



ARCHIMED

IMPACT ING HEALTH CARE

ARTICLE 29 LEC

Report

June 2025

Reporting Period: 1st January – 31st December 2024

Article 29 « Loi Energie Climat »¹

2024 Report

ARCHIMED

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¹ This report follows the requirements of article 29 of law n°2019-1147 of November 8, 2019, and its implementing decree n°2021-996 published on May 27, 2021. It is based on the structure described in Appendix B of AMF instructions DOC-2008-03 and DOC-2014-01.

ARCHIMED, an industrial healthcare actor

ARCHIMED is a global investment firm focused on investing in companies across the healthcare industries that improve lives and access to innovative, effective, and affordable healthcare services and treatments. Since its inception in 2014, ARCHIMED has raised 8 main funds (20 funds including co-investments), totalling around €8 billion in assets under management (AUM). In 2024, ARCHIMED raised two funds (MED Rise and MED Access), acquired five new companies (Cellese, Jeisys, SeqCenter, FIM Medical, and Irrimax), and exited three (Ad-Tech, SMG, and Deallus), continuing to provide superior returns to investors and society. Over the last decade, ARCHIMED has supported over 40 companies in their missions to deliver sustainable healthcare solutions and positive patient outcomes.

With offices in Europe, North America, and Asia, and a team of over 200 staff representing 35 nationalities and a mix of operational, scientific, and financial backgrounds, we provide a global reach for our companies and investors and enable sustainable growth through innovation, internationalization, acquisitions, and capacity expansion. As signatories of the United Nations Principles for Responsible Investment (UN PRI), we are committed to integrating ESG factors across the investment lifecycle and contributing to the United Nations Sustainable Development Goals (UN SDGs). Our recently prioritized Animal and Environmental Health segment reinforces our One Health investment approach, aiming to advance optimal health outcomes for humans, animals, and ecosystems, while supporting sustainable development. In 2024, we also strengthened our commitment to investing in companies that contribute to our mission of impacting healthcare by creating a subsector database on impact potential pathways.

Through the EURÊKA Foundation, whose mission is to improve research and innovation on undertreated diseases and assist vulnerable people affected by health problems (mental and physical), we support numerous charities, associations, and scientific projects by allocating 5% of the carried interest of our funds. ARCHIMED has donated over €5 million to the Foundation since its establishment in 2014. In 2024, we supported 10 Clubhouses (community-based programs supporting people living with mental disorders in their reintegration to society and professional life), 20 associations, and funded 9 research projects in the most promising areas of medicine.

Our team – Our team is composed of experienced healthcare professionals, including doctors, pharmacists, veterinarians, and neuroscientists, working alongside those with financial and industry expertise. We specialize in partnering with founder-owned companies, many of which are led by individuals with strong scientific backgrounds. This unique alignment allows us to truly understand their world and provide tailored support to navigate the complexities of their industries.

Our mission – We join forces with scientists, healthcare professionals, entrepreneurs, and investors to drive the sustainable development of healthcare industries through our three main activities:

- **Fund** – We ensure funds are channeled into companies contributing to improving healthcare outcomes and achieving both ESG and impact objectives.
- **Support** – We empower healthcare entrepreneurs to grow their companies, seeking to drive value for multiple stakeholders and build a better healthcare future.
- **Return** – We deliver superior returns to our investors and fair rewards to our companies, while also aiming to have a wider societal impact by supporting charitable projects through the EURÊKA Foundation.

Our vision – We believe in human, animal, and environmental health as a common value amongst all people and a key condition for long-term development.

Our ambition – By driving more resources to the healthcare industries, we are improving people's health and economic status across all societal levels.

Information pursuant to Article 29 of the Energy-Climate Law (LEC)

A. Overview of the entity's approach to environmental, social, and governance criteria

1. Responsible investment strategy:

Sustainable development is a key precondition for realizing ARCHIMED's mission of advancing healthcare industries, improving health outcomes, and driving long-term value creation. This commitment permeates every aspect of the business and is positioned at the core of the responsible investment approach. It guides ARCHIMED in prioritizing, selecting, and investing in mission-driven companies with the ambition of impacting healthcare and building leading, responsible, and innovative businesses to deliver long-term performance for investors while leaving a positive footprint on society.

ARCHIMED's **Responsible Investment Policy** and internal **Responsible Investment Procedure** reinforce the investment guidelines and strategy implementation, integrating ESG considerations throughout the investment lifecycle by outlining:

- the responsible investment approach and commitments, including objectives and scope
- applicable regulations, frameworks, and definitions for responsible investment (e.g., SFDR, CSRD, UN SDGs, etc.)
- methodologies, tools, and processes used to integrate extra-financial and ESG criteria in the investment process
- how sustainable (impact) investments are identified from the pre-investment and due diligence phase
- how to measure contribution to the **Health Objectives: safety, efficacy, accessibility, affordability, and efficiency**
- how ESG and impact topics are managed and improved during the holding period across the portfolio
- ESG governance structure and processes at the management company level
- compliance controls applicable to certain investment procedures
- specific guidelines and position statements addressing healthcare watchlist activities requiring higher scrutiny

ARCHIMED's responsible investment approach is encapsulated in the following core commitments:

1. **Impact – Contribute to Health Objectives**

- Pre-investment: Build a clear impact thesis based on the contribution to SDG targets and our Health Objectives.
- Post-investment: Define meaningful objectives and specific KPIs to measure impact during the holding period.

2. **ESG – Build Responsible Companies**

- Pre- and post-investment: Identify material ESG topics and assess the company's maturity against peers.
- Post-investment: Actively support companies in setting a Sustainability Roadmap with improvement actions.

3. **Engagement- Align Business Interests**

- Post-investment: Discuss sustainability at the board and link part of management remuneration to ESG targets.

