is linked to the fund's extra-financial performance, which includes both the successful implementation of the ESG process and achieving a minimum decarbonisation rate for the fund (decarbonisation hurdle).
- MAIF Dette à Impact environmental: MAIF, a leading French insurer with 15 years commitment to responsible investment has chosen to entrust CAPZA and its subsidiary Artemid with the management of a

dedicated evergreen Article 9 environmental impact senior debt mandate aiming to support companies in their decarbonization in line with Carbon neutrality in 2050. This fund has the following characteristics:

- It targets companies with good governance and the willingness and ability to contribute to carbon neutrality and more generally to improve their environmental impact
- It supports companies in pursuing a decarbonation path in line with carbon neutrality by 2050, with a significant bonus/malus incentive system for the pricing of loans granted (sustainability/decarbonation linked loans or bonds)
- It leads management teams to establish and implement a proper roadmap to progress in each of the ESG areas.
- It contributes to the emergence, around MAIF, of a group of companies sharing a genuine desire for sustainability and concrete objectives to achieve carbon neutrality
- An innovative impact bonus depending on the achievement of the fund's impact goals has been created under CAPZA's impulse

We deliver high quality ESG reporting with a measurement and a monitoring of our impact

c. Leading by example

We seek to apply to ourselves the same standards of transparency, alignment of interest and transformation levers as those we request from portfolio companies.

For example, we have set a decarbonization target of reducing emissions by 5% per full-time equivalent (FTE) for our own operations. In addition, at the end of 2022, we offered all employees access to equity and free shares, enabling them to benefit from the value created by the sale to AXA IM in 2024.

Our CSR committee, *CAPZA for Good*, defines, supports, and leads all of CAPZA's CSR and impact initiatives. It is responsible for continuously improving our CSR practices at the management company level. We monitor our ESG performance and carbon footprint annually and update our internal roadmap accordingly to ensure continuous progress and alignment with our sustainability objectives.

d. Collaborate with our ecosystem

We share our vision of sustainability in higher education and industry conferences.

We develop a sustainability-linked community and seek to facilitate cross fertilization.

We are involved in various industry groups, and we promote ESG best practices when we act as co-investor or lender

2. Our Governance

a. Globally

i. Sustainable and Impact team

We have a dedicated team headed by Aurore Gauffre (Sustainability and Impact Partner). She is in charge of defining and steering our ESG strategy.
She is supported by one sustainability & impact associate Yasser Sael and two Sustainability & Impact analysts, Solenn Deluche, Hugo Villain and a Sustainability & Impact intern
CAPZA's ESG and CSR strategy concerns all our teams, and its successful implementation depends on the mobilization of all our expertise. Cross-functional teams (Investor relations, Compliance, Product, Legal, Communication) are heavily involved in the implementation of our ESG and CSR policies.

b. On ESG

ii. ESG referents

The Sustainability and impact team relies on a network of ESG referents from each of the investment teams. The appointment of a dedicated ESG referent within each investment team enables our ESG strategy to be disseminated within each investment strategy, and our best practices to emerge and converge. A monthly meeting is organized between the sustainability and impact team and the ESG referents.

iii. ESG Committees

To monitor the implementation of our strategy, CAPZA organizes two types of ESG committees per year:
1. The CAPZA Global ESG Committee meets twice a year:

- One Committee is focused on the update of CAPZA's ESG strategy and processes, as well as CSR & ESG regulations, frameworks and initiatives. It also serves to validate the scope of reporting for the coming year.
- One Committee is focused on the presentation of the results of the annual ESG Reporting campaign and update on the ESG strategy and policy.

2. Each Equity Strategy has its own dedicated ESG Committee, which convenes at least annually to thoroughly assess the non-financial performance of the corresponding fund. This in-depth review serves as the basis for formulating management strategies and action plans for the companies in the portfolio.

Funds committed to a minimum of 30% sustainable investments as defined by SFDR are also subject to stringent oversight by an Impact Committee, augmented by an independent third-party entity. This collaborative effort ensures meticulous monitoring of non-financial performance metrics and facilitates informed decisions regarding supplementary measures.

c. On CSR

iv. CAPZA4GOOD : our CSR Committee

Established in 2019, the committee is responsible for improving corporate responsibility practices within

CAPZA.

