

Financial market participant: Seaya Capital Gestion SGEIC S.A.**Summary**

Seaya Capital Gestion SGEIC S.A. considers principal adverse impacts of its investment decisions on sustainability factors. The present document is the consolidated statement on principal adverse impacts on sustainability factors of Seaya.

This statement on principal adverse impacts on sustainability factors covers the reference period from 1 January to 31 December 2022 (compulsory) and 1 January to 31 December 2021 (voluntary).

Seaya Capital is a responsible investor, integrating sustainability risks indicators and analysing principal adverse impacts on sustainability factors in since the first stage of the investment strategy.

Adverse Sustainability Indicator		Metric	Impact [year n]	Impact [year n-1]	Explanation	Actions taken, and actions planned and targets set for the next reference period	
Climate & Other Environment Related Indicators							
Emissions	1	GHG emissions	Scope 1 GHG emissions	0,07	N/A	Portfolio weight coverage: 97%. All emissions have been estimated using reported fuel consumptions and DEFRA's emission factors.	Efforts are being made by Seaya Capital to ensure that all companies calculate their emissions in order to drive future measures.
	2		Scope 2 GHG emissions	0,38	N/A	Portfolio weight coverage: 97%. All emissions have been estimated using reported electricity consumptions.	Efforts are being made by Seaya Capital to ensure that all companies calculate their emissions in order to drive future measures.
	3		Scope 3 GHG emissions	4,00	N/A	Portfolio weight coverage: 30%. Only 011h has reported its scope 3 GHG emissions.	Seaya Capital will work its portfolio companies throughout 2023 to report scope 3 GHG emissions.
	4		Total GHG emissions	4,45	N/A	-	Efforts are being made by Seaya Capital to ensure that all companies calculate their emissions in order to drive future measures.
	5	Carbon footprint	Carbon footprint (scope 1 and 2)	0,03	N/A	Carbon footprint including scope 1 and 2 emissions only due to lack of information of scope 3 emissions. Portfolio weight coverage for 2022 result: 97%.	Seaya Capital will work its portfolio companies throughout 2023 to report scope 3 GHG emissions.
	6	GHG intensity of investee companies	GHG intensity of investee companies (scope 1 and 2)	0,33	N/A	GHG intensity including scope 1 and 2 emissions only due to lack of information of scope 3 emissions. Portfolio weight coverage for 2022 result: 97%.	Seaya Capital will work its portfolio companies throughout 2023 to report scope 3 GHG emissions.
	7	Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	-	N/A	None of the investee companies operates in the fossil fuel sector.	None of the investee companies operates in the fossil fuel sector.
	8	Share of non- renewable energy consumption	Share of non-renewable energy consumption of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage of total energy sources	49%	N/A	Portfolio weight coverage for 2022 result: 97%. Only electricity consumption has been included in this indicator.	Seaya Capital will make its best efforts to measure electricity and total energy consumption and increase the use of renewable energy within investee companies.
	9	Share of non- renewable energy production	Share of 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	None of the investee companies produce energy.	Seaya Capital will encourage the production of renewable energy as far as possible within investee companies.
	10	Energy consumption intensity per high impact climate sector	Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector	0,01	N/A	All three investee companies are considered to be in high impact climate sectors.	Seaya will continue to take measures to reduce consumption in companies with a high climate sector.
	11	Investments in companies without carbon emission reduction initiatives	Share of investments in investee companies without carbon emission reduction initiatives aimed at aligning with the Paris Agreement	70%	N/A	-	Seaya Capital will be implementing measures so that more and more companies calculate their carbon footprint and are aligned with the objectives of the Paris Agreement.
Biodiversity	12	Activities negatively affecting biodiversity- sensitive areas	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%	N/A	None of the investee companies affects biodiversity-sensitive areas	However, the company acknowledges the importance of biodiversity protection and intends to prioritize corresponding initiatives in the future.