4. **Transparency – Monitor and Report on Sustainability Performance**

- Pre- and post-investment: Evaluate sustainability risks and opportunities for due diligence and investor reporting.
- Post-investment: Collect portfolio ESG and impact data (incl. PAIs) and communicate progress on annual reports.

a. Adherence to responsible business charters, codes, or initiatives pursuant to Article 4 § 2 (d) of the EU SFDR:

It is built upon established frameworks, such as **the UN PRI and SDGs, the Sustainability Accounting Standards Board (SASB), and the Impact Frontiers' Five Dimensions of Impact**, and regulatory requirements mandated by the **European SFDR and CSRD, and French LEC Art.29**. Committing to continuously improving investment practices and fostering collaboration to advance the industry's sustainable transformation, ARCHIMED is engaged in the following initiatives:

- Since 2018, ARCHIMED has been a signatory of **the UN PRI**, the international network of investors integrating ESG criteria and recommended actions into responsible investment practices in line with the six principles.
- Since 2020, ARCHIMED has been a signatory of **the Initiative Climat International (ICI)**, the leading network of private market actors working towards building climate-resilient portfolios and developing Paris-aligned climate strategies.
- Since 2022, ARCHIMED's Sustainability & Impact Operating Partner has been an active member of **the France Invest Sustainability Commission GT1**, a working group creating guidelines on key topics like climate change and biodiversity.
- Since 2024, ARCHIMED has been a member of **the European Data Convergence Initiative (EDCI)**, which promotes a streamlined and standardized approach to portfolio ESG data reporting, improving data comparability and accessibility.

b. ESG integration pre-investment:

Before every first Preliminary Investment Committee (PIC 1), an **Impact Referent** is appointed from the deal team to ensure that all pre-investment sustainability and impact processes are properly followed, in parallel to commercial, financial, legal, or other requirements that are systematically assessed for each investment. The Referent is responsible for completing the **Internal Sustainability Tool (IST)**, ARCHIMED's proprietary sustainability analysis comprising the following components:

- (i) **a negative screening based on our exclusion and watchlist criteria**, designed to filter out activities in restricted sectors, such as fossil fuels, tobacco, and weapons, and mandate higher scrutiny for activities that could raise potential regulatory and/or ethical risks, such as investments in animal testing, medical aesthetics or opioids.
- (ii) **a high-level ESG review based on material topics**, aiming to collect preliminary information on sustainability performance and highlight potential ESG risks and/or opportunities that can be the focus of further due diligence.
- (iii) **an impact assessment based on the Five Dimensions of Impact and the principles of intentionality, additionality and measurement**, seeking to evaluate the contribution of investments to UN SDGs, especially SDG 3 "Good Health and Well-being: Ensure healthy lives and promote well-being for all at all ages" and SDG 9 "Industry, Innovation and Infrastructure: Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation", and our Health Objectives: better safety, efficacy, efficiency, accessibility, affordability.

The **Sustainability & Impact (S&I) team** is actively engaged in this process, providing support and guidance to the Referent and reviewing the analysis. The results are integrated into the PIC1 paper and presented to the **Investment Committee (IC)**. To build ESG capacity beyond the S&I team, a **Business and Impact Reviewer**, typically an experienced Operating Partner or a senior investment team member but external to the deal team, is also appointed ahead of PIC1 to challenge this analysis with relevant ESG and impact questions, providing an alternative perspective rooted in their deep understanding of the industry.

Should the investment move forward, an extensive **ESG and Impact Due Diligence (DD)** is performed by external experts to obtain more comprehensive information on the target's sustainability performance and maturity against peers on material ESG topics based on the business activity, healthcare industry sector, and company size, and validate the impact thesis. Specialized due diligence may also be performed on a case-by-case basis to further deep-dive into a specific topic of concern, e.g., environmental pollution, supply chain resilience, health and safety, animal testing, etc. The DD results are integrated into the respective PIC paper and play an important role in informing the investment decision-making process as well as the **Post-Completion Action Plan (PCAP)**, which includes actions on the management of ESG and impact topics. If the IC approves an investment, ESG and impact obligations also form part of the respective contractual agreements. Aside from the Policy and internal Procedure, these processes are formalized in the **Investment Execution Checklist**, against which compliance is routinely verified by the **Risk and Legal team** aligned with ARCHIMED's global risk management plan.

c. ESG integration post-investment:

During the holding period, a comprehensive **sustainability assessment** is performed by **the S&I team or expert consultants** to deliver key insights to company management on the most material ESG topics and overall ESG performance. This analysis is tailored for each company, taking into consideration factors such as the nature of its business activities, industry sector, geographic location, supply chain characteristics, regulatory environment, and ESG maturity and best practices of peers. The findings form the basis of the company's **Sustainability Strategy and Roadmap**, which is co-developed with company management to define clear **ESG objectives and improvement actions** fitted in a realistic timeline that is aligned with business priorities and resources. Also, **relevant KPIs and targets** are set to facilitate progress monitoring year-on-year and inform decision-making. To ensure effective governance and accountability on sustainability topics, an internal **ESG Committee or Taskforce** that is led or overseen by company management is created and meets regularly to discuss tasks. As part of the continuous effort to educate companies on sustainability and drive engagement at the executive level, whenever it is a viable option, the S&I team conducts **interactive on-site workshops** focused on providing hands-on support for developing the ESG Strategy, setting up the governance, and guiding the practical implementation of the roadmap. Similar to the pre-investment process, a **Portfolio Impact Referent** is appointed from the deal team who works closely with the S&I team to ensure that sustainability commitments are consistently integrated into the company's strategy and vision.

For MED Platform II (SFDR Art. 9), and relevant MED III (SFDR Art. 8+) and MED Rise (SFDR Art. 8+) investments, defining a healthcare impact mission and refining the **Health Objectives and related KPIs** that were identified pre-investment form a critical part of this project, bringing to the forefront the intentional positive contribution of these companies to society.

To further incentivize sustainability initiatives and elevate them to the level of commercial and financial goals, for all MED Platform II (SFDR Art. 9), MED III (SFDR Art. 8+), and MED Rise (SFDR Art. 8+) investments, 20% of management's annual **variable remuneration is linked to ESG targets**. Moreover, sustainability topics are a standard item on the board meeting agenda, actively reinforced by ARCHIMED investment team members who hold board seats within companies.

The S&I team runs an annual **ESG Reporting Campaign** to collect sustainability and impact portfolio data, performs **follow-up reviews** to evaluate each company's progress against its ESG objectives, and offers guidance on future improvements. The consolidated results are shared through **quarterly Fund Investor Reports and the annual Sustainability & Impact Report, including Portfolio Snapshots**. Sustainability and impact results are also shared as part of the exit success story.

