ELEVA Sustainable Impact Europe

ESG Annual Report 2024

Response to Article 29 of the French Energy-Climate Law and SFDR Regulation

As of 31 December 2024

Foreword

This report has been prepared in response to Article 29 of the French Energy-Climate Law and to the Sustainable Finance Disclosure Regulation (SFDR). It covers **ELEVA Sustainable Impact Europe** as a fund classified under SFDR Article 9 throughout 2024.

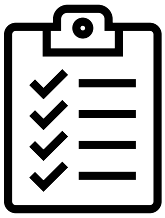
An ESG Annual Report 2024 is available at the ELEVA Capital level and for each open-end fund having assets under management above € 500m and the ones below this threshold but categorised in 2024 under SFDR Article 8 or 9. These documents complement ELEVA Capital's ESG Policy which details our ESG approach, our proprietary methodologies, and the resources we deploy on responsible investment.

These documents available on our website.

ELEVA Capital is committed to a continuous improvement of its approach and reporting. Stakeholders' feedback and dialogue will always be welcomed.

2024 in a nutshell

ELEVA ESG analysis for 100% of companies



97% of Sustainable Investments (SFDR 2.17)

i.e. 100% exclusing cash

37 AGMs or 100% participation rate

Individual engagement with 31 companies

Contents

1. ELEVA Sustainable Impact Europe

In 2024, the **ELEVA Sustainable Impact Europe** fund was categorised under SFDR Article 9 (i.e. only makes Sustainable Investments within the definition set by the SFDR Article 2.17).

The fund was also internally categorised under the **SUSTAINABLE** segment of the ELEVA fund range. For more information about ELEVA funds' ESG positioning, please refer to the ESG Policy available on ELEVA's website.

The **ELEVA Sustainable Impact Europe** has been labelled with the French SRI label since 2021 and complied with the V3 version of the rules from 1 January 2025. The fund has also been labelled with the Belgian Towards Sustainability label since 2022.

	Strategies	Main asset class	Exclusions in as of December 2024[1]	AuM as of 31/12/2024 in million EUR	Share of total AuM	SFDR Categorisation	AMF Classification	Labels as of December 2024	Link to related fund
SUSTAINABLE									
ELEVA Sustainable Impact Europe	-Impact investing -Best in Universe -Exclusions	European equities (EEA + UK + Switzerland)	'SUSTAINABLE' exclusions[2]	25	0.2%	Article 9	Category 1	- French SRI Label (v2) -Towards Sustainability label	https://www.elevacapital.com/en/funds/eleva-sustainable-impact-europe

(1) More details on our exclusion policy (e.g. sectors, thresholds) are available in our ESG Policy and in the Coal Policy, both available on the ELEVA website.

(2) **'SUSTAINABLE' exclusions**: Violation of the UN Global Compact, UN GPs, ILO convention and OECD guidelines for multinational enterprises violations, extremely severe controversies, FATF Blacklist for sovereign investments (if any), controversial weapons, nuclear weapons, weapons in the broad sense, tobacco, palm oil, thermal coal, Oil & Gas (developers; conventional and unconventional production), power generation (carbon-intensive and non-renewable sources), alcohol, pornography, and gambling.

ESG in the investment process:

	SUSTAINABLE
	ELEVA Sustainable Impact Europe
Exclusions	**'ALL ELEVA' exclusions:** Normative exclusions including UNGC violations, etc. | Extreme controversies | FATF Blacklist | Controversial weapons | Nuclear weapons | Tobacco | Palm oil | Coal[1]
	ELEVA 'SRI V3' exclusions: Oil & Gas (developers; unconventional production), and Carbon-intensive power generation
	ELEVA 'SUSTAINABLE' exclusions: All weapons | Alcohol | Pornography | Fossil fuel | Gambling
ESG Analysis	**100% of portfolio ESG-scored with ELEVA methodology**
	Min 60/100 ESG score and **Min 50/100 G score**
	ensuring > 30% reduction of the investment universe
Binding ESG KPI	**Carbon intensity** and **% UNGC**
Sustainable Investments	**100% of sustainable investments** (excluding cash)
	including 30% E and 30% S
	and Min. 40% at portfolio level
Vote & Engagement	**Vote at 100% AGM for equity holdings**
	Systematic ESG engagement post-ELEVA analysis

