SUSTAINABILITY-RELATED DISCLOSURES

This disclosure is made pursuant to Article 10 of 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 ("**SFDR**") as supplemented by Commission Delegated Regulation 2022/1288 of 6 April 2022 ("**RTS**"). This disclosure should not be used as a basis for a decision to invest in the Fund. Such a decision should be based on the Fund's confidential legal, tax and risk memorandum (together with any amendments or supplements thereto, the "**Memorandum**") and the Fund's limited partnership agreement ("**Agreement**") (the Memorandum and the Agreement, together, the "**Offering Documents**").

MED ACCESS S.L.P. (the "Fund")

(a) **Summary**

(b) **No sustainable investment objective:** This financial product promotes environmental or social characteristics but does not have as its objective sustainable investment.

(c) **Environmental or social characteristics of the financial product:** The Fund promotes environmental and social characteristics by directing capital to Portfolio Vehicles with strong ESG and sustainability commitments.

(d) **Investment strategy:** The Fund follows a fund-of-funds investment strategy, investing in alternative investment funds managed by ARCHIMED (the "**Portfolio Vehicles**"), targeting in particular funds classified as Article 8, Article 8 (with sustainable investment) or Article 9 under SFDR. ESG is integrated through SFDR classification verification, a gap analysis against the ARCHIMED SAS (the "**Manager**")'s exclusion policy, and an annual ESG review of all Portfolio Vehicles.

(e) **Proportion of investments:** At least 50% of the Fund's investments will be aligned with the environmental and/or social characteristics promoted by the Fund, comprising Portfolio Vehicles classified as Article 8, Article 8 (with sustainable investment) or Article 9 under SFDR, or applying materially equivalent exclusion criteria. The Fund does not commit to making sustainable investments within the meaning of Article 2(17) of SFDR.

(f) **Monitoring of environmental or social characteristics:** The Fund measures attainment of its promoted E/S characteristics through the share of Portfolio Vehicles integrating environmental and social considerations in their investment processes.

(g) **Methodologies:** Indicators are assessed at Portfolio Vehicle level through annual ESG reviews and data provided by Portfolio Vehicle managers. Environmental and social integration are assessed qualitatively based on Portfolio Vehicle reporting.

(h) **Data sources and processing:** Data is obtained primarily from Portfolio Vehicles through annual ESG reporting. Pre-investment data may be obtained from offering documents, public sources and desktop research. Data is reviewed and analyzed internally by the Manager. Actual data will be used where available; estimates may be used where Portfolio Vehicles do not provide full data.

(i) **Limitations to methodologies and data:** The Fund invests in Portfolio Vehicles that have in most cases already finalized their portfolio construction, limiting its ability to influence underlying portfolio company ESG practices directly. The Fund is dependent on the quality and completeness of data provided by Portfolio Vehicle managers. These limitations are mitigated through pre-investment due diligence and annual ESG reviews.

(j) **Due diligence:** The Manager relies on its Responsible Investment Policy to inform its approach to due diligence. The pre-investment process includes SFDR classification verification and a governance review of each potential Portfolio Vehicle.

(k) **Engagement policies:** The Manager conducts an annual ESG review of all Portfolio Vehicles and provides investors with a report on the central conclusions. Engagement is conducted at Portfolio Vehicle manager level. The Fund will use commercially reasonable efforts to request that Portfolio Vehicles conduct sanctions and adverse media checks as part of their own investment processes.

(l) **Designated reference benchmark:** No index has been designated as a reference benchmark to meet the characteristics.

(b) **No sustainable investment objective**

This financial product promotes environmental or social characteristics but does not have as its objective sustainable investment within the meaning of Article 2(17) of SFDR. The Fund does not commit to making sustainable investments and does not aim for alignment with the EU Taxonomy Regulation (EU) 2020/852.

(c) **Environmental or social characteristics of the financial product**

As an Article 8 fund of funds, MED Access promotes social and environmental characteristics through targeting Portfolio Vehicles classified as Article 8, Article 8 (with sustainable investments) or Article 9 under SFDR, which themselves promote E/S characteristics or pursue sustainable investment objectives.

The Portfolio Vehicles in which the Fund invests each follow their own specific ESG and impact strategy. Based on the historic approach taken by ARCHIMED-managed funds, the E/S characteristics promoted are expected to include, at a minimum:

Environmental

- Climate change mitigation and adaptation
- Resource and operational efficiency
- Pollution prevention and waste reduction
- Biodiversity impact management
- Environmental governance

Social

- Healthcare accessibility and affordability
- Product safety, efficacy and efficiency
- Business governance, ethics and resilience
- Employee welfare and labor practices
- Sustainable and resilient supply chain

(d) **Investment strategy**

Investment strategy used to meet the environmental or social characteristics

The Fund follows a fund-of-funds investment strategy, investing primarily in alternative investment funds managed by ARCHIMED SAS (the “Manager”) with a strong sustainability and ESG commitment. The Manager will apply a strategy of ESG integration through fund selection and ongoing monitoring.