Company performance across the following key ESG topics is systematically assessed throughout the investment lifecycle:

ENVIRONMENT



Assessment of GHG Emissions Scopes 1, 2, 3
GHG Emissions Reduction Action Plan and Targets
Biodiversity Risks
Waste Management and Eco-design
Environmental Pollution
Exposure to Climate Change Risks

SOCIAL



Diversity, Inclusion, and Equal Opportunities
Employee Development and Training
Employee Engagement and Labour Relations
Occupational Health and Safety
Community Engagement and Philanthropy

GOVERNANCE



Business Integrity and Ethics
Corporate Governance (incl. ESG Governance)
Supply Chain Management (incl. Human Rights and Environmental Impacts)
Risk Management (incl. Data Protection and Security)
Product Quality, Safety, Marketing & Distribution

2. EU SFDR fund classification

As of December 31st 2024, the global amount managed by ARCHIMED was around €4.3 billion, including unlisted assets like equities, convertible bonds, derivatives, and other financial instruments, of which 88% was covered by the ESG approach. All ARCHIMED funds are classified as **EU SFDR Art. 8, 8+, or 9** and are subject to the corresponding regulatory obligations. Art. 8+ is an unofficial classification, whereby funds promote environmental and social characteristics (Art. 8 strategy) but also go beyond this by acquiring assets that pursue a sustainable investment objective (Art. 9 strategy). For ARCHIMED Art. 8+ funds, the minimum threshold for sustainable investments is set at two-thirds (66%), i.e., investments that can demonstrate an intentional contribution to improving healthcare in line with SDG 3 and ARCHIMED's Health Objectives.

Article 8 funds	Article 8+ funds	Article 9 funds
<i>Funds that promote environmental and social characteristics</i>	<i>Funds that promote environmental and social characteristics, but also contribute towards a sustainable investment objective</i>	<i>Funds that contribute towards a sustainable investment objective</i>
MED I (€ 30M/ 0% ²) MED II (€ 303M/ 98%) MED Platform I (€ 893M/ 100%) MED Bio (€ 105M/ 100%)	MED III (€ 232M/ 95%) MED Rise (€ 25M/ 100%)	MED Platform II (€ 1.4B/ 96%)

ARCHIMED's funds and respective Net Asset Value (NAV)/ % ESG Coverage.

²MED I is at the end of the liquidation period, with significant impairment of the remaining asset.

3. ESG communication and reporting:

ARCHIMED's commitment to transparency means that comprehensive sustainability information is regularly shared with investors, business partners, and other relevant stakeholders through various communication channels:

- [The ARCHIMED website](#), which presents a summary of the responsible investment approach, is kept up to date.
- [The Responsible Investment Policy](#), which describes in more detail the responsible investment approach, including the processes, tools, and methodologies implemented to integrate ESG criteria, is available on ARCHIMED's website.
- [The EU SFDR Periodic Disclosures](#), which consist of Annexes IV and V (Periodic Fund Disclosures) and Annex I (PAI Report), are updated annually (before June 30) and are available on ARCHIMED's website and investor data platform.
- [The EU SFDR Pre-Contractual Disclosures](#), which consist of Annexes II and III (Pre-contractual Fund Disclosures), are available on ARCHIMED's investor data platform.
- [The Fund Investor Reports](#), which include sustainability updates and material ESG incidents at ARCHIMED and for each fund specifically, are published quarterly and are available on ARCHIMED's investor data platform.
- [The ESG Reporting Campaign](#), which requires all portfolio companies to collect and report on their sustainability performance across a comprehensive set of ESG and healthcare indicators, runs annually. The results are communicated to investors by responding to their [ESG LP Reporting Requests](#), including EDCI and EET reporting.
- [The Sustainability & Impact Report](#), which provides an overview of strategic priorities, ARCHIMED milestones, and portfolio sustainability highlights ([Portfolio Snapshots](#)), is published annually and is available on ARCHIMED's website.
- [The Healthcare Position Statements](#), which outline clear criteria and guidelines applied to all investment opportunities involved with watchlist activities like stem cells, animal testing, and aesthetics, are shared with investors if requested.

B. Internal resources deployed by the entity

1. Human resources:

ARCHIMED's S&I team, composed of four full-time employees (2.5% of the total headcount) – a Director, Associate, Senior Analyst, and Analyst – and one part-time Operating Partner, brings unique in-house expertise on sustainability and impact topics. This team's primary role is to implement the responsible investment strategy in compliance with relevant regulations and to support deal teams and companies in integrating ESG criteria across the investment lifecycle to create sustainable business value. For each deal, an S&I team member is invited to all [Investment Committees](#), participating in productive dialogue on ESG and impact considerations informing investment decisions. Also, [ARCHIMED's ESG Committee](#), composed of members of the Management Committee and the S&I Director, meets periodically to define extra-financial objectives and report to the [Management Committee](#). Ultimately, the entire ARCHIMED team is engaged in driving forward the responsible investment strategy, with the investment team (48% of the total headcount) taking the most active role outside of the S&I team, followed by the IR team (8% of the total headcount), which responds to ESG & Impact LP requests and manages the production of sustainability materials for investor communication. To further align interests, all ARCHIMED team members have sustainability and impact objectives linked to a portion of their annual variable remuneration.

ESG Committee	<ul style="list-style-type: none"> • Denis Ribon – Chairman, Managing Partner, and CEO • Sandrine Laporte – Finance and Operations Partner, and CFO • Karem Kobayashi – S&I Director <p>(Other Partners/Strategic Partners, where relevant)</p>
S&I Team	<ul style="list-style-type: none"> • Karem Kobayashi – S&I Director • Liam Maguire – S&I Associate • Evangelia Nteventzi – S&I Senior Analyst • Miles Brown – S&I Analyst • Alice Morillon – S&I Operating Partner

2. Technical resources:

Pre-investment, the main technical resource supporting the implementation of the responsible investment strategy is the proprietary Internal Sustainability Tool, consisting of Excel spreadsheets guiding the preliminary ESG & impact screenings

for all investment opportunities. Post-investment, a third-party digital platform is licensed to host the annual ESG Reporting Campaign, enabling portfolio data collection and analysis, and another platform is utilized for carbon footprint calculations. Also, ARCHIMED uses a software solution to evaluate climate and biodiversity risks in DD and during portfolio management, and the Private Market Decarbonization Roadmap (PMDR) tool to monitor decarbonization efforts across its investments.