Source: ELEVA Capital, as of 31 December 2024

– Exclusions:

As of December 2024, the fund applied the following set of exclusions to its initial investment universe:

	SUSTAINABLE
	ELEVA Sustainable Impact Europe
'ALL ELEVA' exclusions	• **Normative exclusions** (UNGC, ILO, UNGP, OECD) • **Extreme controversies** (MSCI 'Red flag') • **FATF Blacklist** for sovereign investments • **Unconventional / Controversial weapons** (>0% revenue) • **Nuclear weapons** (>5% revenue) • **Tobacco** (>5% revenue) • **Palm oil** (>5% revenue) • **Thermal coal**[1] (developers; production >10Mt or 5% revenue; power generation >5GW or 10% of revenue)
ELEVA 'SRI V3' exclusions	• **Oil & Gas** (developers; >5% production unconventional) • **Carbon-intensive power generation** (>291gCO2/kWh in 2025)
ELEVA 'SUSTAIN-ABLE' exclusions	• **Oil & Gas**: >5% revenue from production conventional and unconventional • **Non-renewable power generation**: >5% revenue from non-renewable sources and developers of coal or nuclear capacities • **Weapons** (>0% revenue) **and nuclear weapons** (>0% revenue) • **Adult entertainment** (>5% revenue) • **Gambling** (>5% revenue) • **Alcohol** (>5% revenue)

Source: ELEVA Capital, as of 31 December 2024 more information in the ESG Policy, available on our website.

- **Positive ESG Screening:**
    - Each company is analysed internally on ESG criteria and according to the ELEVA methodology (presented in sections 3.3) before any investment. For a stock to be investable for this fund, it must have an ESG score greater than or equal to 60/100. Applying the 'SUSTAINABLE' exclusions and the minimum ESG score of 60/100 lead to a universe reduction of at least 30% in market capitalisation weight. Also, if at any time the 60/100 threshold is no longer sufficient to ensure a reduction of at least 30%, it will be increased accordingly.
    - The fund must also show a better performance than its initial investment universe (in market capitalisation weight) on the following two Principal Adverse sustainability Indicators (PAI):
        - **carbon intensity** (in tons of CO2 equivalent/million euros of revenues, covering Scope 1+2); and
        - exposure to companies without processes and compliance mechanisms to monitor compliance with **UN Global Compact principles and OECD Guidelines for Multinational Enterprises** (sum of the weights).

- **Impact assessment:**
    - The **ELEVA Sustainable Impact Europe** fund invests only in companies having a positive contribution to social and/or environmental issues through their products and/or services. The positive contribution of each company is measured by calculating the proportion of revenue generated with products or services that contribute positively to one or more UN Sustainable Development Goals (SDGs).
    - The company must generate at least 20% of its revenue from this type of products or services. This is a net turnover threshold; thus, there is a further deduction from this percentage of the portion of turnover possibly achieved with products having potentially residual negative impacts (i.e. if not already excluded through the exclusion criteria).
    - At the portfolio level, the minimum revenue alignment with the SDGs has to be above 40% (weighted average).

- **Sustainable investments:**
    - The **ELEVA Sustainable Impact Europe** fund is categorised under SFDR Article 9 and therefore commits to only making Sustainable Investments, as defined internally in line with the SFDR Article 2.17. In practice, the fund commits to a minimum of 80% sustainable investment (with a minimum of 30% sustainable investment with an environmental objective (not necessarily aligned with the EU Taxonomy) and a minimum of 30% sustainable investment with a social objective, the sum of the two always being greater than or equal to 80%.

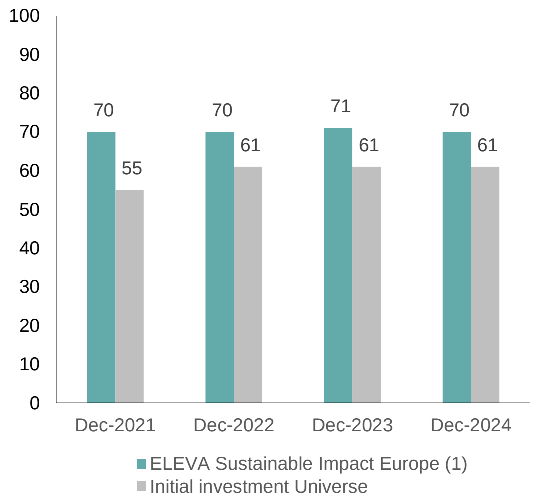
Transparency is at the heart of our responsible investor approach. For further information on **ELEVA Sustainable Impact Europe**, please refer to our ESG Policy and the Prospectus, both available on our website.

