ARCHIMED
IMPACTING HEALTHCARE

# Principal Adverse Impacts (PAI) Statement (2025)

## Information pursuant to Article 4 of Regulation (EU) 2019/2088 (SFDR)

*Published on: 30 June 2026*

### *A. Summary*

All ARCHIMED funds are classified as SFDR Article 8 or 9 and are subject to the corresponding regulatory obligations. Certain funds within ARCHIMED follow a hybrid approach (Article 8 with sustainable investments), promoting environmental and social characteristics (Article 8) but also acquiring assets that pursue a sustainable investment objective (Article 9). For these funds, the minimum threshold for sustainable investments is two-thirds (66%) over the fund lifetime. ARCHIMED's social sustainable investment objective focuses on investments that improve healthcare, contributing to Health Objectives (better efficacy, safety, efficiency, accessibility and affordability), SDGs (particularly focused on SDG 3), and One Health (human, animal and/or environmental health).

As of December 31st, 2025, ARCHIMED managed the following funds:

| ARCHIMED Funds: SFDR Classification | | |
|---|---|---|
| **Article 8 Funds** | **Article 8 Funds (with sustainable investments)** | **Article 9 Funds** |
| MED II<br>MED Platform I [1]<br>MED Bio<br>MED Access<br>MPI-COI-CARSO<br>MPI-COI-PROLLENIUM<br>MPI-COI-NAMSA<br>MPII-COI-NATUS<br>MPII-COI-SUANFARMA<br>MED VET | MED III [2]<br>MED Rise | MED Platform II [3]<br>MPII-COI-ZIMVIE<br>MPII-COI-JEISYS |

*This table excludes MED I and PolyMED funds that have been liquidated.
[1]MED Platform I (MP I) includes MP I B SLP, MP I C1 SLP, MP I C2 SLP, MP I C3 SLP.
[2]MED III includes MED III A SLP and MED III B SLP.
[3]MED Platform II (MP II) includes MP II B and MP II SLP.

ARCHIMED considers the principal adverse impacts (PAIs) of its investment decisions on environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters, as prescribed by the SFDR and Delegated Regulations. Its responsible investment procedure operationalizes this consideration through pre-investment screenings and due diligence, and post-investment portfolio data collection, reporting and monitoring conducted on an annual basis. Principal adverse impacts on sustainability factors are also formally incorporated into ARCHIMED's comprehensive risk management framework assessing sustainability risks alongside other business risks.

### *B. Description of the principal adverse impacts on sustainability factors and historical comparison*

The following portfolio-level PAI statement consolidates indicators across ARCHIMED funds and investee companies, covering the **reference period from 1st January to 31st December 2025**:

| Indicators applicable to investments in investee companies | | | | | | |
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| **Adverse sustainability indicator** | | **Metric** | **Impact 2025** | **Impact 2024** | **Explanation** | **Actions taken or planned, targets for next period** |
| **Climate and other environment-related indicators** | | | | | | |
| Greenhouse gas emissions | 1.GHG emissions | Scope 1 GHG emissions | 13,529 $tCO_2e$ | 26,526 $tCO_2e$ | Emissions values are calculated using the PCAF standard for unlisted equity investments. The methodology allocates each investee company's carbon footprint proportionally to ARCHIMED's ownership stake. For companies lacking carbon data, sectoral estimates or revenue-based extrapolation fill the gap. Though investee companies' data sources may have evolved, the | ARCHIMED applies the PMDR (Private Markets Decarbonization Roadmap) framework across all funds, providing a standard approach for reporting climate strategies and goals and monitoring progress, allowing for targeted intervention. As of FY2025, over 70% of investee companies are capturing emissions data and/or preparing to decarbonize with actions plans in place |
| | | Scope 2 GHG emissions | 10,229 $tCO_2e$ | 16,294 $tCO_2e$ | | |
| | | Scope 3 GHG emissions | 286,096 $tCO_2e$ | 331,284 $tCO_2e$ | | |
| | | Total GHG emissions | 309,854 $tCO_2e$ | 374,104 $tCO_2e$ | | |
| | 2.Carbon footprint | Carbon footprint | 45.8 $tCO_2e$ / €M invested | 88.2 $tCO_2e$ / €M invested | | |
| | 3.GHG intensity of investee companies | GHG intensity of investee companies | 268 $tCO_2e$ / €M revenue | 249 $tCO_2e$ / €M revenue | | |