3. Financial resources:













The 2024 total budget accounting for ESG expenses, including fees paid to providers, was €953,376 (1.4% of the total budget). Also, a dedicated ESG & Impact DD budget is systematically set aside pre-investment for each target investment. During the holding period, ad-hoc financial resources are allocated to advance the ESG analysis conducted pre-investment, support the development of companies' ESG strategies, and the implementation of specific initiatives such as carbon footprint assessments or renewable energy installations; this sum varies based on each company's needs and priorities.

4. Initiatives introduced to strengthen in-house capabilities:

Building internal capabilities and knowledge on ESG-related matters beyond the S&I team has been a primary objective. The ARCHIMED investment team, in particular, participates in at least annual training on sustainability and impact topics coordinated and delivered by the S&I team or in collaboration with expert consultants. Also, investment and IR team members receive continuous support and guidance from the S&I team focused on the integration of ESG and impact criteria pre-investment, as well as the implementation of sustainability best practices within companies during the holding period. In 2024, ARCHIMED's digital learning platform was also used to facilitate access to presentation materials on ESG topics, including relevant regulations like the EU CSRD, and disseminate relevant online resources. The S&I team continues to circulate thematic healthcare newsletters to raise awareness and educate the wider ARCHIMED team on pertinent topics inspired by ARCHIMED's One Health focus, such as the impact of antimicrobial resistance (AMR), eco-design strategies for healthcare companies, and the health consequences of climate change. Structured training sessions addressing the most material ESG topics for each of ARCHIMED's eight prioritized healthcare sectors – Diagnostics, Life Science Tools & Biologic Services, Pharma Services, Biopharma Products, MedTech, Healthcare IT, Consumer Health, Animal & Environmental Health – are planned for Q3 2025. These sessions will be delivered by expert consultants with the support of the S&I team and aim to provide practical insights to investment teams on how to drive sustainable transformation within their sector companies.

5. External support:

To supplement in-house capabilities, ARCHIMED benefits from external expertise by engaging with the following providers:

Third-party service provider	Scope of work in 2024-2025
   	ESG & Impact Due Diligence
 	Carbon Footprint Assessments
	Climate & Biodiversity Risk Analysis
	ESG Data Collection & Reporting
 	Sustainability Regulations Support
	Sustainability-Linked Loan Audit
	Double Materiality Assessment

C. ESG criteria in the entity's governance

As described in sections A and B, the main governance bodies in charge of overseeing the execution of the responsible investment strategy, covering the integration of ESG criteria across the investment lifecycle, are **the Management Committee, the Investment Committee, the ESG Committee, and the Board of Directors of ARCHIMED companies**. These governance bodies, comprising industry professionals with substantial experience in managing companies and applying ESG criteria in business decision-making, play a fundamental role in steering strategic decisions on material sustainability issues concerning ARCHIMED, target investments, and ARCHIMED companies. Also, **the S&I and Risk & Legal teams** perform routine operational and compliance controls to ensure all established ESG governance procedures are correctly implemented. While formal ESG criteria are not incorporated into the internal regulations of ARCHIMED supervisory and management bodies, good governance practices are consistently upheld through their members' deep expertise and skillset as well as ARCHIMED governing policies, fostering a diverse, equitable, and inclusive workplace for all employees.

<p>Management Committee</p>	<ul style="list-style-type: none"> • Denis Ribon – Chairman, Managing Partner, CEO, and EURÉKA Foundation Director: +30 years of healthcare sector experience, former veterinarian, management consultant, and global head of 3i's healthcare team, served as a Deal Partner, Board Chairman, or Board Director in more than 30 public and private healthcare companies. • Vincent Guillaumot – Managing Partner and EURÉKA Foundation President: 20 years of healthcare sector and private equity experience, former management consultant, member of 3i's healthcare team, and Managing Director of a European medical diagnostics lab network, currently holding board positions in investee companies. • André-Michel Ballester – Managing Partner: +30 years of healthcare sector experience, holding senior positions in European and US MedTech companies, overseeing +15 acquisitions, and leading the IPOs of three companies. • Sandrine Laporte – Finance and Operations Partner, and CFO: + 20 years of experience as CFO in both industrial and services businesses, in Europe and North America. • Cécile Pontier – Partner and Head of HR: +20 years of experience in human resources management from various industries such as healthcare, banking, and telecommunications, currently overseeing the HR and the MedSearch team for ARCHIMED and its companies, and co-leads ARCHIMED's operation, including investment staffing.
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1. Remuneration policy pursuant to Article 5 of the EU SFDR:

ARCHIMED's [Remuneration Policy](#) ensures a sound compensation framework and risk management process that are consistent with integrating sustainability risks in investment decisions. Since 2021, the annual performance assessments for all ARCHIMED team members include qualitative and quantitative criteria related to environmental or social characteristics of investments and sustainability risks of the funds managed. Individual accomplishments related to these considerations inform the decision to distribute variable remuneration. This approach empowers all team members to contribute to the implementation of responsible investment practices, aligning with ARCHIMED's overarching objective as a healthcare impact investor. The investment team has additional targets to meet concerning the identification of sustainability risks, opportunities, and impact on health objectives pre-investment, and active engagement with management to advance sustainability performance on material topics and monitor progress during the holding period. To further reinforce responsible portfolio stewardship, a financial incentive alignment mechanism is in place for both deal teams and the management of ARCHIMED companies, linking a portion of annual variable remuneration to ESG objectives.

D. Strategy for engagement with issuers and/or asset management companies

1. Engagement strategy:

ARCHIMED's engagement strategy reinforces its responsibility as a shareholder to carefully select, evaluate, and invest in companies with a long-term outlook, to generate sustainable business and societal value alongside financial returns. To this end, for each investment target, ARCHIMED performs comprehensive due diligence procedures, including systematic financial, legal, tax, commercial, and ESG & Impact analysis, as well as HR, IT, and IP. Furthermore, the effective governance and management of ESG topics constitute crucial investment objectives to be activated within the first year of acquisition as per the PCAP. As described in sections A and B, the S&I team members directly engage with each company's management and deal teams to coordinate this effort, co-developing strategic action plans focused on material ESG objectives, offering practical expert insights, and providing continuous advisory support. Sustainability topics are typically structured through

internal working groups or committees at each company, which are in direct contact with the S&I team throughout the investment lifecycle. This engagement strategy covers 100% of ARCHIMED's investee companies (28 current investments as of 31st December 2024, excluding exits), strengthening responsible portfolio stewardship practices and contributing towards sustainable business and societal value creation. Also, the Board of Directors, which almost always consists of ARCHIMED team members, is vital in facilitating and shaping constructive dialogue concerning sustainability matters at the highest level of strategy planning and risk management. In 2024, the S&I team initiated quarterly monitoring of ESG-related discussions at board meetings.