2. Sustainability performances

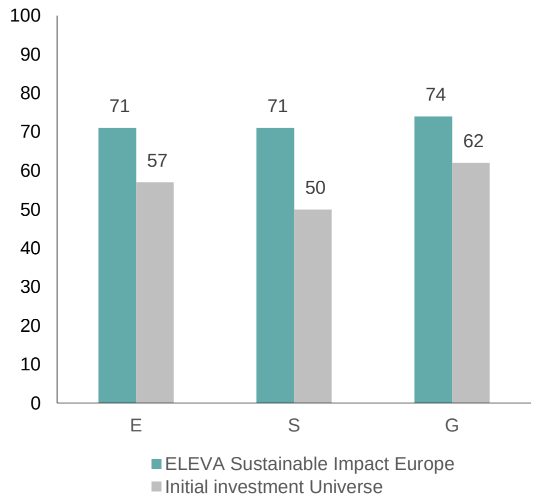
2.1 ESG performance

As of 31 December 2024, 100% of the invested pocket (i.e. excluding cash) had been analysed and scored through the ELEVA ESG methodology. The average ESG score of the portfolio was 70/100 compared to 61/100 for the initial investment universe. The average sub-scores on the E, S and G pillars are also higher compared to the initial investment universe:

ESG Score evolution
(average ESG score /100)



ESG Score per pillar (Dec-2024)
(average E, S, and G scores /100)



Source: ELEVA Capital based on proprietary ESG scores and MSCI data. (1) including controversy penalty

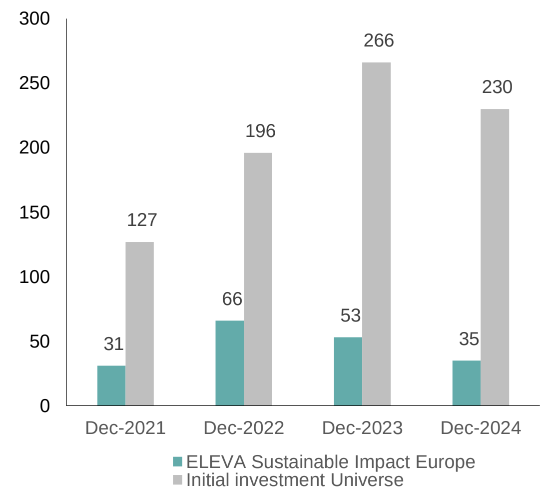
Moreover, the fund must show a better performance than its initial investment universe on the following two ESG key performance indicators:

- **carbon intensity** (in tons of CO2 equivalent/million euros of revenues, covering Scope 1+2); and
- exposure to companies without processes and compliance mechanisms to monitor compliance with **UN Global Compact principles and OECD Guidelines for Multinational Enterprises** (sum of the weights).

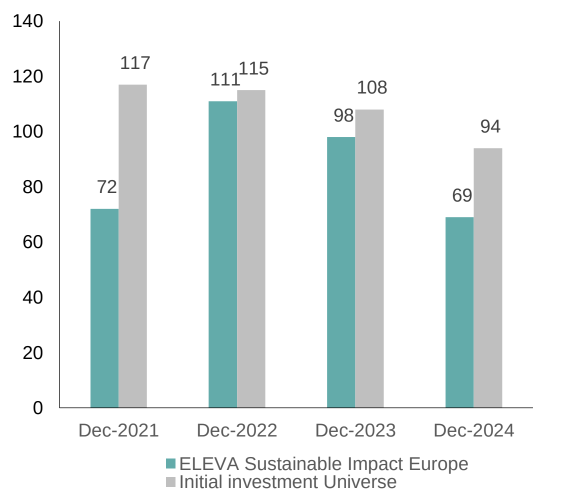
As of 31 December 2024, the fund's average carbon intensity was 69 tons of CO2 equivalent / million euros invested which is lower compared to the initial investment universe (94 tons of CO2 equivalent / million euros invested). UN Global Signatories represented 86% of the fund vs. 56% for the initial investment universe.