In 2022, we endowed this committee with robust governance structures and substantial resources. Comprising up to 14 voting members nominated by the Management Board, the CAPZA for Good Committee ensures representation across various functions and regions. Meetings are convened as necessary and, at a minimum, biannually.

In 2024, we launched our Philanthopric program "Contribute to an Inclusive Finance by Promoting a More Inclusive Financial Sector and Financial Education for Everyone.' This program is implemented in partnership with CITECO and the Fondation Florence.

d. Integration of ESG in the remuneration policy

Sustainability risks are integrated into our compensation policy. We link the variable component of all CAPZA employees' remuneration to sustainability targets. ESG objectives account for about 15% of investment officers' variable remuneration, based on the following criteria and taking into account the strategy (equity or debt)

- Completion of the "IBF accredited Introduction to CSR and ESG Investing" certification
- ESG-climate analysis in one-pagers and IC memos
- ESG-clause and ESG-related incentives included in LOI
- External ESG due diligence with a roadmap for investments with high materiality (as assessed during the OP process)
- Engagement with the portfolio companies (PCs) in ESG reporting campaigns
- Inclusion of the decarbonation clause in the SHA
- Structuring Financing or Management Packages with ESG objectives
- Implementation of Climate Fresk workshops
- Carbon footprint assessment
- Participation in ESG committees and training sessions

e. Training

Staff training and awareness-raising are essential to the successful implementation of an ESG policy. CAPZA's teams receive ongoing training on sustainability issues. Training can take various forms: workshops, training courses, exchanges with the Sustainability and Impact team and external speakers.

B. ESG INTEGRATION IN THE INVESTMENT PROCESS

1. Preinvestment

a. Exclusion policy

First, the investment teams verify the compliance with CAPZA's exclusion policy. Our exclusion policy is built to avoid activities that significantly harm climate and biodiversity or raise severe ethical issues and is based on different types of exclusions and restrictions:

- Norm based exclusions: this category includes illegal economic activity and activity that results in severe breach of international standards, conventions, norms or protocols to which France is a signatory including UN Global compact.
- Sectorial exclusion and restriction concerning environmental commitments focusing on climate change and biodiversity: (i) thermal coal activities; (ii) conventional and unconventional fossil fuels exploration, development and production; (iii) extraction, production and distribution of palm oil and wood pulp, active contribution to deforestation; the trade of unauthorized plant or animal species or products governed by the "CITES", Land grabbing practices or the development of farming projects in national parks considered as protected areas, activities that generates more than 5% of its consolidated revenues in products containing polychlorinated biphenyls, asbestos fibers, drift nets over 2.5 kilometers in length, activities that focuses substantially on production and trade in pesticides.
- Sectorial exclusions and restrictions concerning social commitments: production and trade of tobacco related products and services (representing more than 5% of the company's consolidated revenues), production and trade of weapons (such restrictions do not apply to the extent such activities are part of or accessory to explicit European Union policies), gambling activities, pornography, recreational drug use, human cloning.

The details and definitions of the exclusion policy are available in the appendix

b. Screening

The investment teams then assess the materiality of sustainability issues based on a processed screening.

- an analysis of controversies, which may lead to the investment process being stopped
- an identification of sustainability risks and opportunities based on SASB framework
- an internal scoring based on the PAI and other criteria
- a list of predefined high stakes sectors (Agriculture, Forestry and Fishing; Mining and Quarrying; Manufacturing; Energy; Water Supply, Sewerage and Waste Management; Construction; Wholesale and Retail; Transport and Warehousing; Accommodation and Food Services; Real Estate; Healthcare). This list includes sectors with high impact on the environment.

Whether the stakes are deemed significant or not after the screening, two distinct procedures of due diligence followed.

A minimum ESG rating of 10 out of 20 is required

c. Due diligence

Debt

- **When the ESG challenges or opportunities are identified as significant,** Detailed due diligence is carried out by the Sustainability & Impact team, including discussions with the management or/and sponsor of the target company. The in-depth ESG analysis covers climate (physical and transitional) and biodiversity risks, as well as potential and contingent PAIs.
- **When the ESG challenges or opportunities are identified as non- significant** , the investment team conducts an ESG double materiality analysis covering PAIs, using SASB analysis frameworks and external and internal tools.
- The Altitude tool, developed by AXA climate, which enables a climate and biodiversity analysis based on sector and location data, is also used.
- An analysis of the sponsor's PRI rating and, where applicable, a summary of the sponsor's ESG due diligence report are included in the investment memorandum..