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| | | | | | consistent methodology ensures year-over-year comparability. 2025 figures reflect improved data quality and refined sectoral estimates for companies that have not yet calculated their carbon footprint. | to reduce their footprint. |
| | 4.Exposure to companies active in the fossil fuel sector | Share of investments in companies active in the fossil fuel sector | 0% | 0% | ARCHIMED invests exclusively in healthcare companies; no exposure to fossil fuel sector. | Not applicable |
| | 5.Share of non-renewable energy consumption and production | Share of non-renewable energy consumption and non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources | 79% | 74% | ARCHIMED has expanded its investment activity in the US and APAC through new investments and add-on acquisitions. These markets lag Europe in renewable energy adoption due to heavier fossil fuel reliance. While energy data monitoring has improved year-over-year, some investee companies lack visibility into their renewable versus non-renewable energy mix due to limited control over their energy supply. For conservatism, in the lack of such categorization, ARCHIMED allocates the totality of consumption to non-renewable energy. | Investee companies are advancing their energy efficiency and tracking through key initiatives, including optimizing energy-intensive operations, expanding clean energy in their energy mix, installing renewable infrastructure such as solar panels, deploying energy management and smart meter systems, and digitizing processes to reduce unnecessary consumption. |
| | 6.Energy consumption intensity per high impact climate sector | Energy consumption in GWh per €M revenue of investee companies, per high-impact climate sector | 0.03 GWh/€M | 0.02 GWh/€M | While the majority of ARCHIMED's investee companies do not operate heavy manufacturing facilities, 60% conduct lighter manufacturing processes as part of their healthcare activities. Since most companies lack visibility into energy use specifically attributable to manufacturing, total company energy consumption was used for this calculation, likely resulting in overestimated values. | |
| Biodiversity | 7.Activities negatively affecting biodiversity-sensitive areas | Share of investments in investee companies with sites/ operations located in or near biodiversity-sensitive areas where activities of those investee companies negatively affect those areas | 0.92% | 2% | Two investee companies have sites located near biodiversity-sensitive areas; their activities do not negatively affect those areas. | Companies concerned comply with applicable regulatory obligations for waste and water management to support species protection and habitat preservation. Regular checks are conducted by local environmental authorities to verify compliance. ARCHIMED will support efforts to deepen understanding of their biodiversity impact and implement mitigation actions. |
| Water | 8.Emissions to water | Tons of emissions to water generated by investee companies per €M invested | 0.007 t / €M | 0.02 t / €M | Only one investee company generates emissions to water, deriving from industrial wastewater. It discharges nitrogen and organic pollutants that consume oxygen | The investee company has established procedures to monitor and treat industrial wastewater from machine part rinsing (pre-treated with activated carbon |

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| | | | | | during decomposition. Both quantities are measured in MT and MT COD respectively and carefully monitored. | filters), as well as rainwater runoff and roof drainage from the manufacturing plant. A new waste management and treatment plant helps reduce the discharge of pollutants to water. |
| Waste | 9.Hazardous waste & radioactive waste ratio | Tons of hazardous & radioactive waste generated by investee companies per €M invested | 0.12 t / €M | 1.45 t / €M | Over half of investee companies generated hazardous waste linked to their healthcare activities. Except for six primarily large companies, the remainder generate small waste quantities, well below the 12 metric ton threshold for non-pharmaceutical hazardous waste, under the US EPA standards. | Investee companies have established specialized waste management procedures for collecting, handling, and disposing of hazardous waste according to applicable regulations, particularly biohazardous waste from laboratory processes and electronic waste from medical device manufacturing. Beyond compliance, several companies are driving waste reduction through complementary actions to reduce or replace hazardous raw materials with safer alternatives, extend product lifespan through refurbishing and repair programs, and integrate eco-design features into product and packaging design to minimize waste generation. |
| **Indicators for social and employee, respect for human rights, anti-corruption & anti-bribery matters** | | | | | | |
| Social & employee matters | 10.Violations of UN Global Compact (UNGC) principles & Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises (MNEs) | Share of investments in investee companies involved in violations of the UNGC principles or OECD Guidelines for MNEs | 2.6% | 0% | One investee company faced environmental pollution allegations in 2016 prior to ARCHIMED's investment, resulting in a court ruling in 2025 that imposed a monetary fine and mandated the restoration of affected waterways. As the ruling was concluded within this reference period, the incident is reported accordingly for transparency. | Since the incident and post ARCHIMED's investment, the investee company has implemented significant environmental and operational improvements at the affected facility, specifically focusing on new wastewater management processes and technologies. |
| | 11.Lack of processes & compliance mechanisms to monitor compliance with UNGC principles & OECD Guidelines for MNEs | Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for MNEs or grievance /complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for MNEs | 42% | 70% | Business ethics matters are well-established across investee companies; 80% have a Code of Ethics in place and over 70% maintain adequate whistleblower protections, with several frameworks aligned to UNGC and OECD standards. | Investee companies enforce rigorous business ethics practices safeguarding the rights of employees, customers, and broader stakeholders. These measures include codes of business ethics, whistleblower protections, supplier codes of conduct, and policies on data privacy, security, and human rights. ARCHIMED Value Creation Teams (VCTs) support investee companies in strengthening these frameworks, ensuring high standards of corporate governance, accountability, and transparency. |
| | 12.Unadjusted gender pay gap | Average unadjusted gender pay gap of investee companies | 17% | 15% | Women represented 46% of FTEs across investee companies, | Investee companies are committed to building diverse and |