The performance of the **ELEVA Sustainable Impact Europe** fund against the ESG key performance indicators is presented below.

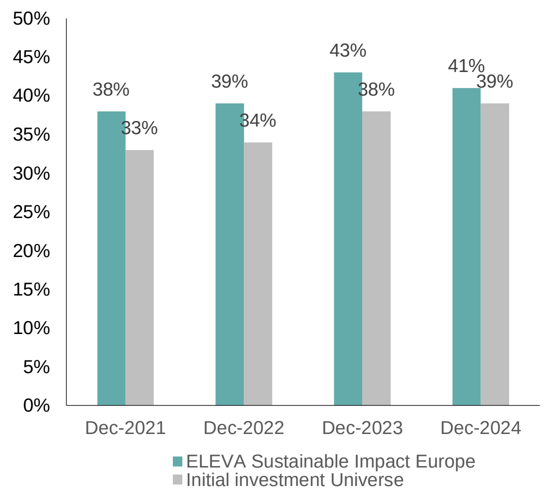
Carbon footprint (Scope 1+2)
(tons of CO_2 equivalent per million € invested)



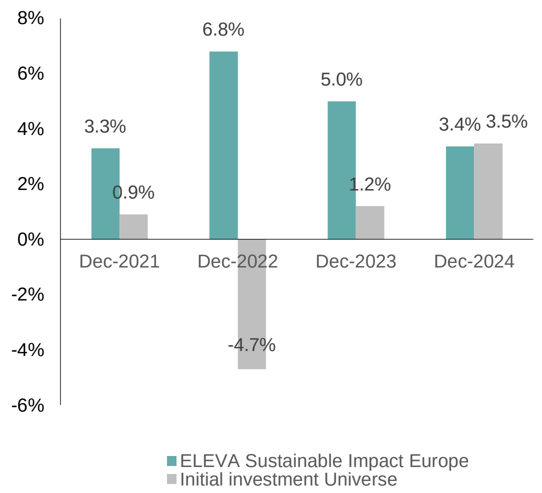
Carbon intensity (Scope 1+2)
(in tons of CO_2 equivalent per million € of sales)



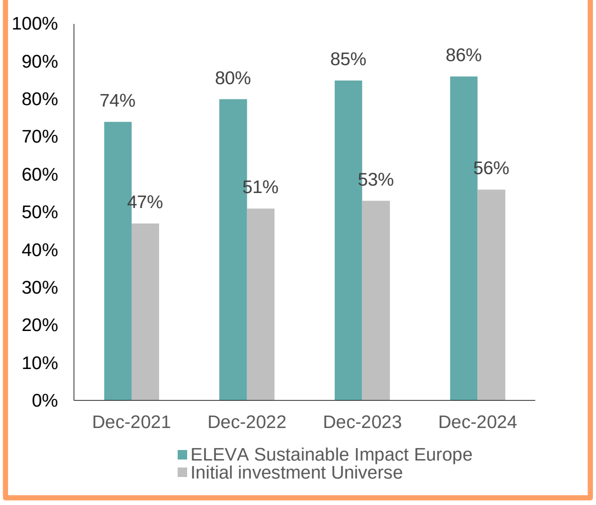
Board gender diversity
(% of women on the board)



Growth in the number of employees
(% of growth)



Signatories of the UN Global Compact
(% of Signatories)



Legend and sources

Binding ESG KPI

Fund performance

Initial investment universe

Source: ELEVA Capital based on MSCI data

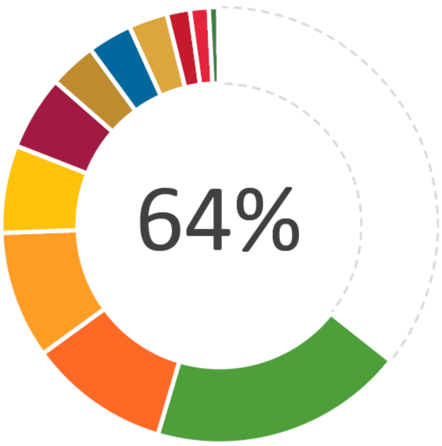
2.2 Contribution to the UN Sustainable Development Goals

The **ELEVA Sustainable Impact Europe** fund seeks to invest in companies whose products/services are deemed to make a positive contribution on social and/or environmental issues. These issues have been defined using a proprietary tool based on the United Nations Sustainable Development Goals (UN SDGs) framework.

