

Brussels, 31.10.2022 C(2022) 7545 final

ANNEX 4

#### **ANNEX**

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#### COMMISSION DELEGATED REGULATION (EU) .../...

Amending and correcting the regulatory technical standards laid down in Delegated Regulation (EU) 2022/1288 as regards the content and presentation of information in relation to disclosures in precontractual documents and periodic reports for financial products investing in environmentally sustainable economic activities.

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#### ANNEX IV

Template periodic disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of environmentally sustainable economic activities. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

#### **Product name:**

- MED III GP
- MED III A SLP
- MED III B SLP

#### **Legal entity Identifier:**

MED III GP: 901148106
 MED III A SLP: 901553271
 MED III B SLP: 901553628

## Environmental and/or social characteristics

Did this financial product have a sustainable investment objective?			
• • X Yes	No		
investments with an environmental objective:%  in economic activities that qualify as environmentally sustainable under the EU Taxonomy  in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	It promoted Environmental/Social (E/S) characteristics and while it did not have as its objective a sustainable investment, it had a proportion of 100% of sustainable investments, while the remainder promoted E/S characteristics.  with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy  with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy  with a social objective		
It made sustainable investments with a social objective:	It promoted E/S characteristics, but did not make any sustainable investments		



## To what extent were the environmental and/or social characteristics promoted by this financial product met?

As an Article 8 fund with a sub-portion of sustainable investment (also termed unofficially an 'Article 8+ fund'), MED III (or 'the Fund') and its management approach is focused on the promotion of social and environmental factors, as well as the contribution to a social sustainable investment objective for part of the portfolio. ARCHIMED has adopted sustainable investment objectives with a social focus for its latest funds, namely the attainment of the United Nations Sustainable Development Goal ('SDG') 3 "Good Health and Wellbeing" through ARCHIMED's five HEALTH objectives:

- (a) better efficiency, (b) better efficacy, (c) better safety, (d) better accessibility and (e) better affordability,

at the level of either the patient, healthcare provider, medical industry or animal and environmental health - as well as targets of SDG 9 "Industry, Innovation and Infrastructure", where relevant.

MED III has defined Environmental and Social (E/S) characteristics that companies should promote:

- 1) The Fund has a focus on healthcare companies promoting **eco-conception and sustainable use of natural resources and contributing to carbon neutrality**. We therefore have sought to promote the following environmental characteristics:
  - Mitigation of adverse impact on the environment,
  - · Companies' carbon footprint and exposure to climate-related risks,
  - Use of renewable energy,
  - Formalized environmental policy.
  - Hazardous and non-hazardous waste management.
- 2) MED III's investment strategy also seeks to invest in healthcare companies with initiatives implemented regarding **employees' and stakeholders' work conditions and promoting business ethics**. We therefore promote the following social characteristics:
  - Employees' wellbeing, safety, satisfaction, and retention,
  - Business ethics,
  - Gender equality.

In addition, as mentioned above the investment strategy uses the SDGs and respective targets as a framework against which to analyse companies' responsible policies and sustainable factors. A particular focus is applied on improving outcomes related to SDG 3 and SDG 9, and their associated relevant targets.

To date, MED III has contributed to the promotion of its environmental and social characteristics through its investments:

- All investee companies of MED III have fully completed the ESG reporting on 2022 data and provided information on all ESG indicators.
- All investee companies within MED III have had a Sustainability Assessment carried out by external
  consultants and a Sustainability Roadmap developed and approved at Board level or are currently
  involved in the process of conducting such Assessment and Roadmap.
- A specific analysis of progress regarding the promotion of environmental and social characteristics was conducted on each portfolio company in 2023, with two objectives: (i) verifying and validating ESG and Impact 2022 data reported within the Reporting21 platform, and (ii) assessing progress and initiatives of the company on ESG material topics. This analysis allowed us to create a Sustainability Scorecard for each company that investors can find on their dedicated data site access.
- ARCHIMED's Sustainability & Impact team and Investment team have engaged with the management of each portfolio company to assess progress against its specific KPIs and will continue to do so on an annual basis during the holding period of each investment.

Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.

#### How did the sustainability indicators perform?

On this period, all investee companies of MED III have fully completed the ESG reporting on 2022 data and provided information on all ESG indicators. A list of 140 sustainability indicators on the 2022 reporting period were collected on all investee companies, through a reporting platform (reporting21). The sustainability indicators include topics including:

- Carbon footprint assessment
- Environmental footprint
- Impacts on biodiversity
- Employment
- Equal opportunities
- Training
- Profit-sharing
- Health & Safety
- Corporate governance
- Business ethics
- CSR governance
- Cyber security and data protection
- Supply chain management
- Human rights
- SASB indicators on impact on health

Results of this reporting can be found in the ESG scorecards per company available on MED III investor's website. The Fund's Impact Report also contains the investee companies' performance on these sustainability indicators, as well as in ARCHIMED's Sustainability report available on our website. Finally, specific results on the principle adverse Impact indicators (PAIs) are available In Annex I of this document.

#### ...and compared to previous periods?

Our 2023 reporting campaign on 2022 data corresponds to the first year of SFDR reporting. Comparison to previous periods will be available starting 2024, on 2023 reporting.

Our next ESG Reporting cycle will be launched in January 2024 to collect relevant information from our portfolio companies for the 2023 period. We will use this data to show historical comparisons for 2022-2023 in an updated PAI Statement that will be published on our website in June 2024. These indicators will also be included in the next iteration of our Impact Report.

#### What were the objectives of the sustainable investments that the financial product partially made and how did the sustainable investment contribute to such objectives?

As an Article 8+ Fund, and according to Annex IV of the Limited Partnership Agreement of MED III, at least 66% of MED III's investments have a social sustainable investment objective, namely to improving healthcare outcomes by contributing to one or more of our five healthcare objectives: better efficiency, efficacy, safety, accessibility and affordability. These objectives seek to provide better healthcare outcomes at the doctor, patient, animal, and environmental health level, through improvements directly to patients or through the medical industries and services to hospitals and care providers.

In addition to the healthcare objectives, the sustainable investment objective also encompasses measurement of the fund's contribution to the achievement of the SDG 3 and SDG 9 and their associated targets.

Through this framework, investments with a socially sustainable objective can be identified through their contribution to the five healthcare objectives as depicted in our sustainable healthcare investment matrix included below:

- Efficiency: for instance, number of people reached through prevention initiatives, cost reduction archived (in %), time reduction archives (in %)
- Efficacy: for instance, protection efficacy of vaccines, number of health issues significantly impacting patients' quality of life / health addressed
- Safety: for instance, number of tests performed, treatments and surgeries completed, and patients recovered
- Accessibility: for instance, number of patients gaining access to care, patient satisfaction rate of healthcare services
- Affordability: for instance, number of products sold enabling cost savings.

Improve health outcomes	Better efficiency	Better efficacy	Better safety	Better accessibility	Better affordability
At people/ patients/ populations level					
At doctors/ healthcare professionals / care providers level					
At healthcare industries level					
At the level of equivalent targets regarding animal and environmental health					

Table 1: Illustration of assessment to be undertaken by the Deal Team

To ensure the Fund attains its sustainable investment objective, the Management Company has implemented an exclusion policy and a watch-list for additional vigilance. Investments into Healthcare sectors or companies exposed to strict regulations, having potential negative impacts, or limited positive impacts are thus restricted. In addition, vigilance is applied to a watchlist of 7 healthcare sectors. Every investment in these sub-sectors is discussed on a case-by-case basis during the Investment Committee, with the presence of the Management Company's Advisory Board:

- Vigilance due to strict regulations on: Human reproductive cells (embryonic stem cell research), Drug Discovery Services and preclinical development (animal testing conditions), and Stem cells, Cell therapy and Gene therapy (only for preventive, diagnostics, or therapeutic purposes)
- Vigilance due to potential negative impacts on: Biocontrol (risks of chemically based fertilizer and pesticides), Pain relief and sleep aids (risks of substance dependence), Assisted living (risks regarding quality of care)
- Vigilance due to limited positive impacts on health: Aesthetics (non-essential plastic surgery). Probiotics, Vitamins, and minerals (only products with clinical studies considered impactful).