Equity

- **When the ESG challenges or opportunities are identified as significant** , Detailed due diligence is carried out with a third party, including discussions with the management of the target company. The analysis covers climate (physical and transitional) and biodiversity risks. A preliminary ESG roadmap is drawn up and included in the investment memorandum. Where possible, we integrate the investments and costs required to implement the ESG roadmap and value creation opportunities into our business plan.
- When ESG challenges or opportunities are identified as non-significant, the investment team performs a double materiality analysis, covering Principal Adverse Impacts (PAIs), using SASB frameworks and both internal and external tools
- The Altitude tool, developed by AXA climate, which enables a climate and biodiversity analysis based on sector and location data, is also used.
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d. Engaging from the transaction

Since July 2023, in investments in Equity strategies, we are systematically integrating general ESG provisions and a specific net zero provision, engaging the company to align with Net Zero by 2050.

In Equity and Debt, we seek to integrate ESG targets in the pricing mechanism of the transactions, whether it is in the pricing of the debt or in the management package.

We are seeking to integrate ESG considerations into our short-term plan

2. Investment period: monitor and accelerate

a. Sustainability and Impact acceleration program

We have defined a process to catalyze our impact. We have built a proper internal expertise to support our portfolio companies in the achievement of their Sustainability roadmap. In addition, we are relying on an ecosystem of partners who are committed to support our companies in priority and at advantageous condition. Depending on the strategies and our role in the governance, our ability to influence and implement differ. Our approach during the investment period is based on the following key steps:

1. ESG Questionnaire: in the context of the annual ESG reporting, each Portfolio Company is asked to answer a questionnaire with more than 100 questions covering Sustainability Risks and impacts, including the 14 mandatory and 2 optional PAIs of the SFDR regulation.
2. Annual ESG analysis carried out by a third party: based on the sector, the answers to the above questionnaire and on exchanges and meetings with the Management, with the objective of assessing annually the company's sustainability risks regarding sixteen (16) issues, classified in three general ESG themes (environmental, social and governance) and to produce a unique ESG scoring.
3. An annual ESG Factsheet is prepared for each Portfolio Company covering the analysis described above as well as an action plan to improve sustainability policies and practices, to achieve CAPZA and the fund's ESG objectives and Characteristics. A working session is organized with the portfolio companies to discuss the ESG analysis. The ESG factsheet is shared and discussed during a Board meeting.
4. Acceleration program developed by CAPZA covering access to our sustainability and impact dataroom, provision of best-in-class standards and policies, regular training, top ESG providers, dedicated events.
5. Annual reporting and monitoring at the fund level of the extrafinancial performance of the fund and an analysis of the improvements made by the Fund towards the ESG characteristics of the fund and an explanation of why the promotion of ESG characteristics or the Sustainable objective have been or not been met.

b. Specificities according to strategies

For funds with an objective to invest more than 30% in sustainable investments, an impact committee is implemented. The Impact Committee will decide and implement remedial actions in case of trajectory deviation, such as organising meetings with the CEO, resolutions to the board, equity capex line and increasing the staff dedicated to corporate social responsibility. The consolidated ESG reporting will be presented and discussed in front of the Impact Committee.

For our fund Growth Tech, we are integrating specific questions in our due diligence and reporting to integrate specificities from the sector.

c. Monitoring ESG risks and impacts

We monitor ESG risks in our portfolio on an annual basis. We measure the risk related to 16 extrafinancial issues such as Climate, Biodiversity, training, social dialogue, governance by giving to each issue a risk score out of 5. This risk score is the result of the difference between the issue level and the maturity level.

● The issue is scored in relation to the company's size, business sector, countries of operation, reported data, and to a lesser extent in relation to other companies in the portfolio.

● The maturity score identifies a company's level of commitment and awareness.

● The greater the gap between the issue level and the maturity level, the greater the ESG risk for the given issue.

● Based on each rating, CAPZA assigns an overall score out of 100. End of 2024, ESG ratings for CAPZA holdings ranged from 31 to 93, with an average of 76.

We have established a process for identifying and managing significant risks.

