

PARTECH

EXCLUSION POLICY

February 2024



| | | | |
|------------------------------|------------------------------|---------------|---|
| Document Reference Code | PP02-01 | | |
| Name | Exclusion policy | | |
| Document Owner | Chief Sustainability Officer | | |
| Reviewer | Compliance & Risk | | |
| Approver(s) | Excom | | |
| Document Access Permissions: | | | Company-wide |
| French translation available | | | No |
| Effective from Date | 02 2024 | Review Cycle | Annually |
| Version no. | Author | Approval Date | Comments |
| 1 | CSO / Legal | 11/2023 | ➤ Creation of the policy |
| 2 | Compliance & Risk | 02/2024 | ➤ Updates of the policy (addition of the context, scope and objective sections) |



TABLE OF CONTENTS

| | |
|---|----------|
| I. INTRODUCTION | 4 |
| 1. CONTEXT | 4 |
| 2. SCOPE | 4 |
| 3. OBJECTIVE | 4 |
| II. INTEGRATION IN THE INVESTMENT PROCESS..... | 4 |
| III. EXCLUDED SECTOR DEFINITIONS..... | 5 |
| 1. ALCOHOL | 5 |
| 2. TOBACCO | 5 |
| 3. WEAPONS AND CONTROVERSIAL WEAPONS | 5 |
| 4. CASINOS..... | 5 |
| 5. PORNOGRAPHY | 5 |
| 6. CONVENTIONAL AND UNCONVENTIONAL FOSSIL FUELS | 5 |
| 7. WILDLIFE (“CITES”) | 5 |
| 8. GENETICALLY MODIFIED ORGANISMS (GMOs) | 5 |
| 9. HUMAN CLONING | 6 |
| 10. ILLEGAL ACTIVITY | 6 |
| IV. NORMATIVE EXCLUSIONS..... | 7 |
| 1. INTERNATIONAL LABOUR ORGANIZATION (ILO)..... | 7 |
| 2. THE OECD GUIDELINES | 7 |
| 3. THE 10 PRINCIPLES OF THE UN GLOBAL COMPACT..... | 7 |
| 4. THE WORLD BANK GROUP ENVIRONMENTAL, HEALTH & SAFETY GUIDELINES | 7 |
| 5. THE INTERNATIONAL FINANCE CORPORATION PERFORMANCE STANDARDS..... | 7 |



I. Introduction

1. Context

Partech Partners (“Partech” or “the Firm”) invests in technology-based companies at various stages of development (seed, venture and growth), operating on four continents. Those companies are tech-based but operate in different sectors.

As a regulated Alternative Investment Fund Manager (AIFM) operating in the venture capital space, Partech recognizes the need for responsible and sustainable investment practices that align with both its fiduciary duty and evolving regulatory landscape.

Funds’ legal documentation provides a formal framework for fund operations and restrictions. However, Partech has decided to implement an exclusion policy to enhanced transparency by clearly articulating the firm’s stance on specific exclusion criteria, ethical considerations, and sustainability principles. Together, these elements contribute to a comprehensive approach to responsible and sustainable investing.

2. Scope

The policy described below applies for its most recent Funds and when relevant.

It is also important to note that whenever they are reviewed, the ESG procedures of Partech are integrated with the investment cycles of new Partech Funds and will be adapted to the existing Funds when possible and relevant.

This policy addresses the direct investment made by Partech (across its funds), it is important to stress that this exclusion list concerns the activities of companies in which Partech aims to invest, it does not apply to those companies’ clients, stakeholders or suppliers.

3. Objective

This Policy complements the provisions of Partech’s Responsible Investment Policy that aim to present the broad lines of Partech’s approach to responsible investment and to the integration of Environmental, Social and Governance (ESG) considerations into key stages of the investment.

The Exclusion Policy sets out Partech’s exclusions regarding sectors or activities with potential negative impacts on the environment, human dignity, health, or society. Partech shall not invest in companies involved in the business sectors listed below.

II. Integration in the investment process

Once an investment opportunity is identified, various due diligences are carried out by Partech’s teams on the companies. During the pre-investment due diligence process, the screening phase is carried out in accordance with Partech’s RI (Responsible Investment) policy.