2. *Voting policy pursuant to Article 4 § 2 (c) of the EU SFDR:*

ARCHIMED's [Shareholder Engagement & Voting Rights Policy](#) aims to create value and strengthen transparency, accountability, and good governance practices for all stakeholders across all investment operations and the value chain. Voting rights are held by the Chairman, Managing Directors, and all employees or Operating Partners who represent ARCHIMED. They are responsible for thoroughly examining and analysing the resolutions presented by the senior managers of investee companies, including on ESG topics, which are put to a vote on a case-by-case basis. Although this Policy is primarily focused on addressing corporate governance, organizational structure, and compensation matters, it also aims to encourage responsible business practices, fostering fairness and non-discrimination at work, protecting human rights, and promoting environmental stewardship in line with the consideration of PAI indicators in investment decisions.

3. *Sectoral disengagement:*

ARCHIMED invests exclusively in companies across the healthcare industries. Also, as per the Responsible Investment Policy, certain sectors and business activities are strictly restricted from ARCHIMED's investment universe on ethical, legal, or sustainability-related grounds. These are (i) illegal economic activities and/or activities related to severe human rights violations, (ii) weapons and ammunition, (iii) pornography and prostitution, (iv) tobacco and distilled alcoholic beverages, (v) thermal coal and fossil fuels, (vi) casinos and gambling, (vii) gamete donation, (viii) human reproductive cloning, (ix) embryonic stem cell research, (x) gestational surrogacy, (xi) recreational cannabinoids, (xii) euthanasia and assisted suicide.

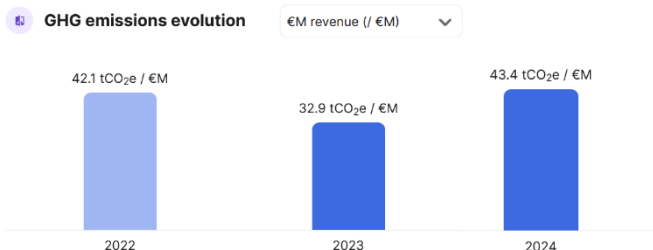
E. Alignment with the European Taxonomy and policy on fossil fuels

All ARCHIMED funds promote good ESG practices, while SFDR Art. 8+ (MED III and MED Rise) and Art. 9 (MED Platform II) funds must also contribute to the social sustainable investment objective of improving healthcare alongside their financial objectives. No fund has committed to environmental sustainable investment objectives, and so ARCHIMED is not subject to alignment with the European Taxonomy, since the technical screening criteria do not apply to ARCHIMED investments. As a specialist private equity firm investing exclusively in the healthcare sector, ARCHIMED is not exposed to any assets operating in the fossil fuel sector. Investing in this sector is officially prohibited as per the Responsible Investment Policy.

F. Strategy for alignment with the Paris Agreement

1. *Carbon footprint – own operations:*

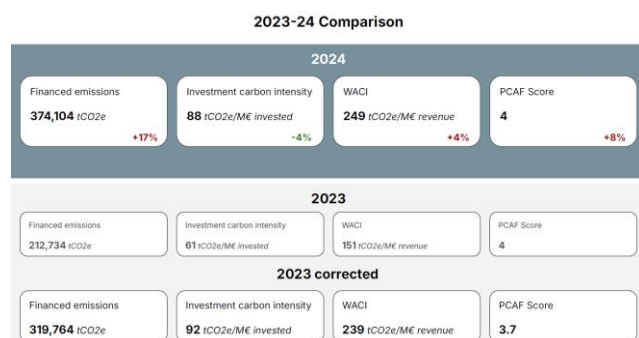
Measuring greenhouse gas emissions is a fundamental step towards understanding environmental impact and informing concrete actions to reduce corporate footprint and build a climate-resilient portfolio. Since 2022, ARCHIMED is calculating the carbon footprint of its own operations across offices, covering Scope 1, 2, and 3 emissions, per the GHG Protocol. In 2024, a more rigorous data collection process led to ~70% of emissions measurements being derived from actual physical data, compared to ~40% in 2023, including more accurate electricity readings facilitated by installing on-site smart meters. The 2024 scope also includes data covering the recently established Asia-Pacific business (Japan and Singapore offices). Scope 3 emissions continue to represent the largest portion (98%) of ARCHIMED's operational greenhouse gas emissions, stemming primarily from essential business travel, reflecting its international investment footprint and global reach. ARCHIMED's main objective for this year is to further improve data quality and transparency to set a robust baseline of carbon footprint results that can serve as a solid basis for designing a targeted corporate carbon reduction program.



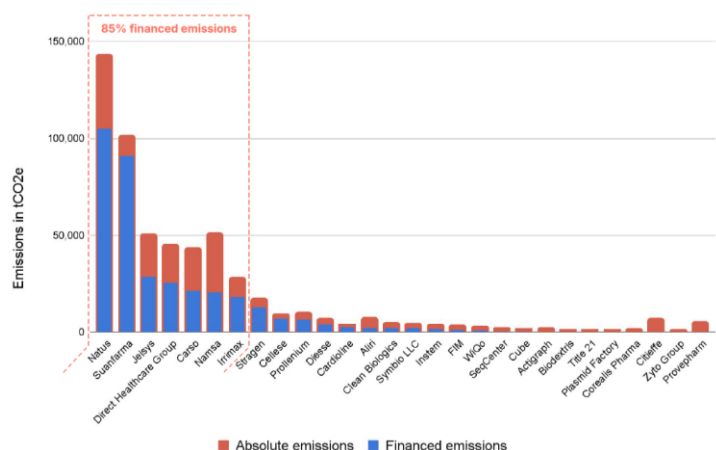
Graph 1: Own operations carbon footprint intensity (2022-2024)

2. Carbon footprint - financed emissions:

Since 2023, ARCHIMED has also been estimating the financed emissions of its investment portfolio, per the PCAF Standard. This methodology assigns ARCHIMED a share of each investee company's carbon footprint proportional to its ownership stake and utilizes sectoral estimates or revenue-based extrapolations for emissions where carbon data is not available. While the general approach has remained consistent, the calculation parameters for certain large assets have evolved to reflect their full organizational boundaries and thus expand the carbon footprint coverage, which explains the 2023 data adjustments and moderate year-on-year variation. These key methodological improvements enhance data reliability and accuracy and increase confidence in producing more comparable carbon footprint results within the next three years. The 2024 scope also includes data covering the new funds, MED Bio and MED Rise, and additional investments in existing funds.