- If an ESG risk is greater than 4 for a company, the information is shared to the risk and compliance committee and to the partner responsible for the investments to discuss and find mitigation actions. The information is shared to the Board at least annually.
- We are engaging with all our companies to decrease the risk for each issue.

i. Climate

We are committed to have 0 % portfolio companies with very high risk on climate

We help the companies to increase awareness on those matters by offering training and promoting the implementation of an environmental policy.

For every new investment in equity strategies, we are integrating a commitment from the company and the shareholders to make its best efforts to decarbonize in line with Net Zero by 2050.

We are engaging to have **100%** of companies (equity) with average or higher risk on climate implement an action plan aligned with Net Zero by end of 2025.

ii. Biodiversity and water

We are committed to have 0 % portfolio companies with very high risk on biodiversity or water

We help companies raise awareness on these matters by promoting training, encouraging the implementation of a responsible purchasing policy, and supporting the adoption of water-saving solutions and a water policy we have developed to reflect the highest standards.

We are engaging to have 100% of portfolio companies (equity) with average or higher dependency or impact on biodiversity implement responsible purchasing by end of 2025 and action plan aligned with Kunming-Montreal global biodiversity framework by 2030.

We are engaging to have 100% of portfolio companies (equity) with average or higher impact or dependance on water implement water management policy by end of 2025.

iii. <u>Information to investors in case of severe incidents</u>

In the event of a confirmed severe controversy or serious incident, immediate communication is carried out with all members of the fund's Investment Committee, including the Chief Risk Officer. A dedicated ad hoc committee is convened to define and implement appropriate remediation measures. The information is also shared with the Chief Compliance Officer and the Head of Sustainability & Impact.

If the incident has a material financial impact, detailed information is included in the fund's next quarterly report to investors. Additionally, the incident is reviewed by the Risk and Compliance Committees, which address ESG matters at least once a year.

d. Stewardship and voting policy

Capza regularly interacts with the management of companies it invests in.

This is done throughout the year during ad-hoc meetings, Supervisory Board or Board of Directors meetings, Sustainability dedicated meetings.

Sustainability issues are discussed at least once a year at Board level based on our ESG annual analysis and action plan.

In most of our investments, the achievement of ESG objectives have an impact on the cost of the debt, the management package, or the compensation scheme of the management. Resolutions in favor of those ESG objectives are submitted or supported by CAPZA.

More information is available in our shareholder engagement policy.

3. Exit

CAPZA considers that its ESG responsibility extends beyond the holding period of its investments. This is why, at the time of exit, ESG and impact reporting—including the analysis of the company's performance on relevant sustainability indicators, such as Principal Adverse Impacts (PAIs) and fund-specific promotion indicators—is systematically made available in the data room. Additionally, the sale process specifications require potential buyers to outline their strategic vision for the company, including their approach to sustainability, when submitting an offer.

When the value creation linked to the sustainability roadmap or the sustainability risk are material, an ESG Vendor Due Diligence can be carried out.

4. Our sustainable investment definition

We decided to precise our definition of sustainable investment based on the SFDR regulation. We can qualify an investment as sustainable:

1. When it contributes to a social or environmental objective through:
   - The products and services offered if they help meet one of the Sustainable Development Goals (SDGs), and if these products and services account for more than 25% of revenues, or if they are expected to account for more than 25% of revenues within the fund's investment horizon.
   - The company's credible commitment to decarbonizing its operations in line with the Paris agreements. For companies with fewer than 500 employees, this commitment may relate solely to scope 1 and 2, bearing in mind that scope 3 must also be measured and reduced. For companies with more than 500 employees, the reduction of their carbon footprint in line with the Paris agreements must cover scopes 1, 2 and 3.

2. Without causing significant detriment to other environmental or social objectives - or that a clear roadmap to limit or eliminate these negative effects/externalities has been defined and integrated into the transaction documentation.

