Website product disclosure for financial products that have sustainable investments as their objective

Articles 38-49 RTS SFDR

Seaya Andromeda Sustainable Tech Fund I, FCR

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For financial products that have sustainable investments as their objective, financial market participants shall publish the information referred to in Article 10(1) of Regulation (EU) 2019/2088 and articles 38 to 49 of the commission delegated regulation (EU) 2022/1288 of 6 April 2022 made up of the following sections:

a) Summary (article 38)

Seaya Andromeda (“the Fund”) is a Climate Tech Fund that aims to address global climate challenges through technology. The companies in which the Fund invests must generate both a positive financial return and a positive impact in line with the Sustainable Development Goals (SDGs) developed by the United Nations; precisely, the Fund's investment is aligned with the following SDGs:

- SDG 2: End hunger, achieve food security and improved nutrition and promote sustainable agriculture.
- SDG 3: Ensure healthy lives and promote well-being for all ages.
- SDG 8: Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.
- SDG 12: Ensure sustainable consumption and production patterns.
- SDG 13: Take urgent action to combat climate change and its impacts.

The Fund is committed to investing in companies that engage in economic activities that substantially contribute, or facilitate contribution, to the achievement of the following environmental and social objectives:

(a) climate change mitigation

(b) adaptation to climate change

(c) sustainability and protection of water and marine resources

(d) transition to a circular economy

(e) pollution prevention and control

(f) protection and restoration of biodiversity and ecosystems

(g) the fight against inequality

(h) strengthening social cohesion, social integration and industrial relations

(i) developing human capital; and

(j) supporting economically or socially disadvantaged communities.

For an investment to be considered sustainable, and therefore suitable for investment by the Fund, in addition to contributing to an environmental and social objective, it must not cause significant harm to any EU Taxonomy objective (DNSH) and must observe good corporate governance practices. To ensure compliance with the DNSH principle, the Principal Adverse Impacts will be analyzed during the pre-investment due diligence process, following the indicators and guidelines included in the technical standards contained in Chapter II of the Delegated Regulation (RTS) and Annex I thereto.

In the investment phase, the achievement of the environmental objectives will be calculated mainly through the reduction of greenhouse gas emissions and efficiency improvements in resource consumption and waste generation. In contrast, the degree of achievement of social objectives will be measured, above all, through job creation as a primary indicator of the contribution to social and economic progress, together with complementary indicators that measure the contribution to improvements in the degree of well-being of the people affected.

b) No significant harm to the sustainable investment objectives (article 39)

Where investments are made in economic activities that qualify as environmentally sustainable under the Taxonomy, an investment will be determined to contribute to one environmental objective without significantly harming any other environmental objective if it meets the technical screening criteria (TSC) established by the European Commission. The identification and quantification of the principal adverse impacts on the sustainability factors of the Fund's investments is key to assessing whether significant harm to any other environmental or social objective is being caused by the investment, particularly in those investments that are not aligned with the Taxonomy and are not regulated by the TSCs. In addition, the principal adverse impacts are calculated annually to monitor the evolution of the negative impacts generated by the Fund's investments.

To ensure compliance with the principle of DNSH, the principal adverse impacts will be analyzed during the pre-investment Due Diligence following the indicators and guidelines included in the technical standards contained in Chapter II of the Delegated Regulation (RTS) and in Annex I of the same, and the alignment of the investment with respect to:

- the OECD Guidelines for Multinational Enterprises,
- the United Nations Guiding Principles on Business and Human Rights; and
- the principles and rights set out in the eight core conventions identified in the International Labor Organization's Declaration on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

c) Sustainable investment objective of the financial product (article 40)

The Fund's objective is to make sustainable investments by taking temporary stakes in unlisted companies whose main activity or business model is related to the following areas: Energy Transition, Sustainable Food Value Chain and Circular Economy.

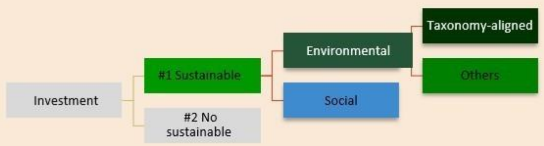
d) Investment strategy (article 41)

The Fund's investment strategy is based on positive screening, selecting those investments that, within the Fund's thematic areas, contribute substantially or facilitate the contribution to some of the defined environmental or social objectives.

