

REPORT 2023

Loi Energie-Climat Article 29

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General ESG approach at 360 Capital

The below report provides information on our investment strategy and policy, as well as on the means dedicated to ESG monitoring.

1.1 Summary of the approach of the management company in consideration of ESG criteria in particular in its investment policy and strategy

360 Capital is a management company managing venture capital funds investing primarily in unlisted “early stage” companies through minority equity investments.

The purpose of the funds managed by 360 Capital is to make investments companies that are primarily innovative, recently formed and unlisted in a financial instruments market, with an important growth potential.

The management company endeavors to carry out its investment strategy as an equity investor in a socially responsible manner. As an early-stage investor, 360 Capital has a role to play in accompanying early-stage companies growing in a sustainable manner.

As a management company regulated by the French *Autorité des Marchés Financiers*, 360 Capital has the obligation to maintain and abide by a set of clear procedures.

Several of these procedures pertain to principles of good governance and responsibility, and are therefore worth mentioning within the scope of our ESG report.

In particular, they cover:

- Anti-money laundering procedures
- Registry of customer complaints
- Risk assessment and monitoring processes
- Ethics code (signed by all employees of the management company)
- Prevention of conflicts of interest
- Organization of internal control

For each fund managed by the management company, the Funds’ By-Laws further clarify and formalize the governance of the funds and the Management team’s obligations towards its LPs.

360 Capital established an ESG policy, publicly available on the 360 Capital website (www.360cap.vc). The ESG policy details a set of goals at the entity level and the processes deployed, in particular in the pre-investment phase, apply to all funds managed by 360 Capital which are in their investment period.

360 Capital is an engaged investor, mostly actively participating to the governance of investee companies through board membership or board observer positions (in c. 80% of investee companies). In 2023 360 Capital has formalized an engagement policy covering all its assets.

The management company’s commitments are translated in the monitoring of portfolio companies by encouraging the systematic consideration of ESG-related issues at the board level, and the gathering of KPIs on a selection of ESG criteria through an annual ESG questionnaire sent out to all investee company.

The result of the questionnaire is consolidated in an annual ESG report provided to all Limited Partners and available on the 360 Capital website.

360 Capital’ policies take into account sustainability risks into the investment decision-making process by incorporating additional layers of scrutiny and due diligence.

The management company aims to continuously improve its processes, in particular in the pre-investment phase, to take into account sustainability risks as defined by SFDR : “An environmental,

social, or governance event, or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of the investment arising from an adverse sustainability impact.” Due to the early stage nature of the investments and minority shareholding positions, 360 Capital does not take into account the Principle Adverse Impacts as defined in the SFDR regulation.

In the reference period, as at 31 December 2023, three funds currently in their investment period deployed by the Management Company were classified Art. 6 under SFDR or have considered Art. 6 under SFDR standards in anticipation of their By-Laws updates scheduled in 2023/2024. Two funds in their investment period are classified as Article 8 under SFDR, one of which was reclassified from Article 6 to Article 8 in January 2023 upon consultation of its Limited Partners

The investment policy of all funds includes strict exclusion policies, concerning controversial or high-sustainability risk. The exclusions are detailed in the by-laws of each fund and described in the management company’s ESG policy. These include, for example : coal extraction and production, tobacco, weapons, gambling, companies that seriously violate one of the principles of the UN Global Compact.

1.2 Content, frequency and means used by the management company to inform its investors and stakeholders on the criteria relative to the ESG goals taken into account in the ESG policy and investment strategy

360 Capital’s ESG policy is publicly available on the 360 Capital website (www.360cap.vc).

The Limited Partners (LPs) of the funds managed by 360 Capital receive, on an annual basis, 360 Capital’s Annual ESG report, covering the actions and processes implemented at entity level and aggregate results and trends of the investee companies of the funds managed by 360 Capital. Since March 2024, the Annual Report is made publicly available on 360 Capital’s website.

Additional information might be communicated to investors, in particular pertaining to specific E, S, G issues which might arise in portfolio companies, in each funds’ quarterly report.

For all new funds, the pre-contractual disclosures and by-laws specify the approach of the fund, in particular pertaining to Art. 8 classification.

In 2024, the investors of the two Article 8 funds - 360 Square II and 360 Fund V - will receive the SFDR periodic disclosures.

1.3 List of financial products mentioned in reference to article 8 and article 9 of the EU regulation 2019/2088 of the European Parliament and Council dated 27 November 2019, and the global share, in percentage, of assets under management taking into account social, environmental and governance in the total amount assets under management

Article 8 Products under the EU regulation 2019/2088 of the European Parliament and Council dated 27 November 2019, for the period ended December 31 2023 :

- 360 Square II
- 360 Fund V

In the reference period ended December 31 2023, the management company manages two Article 8 Fund, 360 Square II and 360 Fund V which promote E, S, G criteria. The Funds' commitments represent 56% of the funds total commitments on the five funds currently in their investment period.

Subsequent event: in 2024 upon consultation of its investors, a third fund, 360 Capital Italia SICAF, launched in 2022, will be reclassified as Article 8 under SFDR.

In the reference period ended December 31 2023, three funds managed by 360 Capital currently in their investment period were classified Article 6 under the Regulation EU 2019/2088 (SFDR) or have considered Art. 6 standards in anticipation of their By-Laws updates scheduled in 20232.

All the funds managed by 360 Capital are covered by 360 Capital's general approach to ESG. In particular, all funds currently in their investment period (actively deploying in new investee companies) are within the scope of extra-financial E, S, G criteria monitored through 360 Capital's annual ESG report and include strict sectorial exclusion policies as defined in each fund's by-laws.

1.4 Adhesion of the management company or some of its financial product to a charter, a code, or the obtaining of label on the consideration of E, S, G criteria, including a summary of these criteria, in coherence with paragraph 2)d) of the above EU regulation.

360 Capital is a signatory of the United Nations Principles for Responsible Investment (UNPRI).

360 Capital is also a signatory of the SISTA and France Invest charters on diversity, promoting gender diversity in entrepreneurship and venture capital.



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