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| | 13.Board gender diversity | Average ratio of female to male board members in investee companies | 8% | 10% | 37% of senior management positions, and 26% of C-suite positions, including three female CEOs. These employment figures display a fair female representation across organizational and leadership levels. The unadjusted gender pay gap does not account for differences in role, seniority, or function, and as such does not necessarily reflect unequal pay for equivalent work. | inclusive workplaces through targeted initiatives that promote fairness and equal opportunity. A key focus is gender equity, with several companies actively monitoring the gender pay gap on an annual basis and implementing corrective measures to ensure equitable compensation across all organizational levels. |
| | 14. Exposure to controversial weapons | Share of investments in investee companies involved in manufacture or selling of controversial weapons | 0% | 0% | ARCHIMED invests exclusively in healthcare companies; no exposure to controversial weapons sector. | Not applicable |
| **Additional indicators** | | | | | | |
| Emissions | 15. Investments in companies without carbon emission reduction initiative | Share of investments in investee companies without carbon emission reduction initiatives aimed at aligning with the Paris Agreement | 84% | 84% | Climate action is gaining momentum across investee companies; 70% capture emissions data and 35% have actionable carbon reduction plans in place.<br>Five companies have committed to, or are actively working towards, SBTi or Paris Agreement alignment by 2026, with one already having a clear net zero strategy. | Investee companies are guided by ARCHIMED's S&I team and a network of climate experts in setting science-based carbon reduction targets and deploying concrete carbon reduction initiatives. Through business-specific levers and hands-on support, ARCHIMED drives the portfolio's transition towards alignment with global climate goals and monitors maturity and progress through the PMDR scale. |
| Social & employee matters | 16.Investment in companies without accident prevention policies | Share of investments in investee companies without a workplace accident prevention policy | 13% | 12% | Most investee companies maintain comprehensive occupational health and safety procedures, with accident prevention measures aligned to health, safety, and quality standards. | Health and safety are a priority across all investee companies, particularly those with laboratory or manufacturing operations carrying elevated occupational risks. Accident prevention measures include regular training, risk assessments, external audits, ergonomic workplace design, and incident reporting systems, reflecting commitments to embedding a culture of safety into daily operations. |

(1) The 2025 reporting scope includes 35 investments across funds: MED II, MED III, MED Platform I, MED Platform II, MED Bio, MED Rise

(2) The 2024 reporting scope includes 28 investments across funds: MED I, MED II, MED III, MED Platform I, MED Platform II, MED Bio, MED Rise

*For detailed information on the PAI performance of each fund, refer to the fund-level SFDR Periodic Disclosures (Annexes IV & V).*

## *C. Description of policies to identify and prioritize adverse impacts on sustainability factors*

Adverse impacts on sustainability factors are identified and prioritized throughout the investment lifecycle through the following responsible investment processes as per the ARCHIMED Responsible Investment Policy and Procedure:

- **Screening:** Before the first Pre-investment Committee (PIC), a Sustainability Referent is appointed from the deal team and is responsible for ensuring all pre-investment sustainability and impact processes are properly followed, including the completion of ARCHIMED's proprietary Internal Sustainability Tool (IST). The IST comprises of (i) the negative screening for filtering targets based on sectoral and activity-based exclusion and watchlist criteria, (ii) the positive screening for evaluating their contribution to Health Objectives (better safety, efficacy, efficiency, accessibility, affordability) and One Health, and (iii) the high-level ESG assessment for collecting initial information on sustainability risks and performance.

- **Due Diligence:** Before the final IC, an ESG & Impact Due Diligence (DD) is performed by external experts to identify sustainability risks and opportunities. The comprehensive scope of work includes, but is not limited to, (i) a materiality analysis based on the target's size, business activity, geography and industry, (ii) a maturity assessment against a peer group and (iii) a review of the impact thesis. Additional assessment of specific topics (e.g. environmental pollution, supply chain resilience, health and safety, animal testing) may be included on a case-by-case basis, where relevant. Also, a high-level Climate and Nature-related Screening based on geolocation is conducted using AXA Climate's Altitude tool to flag critical climate change physical and transition risks and biodiversity concerns. The DD and Screening findings are integrated into the respective IC papers, informing the investment decision-making process as well as the Post-Completion Action Plan (PCAP), which includes priority mitigation and improvement actions on ESG topics. Once a target is IC-approved, sustainability obligations form part of contractual documentation to close the investment.