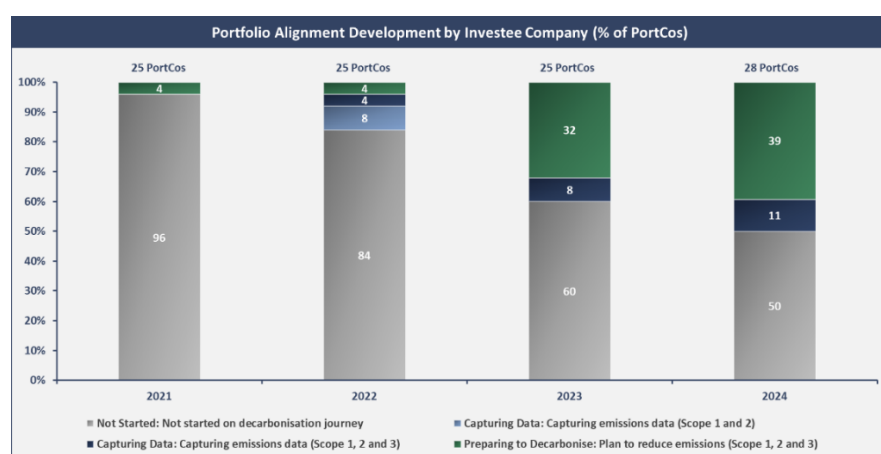


As financed emissions account for the most significant portion of ARCHIMED's total carbon footprint (99%), the S&I team and its climate expert network proactively engage with investee companies to support them in conducting comprehensive carbon footprint assessments and developing clear carbon reduction action plans with tangible near- and long-term targets. The detailed portfolio analysis revealed that 85% of financed emissions are generated by only seven assets, and so the objective for this year is to focus on the decarbonization efforts of these prioritized assets to achieve the highest impact.



Graph 2: Financed emissions distribution across investee companies (2024)

ARCHIMED systematically collects carbon footprint-related information, including relevant PAI indicators, both in DD and during the holding period, offering an environmental lens to investment and business decisions. To further advance carbon footprint performance measurement and monitoring activities, in 2024, ARCHIMED adopted the PMDR (Private Markets Decarbonization Roadmap), a specialized tool developed by Bain on behalf of the initiative Climat International (iCI) and the Sustainable Markets Initiative's Private Equity Task Force. The PMDR enables private equity firms to report and communicate on their decarbonization progress and goals in a standardized, structured, and transparent way. The portfolio alignment analysis, categorizing investee companies according to PMDR's four development stages, provides a transparent illustration of the significant progress made in 2023-2024. Notably, about half of the investee companies have completed a carbon footprint assessment, of which the majority is also working on meaningful decarbonization initiatives, including one company with a net-zero strategy and two planning to commit to the Science-based Targets initiative (SBTi). Decarbonization efforts remain central to advancing the responsible investment strategy and supporting the development of sustainable healthcare industries, as ARCHIMED continues to evaluate the possibility of introducing a climate strategy promoting a low-carbon trajectory in line with global long-term climate objectives set by the 2015 Paris Agreement.



Graph 3: Portfolio alignment under the four PMDR development stages ranking decarbonization maturity (2024)

G. Strategy for alignment with long-term biodiversity objectives

In 2024, ARCHIMED adopted a software solution that enables the identification of biodiversity and nature-related risks and opportunities for potential and existing investments, complementing internal ESG DD processes and portfolio stewardship. This specialized tool assesses biodiversity footprint by modelling the geographical proximity of a company asset to areas with threatened or protected species and analysing its impacts and dependencies on terrestrial and aquatic ecosystems. It relies on credible aggregated data sources, such as the Global Biodiversity Score (GBS) and ENCORE (Exploring Natural Capital Opportunities, Risks and Exposure), as well as Taskforce on Nature-related Financial Disclosures (TNFD) guidance. A consolidated portfolio biodiversity and nature-related risk assessment is in progress with expected completion in H2 2025. The results will provide initial insights into the biodiversity risk exposure of ARCHIMED investments and guide discussions on the materiality of introducing a strategy in line with long-term goals set by the 1992 Convention on Biological Diversity.

H. ESG criteria in risk management

As described in sections A and B, environmental, social, and governance criteria are integral to ARCHIMED's responsible investment strategy, whose implementation is supported by established due diligence tools and processes. ARCHIMED's annual compliance and risk control plan includes a review of the investment procedure to further verify that sufficient integration of sustainability risks is respected throughout the investment cycle. The Responsible Investment Procedure identifies the following principal risks incorporated in the systematic assessment of potential and existing investments:

- **Environmental risks** address environmental factors affecting operations. These include, but are not limited to:
 - (i) climate change physical risks, associated with damages from meteorological and weather-related phenomena, such as loss of value of investments held by Funds managed and issued by affected entities, and the increase in the frequency and cost of compensation claims payable by insurers to policyholders.

- (ii) climate change transition risks, associated with changes required because of the ecological transition and the environmental objectives defined by the European Taxonomy, especially when these changes are poorly anticipated or occur suddenly. These risks include asset depreciation due to regulatory changes that would restrict or prohibit highly carbon-intensive activities and losses from phasing them out.
- (iii) biodiversity and nature-related risks, associated with dependencies and impacts on protected species and natural ecosystem services. These risks relate to changes in the necessary environmental conditions that allow ecosystems to function properly, which include the increasing prevalence of extreme climate and geological events, leading to biodiversity loss and disrupting ecosystem balance.
- **Social risks** address corporate responsibility towards stakeholders. These include, but are not limited to:
 - (i) occupational health, safety, and well-being, as well as workplace equity, inclusivity, and anti-discrimination,
 - (ii) respect for human and labour rights across the supply chain,
 - (iii) product quality linked to client safety and satisfaction,
 - (iv) charitable or philanthropic initiatives benefiting the local community.
- **Governance risks** address the legitimacy of corporate structures and compliance. These include, but are not limited to:
 - (i) executive compensation plans, composition, and competency of management and board of directors,
 - (ii) respect for business ethics, covering operations and value chain partnerships,
 - (iii) regulatory compliance, including with data privacy and protection legislation.