For a company to enter the portfolio, a minimum netted revenue contribution of 20% to one or more UN SDGs is required – above other constrains in terms of minimum ESG scores and exclusions. At the portfolio level, the fund has an objective to have a weighted average contribution to the SDGs of at least 40%.

As of 31 December 2024, the revenue exposure to the SDGs was %. In other words, if the fund was a company, % of its revenues would contribute to SDGs. This is a net revenue exposure, meaning that under ELEVA Capital's methodology positive revenue contributions are net of any negative revenue contributions.

UN SDG exposure of the fund
(% of revenue)



Exposure to SDG in % of revenues : 64%

1	1.4%	No poverty	9	10.4%	Industry, innovation, infrastructure
2	2.9%	Zero hunger	11	9.4%	Sustainable cities
3	18.9%	Good health & well being	12	3.5%	Responsible consumption & prod.
4	1.7%	Quality education	13	0.7%	Climate actions
5	0.0%	Gender equality	14	0.0%	Life below water
6	0.1%	Clean water & sanitation	15	0.0%	Life on land
7	6.5%	Affordable & clean energy	16	3.3%	Peace, justice, strong institutions
8	5.5%	Decent work & economic growth		35.7%	No exposure to SDG, including cash

Sources: ELEVA Capital, data externally validated by Stone Soup Consulting

Transparency is of paramount importance as data remain scarce and risks of impact-washing run high. In this context, our fund stands apart in its disclosure, as demonstrated by the voluntary release of an Impact Report. Also, the data we use to qualify companies as sustainable investments and to measure their positive contribution is verified by an external party, Stone Soup Consulting. This brings additional guarantees on the robustness of our impact methodology.

For further information on **ELEVA Sustainable Impact Europe**:

- More details on the ELEVA SDG methodology and the calculation formula are available in section 4.1. and 6.2. of our ESG Policy, available on our website.
- The most recent edition of our Impact Report is available on our website.

3. Voting and engagement

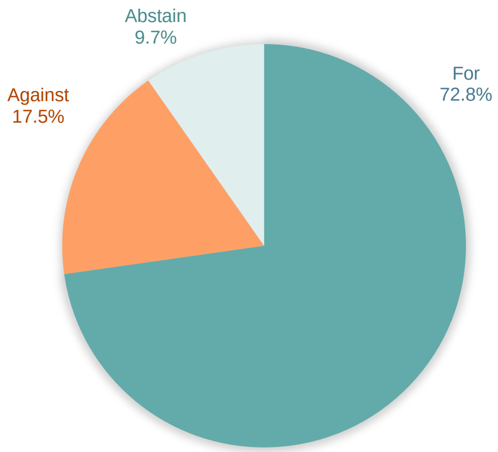
3.1 Voting review in 2024

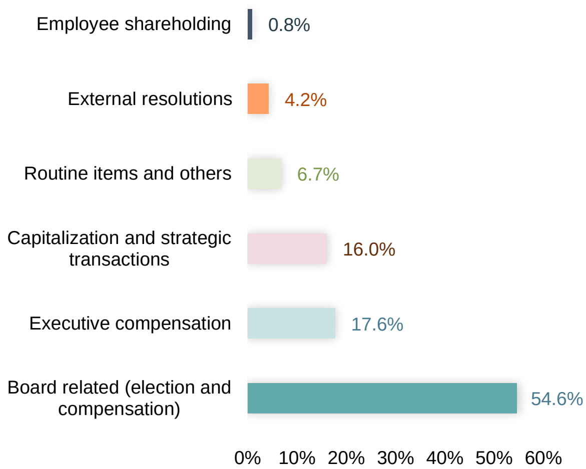
When responsible for proxy voting, ELEVA Capital systematically exercises its voting rights at the shareholder meetings of every equity holding.

