

**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		Impact [year n]	Impact [year n-1]	Explanation	Actions taken, and actions planned and targets set for the next reference period	
<b>Climate &amp; Other Environment Related Indicators</b>						
<b>Emissions</b>	1	GHG emissions	1.614,19	494,18	Five companies don't have Scope 1 GHG emissions, so the indicator has been calculated taking into account the rest of companies.	Efforts are being made by Seaya Capital to ensure that all companies calculate their emissions in order to drive future measures.
	2		44,68	52,76	Four companies don't have Scope 2 GHG emissions, so the indicator has been calculated taking into account the rest of companies.	Efforts are being made by Seaya Capital to ensure that all companies calculate their emissions in order to drive future measures.
	3		853,45	17,30	Five companies don't have Scope 3 GHG emissions, so the indicator has been calculated taking into account the rest of companies.	Seaya Capital will work its portfolio companies throughout 2023 to report scope 3 GHG emissions next year (especially with five investee companies).
	4		2.512,31	N/A	The total emissions are increasing due to the growing measurement of emissions by the companies.	Efforts are being made by Seaya Capital to ensure that all companies calculate their emissions in order to drive future measures.
	5	Carbon footprint	20,61	11,47	Carbon footprint including scope 1 and 2 emissions only due to lack of information of scope 3 emissions.	Seaya Capital will work its portfolio companies throughout 2023 to report scope 3 GHG emissions.
	6	GHG intensity of investee companies	135,35	113,65	GHG intensity includes scope 1 and 2 emissions only due to lack of information of scope 3 emissions.	The aim is to encourage companies to develop more defined climate change strategies and establish solid reduction targets over time.
	7	Exposure to companies active in the fossil fuel sector	0,00%	0,00%	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	74,13%	92,05%	Only electricity consumption has been included in this indicator. Two companies don't have electricity consumption, so the indicator has been calculated taking into account the rest of companies.	The asset manager 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	0,00%	0,00%	Only one company (in 2022) produces energy (all renewable).	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	0,01	0,00	Three investee companies are considered to be in high impact climate sectors.	Seaya Capital will continue to take measures to reduce consumption in companies with a high climate sector.
	11	Investments in companies without carbon emission reduction initiatives	46,34%	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.

<b>Biodiversity</b>	12	Activities negatively affecting biodiversity- sensitive areas	0,00%	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.
<b>Water</b>	13	Emissions to water	0,00	N/A	None of the investee companies has generated emissions to water. One company doesn't have this data, so the indicator has been calculated taking into account the rest of companies	Seaya Capital will calculate water emissions data for all its investee companies and it will promote measures to reduce it.
<b>Waste</b>	14	Hazardous waste and radioactive waste ratio	0,00	N/A	None of the investee companies has generated hazardous or radioactive wastes.	Seaya Capital will continue to ensure that hazardous waste is no longer produced.
	15	Non-recycled waste ratio	0,03	0,00	Companies' waste is relatively very low, so their waste is (or close to) 0. One company doesn't have this data, so the indicator has been calculated taking into account the rest of companies	Seaya Capital will encourage the companies in its portfolio to reduce the amount of non-recyclable waste as much as possible.
<b>Social and Governance indicators</b>						
<b>Social and employee matters</b>	18	Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (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	69%	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	85%	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.
<b>Health &amp; Safety</b>	25	Rate of accidents	0,04	0,00	Only one company has had one accident in 2022.	Seaya Capital will pay greater attention to enforcing workplace safety policies in order to avoid any accidents next year.
	26	Investments in companies without workplace accident prevention policies	20%	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.
<b>Diversity &amp; Inclusion</b>	28	Unadjusted gender pay gap	36%	17,47%	-	Seaya Capital will continue to actively promote equal pay to reduce the gender pay gap.
	29	Board Gender Diversity	21%	12,38%	-	Seaya Capital will continue to actively promote gender diversity on the board.
<b>Supply chain</b>	31	Exposure to Controversial Weapons [anti-personnel mines, cluster munitions, chemical weapons and biological 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.
<b>Responsible governance</b>	32		0,00	0,00	None of the investee companies has convictions for violation of anti-corruption and anti-bribery laws.	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	Convictions and fines	0,00	0,00	None of the investee companies has fines for violation of anti-corruption and anti-bribery laws.	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.
<b>Human Rights</b>	34	Lack of a human rights policy	44%	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.
<b>Anti-corruption and anti-bribery</b>	35	Lack of anti-corruption and anti-bribery policies	41%	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.

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**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 investee companies. Furthermore, recurrent meetings take place to assess ESG evolution. 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.

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**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.

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**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.

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**Historical comparison**

This is the inaugural year of reporting Principal Adverse Impacts (PAIs) for the year 2022. However, Seaya has already voluntarily calculated PIAS last year, showcasing proactivity and best practices in the market.