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

Summary

Seaya Capital Gestion SGEIC S.A. (Seaya Capital) 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 and 1 January to 31 December 2023.

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

Adverse Sustainability Indicator		Metric	Impact 2023	Impact 2022	Explanation	Actions taken, and actions planned and targets set for the next reference period
Climate & Other Environment Related Indicators						
Emissions	GHG emissions	Scope 1 GHG emissions	**2.228,2**	**1.872,5**	Total Scope 1 emissions have increased due to a rise in both the investee value and the Scope 1 emissions of one of the portfolio companies.	Seaya Capital actively encourages all companies in its investment portfolio to adopt practices to measure and reduce Scope 1 GHG emissions.
		Scope 2 GHG emissions	**19,9**	**49,8**	Despite the addition of two new portfolio companies to the portfolio, Seaya Capital has managed to achieve a reduction in Scope 2 emissions for the vast majority of its investees.	Seaya Capital will continue to actively encourages all companies in its investment portfolio to adopt practices to measure and reduce Scope 2 GHG emissions.
		Scope 3 GHG emissions	**1.908,3**	**942,9**	Scope 3 emissions have increased because all companies reporting Scope 3 have expanded their methodology compared to last year.	Seaya Capital works with its portfolio companies to report on Scope 3 GHG emissions and set reduction targets. For example, Seabery has already started to track Scope 3 emissions and commitment to be carbon neutral in 2 years.
		Total GHG emissions	**4.156,4**	**2.856,4**	The rise in Scope 3 emissions reporting, together with growing Scope 1 emissions and the increased value of investee companies, has contributed to the overall increase in total emissions.	Seaya Capital encourages all companies in its portfolio to calculate their carbon footprint and supports the implementation of action plans aimed at reducing it. For example, Samara has begun to comprehensively track scope 1, 2, and 3 emissions.
	Carbon footprint	Carbon footprint	**34,1**	**27,5**	The carbon footprint has increased due to a rise in Scope 1 emissions and the addition of two new companies to the portfolio.	Seaya Capital encourages all companies in its portfolio to calculate their carbon footprint and supports the implementation of action plans aimed at reducing it.
	GHG intensity of investee companies	GHG intensity of investee companies	**186,7**	**154,9**	Some investee companies have experienced an increase in revenue and value of investment, as well as a rise in Scope 1 emissions. This has resulted in a higher GHG intensity for the portfolio.	Seaya Capital encourages all companies in its portfolio to calculate their carbon footprint and supports the implementation of action plans aimed at reducing it. In particular, Seaya's impact fund has defined areas of focus such as energy and decarbonization as part of its strategy.
	Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	**0%**	**0%**	As in the previous year, none of the investee companies operate in the fossil fuels sector.	As a responsible investor, Seaya Capital continues to avoid investing in companies that operate in the fossil fuel sector.
	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	**62,10%**	**54,90%**	Due to the expansion of the portfolio and more comprehensive reporting, there has been an increase in the reported consumption of non-renewable energy.	Seaya Capital is committed to actively encouraging its portfolio companies to adopt renewable energy sources, aiming to lessen their environmental footprint. Furthermore, to reduce reliance on non-renewable energy, Crowdfarming plans to install solar panels at their logistics center by the end of the year.
	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	**0%**	**0%**	As in the previous year, only one company produces energy and it is all renewable.	Seaya Capital will continue to actively promote the production of renewable energy where applicable.
	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**	**0**	There are no changes from the previous year.	Seaya Capital will strive to keep the energy consumption intensity as low as possible within each high-impact climate sector.
	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	**50,6%**	**50,4%**	As Seaya Capital has expanded its portfolio, there has been a slight increase in companies without carbon reduction initiatives.	Seaya Capital will continue to support investee companies in calculating their carbon footprint and setting emissions reduction targets to further the objectives of the Paris Agreement.
Biodiversity	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%**	**0%**	As in the previous year, none of the investee companies affect biodiversity sensitive areas.	Seaya Capital continues to recognize the importance of biodiversity conservation and is dedicated to initiating future measures to protect it.
Water	Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	**0**	**0**	As in the previous year, none of the investee has emissions to water.	Seaya Capital will continue to monitor the water emissions of its companies and will strive to keep this indicator at zero.
Waste	Hazardous waste ratio	Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average	**0**	**0**	As in the previous year, none of the investee companies generate hazardous or radioactive wastes.	Seaya Capital will continue to ensure that no hazardous waste is produced.
	Non-recycled waste ratio	Tonnes of non-recycled waste generated by investee companies per million EUR invested, expressed as a weighted average	**0**	**0,1**	Seaya Capital's commitment to actively monitoring ESG KPIs, closely aligned with their investees' ESG action plans, is evident in the decrease of non-recycled waste.	Seaya Capital will continue to encourage the companies in its portfolio to recycle all waste and further promote the mission of waste reduction in the Andromeda fund.