In 2024, ELEVA Capital voted at **37 distinct general meetings** for which **ELEVA Sustainable Impact Europe** held voting rights, i.e a 100% exercise rate.

These 37 annual meetings totalised **728 resolutions** (of which 49 were non-voting items) – an average of 20 resolutions per shareholder meeting. We voted 'AGAINST' 119 of the 679 voting resolutions, i.e. a 17.5% AGAINST rate (vs. 16.8% in 2023). Considering the relatively low volume of external resolutions (7 in 2024), the opposition rate is in the same order of magnitude: 17.1% (vs. 17.2% in 2023). As a reminder, the opposition rate includes the votes AGAINST resolutions supported by management, plus the votes FOR resolutions not supported by management.

Breakdown of voting decisions (% of voting instructions)	Breakdown of voting AGAINST by theme (% of voting instructions)





Source: ELEVA Capital based on ISS data

The resolutions that drew the most of AGAINST votes from the fund were Board related (54.6% of total AGAINST votes) followed by those related to Executive compensation (17.6% of total AGAINST votes).

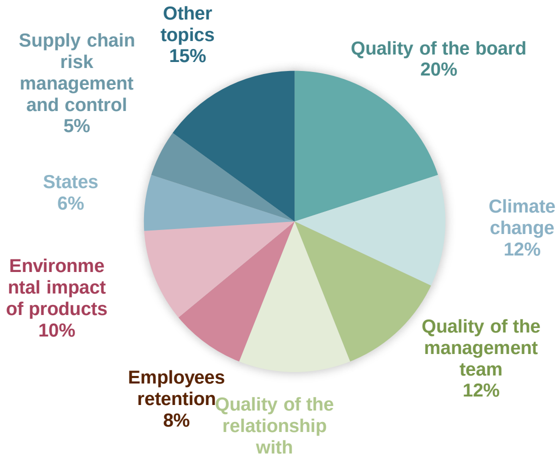
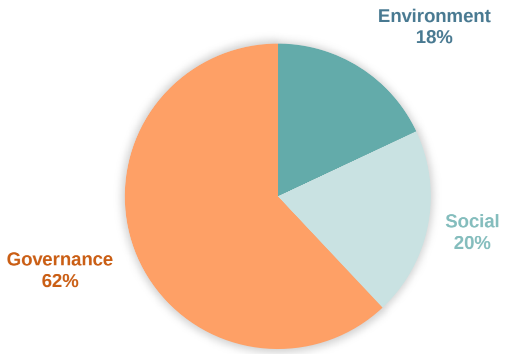
The distribution of voted resolutions for **ELEVA Sustainable Impact Europe** in 2024 by topic is as follows:

- 657 resolutions related to governance (97% of total voting instructions); and
- 22 items on combined environmental-social resolutions (3%);

All voting decisions for the AGMs of the **ELEVA Sustainable Impact Europe** fund are disclosed in its Voting Report, available on our website.

3.2 Engagement review in 2024

Over the course of the year, **ELEVA Sustainable Impact Europe** engaged with a total of **31 companies** held in portfolio and shared with them **100 areas of improvement**. The main topics of engagement are shown below in the pie charts.

Breakdown of engagement by theme (% of engagements)	**Breakdown of engagement by E/S/G pillar** (% of engagements)
	

Source: ELEVA Capital based on proprietary data

Based on the fund inventory as of 31 December 2024, **ELEVA Sustainable Impact Europe** engaged with 33 companies representing 97% of the total number of companies held in portfolio. The remaining 3% have been engaged in 2024.

We monitor companies' progress to assess the degree of achievement over time. Full updates of the ESG analysis, which takes place about every two years when we are still invested in the company, help verify whether the engagement has borne fruit.

We track which topics have been 'achieved', 'partially achieved' or 'not achieved'. This sets the basis for re-engaging with the company. The re-engagement could be a reiteration of formerly discussed topics or, if past topics were 'achieved' or have become less relevant, they can be replaced by new engagement topics.

In 2024, we assessed the achievement of the post-ESG analysis engagement topics sent previously for 19 companies, representing a total of 53 engagement areas. Results are presented in the following chart.

