

newfund

**REPORT ARTICLE 29 LOI ENERGIE CLIMAT
2025**

NEWFUND MANAGEMENT, JUNE 2026

The report covers the reference period from January to December 2025 and complies with the provisions of Article D. 533-16-1.-III, 1° of Article 29 of the Energy-Climate Law. The information referred to in Article 29 of the Energy and Climate Law relates to all funds managed by Newfund.

A. General approach to consideration of environmental, social and governance criteria

Summary of the approach

Newfund has adopted a mixed approach to considering ESG criteria, allowing it to adapt as well as possible to the different levels of development of the participations at each stage of the investment process.

By the very nature of its investments (targeting VSEs and SMEs, mainly in the digital world and therefore with relatively few industrial issues), Newfund has limited exposure to ESG risks.

Pre-investment

EXCLUSIONS

Newfund does not invest in certain sectors of activity, such as

- Manufacturing and trading of arms and ammunition
- Tobacco
- Alcohol
- Coal
- Fossil fuels
- Gambling
- Pornography
- Fur
- Palm oil

In compliance with the Ottawa (1997) and Oslo (2008) conventions signed by France, Newfund ensures, prior to any investment, that the company does not produce or market anti-personnel mines, cluster bombs or related components and equipment.

In order to prevent the financial, legal and reputational risks associated with investments in jurisdictions recognized as weakly regulated, non-transparent or non-cooperative in terms of tax fraud, money laundering and financing of terrorism, Newfund does not invest in countries and territories on the list of "Non-Cooperative States and Territories" (NCST) as well as in high-risk and non-cooperative jurisdictions identified by the Financial Action Task Force (FATF).

THEMATIC INVESTMENT

Newfund may invest in companies engaged in sustainable development activities, or more generally aiming at preserving the environment or promoting human welfare (e.g. renewable energies, recycling, enhancing human relations, improving the quality of life, etc.).

In this respect, Newfund analyzes the target company's activity in relation to the United Nations' Sustainable Development Goals (SDGs), in order to identify companies with a positive environmental and/or social impact.

SCREENING AND DUE DILIGENCE

Newfund integrates the analysis of relevant ESG issues specific to each company into the screening process, prior to any investment decision. In addition to the "classic" pre-acquisition audits, an ESG screening is systematically carried out by the investment teams in order to identify sustainability risks, the main negative impacts and extra-financial opportunities.

This due diligence is based on Newfund's proprietary methodology, which can be adapted to the level of development of target companies (Seed, Series A). It results in the calculation of a score based on a number of ESG criteria that vary according to the company's degree of maturity and classify the target companies into several distinct categories.

In cases where a significant sustainability risk is identified (pollution, supply chain, reputation, social risk, etc.), the case is not pursued unless a concrete solution can be identified, and a firm commitment is made by management to resolve and/or significantly improve the situation during the holding period.

Any target company with a "No investment" score will not be considered for investment by Newfund.

If necessary, additional ESG due diligence may be carried out with the support of a specialized external advisor (particularly if the company's activity and size justify it).

SHAREHOLDER ENGAGEMENT

During the acquisition phase, Newfund is committed to taking ESG issues into account in its shareholder practices by integrating, where necessary

- an ESG clause in the term sheet sent to French target companies and, when possible, to companies in other geographies;
- identifying the extra-financial criteria that must be taken into account and that should be monitored throughout the relationship with the target company in the file presented to the investment committee;
- in the business plan, the material sustainability risks identified during the pre-acquisition due diligence (e.g.: cost of decontamination, compliance with standards, training, etc.).

Ownership

Newfund is committed to diversity and the highest standards of ethical conduct and strives to invest in companies with similar commitments:

- Environment: Newfund encourages its investments to identify and limit their environmental impacts, in particular through better use of natural and energy resources and better waste management. Depending on their activity, portfolio companies may, for example, carry out a greenhouse gas emissions assessment, invest in more energy-efficient tools or develop products or services with greater sustainability and/or less impact on the environment.
- Social: Newfund is convinced that responsible human resources management is a key factor in the success of companies. It pays attention to employees' working conditions, particularly in terms of health and safety. Newfund encourages the establishment of constructive social dialogue and the promotion of good practice in the development of employees' skills, respect for equal opportunities and diversity within portfolio companies.
- Governance: Newfund believes that an appropriate governance structure is essential for business development. Good corporate governance includes the implementation of good ethical and deontological practices, as well as attention to relations with the various stakeholders of a company.

In the holding phase, Newfund is therefore committed to taking ESG issues into account in its shareholder practices by:

- formalizing, if deemed necessary in a post-closing plan, the areas of progress identified in environmental, social and/or governance matters;
- ensuring the implementation of an active sustainable approach through regular dialogue with management;
- taking into account, when exercising its voting rights, compliance with the ESG criteria it has chosen to follow for each company in which it has invested. If it deems it necessary, Newfund may propose resolutions in order to improve the consideration of ESG criteria within the company or at improving the quality of the information that may be published on the subject;
- setting up, when needed, the collection of extra-financial data from portfolio companies in addition to financial reporting.