Adverse Sustainability Indicator		Metric	Impact 2023	Impact 2022	Explanation	Actions taken, and actions planned and targets set for the next reference period
Social and Governance indicators						
Social and employee matters	Violations of UN Global Compact principles and Organization 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%**	**0%**	As in the previous year, none of the investee companies have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises.	Seaya Capital will continue to respect the principles of UNGC as well as guidelines by the Organization for Economic Cooperation and Development (OECD) for Multinational Enterprises and encourages investee companies to become signatories of international organization. Seaya itself is a signatory of the UN PRI since 2017.
	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	**70,3%**	**75,6%**	The proportion of investments in investee companies lacking policies to monitor compliance with international principles and guidelines has decreased, due to Seaya's active management of ESG issues and their success in formalizing governance structures and policies.	Through its ESG governance structure and investee action plans, Seaya Capital will continue to promote the formalized development of processes and mechanisms to monitor compliance with principles advocated by various international institutions.
	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 labor and forced labor)	**55,7%**	**76,6%**	As Seaya actively collaborates with companies to define and implement an ESG action plan, there has been an increase in the number of companies adopting supplier codes of conduct as part of their ESG governance structure.	Seaya Capital will continue to support its investee companies, where applicable, in adopting supplier codes of conduct as part of their ESG policies and governance structures. As part of this commitment, Seaya Capital is currently supporting both Samara and Rated Power in establishing supplier codes of conduct.
Health & Safety	Rate of accidents in investee companies expressed as a weighted average	Rate of accidents in investee companies expressed as a weighted average	**0,7**	**0,2**	This increase coincides with an increase in workforce size across portfolio companies.	As part of their ESG governance, Seaya Capital will continue to aim to reduce the accident rate across all its investee companies, ensuring the highest standards of health and safety.
	Investments in companies without workplace accident prevention policies	Share of investments in investee companies without a workplace accident prevention policy	**4,9%**	**16,1%**	The rate has declined due to Seaya's requirement for investee companies to implement actions that align with their individual human capital management strategies. Notably, Receeve is the only company without a workplace accident prevention policy, which is attributed to its remote-first operational model.	Seaya Capital will continue to support its investee companies in developing policies for the prevention of workplace accidents and can tailor these policies to align with Receeve´s operating model.
Diversity & Inclusion	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	**19,7%**	**18,9%**	This rate has slightly increased due to fluctuations in the values of investee companies. However, through ESG action plans and governance policies, some companies have observed reductions in the gender pay gap.	Seaya Capital actively commits to leveraging its influence to actively reduce the gender pay gap within its portfolio companies.
	Board Gender Diversity	Average ratio of female to male board members in investee companies, expressed as a percentage of all board members	**18,1%**	**8,9%**	This ratio has increased due to Seaya's active management of ESG issues in investee companies, along with their ability to establish and support investees in diversity objectives and goals.	Seaya Capital will continue to actively promote and advance gender diversity on the boards of investee companies.
Supply chain	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%**	**0%**	As in the previous year, none of the investee companies have been exposed to controversial weapons.	In line with the Seaya Capital Responsible Investment Policy, Seaya Capital will continue to not invest in companies involved in the manufacturing or selling of controversial weapons.
Responsible governance	Convictions and fines	Number of convictions for violation of anti-corruption and anti-bribery laws	**0%**	**0%**	As in the previous year, none of the investee companies have been convicted for the violation of anti-corruption and anti-bribery laws.	Seaya Capital will continue to ensure its investee companies adhere to anti-corruption policies and international standards, to avoid convictions.
		Amount of fines for violations of anticorruption and antibribery laws	**0%**	**0%**	As in the previous year, none of the investee companies have been fined for violating anti-corruption and anti-bribery laws.	Seaya Capital will continue to ensure its investee companies adhere to anti-corruption policies and international standards, to avoid fines or sanctions.
Human Rights	Lack of a human rights policy	Share of investments in entities without a human rights policy	**55,4%**	**55,8%**	This ratio has seen a slight decrease due to Seaya Capital's active management and implementation of ESG governance structures in new investees.	Seaya Capital will continue to support its investee companies in creating governance structures that adopt human rights policies.
Anti-corruption and anti-bribery	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	**40,6%**	**40,3%**	There has been a slight increase due to the addition of a new portfolio company where ESG policies are still being formalized.	Seaya Capital will continue to support its investee companies in adopting anti-corruption and anti-bribery policies in alignment with their ESG governance structures. Seaya Capital is actively engaging in extending the development of anti-corruption policies to all investees.