- 22.6% have been achieved;
- 32.1% partially achieved; and
- 45.3% not achieved.

4. European Taxonomy and exposure to the fossil fuel sector

4.1 Taxonomy alignment

Taxonomy-aligned sustainable investments:

ELEVA Sustainable Impact Europe has not committed to a minimum share of sustainable investments with an environmental objective aligned with the EU Taxonomy, but we voluntarily disclose the ex-*post* weighted average taxonomy alignment of the fund as of 31 December 2024:

Taxonomy indicator		ELEVA Sustainable Impact Europe % excluding sovereign investments	ELEVA Sustainable Impact Europe Equivalent amount in million EUR	Initial investment universe
Revenue	Eligibility	24.0%	6	17.9%
	Alignment	4.9%	1	5.3%
Capital Expenditures	Eligibility	23.3%	6	22.5%
	Alignment	7.7%	2	7.1%
Operational Expenditures	Eligibility	16.6%	4	15.5%
	Alignment	5.2%	1	5.5%

Source: ELEVA Capital based on MSCI data

Most Taxonomy aligned investments presented in the table above had a positive contribution to climate change mitigation and climate change adaptation, and to a lesser extent to the four other environmental objectives. They are only based on reported company data. More statistics are presented in the fund's SFDR periodic reporting annexed to the 2024 Annual Report.

For more details on taxonomy definition, please refer to the ESG Annual Report 2024 of ELEVA Capital available on our website.

Other environmentally and socially sustainable investments:

As of 2024 and beyond the Taxonomy, **ELEVA Sustainable Impact Europe** committed to a minimum share of 80% of sustainable investments as defined internally, in line with the SFDR Article 2.17. The fund also committed to reaching a minimum 30% of environmentally (not necessarily aligned with the EU Taxonomy) and 30% socially Sustainable Investments – the sum of the two always being greater than or equal to 80%.

As of 31 December 2024, **ELEVA Sustainable Impact Europe** had a proportion of sustainable investments of 97% measured ex-post (i.e. 100% excluding cash), of which 36% with an environmental objective (not necessarily aligned with the EU taxonomy) and 61% with a social objective.

More information on ELEVA Capital's definition of Sustainable investments in accordance with Article 2.17 of the SFDR regulation is presented in the ESG Policy, available on our website.

4.2 Fossil fuel sector exposure

In parallel to its Taxonomy alignment, we assessed the exposure of the **ELEVA Sustainable Impact Europe** fund to the fossil fuel sector as of 31 December 2024. We assessed our portfolio exposure to companies with activities including extraction, processing, storage, and transportation of petroleum products, natural gas, and thermal coal. As a baseline for comparison, we calculated the same metric for the initial investment universe. Two different calculations have been performed to assess exposure to fossil fuels:

- **Portfolio exposure to fossil fuel-related activities (weighted average):** The assessment is made at the economic activity level for each investee company. This means only revenues linked to fossil fuel-related activities are accounted for. This calculation is similar to the one performed for the Taxonomy alignment.

	Exposure to fossil fuel-related activities		Coverage rate
	% of total weight	Equivalent amount in million EUR	
ELEVA Sustainable Impact Europe	0.0%	0	100.0%
Initial investment universe	4.0%		99.3%

Source: ELEVA Capital based on MSCI data derived from publicly available information

- **Portfolio exposure to the fossil fuel sector (binary):** The assessment is done at the company level. We sum up the weightings of all companies involved in the fossil fuel sector. This calculation corresponds to the methodology of the fourth Principal Adverse sustainability Indicator 'Exposure to companies active in the fossil fuel sector' (PAI 4) but as of 31 December 2024:

	Exposure to the fossil fuel sector		Coverage rate
	% of total weight	Equivalent amount in million EUR	
ELEVA Sustainable Impact Europe	0.0%	0	100.0%
Initial investment universe	5.7%		98.1%

Source: ELEVA Capital based on MSCI data derived from publicly available information

5. Strategy to align with the Paris Agreement

5.1 Climate change consideration

Our commitment to fighting climate change and managing climate risks of our investments influence the investment process of our funds, from the definition of the investment universe and stock selection to portfolio construction. Climate change consideration is embedded in all the steps of our ESG approach and notably for **ELEVA Sustainable Impact Europe**.