This approach enables us to ensure that at least 66% of MED III's investments are contributing to socially sustainable investment objectives by the end of the fund life, with healthcare outcomes solutions used as assessment criteria to determine their impact on each investment's contributions to a healthier society.

All investments conducted in 2022 by MED III Fund, were sustainable investments the impact assessment analysis helped us identified that the three acquisitions contribute to the following health objectives:

- For 66% to improve accessibility at care providers/hospitals level, and at the level of medical industries.
- For 100% to improve efficiency at care providers/hospitals level and at the level of medical industries
- For 66% to improve safety at patients level
- For 66% to improve affordability at patients level

For more detailed results on the contribution to sustainable objectives of MED III investments, please refer to the Fund's Impact Report.

How did the sustainable investments that the financial product partially made not cause significant harm to any environmental or social sustainable investment objective?

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific Union criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

MED III's Investment strategy is focused on the promotion of E/S characteristics for a sub-section of the Fund and on the contribution to one or more of ARCHIMED's objectives, as well as the contribution to SDG 3 and 9, and relevant targets for the other part of investments.

This strategy dictates that the investments of the Fund will undergo a pre-investment screening and ESG due diligence to ensure that not only does the Fund contribute to social objectives, but that it will 'do no significant harm' (DNSH) to other sustainable investment objectives mainly through the collection and analysis of Principal Adverse Impacts indicators.

Please refer to Annex III of MED III Limited Partnership Agreement for more information on how DNSH principle is implemented for all new investments.

How were the indicators for adverse impacts on sustainability factors taken into account?

During the investment cycle, the ESG Due diligence assesses indicators that would indicate presence or absence of a principal adverse impact (PAI). These indicators include, in compliance with the SFDR and Delegated regulation, the following principal adverse impacts:

 Environmental damage, GHG emissions; carbon footprint; GHG intensity of Portfolio Companies; exposure to companies active in the fossil fuel sector; share of nonrenewable energy consumption and production; energy consumption intensity per high impact climate sector; activities negatively affecting biodiversity-sensitive areas; emissions to water; hazardous waste ratio.

- Social and employee matters, respect for human rights such as health and safety of
  workforce; unfair advantage; community relations; human rights, violation of UN Global
  Compact principles and OECD Guidelines for Multinational Enterprises; lack of processes
  and compliance mechanisms to monitor compliance with UN Global Compact principles
  and OECD Guidelines for Multinational Enterprises; unadjusted gender pay gap; board
  gender diversity; exposure to controversial weapons.
- Governance, anti-corruption and anti-bribery matters, appropriate KYC is undertaken on service providers and investors.
- Conflict of interest risk.
- In addition to the mandatory PAIs, two additional PAIs are taken into account: 1) "Investments in companies without carbon emission reduction initiatives aimed at aligning with the Paris Agreement", which was chosen due to ARCHIMED's focus on climate as a central pillar within our responsible investment strategy; and 2) "Share of investments in investee companies without workplace accident prevention policy" which was selected due to the particular importance of health in safety in the workplace of healthcare businesses, which may be exposed to particular chemicals, machinery or other occupational hazards beyond that of a typical office environment.

Furthermore, our responsible investment strategy is embedded into all steps of our investment lifecycle and is focused on supporting and accelerating our portfolio companies' sustainable transformation alongside ours. For this purpose, we bring advice on the definition of their Corporate Social Responsibility (CSR) strategy and assist them in developing actionable Sustainability and Impact Roadmaps that help set clear objectives, assign internal responsibilities, and monitor progress over time through the PAIs and tailored impact KPIs. These Roadmaps are validated at board level executed by the company's management team as a concrete action plan to advance ESG and sustainability performance, as well as ultimately their PAI results, while also simultaneously contribute to the achievement of the social sustainable objective of the fund. If risks or incidents arise, ARCHIMED identifies any potential corrective action plans and implements active measures to mitigate the identified risks.