Description of policies to identify and priorities 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.

Seaya consistently integrates ESG principles and commitments across all its managed funds. The Asset Manager has introduced additional impact principles and commitments to certain investments, leading to a distinction between its venture funds and impact funds. This distinction is in accordance with the categorization set forth by the European Union Sustainable Finance Disclosure Regulation. Seaya III is classified as an Article 8 fund, promoting environmental and social characteristics, while Seaya Andromeda is registered as an Article 9 fund with sustainable investment as its objective.

Pre-Investment phase:
Preliminary screening is carried out to avoid investments in sectors which are listed as banned by the Seaya Capital Responsible Investment Policy.
A following ESG due diligence evaluation process is conducted and 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 pre-deal questionnaire that includes the most relevant ESG issues developed from the recommendations of UN PRI and Invest Europe.

Ownership Phase:
Seaya Capital promotes the adoption of ESG best practices in its portfolio companies, aiming to optimize impactful returns. The asset manager enforces ESG management through a detailed 100-day plan, actively implemented during the investment lifecycle. This strategy aims to improve ESG standards and reduce associated risks progressively. The plan is structured to include:
• A Materiality Map that assesses the significance of various ESG issues based on findings from the ESG Due Diligence or Review.
• Opportunities for ESG Value Creation, pinpointing the primary levers for ESG enhancement within the company.
• High-Level ESG Strategy Pillars and Objectives, outlining the core areas such as stakeholder reporting, climate change mitigation, and responsible human capital management, where the company will concentrate its efforts.
• A Detailed Action Plan, outlining specific initiatives aimed at achieving the set objectives. Each action will be assigned to a designated person or department, along with a suite of metrics to track the progress and degree of implementation.
Investee companies are tasked with establishing mechanisms for regular ESG data collection to meet Seaya Capital´s ESG tracking requirements. Portfolio companies also provide annual reports on Seaya Capital´s ESG indicators, including principal adverse impacts and other relevant ESG and climate metrics, while establishing an internal ESG governance structure.
If Seaya Capital holds a majority stake and has board representation, it proactively addresses significant ESG strategic issues, ensuring greater influence and oversight. In investments where Seaya does not have control, influence on sustainability matters and application of this Policy is more limited, but Seaya will always seek to integrate, to the extent possible, relevant ESG issues in the investment analysis and ownership engagement.
This strategic approach demonstrates Seaya Capital´s commitment to integrating ESG considerations into its investment strategy, ensuring that investee companies are not only compliant but also leaders in ESG best practices.