Water	13	Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	-	N/A	Portfolio weight coverage for 2022 result: 97%.	Seaya Capital will promote measures to reduce it.
Waste	14	Hazardous waste and radioactive waste ratio	Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average	-	N/A	Portfolio weight coverage for 2022 result: 97%.	Seaya Capital will continue to ensure that hazardous waste is no longer produced.
Social and Governance indicators							
Social and employee matters	18	Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	0%	N/A	None of the investee companies has been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises.	Seaya Capital will encourage investee companies to become signatories of international organizations in order to publicly demonstrate commitment to international standards and corresponding obligations.
	19	Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and guidelines for Multinational enterprises	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%	N/A	The consideration and measurement processes and compliance mechanisms to monitor compliance with UN Global Compact principles and guidelines for Multinational enterprises in investee companies have started.	Seaya Capital will promote among the invested companies the implementation of policies and commitments aligned with the principles of the UN Global Compact and OECD, as well as promote mechanisms to prevent violations of the principles of international standards. The aim is continuously strengthen the culture of ethical behavior within the organizations, following the principles of international entities at all times.
	20	Lack of a supplier code of conduct	Share of investments in investee companies without any supplier code of conduct (against unsafe working conditions, precarious work, child labour and forced labour)	33%	N/A	The consideration and measurement of the supplier code of conduct in investee companies have commenced.	With his capacity of engagement, Seaya Capital has to communicate the importance of having a code of conduct and implement measures to respect it.
Health & Safety	26	Investments in companies without workplace accident prevention policies	Share of investments in investee companies without a workplace accident prevention policy	3%	N/A	The consideration and measurement of workplace accident prevention policies in investee companies have commenced.	Seaya Capital will do its best to ensure that companies that do not have a workplace accident prevention policy implement it during the following year.
Diversity & Inclusion	28	Unadjusted gender pay gap	Difference between average gross hourly earnings of male paid employees and of female paid employees as a percentage of average gross hourly earnings of male paid employees;	1%	N/A	-	Seaya Capital will continue to actively promote equal pay to reduce the gender pay gap.
	29	Board Gender Diversity	Average ratio of female to male board members in investee companies, expressed as a percentage of all board members	0%	N/A	-	Seaya Capital will continue to actively promote gender diversity on the board.
Supply chain	31	Exposure to Controversial Weapons [anti-personnel mines, cluster munitions, chemical weapons and biological weapons]	Share of investments in investee companies involved in the manufacture or selling of controversial weapons	0%	N/A	None of the investee companies is involved in the manufacture or selling of controversial weapons.	Seaya Capital will continue to comply with its responsible investment policy which excludes armament activities.
Responsible governance	32	Convictions and fines	Number of convictions for violation of anti-corruption and anti-bribery laws	-	N/A	-	Seaya Capital will promote that investee companies will continue to comply with anti-corruption policies, international standards and ethics so that they do not result in fines or sanctions.
	33		Amount of fines for violations of anticorruption and antibribery laws	-	N/A	-	Seaya Capital will promote that investee companies will continue to comply with anti-corruption policies, international standards and ethics so that they do not result in fines or sanctions.
Human Rights	34	Lack of a human rights policy	Share of investments in entities without a human rights policy	100%	N/A	The consideration and measurement of the human rights policies implemented in the companies have started.	Seaya Capital will continue to implement measures to ensure that investee companies adopt human rights policies.
Anti-corruption and anti-bribery	35	Lack of anti-corruption and anti-bribery policies	Share of investments in entities without policies on anti-corruption and anti-bribery consistent with the United Nations Convention against Corruption	33%	N/A	The consideration and measurement of the anti-corruption and anti-bribery policies implemented in the companies have started.	Seaya Capital will continue to implement measures to ensure that investee companies adopt anti-corruption and anti-bribery policies.

Description of policies to identify and prioritise principal adverse impacts on sustainability factors

Seaya Capital acts as a responsible investor by integrating sustainability risks and analyzing principal adverse impacts on sustainability factors at each stage of the investment process. A questionnaire including specific ESG indicators is used to evaluate, measure and monitor the improvement in the evolution of ESG performance in the investees, which are measured at least annually.

The indicators include the principal adverse impacts on sustainability factors, which are complemented with others obtained from SASB® (Sustainability Accounting Standards Board) and are chosen according to financial materiality criteria within the sector of activity. The information needed in order to calculate the indicators is obtained directly from the investees. These indicators are monitored by the investment teams and discussed by the manager's ESG committee.

Engagement policies

The asset manager, as it does not invest in shares traded on a regulated market located in or operating in a Member State, will not publish an engagement policy on its website that describes how shareholder involvement is integrated into their investment policies.

References to international standards

Seaya is aligned with internationally recognised standards throughout its investment processes. On the one hand, Seaya is a signatory of the UN Principles for Responsible Investment since 2017 and has committed to implementing the six principles established by the international body. On the other hand, Seaya prioritizes its contribution to the UN Sustainable Development Goals (SDG), specifically SDG 12 (responsible consumption and protection) and SDG 13 (climate action), and also supports SDG 8 (decent work and economic growth), SDG 9 (industry, innovation and infrastructure), sustainable cities and communities (SDG 11), and SDG 15 (life on land) as secondary objectives.

The evaluation process of due diligence includes an analysis of the materiality of the most relevant ESG aspects within the sector of activity using the SASB® (Sustainability Accounting Standards Board) methodology and a questionnaire that includes the most relevant ESG issues developed from the recommendations of UN PRI and Invest Europe.

Seaya III is formalizing his ESG commitments and actions through strict policies and procedures like ESG policies, human rights policies, supplier code of conduct, EU General Data Protection Regulation compliance, workplace accident prevention policies and corruption and anti-bribery policies. Seaya will continue its commitment to the environment by promoting strategies and objectives among all companies in its portfolio to contribute to the climate change mitigation goals of the Paris Agreement.

Historical comparison

This is the inaugural year of reporting Principal Adverse Impacts (PAIs) for the year 2022.