In particular, Vehicles falling within the scope of Article 8 or Article 9 of the SFDR regulation periodically collect non-financial information from portfolio companies to meet their reporting requirements. Newfund annually assesses the exposure of its portfolio to sustainability risks and establishes an ESG footprint in order to evaluate the main negative externalities that may arise. The ESG indicators are communicated to investors as part of the funds' periodic extra-financial communication and are used as a tool for dialogue between the Newfund team and the management of the portfolio companies. Regarding vehicles falling within the scope of Article 9 of the SFDR regulation, these indicators make it possible to verify alignment with previously defined objectives.

Exits

Significant progress made by portfolio companies on ESG aspects can be taken into account as a part of the valuation during the exit process. Particular attention is paid to the quality of the potential acquirer, its objectives and the means it has at its disposal to pursue the company's development.

Reporting and communication

In accordance with Article L. 533-22-1 of the French Monetary and Financial Code, amended by Law n°2019-1147 of November 8, 2019 and the application of European Regulation 2019/2088 on the publication of information on sustainable investments and sustainability risks, Newfund makes available to investors and the public:

- its general approach on the consideration of ESG Criteria in the Investment Policy as well as the risks associated with climate change and biodiversity;
- a description of the methodology used to implement the ESG policy and how it is applied;
- a description of how the results of the ESG analysis are integrated into the investment process and shareholder practices.

A specific sustainability communication for investment vehicles is carried out as part of the periodic information communicated to investors, in compliance with the texts referred to and according to the SFDR scope to which the said vehicles belong.

Industry initiatives

In order to demonstrate its public commitment as a responsible investor, Newfund is involved in several initiatives.

Principles for Responsible Investment – PRI

The PRI is the world's leading proponent of responsible investment, supported by the United Nations. The Principles complement the United Nations Global Compact, which calls on companies to integrate a range of universal principles on human rights, labor, the environment and anti-corruption into their operations and strategies.

By becoming a signatory to the PRI, Newfund demonstrates its commitment to integrating environmental, social and governance (ESG) considerations into its investment practices and ownership policies. The Management Company voluntarily complies with annual reporting requirements to an independent body.

The PRI proactively leads the network of signatories by conducting initiatives on targeted issues, organizing working groups and publishing regular studies.

As a signatory, Newfund is committed to implementing the PRI's core principles in the conduct of its business. The application of these Principles is in the long-term interest of our beneficiaries and should ensure that our investment activities are aligned with the general interest:

- Principle 1: We will consider ESG issues in our investment analysis and decision-making processes.
- Principle 2: We will be active investors and consider ESG issues in our shareholder policies and practices.
- Principle 3: We will require the entities in which we invest to make appropriate disclosures on ESG issues.
- Principle 4: We will promote acceptance and implementation of the Principles among asset management stakeholders.
- Principle 5: We will work together to increase our effectiveness in implementing the Principles.
- Principle 6: We will report individually on our activities and progress in implementing the Principles.

Investors for Growth Charter - France Invest

As a member of France Invest (French Association of Investors for Growth), Newfund supports the initiatives taken by the profession to promote sustainable development. As such, it has signed the Charter of Commitments of Investors for Growth.

Charter of commitment to promote gender diversity in the digital sector - SISTA

By signing SISTA's Charter of Commitment to Promote Gender Equality in the Digital Sector, Newfund affirms its determination to adopt an active approach to promoting gender equality within the management company, its ecosystem and all the portfolio companies.

The Stewardship Pledge - Kauffman Fellows

By joining the Stewardship Pledge of the Kauffman Fellows organization, Newfund affirms the importance it attaches to the promotion of a sustainable and positive societal transformation in the context of financing innovation.

B. List of financial products mentioned under Article 8 and 9 of the Sustainable Finance Disclosure Regulation (SFDR)

Investment Strategy	Financial Product	Classification under Regulation EU 2019 / 2088 (SFDR)
Venture Capital (2023)	Newfund NAEH INNOPY	Article 8
Venture Capital (2023)	Newfund Heka	Article 9
Venture Capital (2024)	Newfund Velocity	Article 8

As of December 31, 2025, the net assets of SFDR Art. 8 and Art. 9 funds amounted to 23,74% of the total net assets managed by Newfund Management. All the funds managed by Newfund Management, regardless of their SFDR classification, comply with the exclusion list adopted by the management company.

C. Objective of balanced representation of women and men (Rixain Law)

The Rixain law, passed on December 24, 2021, introduced a new article into the COMOFI (under no. L. 533-22-2-4), which states that "Portfolio management companies define an objective of balanced representation of women and men among the teams, bodies and managers responsible for making investment decisions. The results obtained are presented in the document mentioned in II of article L. 533-22-1. This target is updated annually."

As a signatory of France Invest's gender parity Charter, Newfund has the ambition to reach:

- 40% of women in the investment teams in 2030
- 25% of women in charge of the investment committee decisions by 2030 and 30% by 2035

At the end of 2025, the Newfund has reached the following results:

- 57% of women in the investment teams
- 40% of women in charge of the investment committee decisions