Engagement policies

Seaya Capital has integrated responsible investing into its core decision-making processes by adopting best practices that embed ESG and impact considerations into every investment. Seaya Capital ensures the effective management of ESG within its portfolio through the implementation of a comprehensive ESG 100-day plan, which is actively applied throughout the investment period. The goal of this plan is to progressively enhance the ESG performance of investee companies and to mitigate potential ESG risks.
ESG activities within the portfolio companies are overseen by Seaya Capital´s deal teams, who may participate directly in the execution or coordination of certain initiatives where they can add value. Investees may define an internal governance structure responsible for ESG issues and implement a sustainability action plan to improve their performance, mitigate potential ESG risks, and comply with applicable sustainability regulations.
Periodically, the investee companies report relevant ESG information and data to Seaya, including principal adverse impact indicators and other ESG and climate performance metrics included in international frameworks. This enables Seaya to monitor the performance of its portfolios and identify trends and areas of concern.

References to international standards

Seaya consistently integrates globally recognized standards into its investment strategies. As a signatory to the UN Principles for Responsible Investment since 2017, Seaya is dedicated to upholding the six principles set forth by this esteemed international organization. Furthermore, Seaya actively supports the UN Sustainable Development Goals (SDGs), with a particular focus on SDG 12 (responsible consumption and production) and SDG 13 (climate action). Additionally, Seaya contributes SDG 8 (decent work and economic growth), SDG 9 (industry, innovation, and infrastructure), SDG 11 (sustainable cities and communities), and SDG 15 (life on land) as secondary goals.

During the due diligence process, Seaya conducts a thorough analysis of the most significant environmental, social, and governance (ESG) industry risks utilizing the SASB® (Sustainability Accounting Standards Board) framework.
Seaya Capital has formalized its ESG commitments through the implementation of robust policies and procedures, including ESG guidelines, human rights policies, a supplier code of conduct, adherence to the EU General Data Protection Regulation, workplace accident prevention measures, and anti-corruption and bribery policies.

In its ongoing efforts to protect the environment, Seaya is committed to fostering strategies and objectives across its portfolio companies that align with the climate change mitigation targets of the Paris Agreement.

Historical comparison

The 2023 principle adverse impact report from Seaya Capital reveals notable advancements in certain ESG areas since 2022, while highlighting challenges in others.
In the areas of water, waste and biodiversity protection, a low impact has been maintained, and in some cases reduced, with almost zero tonnes of non-recycled waste produced, no investment in companies that negatively affect sensitive biodiversity areas and no emissions to water.
Regarding climate change and environmental indicators, Scope 3 greenhouse gas (GHG) emissions have notably increased in 2023, from 934 tonnes of CO2 equivalent to 1908 tonnes of CO2 equivalent. However this rise is mainly attributable to the increased reporting of Scope 3 emissions among portfolio companies. Seaya Capital commits to promoting the measurement of the carbon footprint and the implementation of carbon reduction plans, focusing on the transition to renewable energies and energy efficiency.

In 2023, Seaya Capital maintained its focus on promoting measures to mitigate social impacts. In the social and labor domains, there were no reported violations of the United Nations Global Compact principles or the OECD Guidelines for Multinational Enterprises. However, there was a slight increase in the percentage of investments in companies lacking compliance processes and mechanisms, from 60% to 70%. Seaya Capital, through its ESG governance structure and action plans for investees, will persist in advocating for the development of processes and mechanisms to ensure adherence to principles set forth by various international institutions. While the gender pay gap has widened, there has been a significant improvement in gender diversity on the board of directors, which has increased from 10% to 43%. Seaya Capital will continue its efforts to promote equal pay and to further enhance gender diversity on boards of directors.

In summary, Seaya Capital actively engages or promote initiatives with investee companies to integrate ESG practices into their operations. Through this engagement and periodic monitoring, Seaya remains committed to enhancing ESG practices in its portfolio companies and addressing ESG challenges.

Notes (Limitations)

1. Methodologies

The calculation of emissions can be complex, so some companies have improved their methodology in comparison with last year to obtain a more transparent and accurate indicator.

2. Perimeter

Indicator 13 (Emissions to Water): Four of the investee companies do not have this data, and one company considers it non material.
Indicator 14 (Hazardous Waste Ratio): Three companies do not have this data.
Indicator 15 (Non Recylced Waste ratio): Six companies do not have this data.
Indicator 22 (Board Gender Diversity): Three investee companies do not have a board of directors.