The screening covers the environmental and social impacts, and the corporate governance of the prospective companies. The Exclusion list set out by this policy must be checked during this phase.

Moreover, the alignment of the potential investment with this Exclusion Policy applies at the date of the analysis carried out, considering the past and present activities of the companies that are under consideration, including, when applicable, the expected future development as of the analysis date.

III. Excluded sector definitions

1. Alcohol

Companies or other entities engaged in the financing of, production of, or trade-in distilled alcoholic beverages (excluding for the avoidance of doubt beer and wine).

2. Tobacco

Companies or other entities engaged in the financing of, the production of, and trade in tobacco or tobacco-related products.

3. Weapons and controversial weapons

Companies or other entities engaged in the financing of, the production of, and trade in weapons and ammunition of any kind, it being understood that this restriction does not apply to the extent such activities are part of or accessory to explicit European Union policies.

Companies or entities involved in the production, trade, stockpiling sale, transfer, import, export or any other activity or service associated (including technological research) with “Controversial Weapons” or of key components (constructive component, support service, etc.) of any of the systems of the weapons above mentioned. “Controversial Weapons” are defined as the following categories of weapons: nuclear weapons, chemical weapons, biological weapons, depleted uranium weapons, anti-personnel mines, anti-tank mines, cluster/ bombs or (munitions) submunitions.

4. Casinos

Companies or other entities engaged in casinos and equivalent enterprises.

5. Pornography

Companies or entities engaged in any business relating to pornography or prostitution.

6. Conventional and unconventional fossil fuels

Companies or entities engaged in generating more than 10% of their turnover in fossil-fuel conventional energy production, sale, storage and transport (coal, oil, natural gas, electric power generation exceeding the Emissions Performance Standard (EPS)) and non-conventional prospection, exploration and extraction of oil from bituminous shale, tar sands or oil sands.

7. Wildlife (“CITES”)

Trade in wildlife or wildlife products regulated under the Convention on International Trade in Endangered Species or Wild Fauna and Flora (“CITES”).

8. Genetically Modified Organisms (GMOs)

When providing support to the financing of the research, development or technical applications relating to genetically modified organisms (GMOs), Partech shall ensure the appropriate control of legal, regulatory, and ethical issues linked to such GMOs.



9. Human cloning

Companies or entities engaged in human cloning (excluding companies or entities that use cloning for biomedical research or therapeutic purposes)

10. Illegal Activity

Companies or entities whose business activity consists of an illegal economic activity or any production, trade, or other activity that is illegal under applicable laws or regulations.

IV. Normative exclusions

In addition to the list of activities presented above, Partech takes the following safeguards into account. Investments made by Partech's funds must comply with one of the following safeguards:

1. International Labour Organization (ILO)

The applicable local, national, and international laws and regulations in the jurisdictions of operations of the portfolio companies and International Labour Organization (ILO).

2. The OECD Guidelines

(<http://mneguidelines.oecd.org/guidelines/>)

The OECD Guidelines for Multinational Enterprises are recommendations addressed by governments to multinational enterprises operating in or from adhering countries. They provide non-binding principles and standards for responsible business conduct in a global context consistent with applicable laws and internationally recognized standards.

3. The 10 Principles of the UN Global Compact

(<https://unglobalcompact.org/what-is-gc/mission/principles>)

To comply with the UN Guiding Principles on Business and Human Rights means operating in ways that, at a minimum, meet fundamental responsibilities in the areas of human rights, labour, environment, and anti-corruption. The Ten Principles of the United Nations Global Compact are derived from: the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention Against Corruption.

4. The World Bank Group Environmental, Health & Safety Guidelines

The "WBG & EHS Guideline" provide technical general and sector-specific guidelines as relevant and examples of good international industry practices to meet IFC's Performance Standards.

5. The International Finance Corporation Performance Standards

The International Finance Corporation Performance Standards ("IFC PS 1-8" -2012) defines an international framework for identifying and managing environmental and social risks related to activities ([Sustainability-At-IFC/Policies-Standards/Performance-Standards/](#))