To further align business interests with sustainability and impact objectives, ARCHIMED has mandated that for MED III, 20% of the CEO's variable renumeration is linked to the achievement of this Roadmap, which by default guarantees improvement of their PAIs over the holding period. The ARCHIMED team unceasingly mentors and assists the portfolio companies with their sustainability journey through regular engagement with company management and monitors company progress against this Roadmap through formal follow-up reviews which are performed on an annual basis. Results on the PAIs for this Fund are available at the end of this document.

Our annual Sustainability Report provides a consolidated statement for the PAIs of all funds, consistent with the requirements of Table 1, Annex one of the SFDR Delegated Regulation. The most recent statement covers the period from 1 January 2021 to 31 December 2021; our 2022 report is due to be published on our website by July 2023.

Were sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:

Yes, the Management Company ensures portfolio companies are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. This information is gathered as part of our annual ESG reporting process and is carried out across all portfolios. ARCHIMED policies require MED III to perform appropriate due



Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anticorruption and antibribery matters.

diligences on its own activities, investments, and business relationships to enable appropriate action to be taken in the event of any findings of non-compliance. ARCHIMED ensures human rights, equality and anti-bribery and corruption policies are in place and that there are not any instances of child, forced, or compulsory labour.

## How did this financial product consider principal adverse impacts on sustainability factors?

PAIs on the sustainable investment portion of the fund were considered throughout the entire investment cycle, from the initial negative and positive screening phases. After the screening is complete, our Internal Sustainability due diligence tool contains PAI-related questions, and from which it is determined if additional due diligence is required from an external consultant.

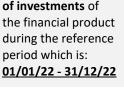
If any PAIs are identified during the screening or due diligence processes, ARCHMED's Impact Investment team discusses with the management of the investee company and it is decided whether these impacts can be mitigated, and the investment can go ahead, or if the transaction must be dropped based on the incompatibility with the Fund's social and environmental characteristics.

As explained above, our ESG reporting process monitors this by asking portfolio companies for PAI-related data on an annual basis, enabling a table containing PAIs to be included within our Impact Report.



#### What were the top investments of this financial product?

Largest investments	Sector	Assets invested amount (%)	Country
Corealis	BioPharma Products	43	Canada
Title21	Health Technologies & Software	35	USA
Cardioline	MedTech	22	Italy



investments constituting the greatest proportion



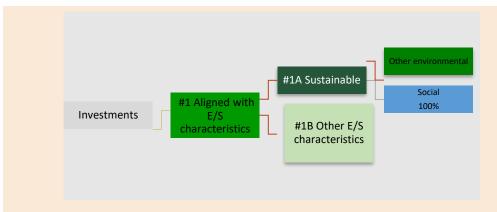
# Asset allocation describes the share of investments in specific assets.

#### What was the proportion of sustainability-related investments?

MED III currently holds investments in 3 companies within the healthcare industries which are all actively contributing to the Fund's healthcare objectives. Hence 100% of assets were sustainability-related investments. The Fund seeks to have at least 66% of its investment in companies with a sustainable social investment objective, and the remainder in companies that promote positive social and environmental characteristics, as explained in our investment strategy.

#### What was the asset allocation?

As at 31/12/22, 100% of the Fund's invested amount were allocated to sustainable investments contributing to the Healthcare Objectives of the Fund. The most recent investment, which is not in the scope of this report, promotes E/S characteristics and will be included in the next iteration of the report.