The ESG analysis of the companies in which the Fund invests also analyzes good governance practices. The analysis is carried out using a questionnaire that addresses essential issues such as the existence and composition of the Board of Directors, the remuneration of directors, the existence of compliance policies and, due to the technological nature of the companies in which the Fund invests, particular emphasis is placed on cybersecurity and data protection policies. In that regard, the action plans require, at least, the existence of a Board of Directors, criminal compliance policies and robust cybersecurity and data protection policies.

e) Proportion of investments (article 42)

At least 75% of the Fund will be invested in sustainable investments.



#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.

#2Other 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 environmentally and socially sustainable investments.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

f) Monitoring of sustainable investment objective (article 43)

During the investment period, compliance with the action plan is monitored and promoted in the investees through representation on the board and dialogue with the management team.

Once a year, the management team is required to complete a questionnaire that includes questions on the degree of compliance with the action plan and the reporting of key indicators that include the principal adverse impacts on sustainability factors.

The analysis of the answers to the questionnaire will be carried out by the investment team and the conclusions will be reported to the ESG Committee of the management company, which will evaluate the improvements achieved in the company's ESG performance and will agree with the investment team on the content of the engagement actions to be carried out in the investee during the year.

g) Methodologies (article 44)

The degree of achievement of environmental objectives will be measured mainly through the reduction of greenhouse gas emissions and efficiency improvements in resource consumption and waste generation.

Additionally, the degree of achievement of social objectives will be measured principally through job creation, as a basic indicator of the contribution to social and economic progress. Other complementary indicators that measure the contribution to improvements in the degree of well-being of the people affected will also be used.

h) Data sources and processing (article 45)

The data used to measure the achievement of the Fund's environmental objectives are obtained from the companies themselves. The ESG Team is responsible for annually compiling the relevant information for the calculation of the sustainability indicators used to measure the achievement of the objective.

To ensure data quality, the data itself is reviewed by a specialized ESG consulting firm.

The evolution of the principal adverse impacts is measured through the annual calculation of indicators. The information regarding principal adverse impacts on sustainability factors will be included in the periodic information reported to investors.

There is no fixed proportion of data that will be estimated. In some cases, data will be estimated based on experience.

i) Limitations to methodologies and data (article 46)

In some cases, it will not be possible to obtain the necessary data for the calculation of the investee's indicators. This might occur when the investee has been recently acquired and, as a result, has not had time to implement the ESG processes required by the Manager.

The lack of data to measure the indicators does not prevent the investee from achieving the environmental or social objectives.

j) Due Diligence (article 47)

The identification of ESG aspects to be improved is based on an ESG assessment carried out in the pre-investment phase. The assessment process includes a materiality analysis of the most relevant ESG aspects within the sector of activity using the SASB® (Sustainability Accounting Standards Board) methodology and a questionnaire including the most relevant ESG issues based on the recommendations of UN PRI and Invest Europe. The conclusions of the analysis are incorporated into the Investment Case Memorandum for the Investment Committee including an action plan.

In addition, both compliance with the principle of no significant harm to any EU Taxonomy objective (DNSH) and the principal adverse impacts are analyzed during the pre-investment due diligence.

k) Engagement policies (article 48)

Seaya is committed to dialogue with the companies in which it invests to influence and ensure improved ESG performance. Therefore, it implements a strategy of active engagement. ESG activities within portfolio companies are overseen by Seaya teams, which may be directly involved in the execution or coordination of specific initiatives where they can add value.

If ESG Due Diligence has not been conducted before the investment decision-making process, the company undertakes to conduct an ESG Review as a situational analysis. Then, based on the results of the due diligence or review conducted, and if not already in place, investees could define an internal governance structure, a manager for ESG issues and implement a sustainability action plan to improve their performance, mitigate potential ESG risks and comply with applicable sustainability regulations.

l) Attainment of the sustainable investment objective (article 49)

The fund has not elected a benchmark index to achieve the sustainability investment objective.