- **Holding Period:** During the holding period, the Sustainability & Impact (S&I) team actively engages with portfolio companies to cultivate a sustainable competitive advantage and strengthen long-term business resilience. The S&I team offers hands-on support and practical guidance for (i) developing and refining the corporate Sustainability Roadmap and governance aligned with the business vision, (ii) determining and implementing high-impact environmental, social and governance initiatives addressing strategic goals, and (iii) organizing and facilitating interactive workshops and training sessions building internal capacity on sustainability. Every year following the completion of the ESG Reporting Campaign, the S&I team conducts follow-up reviews to assess each company's progress against sustainability objectives and provide recommendations for future improvements. In 2025, ARCHIMED launched the **Sustainability Essentials**, 6 sustainability value creation drivers underpinned by 18 actions applied across portfolio companies to improve their sustainability performance over time. A Portfolio Sustainability Referent is appointed from the deal team and works with the S&I team to identify sustainability priorities, mobilize necessary resources, drive project execution, and track progress against established commitments. To further embed sustainability within organizational practices, ARCHIMED encourages its companies to link a portion of executive remuneration to sustainability targets and to incorporate sustainability topics into the board agenda.

## *D. Engagement policies*

ARCHIMED's engagement strategy reinforces its shareholder responsibility to select, evaluate, and invest in companies with a long-term outlook, generating sustainable business and societal value alongside financial returns. For each investment target, comprehensive due diligence is conducted across financial, legal, tax, commercial, ESG and, where applicable, Impact, HR, IT and IP dimensions. Action items concerning effective ESG governance and management are formally embedded into the PCAP for all companies, with sustainability dialogue and objective-setting initiated within the first year of acquisition. The S&I team directly engages with portfolio company management and deal teams to coordinate ESG and, where applicable, impact implementation, co-developing strategic action plans focused on material sustainability objectives in line with ARCHIMED Sustainability Essentials and each company's needs and providing continuous expert advisory guidance and hands-on support. ESG governance within companies is typically structured through internal working groups or committees, maintaining direct contact with the S&I team throughout the investment lifecycle, at minimum once per quarter. Several Partners and senior investment directors also represent ARCHIMED at the Board of Directors of portfolio companies, ensuring constructive dialogue on sustainability matters at the highest strategic level. ARCHIMED's engagement strategy concerns all investees (35 companies as of 31st December 2025, excluding exits). The Shareholder Engagement and Voting Rights Policy prioritizes corporate governance, organizational structure, and executive compensation, while also reinforcing ARCHIMED's commitment to encouraging responsible business practices: environmental stewardship, fair employment, human rights protection, and non-discrimination—aligned with international initiatives such as the UN PRI, and consistent with PAI indicator assessment within the context of investment decisions.

ARCHIMED is a specialist healthcare investor with a focused investment strategy centered on priority healthcare industries. Its investment universe is defined by its MedSeg approach, a proprietary framework for sourcing and evaluating companies within these target segments. This strategic positioning automatically excludes investments in any other sector. As per the Responsible Investment Policy, investments in the following sectors and activities are strictly prohibited on ethical, legal, or ESG grounds: (i) illegal economic practices, (ii) severe human rights violations,

(iii) pornography and prostitution, (iv) embryonic stem cells, (vi) human reproductive cloning, (vii) euthanasia and assisted suicide, (viii) gestational surrogacy, (ix) recreational cannabinoids, (x) transgenic GMOs, (xi) plastic surgery for cosmetic and beauty purposes.

### *E. References to international standards*

ARCHIMED's responsible investment approach is founded on the following international frameworks:

- **United Nations Sustainable Development Goals (UN SDGs)**: global sustainable development objectives are anchored to ARCHIMED's definition of impact on health as well as its Sustainability Essentials framework.
- **The Five Dimensions of Impact (by Impact Frontiers):** established impact assessment framework used as the basis for the positive screening analysis conducted on investment targets pre-investment.
- **One Health:** integrated approach promoted by the Quadripartite collaboration (WHO, WOAH, UNEP, FAO), aligned with ARCHIMED's goal of supporting positive outcomes for human, animal and environmental health.
- **Private Markets Decarbonization Roadmap (PMDR):** private markets assessment tool used to monitor portfolio progress across decarbonization stages, from data collection to target-setting and transition plans.
- **Sustainability Accounting Standards Board (SASB):** relevant indicators specific to the healthcare industries are collected annually as part of the annual reporting campaign alongside other ESG metrics, including PAIs.

ARCHIMED further strengthens its commitments through active collaboration with the following industry initiatives:

- **The United Nations Principles for Responsible Investment (UN PRI)** – international investor network on responsible investment practices; signatory since 2018.
- **The Initiative Climat International (iCI)** – private markets network on climate-resilient portfolios; signatory since 2020.
- **The European Data Convergence Initiative (EDCI)** – private markets initiative on ESG reporting; member since 2024.