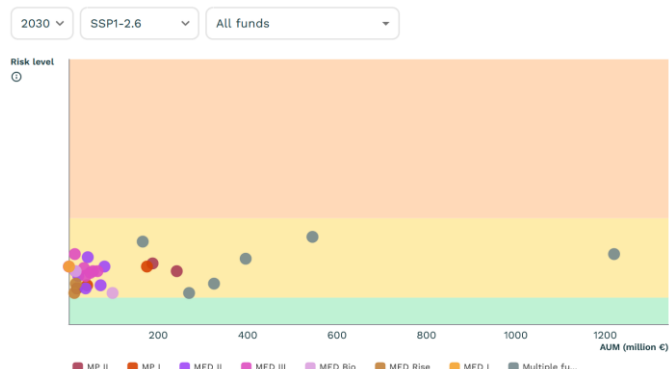
To further refine the consideration of ESG criteria that are most material to ARCHIMED's operations and investment activity, in 2024, preparatory work was undertaken for the completion of a first double materiality assessment in line with the requirements of the Corporate Sustainability Reporting Directive (CSRD) regulation. However, due to recent developments postponing CSRD implementation timelines and introducing ambiguity over its application scope and reporting indicators, this workstream has been put on pause pending important clarifications from the European regulatory authorities.

ARCHIMED's risk control system is articulated in the Risk Policy, encompassing financial, operational, and ESG risks:

- **First level of control:** The investment teams, in collaboration with the S&I team, serve as the first line of control. They are responsible for identifying risks specific to each investment opportunity and ensuring alignment with the investment strategy, as outlined in sections A and B. Additionally, they also define the necessary engagement strategies and support measures to enable companies to effectively implement the Sustainability Strategy and Roadmap. The S&I team is also responsible for ongoing fund-level compliance with relevant regulations like the EU SFDR.
- **First level of control bis:** The Risk Manager verifies that the pre-investment process correctly and consistently incorporates all components of the sustainability analysis, as described in section A, through formalized investment execution checklists. These checklists confirm that all procedures are aligned with the fund's responsible investment strategy and its classification under the EU SFDR.
- **Second and third levels of control:** The Internal Control & Compliance Manager has integrated ESG risks, alongside other risks, into the internal control plan, as well as the external audit conducted by a regulatory compliance firm.

The ESG Risk Management Framework is structured according to the investment strategy of each fund, as described in the Limited Partnership Agreement (LPA) and side letters, as well as the Responsible Investment Policy. ARCHIMED is committed to strengthening ESG risk integration across this framework. In line with the Risk Policy, the Risk Manager, supported by the S&I team, is developing an ESG risk cartography at the fund level based on the sub-risks mentioned above, aiming to identify principal ESG risks for deeper analysis. The initial outcomes of this cartography will be presented to the Management Committee in H2 2025 and will form an integral part of ARCHIMED's annual mapping process for financial and extra-financial risks. Extra-financial risks, particularly climate change physical risks, are increasingly assuming greater importance in ARCHIMED's risk management framework due to their possible material impact on investment value and performance. In 2024, a first consolidated portfolio climate change physical risk assessment was conducted via a software solution, evaluating climate physical risks of each company asset as a function of three pillars: hazard, vulnerability, and exposure. The initial analysis revealed a medium near-term physical climate risk exposure across ARCHIMED investments, and so an objective for this year is to engage with climate experts to better understand the practical implications of these results and translate them into actionable insights for ARCHIMED's investment and risk management practices.

Companies' exposure to physical risks



Graph 4: Portfolio exposure to physical climate change risks (2024)

Information pursuant to Article 4 of the European Sustainable Finance Disclosure Regulation (SFDR)

I. Principal Adverse Impact (PAI) indicators for Article 8 and 9 SFDR financial products

PAI Indicator	Metric	ARCHIMED Portfolio 2024 ⁽¹⁾	ARCHIMED Portfolio 2023 ⁽²⁾	Explanation	Actions taken & planned actions for the next reporting period
GHG emissions	PAI 1.1 - Scope 1 GHG emissions	26,526 tCO ₂ e	4,115 tCO ₂ e	The values are based on financed emissions calculations conducted according to the PCAF standard for unlisted equity investments. This methodology assigns ARCHIMED a share of each investee company's carbon footprint proportional to its ownership stake and utilizes sectoral estimates or revenue-based extrapolations for emissions where carbon data is not available for that year.	While the general approach to GHG emissions estimates has remained consistent, the calculation parameters for certain large assets have evolved in 2024 to reflect their full organizational boundaries. As a result, the carbon footprint coverage has expanded, explaining the 2023 data adjustments and moderate year-on-year variation. These key methodological improvements enhance data reliability and accuracy and increase confidence in producing more comparable carbon footprint results within the next three years.
	PAI 1.1 - Scope 2 GHG emissions	16,294 tCO ₂ e	27,551 tCO ₂ e		
	PAI 1.1 - Scope 3 GHG emissions	331,284 tCO ₂ e	181,068 tCO ₂ e		
	PAI 1.1 - Total GHG emissions	374,104 tCO ₂ e	212,734 tCO ₂ e		
	PAI 1.2 - Carbon footprint	88.2 tCO ₂ e / €M invested	61.2 tCO ₂ e / €M invested		
	PAI 1.3 - GHG intensity of investee companies	249 tCO ₂ e / €M revenue	151 tCO ₂ e / €M revenue		
	PAI 1.4 - Share of investments in companies active in the fossil fuel sector	0%	0%	ARCHIMED invests exclusively in companies across the healthcare industries and thus has no exposure to the fossil fuel sector. Investment activity in this sector is officially prohibited as per the exclusion list criteria.	Not applicable
	PAI 1.5 - Share of non-renewable energy consumption and 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	74%	62%	ARCHIMED has strategically expanded its investment activity in the US and South Korea. Renewable energy adoption remains less mature in these markets, where the energy mix relies heavily on fossil fuels, compared to more advanced clean energy transition practices in Europe. In 2024, two-thirds of investee companies were engaged in healthcare manufacturing or industrial activities under the high-impact climate sector C.	Investee companies continue to make significant strides in their sustainability efforts by implementing several initiatives focused on optimizing traditionally energy-intensive manufacturing and/or production operations for energy efficiency, rebalancing their energy mix to include a larger share of clean energy, and installing renewable energy infrastructure such as photovoltaic panels for on-site energy production and circularity. In addition, as part of their decarbonization strategies, certain companies have set objectives to electrify their vehicle fleet and adopt sustainable logistics for the transport of products.
	PAI 1.6 - Energy consumption in GWh per million EUR of revenue of investee companies, per high-impact climate sector	0.02 GWh/€M	0.06 GWh/€M		
	PAI 2.4 - Share of investments in investee companies without carbon emission reduction initiatives	84%	96%	This indicator intends to capture only the share of investee companies without carbon reduction initiatives specifically aligned with the Paris Agreement (e.g., net-	