**#1** 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.

**#20ther** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.

Taxonomy-aligned activities are expressed as a share of:

- turnover
   reflecting the
   share of revenue
   from green
   activities of
   investee
   companies.
- capital
   expenditure
   (CapEx) showing
   the green
   investments made
   by investee
   companies, e.g. for
   a transition to a
   green economy.
- operational expenditure (OpEx) reflecting green operational activities of investee companies.

#### In which economic sectors were the investments made?

All investments made through MED III were made in healthcare industries across seven different sectors:

- Biopharma Products
- Consumer Health
- Healthcare IT: 1 investment
- In Vitro Diagnostics
- Life Science Tools and Biologic Services
- MedTech: 1 investment
- Pharma Services: 1 investment

## \*\*\*\*

## To what extent were the sustainable investments with an environmental objective aligned with the EU Taxonomy?

N/A. MED III does not conduct sustainable investments with an environmental objective aligned with the EU taxonomy. Instead, the Fund's focus is on the promotion of environmental and social characteristics, as well as on the attainment of a social sustainable investment objective for a sub-portion of the portfolio.

Did the financial product invest in fossil gas and/or nuclear energy related activities complying with the EU Taxonomy¹?

In fossil gas	In nuclear energy

<sup>&</sup>lt;sup>1</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

To comply with the EU Taxonomy, the criteria for fossil gas include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For nuclear energy, the criteria include comprehensive safety and waste management rules.

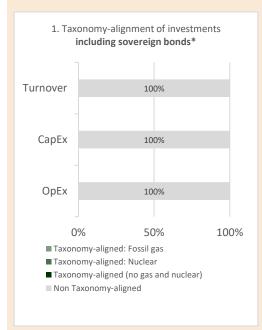
Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

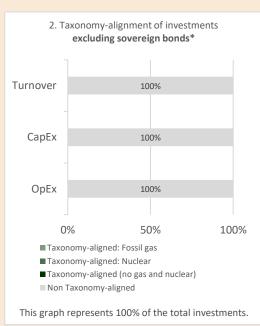
Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

are
sustainable
investments with an
environmental
objective that do
not take into
account the criteria
for environmentally
sustainable
economic activities
under Regulation
(EU) 2020/852.



The graphs below show in green the percentage of investments that were aligned with the EU Taxonomy. As there is no appropriate methodology to determine the taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.





- \* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.
- What was the share of investments made in transitional and enabling activities?

Not applicable. The Fund does not invest or plan to invest in transitional nor enabling activities in the sense of the EU Taxonomy.

How did the percentage of investments that were aligned with the EU Taxonomy compare with previous reference periods?

Not applicable at this stage. As stated above, MED III's investments do not follow an environmentally sustainable investment objective in the sense of the EU Taxonomy. Instead, they focus on the promotion of social and environmental characteristics, and on the attainment of a social sustainable investment objective for a sub-portion of this portfolio.



What was the share of sustainable investments with an environmental objective not aligned with the EU Taxonomy?

MED III's investments do not have pursue an environmental objective, nor does the Fund plans to align with the EU Taxonomy. Hence, 100% of the Fund's investments were not aligned with the EU Taxonomy.



#### What was the share of socially sustainable investments?

According to its LPA, and Annex III, invested amounts of MED III should pursue social objectives through the improvement of healthcare outcomes at various level (as detailed above), for at least 66%. On this reporting period, socially sustainable investments represented 100% of the Fund's total investments. The Fund will

have an investment that contributes to E/S characteristics within the scope of the next pre-contractual disclosure



## What investments were included under "other", what was their purpose and were there any minimum environmental or social safeguards?

None of MED III's investment fall into this category.



## What actions have been taken to meet the environmental and/or social characteristics during the reference period?

To attain the Fund's sustainable investment objective, 100% of the investments of the Fund undergo a preinvestment screening and ESG & Impact due diligence to ensure that all investments are selected on their ability to contribute to promote E&S characteristics.

