

POLICY ON THE INTEGRATION OF ESG RISKS INTO INVESTMENT SERVICES



version	Approval date	Responsible departments	Approval
1.0		ACTYUS PRIVATE EQUITY SGIIC, S.A.	Board of Directors of ACTYUS PRIVATE EQUITY SGIIC, S.A.

GEOGRAPHICAL JURISDICTION	AND	BAH	ESP	LUX	MON	PAN	BRA	MIA	SWI	URU
			X							

The information contained in this document is for internal use and is the property of the Andbank group. It may not be copied, reproduced or distributed, in whole or in part, without the express authorisation of the document's creator.

CONTENTS

1.	INTRODUCTION	3
1.1	PURPOSE OF THE POLICY	3
1.2	RESPONSIBILITY FOR THE PREPARATION, APPROVAL, MAINTENANCE AND UPDATING OF THE POLICY	3
1.3	RECIPIENTS OF THE POLICY	4
2.	GENERAL SUSTAINABILITY PRINCIPLES	4
3.	INTEGRATION OF ESG FACTORS	5
3.1	NON-CONSIDERATION OF ADVERSE EVENTS ON SUSTAINABILITY	5
3.2	TRAINING	5
3.3	TRANSPARENCY	5
4.	MAJOR ADVERSE EVENTS	5
5.	OVERSIGHT	5
6.	DOCUMENT TRACEABILITY	6

POLICY ON THE INTEGRATION OF ESG RISKS INTO INVESTMENT SERVICES

1. INTRODUCTION

1.1 PURPOSE OF THE POLICY

This document contains the criteria and procedures defined by ACTYUS PRIVATE EQUITY S.G.I.I.C., S.A. (hereinafter, “the Management Company” or “Actyus”) in relation to Socially Responsible Investing (SRI) and seeks to define the criteria to be taken into account during the integration of ESG (environmental, social and governance) variables.

Although the Management Company does not take these ESG criteria into account as an excluding factor when making investment-related decisions, it does bear them in mind as a relevant factor to its investments.

The integration of ESG criteria consists of incorporating the sustainability risk (understood as any environmental, social or governance event or condition which, if it were to occur, could have an actual or potential material adverse effect on the value of the investment) into the analysis processes in the investment-related decision-making, promoting transparent disclosure and working in collaboration to improve the effectiveness of the application of the principles approved by the Board of Directors.

In other words, the Management Company will bear in mind not only financial aspects, but also non-financial issues (ESG - E (Environmental), S (Social) and G (Governance) criteria) in the investment decision-making process, without neglecting the financial goals.

The ESG criteria are classified as follows:

1. Environmental (E): these encompass factors that affect the impact of the companies and institutions on the environment and the surroundings.
2. Social (S): these encompass factors that affect the impact of the companies and institutions on the people who may form part of or be affected by their activity.
3. Corporate Governance (G): these encompass factors that affect the impact of the companies and institutions on their management.

Actyus seeks to contribute to the sustainable development of society and companies, delivering benefits that transcend the financial markets by increasing the resilience of the real economy and the stability of the financial system.

1.2 RESPONSIBILITY FOR THE PREPARATION, APPROVAL, MAINTENANCE AND UPDATING OF THE POLICY

The Regulatory Compliance and Risk Management (hereinafter, “RCRM”) Department is responsible for drawing up and updating this procedure in accordance with the current regulations, and for this purpose it will work in conjunction with the other departments that are involved.

The Board of Directors of the Management Company is responsible for the approval of this Policy and the proper observance of this document. In addition, the Board of Directors is responsible for the integration of the sustainability risks.

The Internal Audit Unit will be responsible for the oversight of the proper observance of this policy, as well as any breaches that may be detected.

This is an open-ended document, and it will therefore be updated and/or modified, at least, in the following cases:

- a. When any legal or regulatory changes occur that affect the procedures outlined above.
- b. When any internal changes occur within the Management Company that affect the procedures outlined above.
- c. When, at the request of the RCRM Department, the Board of Directors approves the inclusion of new controls or modifies the existing ones.
- d. At the request of the Directors of the different areas of the Management Company, the internal and external auditors and the national regulator.

The different versions of this document are listed in the Record of Updates table attached at the end of this document.

1.3 SCOPE OF APPLICATION

This policy will apply to the Management Company, its administrators, directors, executives and employees.

The Management Company will provide the means to respond to the integration of the ESG criteria into the structure of the institution and its internal procedures.

2. GENERAL SUSTAINABILITY PRINCIPLES

The Management Company is guided by the United Nations Principles for Responsible Investment:

- Incorporation of ESG issues into practices and policies.
- Incorporation of ESG issues into investment-related analysis and decision-making processes.
- Promotion of the transparent disclosure of ESG issues during the process of identifying new investment opportunities for the Venture Capital Institutions (VCIs) and Collective Investment Schemes (CIUs) under management.
- Promotion of the acceptance and application of the Principles for Responsible Investment in the asset management sector.
- Collaborative work to improve the effectiveness of the application of the Principles for Responsible Investment.
- Reports on the activity and progress of the Management Company in the application of the Principles for Responsible Investment.

3. INTEGRATION OF ESG FACTORS

3.1 NON-CONSIDERATION OF ADVERSE EVENTS ON SUSTAINABILITY

The Management Company does not regard these ESG criteria as an excluding factor in its investment-related decision-making process, but does bear them in mind insofar as it deems them to be relevant factors to be analysed before investing.

3.2 TRAINING

The Management Company will provide the necessary training to its employees to ensure that they are aware of the ESG criteria.

3.3 TRANSPARENCY

The Management Company believes that being a responsible investor means being transparent with respect to how it incorporates ESG issues into its investment decisions. It therefore makes this policy available to its stakeholders on its website.

4. MAJOR ADVERSE EVENTS

Taking into account the size, nature and scale of the activities carried out with respect to the main adverse events in matters of sustainability, the Management Company is not taking the adverse events into account in its investment-related decisions. This is because it does not currently have a due diligence policy in relation to said adverse events, although it may be drawn up as the level of maturity of the ESG risk management allows firm methodologies to be established and if it becomes mandatory for the size of the Management Company.

5. OVERSIGHT

This policy is prepared by the Board of Directors of the Management Company, which is responsible for approving and overseeing its application.

6. DOCUMENT TRACEABILITY

VERSION CONTROL			
Version	1.0		
Version Changes	<ul style="list-style-type: none"> Initial version of the document 		
	Name	Signature	Date
Author	CNGR		20/10/2023
Review			
Approval	Board of Directors of the Management Company		18/12/2023