Pre-investment phase:

- **SFDR classification verification** of each potential Portfolio Vehicle as a primary indicator of its ESG commitment.
- **ESG gap analysis** of the Portfolio Vehicle’s investment strategy against the Manager’s exclusion policy**.**

Ongoing monitoring:

- **Annual ESG review** of all Portfolio Vehicles; the Manager provides investors with a report containing the central conclusions of such review.

Policy to assess good governance practices

The Fund assesses the governance structure of potential Portfolio Vehicles as part of due diligence, covering advisory board composition, conflicts of interest policies and amendment procedures. The Fund will use commercially reasonable efforts to request legal confirmation that Portfolio Vehicles conduct sanctions and adverse media checks as part of their own investment process.

(e) **Proportion of investments**

The Fund's asset allocation is structured as follows:

- **Category #1 – Aligned with E/S characteristics (minimum 50%):** Portfolio Vehicles classified as Article 8, Article 8 (with sustainable investments) or Article 9 under SFDR, or applying exclusion criteria materially consistent with the Fund's own exclusion policy.
- **Category #2 – Other investments:** Portfolio Vehicles not meeting Category #1 criteria (expected to constitute a minority of the portfolio); and liquidity reserve investments (money market funds, short-term negotiable instruments, public and private debt, cash equivalents) held pending deployment into Portfolio Vehicles. No environmental or social safeguards are applied to Category #2 investments.

The Fund does not commit to investing in sustainable investments within the meaning of Article 2(17) of SFDR or in environmentally sustainable investments within the meaning of Article 2(1) of Regulation (EU) 2020/852 (the "EU Taxonomy"). Accordingly, the minimum extent to which sustainable investments with an environmental objective are aligned with the EU Taxonomy is 0%.

Note: During the ramp-up period prior to full deployment into Portfolio Vehicles, the liquidity reserve may represent the majority of assets.

(f) **Monitoring of environmental or social characteristics**

The Fund measures the attainment of its promoted E/S characteristics through the following indicators, monitored annually through the Manager's ESG review of Portfolio Vehicles:

- Share of Portfolio Vehicles integrating environmental considerations in their investment and due diligence processes (e.g. carbon emissions, energy use, environmental management systems, waste and pollution management);
- Share of Portfolio Vehicles integrating social considerations in their investment and due diligence processes (e.g. gender diversity, employee welfare, training, health and safety);

(g) **Methodologies**

Given the fund-of-funds structure of MED Access, indicators are assessed at Portfolio Vehicle level based on data and reporting provided by Portfolio Vehicle managers. Illustrative methodologies include:

- *Environmental and social integration:* Assessed qualitatively by reviewing whether each Portfolio Vehicle integrates environmental and social criteria in its investment and due diligence processes and collects relevant ESG indicators from its portfolio companies.

(h) **Data sources and processing**

Data sources used to attain the promoted characteristics

Data is obtained primarily from Portfolio Vehicles through annual ESG reporting. Pre-investment data may be obtained from offering documents, public sources and desktop research.

Measures taken to ensure data quality

Data collected from Portfolio Vehicles is reviewed and analyzed internally by the Manager. Annual ESG review reports are provided to investors summarizing central conclusions.

How data are processed

ESG data from Portfolio Vehicles is consolidated by the Manager on an annual basis as part of the ESG review process and reported to investors.

Proportion of data that are estimated

Actual data will be used where available. Where Portfolio Vehicles do not provide full data, the Manager may use qualitative assessments or estimates based on available information.

(i) **Limitations to methodologies and data**

Limitations to the methodologies and data primarily arise because of the fund-of-funds structure of MED Access: the Fund invests in Portfolio Vehicles that have in most cases already finalized their portfolio construction, limiting its ability to influence underlying portfolio company ESG practices directly. These limitations are mitigated through pre-investment ESG due diligence and annual ESG reviews of Portfolio Vehicles.

The Manager seeks to ensure that limitations regarding methodologies and data do not affect the attainment of the environmental and/or social characteristics.

(j) **Due diligence**

The Manager relies on its Responsible Investment Policy to inform its approach to due diligence. The pre-investment due diligence process includes:

- **A SFDR classification verification,** confirming the Portfolio Vehicle's SFDR category as a primary indicator of its ESG commitment;
- **A governance review** of the Portfolio Vehicle's structure, covering advisory board composition, conflicts of interest and amendment procedures.

(k) **Engagement Policies**

Given the fund-of-funds structure of MED Access, engagement is conducted at Portfolio Vehicle manager level rather than at the underlying portfolio company level. The Manager's engagement approach includes: conducting an annual ESG review of all Portfolio Vehicles and providing investors with a report on the central conclusions; and using commercially reasonable efforts to request that Portfolio Vehicles conduct sanctions and adverse media checks as part of their own investment processes.

(l) **Designated reference benchmark**

No index has been designated as a reference benchmark to meet the characteristics.

Update History

Version	Date
1	June 2026