During that pre-investment screening, the deal teams supported by the Sustainability & Impact team conducted a negative screening and excludes investments within certain sectors, companies, and underlying assets on the basis that they are most exposed to specific risks ESG, including:

- Environmental: Climate (thermal coal), Biodiversity (palm oil)
- Social: Health (Tobacco and distilled alcoholic beverages), Human Reproductive Cloning, Human Rights, Weapons and ammunition, Casinos and gambling activities, pornography, prostitution, and UNGC breach.

Post-investment, the maturity of investee companies on ESG topics was assessed through the collection of 140 sustainable indicators as well as through qualitative calls. Results of this analysis conducted with the support of external consultants were used to create Sustainability Scorecards for each investee companies. These scorecards are available on the investors' dedicated data site.

Additionally, deep dive sustainability assessments were carried out (or are currently being carried out) by external consultants on each of MED III's investee companies. These Sustainability Assessments enable to obtain a clear understanding of each company's most material ESG topics and the level of maturity of the company against these topics. Based on this analysis a Sustainability Roadmap is designed with the help of external consultants and approved at Board level. Progress against the Roadmap is assessed yearly by external consultants and ARCHIMED engages with the management of investee companies to ensure progress is made.

Specific actions have been implemented at investee companies' level that are specified in the Fund's Impact Report as well as in ARCHIMED's Sustainability Report, and regularly to our investors in quarterly reports of the Fund.



#### How did this financial product perform compared to the reference benchmark?

Not applicable. The Fund does not use a benchmark.

- How does the reference benchmark differ from a broad market index?
  Not applicable.
- How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the environmental or social characteristics promoted?

Not applicable.

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

- How did this financial product perform compared with the reference benchmark?
  Not applicable.
- How did this financial product perform compared with the broad market index?`
  Not applicable.

### <u>Description of the principal adverse impacts (period: 1st January – 31st December 2022)</u>

<b>Adv</b> MEI	verse Sustainability Indicator	Metric	ARCHIMED Portfolio Impact
1.	GHG emissions	PAI 1.1 - Scope 1 GHG emissions	255.25
		PAI 1.1 - Scope 2 GHG emissions	339.69
		PAI 1.1 - Scope 3 GHG emissions	3,828.05
		PAI 1.1 - Total GHG emissions	4,422.99
2.	Carbon footprint	PAI 1.2 Carbon footprint	45.18
3.	GHG intensity of investee companies	PAI 1.3 - GHG intensity of investee companies	91.08
4.	Exposure to companies active in the fossil fuel sector	PAI 1.4 - Share of investments in companies active in the fossil fuel sector	0%
5.	Share of non-renewable energy consumption and production	PAI 1.5 - Share of non-renewable energy consumption and non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage of total energy sources	N/A (production), NA (consumption)
6.	Energy consumption intensity per high impact climate sector	PAI 1.6 - Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector	0
7.	Activities negatively affecting biodiversity- sensitive areas	PAI 1.7 - Share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas	0%
8.	Emissions to water	PAI 1.8 - Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	0
9.	Hazardous waste and radioactive waste ratio	PAI 1.9 - Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average	0.2
10.	Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	PAI 1.10 - Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	0%
11.	Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	PAI 1.11 - Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance /complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	100%
12.	Unadjusted gender pay gap	PAI 1.12 - Average unadjusted gender pay gap of investee	21%
13.	Board gender diversity	PAI 1.13 - Average ratio of female to male board members in investee companies, expressed as a percentage of all board members	12%
	Exposure to controversial weapons (antipersonnel mines, cluster munitions, chemical weapons and biological weapons)	PAI 1.14 - Share of investments in investee companies involved in the manufacture or selling of controversial weapons	0%
Oth	er indicators for principal adverse impacts on	· · · · · · · · · · · · · · · · · · ·	
15.	Investments in companies without carbon emission reduction initiatives	PAI 2.4 - Share of investments in investee companies without carbon emission reduction initiatives aimed at aligning with the Paris Agreement	100%
16.	Investments in companies without workplace accident prevention policies	PAI 3.1 - Share of investments in investee companies without a workplace accident prevention policy	22%