	aimed at aligning with the Paris Agreement			zero or SBTi reduction targets and/or climate strategies). It does not represent the full scope of companies committed to carbon emissions reduction efforts.	term targets. To date, about half of the investee companies have completed at least one carbon footprint assessment, of which the majority are also working on implementing meaningful carbon reduction initiatives, including one company with a Paris-aligned net-zero strategy and two in the process of committing to SBTi targets. ARCHIMED uses the PMDR (Private Market Decarbonization Roadmap) tool to monitor, report, and communicate on decarbonization progress across its investments.
Biodiversity	PAI 1.7 - Share of investments in investee companies with sites/ operations located in or near biodiversity-sensitive areas where activities of those investee companies negatively affect those areas	2%	3%	In 2023, it was identified that two investee companies' sites are located near biodiversity-sensitive areas. In 2024, an initial biodiversity assessment was conducted by modelling their assets' geographical proximity to areas with threatened or protected species and analysing their impacts and dependencies on terrestrial and aquatic ecosystems. The results revealed that one company is exposed to very low biodiversity risks, and so it is not considered to be negatively affecting biodiversity, whereas the other is exposed to potentially high biodiversity risks.	Investee companies ensure strict compliance with applicable regulatory obligations, particularly in terms of waste and water management, to support the preservation of the environment and protected species. ARCHIMED will support their efforts to deepen understanding of their biodiversity impact and implement relevant mitigation actions.
Water	PAI 1.8 - Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	0.02	0.07	In 2024, only one investee company generated emissions to water, deriving from the discharge of industrial wastewater.	The investee company has established appropriate procedures for the monitoring and treatment of the discharge of industrial wastewater from the rinsing machine parts, previously treated with an activated carbon filter, as well as runoff rainwater and roof drainage from the manufacturing plant.
Waste	PAI 1.9 - Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average	1.45	0.82	In 2024, more than half of the investee companies generated waste that could be classified as hazardous, including mainly pharmaceutical, biological, or electronic waste derived from healthcare activities.	Investee companies have established specialized waste management procedures for the collection, handling, and disposal of hazardous waste according to applicable regulations, especially concerning biohazardous waste from laboratory processes and electronic waste from medical device manufacturing. Also, certain companies have introduced initiatives to reduce the amount of hazardous raw materials used and/or replace them with safer alternatives, while others operate refurbishing and repair programs, helping extend the product lifespan and the circularity of related components, and integrate eco-design features into the product and packaging design, further reducing the amount of waste.
	PAI 1.10 - Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	0%	0%	In 2024, investee companies did not report any violations of UNGC principles or OECD Guidelines for Multinational Enterprises.	Not applicable
	PAI 1.11 - Share of investments in investee companies without	70%	39%	In 2024, over two-thirds of investee companies had a code of ethics and/or a	Investee companies enforce several stringent business ethics practices designed to protect the rights of

Social and personnel issues	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			grievance handling mechanism, and over one-third had a human rights policy. Most of these policies do not explicitly address compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises.	employees, customers, stakeholders, and the broader community. ARCHIMED teams directly support companies in developing a code of business ethics, whistleblowing protection, supplier code of conduct, and policies on data privacy and security, and health and safety, upholding high-quality corporate governance and accountability.
	PAI 1.12 - Average unadjusted gender pay gap of investee companies	15%	18%	In 2024, women held around one-third of senior management positions across investee companies, reflecting an increase in female representation in leadership. Also, one investee company led by a female CEO reported a positive gender pay gap.	Investee companies are committed to fostering diversity and inclusion through targeted initiatives that promote fairness in the workplace. These efforts include the annual monitoring of the gender pay gap, along with the implementation of corrective measures to ensure equitable compensation across all levels of the organization.
	PAI 1.13 - Average ratio of female to male board members in investee companies, expressed as a percentage of all board members	10%	10%		
	PAI 1.14 - Share of investments in investee companies involved in the manufacture or sale of controversial weapons	0%	0%	ARCHIMED invests exclusively in companies across the healthcare industries and thus has no exposure to controversial weapons. Investment activity in this sector is officially prohibited as per the exclusion list criteria.	Not applicable
	PAI 3.1 - Share of investments in investee companies without a workplace accident prevention policy	12%	20%	In 2024, most investee companies had established comprehensive occupational health and safety procedures, including workplace accident prevention measures in line with applicable health, safety, and quality standards.	Health and safety are priority concerns for all investee companies, particularly those with laboratory or manufacturing operations where employees may face elevated occupational risks compared to a typical office environment. Investee companies continue to implement several initiatives to strengthen accident prevention, like conducting regular health and safety trainings, risk assessments, and external audits.

⁽¹⁾ The 2024 reporting scope includes 28 investments across funds: MED I, MED II, MED III, MED Platform I, MED Platform II, MED Bio, MED Rise

⁽²⁾ The 2023 reporting scope includes 25 investments across funds: MED I, MED II, MED III, MED Platform I, MED Platform II

Annex I is available on ARCHIMED's website. For detailed information on the PAI performance of each fund, refer to the fund-level SFDR Periodic Disclosures (Annexes IV & V).