3. that applies good governance practices, by assessing the main issues through
   - The existence of internal processes/mechanisms to monitor compliance with the UN Global Compact or the OECD Guidelines for Multinational Enterprises,
   - The existence of a written policy (e.g. HR policy, code of ethics, etc.) underlining commitment to respecting human rights and preventing forced labor in operations and the supply chain, the gender pay gap, and compliance with tax obligations

C. APPENDIX

1. Exclusion policy

CAPZA will not invest, guarantee, or otherwise provide financial or other support, directly or indirectly, to companies or other entities (each time, as determined at the time of the Investment):

(A) NORM BASED EXCLUSION

- whose business activity consists of an illegal economic activity (i.e. any production, trade or other activity, which is illegal under the laws or regulations applicable to the Fund or the relevant company or entity) including without limitation, (a) the research, development or technical applications relating to human cloning, being defined as embryonic stem cell cloning (as prohibited by national bioethics standards in France or by European or international standards applicable), or any illicit activities involving organs, tissues and production of the human body ; (b) illicit trade or activities likely to facilitate trafficking of cultural assets ; (c) Procuring of prostitutes.
- whose business activity results in severe and systematic breaches of (i) the law laid down by the national authorities in the markets in which such companies or entities operate or (ii) international standards, conventions, norms or protocols to which France is a signatory including UN Global compact (in each case, to the extent that such severe and systematic breaches are evidenced by an official source such as the United Nations, the OECD, governments or other similar bodies) regarding (a) environment protection (including international universal sustainability principles arising from initiatives partnering with international organisations); (b) corruption; (c) child labor or forced labor; or (d) the right of workers to organize in a trade union.
- whose headquarters are located (i) in countries subject to trade embargoes imposed by France, the United Nations, the Office of Foreign Assets Control or the European Union, to the extent that such restrictions are not prohibited under Council Regulation (EC) no. 2271/96 as may be amended from time to time ; (ii) in countries or territories included in the list issued by the French authorities regarding uncooperative tax jurisdictions *(Arrêté du 12 février 2010 pris en application du deuxième alinéa du 1 de l'article 238-0 A du code général des impôts - Légifrance*).

(B) SECTORIAL EXCLUSIONS BASED ON ENVIRONMENTAL COMMITMENTS

(1) (CLIMATE ACTION)

- Which is involved directly in (i) activities involving the exploration, development, and production of conventional or unconventional fossil fuels (shale oil and gas, oil sands, Artic drilling, ultra-deepwater drilling, extra-heavy extraction, or coal seam gas exploitation),; (ii) coal-based activities, including coal extraction, coal power generation, electricity via a coal powered plant and/or coal mining activities;

(2) (BIODIVERSITY)

- which is involved directly in (i) the extraction, production and distribution of palm oil and wood pulp (to the exclusion of companies or entities which use palm oil or wood pulp in their products) ; (ii) the active contribution to deforestation ; (iii) the trade of any plant or animal species or products governed by the Convention on International Trade in Endangered Species of Wild Fauna or Flora ("CITES") which are not authorised by a CITES permit ; (iv) Land grabbing practices or the development of farming projects in national parks considered as protected areas ; (v) the production of and trade in genetically modified organisms ("GMOs") (to the exclusion of companies or entities which use "GMOs" in their products).
- which generates more than 5% of its consolidated revenues in (i) the production, trade, or usage of drift nets over 2.5 kilometers in length, asbestos fibers or products containing polychlorinated

biphenyls.

- which substantially focuses on production of and trade in pesticides.

(C) SECTORIAL EXCLUSIONS BASED ON SOCIAL COMMITMENTS

- which is involved directly in (i) the production (or the financing thereof) of and trade in weapons and ammunition of any kind as an end weapon, including anti-personnel landmines and cluster bombs prohibited by the Ottawa and Oslo Conventions, nuclear weapons, and/or chemical or biological weapons (including white phosphorus weapons) and depleted uranium ammunition, or the supply of essential and/or customized semi-finished parts of any of the preceding (as well as the upgrading and maintenance of nuclear weapons), it being understood that such restrictions do not apply to the extent such activities are part of or accessory to explicit European Union policies; (ii) pornography ; (iii) the production of and trade in recreational drugs ; (iv) online and offline gambling activities ; (v) the research, development or technical applications relating to electronic data programs or solutions, which aim specifically at supporting any activity referred to above or which are intended to enable to illegally enter into electronic data networks or download electronic data.
- which substantially focus on (i) the production of and trade in distilled alcoholic beverages
- which generates more than 5% of its consolidated revenues in (ii) the production of and trade in tobacco and tobacco-related products (including electronic cigarettes) as well as their supporting services, unless the activity has an established therapeutic purpose,