All details of our current practices related to climate change are disclosed in the ESG Annual Report 2024 of ELEVA Capital available on our website.

More specifically, **ELEVA Sustainable Impact Europe** goes beyond our general approach on climate change thanks to the selection of companies that contribute to the SDGs, through the products and services they sell. Of these SDGs, 3 are directly related to climate change:

- SDG 7: Clean and Affordable Energy. Examples of activities: Renewable energy production, financing renewable energy production capacity, equipment to produce this type of energy, etc.
- SDG 11: Sustainable Cities and Communities. Examples of activities: Sustainable mobility, waste recycling, sustainable buildings, building materials and equipment improving the energy efficiency of buildings, etc.
- SDG 13: Measures to combat climate change. Examples of activities: Prevention of climate change related natural disasters, instruments for measuring weather phenomena, products for capturing CO2, etc.

5.2 Next steps on ELEVA Capital's climate strategy

Our commitment to contribute to a low-carbon economy is a long-term endeavour. In recent years, we have laid a solid foundation on which we will continue to build.

Implied Temperature Rise (ITR):

As a starting point to build a comprehensive climate strategy with a clear alignment with the Paris Agreement and time-bound objectives, ELEVA Capital subscribed to a dedicated MSCI dataset in 2022 to measure the implied temperature rise of its portfolios. This tool helps us to appraise the actual baseline and to start working on our roadmap to align our portfolios with the temperature objectives of the Paris Agreement.

As presented below and despite an inflexion driven by Air Liquide in 2023, **ELEVA Sustainable Impact Europe**'s **Implied Temperature Rise (ITR)** has decreased substantially since 2021. That being said, the results prove to be difficult to compare, notably due to methodological changes from the data provider MSCI.

	Implied temperature rise (ITR)				Coverage rate			
	2021	2022	2023	2024	2021	2022	2023	2024
ELEVA Sustainable Impact Europe	2.05	1.78	2.07	1.64	94.3%	98.2%	99.1%	100.0%
Initial investment universe	2.53	2.40	2.25	2.22	91.2%	90.8%	98.4%	98.2%

Source: ELEVA Capital based on MSCI methodology and data

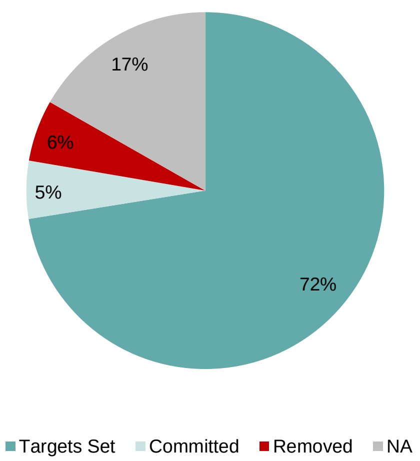
This ITR metric gives a picture of the fund's positioning on the way towards the alignment with the Paris Agreement to limit global warming to well below 2°C. However, due to the methodological biases of the MSCI methodology combined with the high variability of carbon data, setting temperature targets in the medium term proves difficult.

Science-Based Target initiative (SBTi):

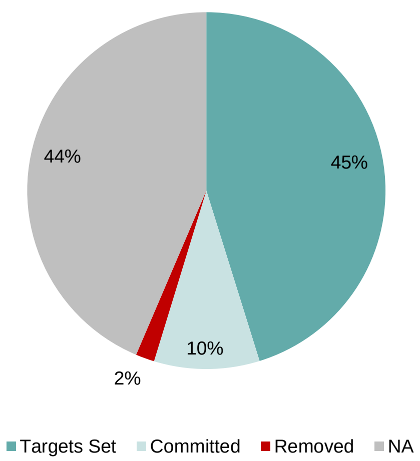
An alternative metric is the share of investments in companies with SBTi-validated climate targets or which are committed to an SBTi validation. The Science Based Targets initiative (SBTi) has become a reference in frameworks and tools for companies to set science-based net-zero targets and this metric has the advantage of simplicity.

As of 31 December 2024, 72% of the investments made by **ELEVA Sustainable Impact Europe** were in companies with a climate target validated by the SBTi (vs. 59% in 2023) and 5% in companies committed to an SBTi validation (vs. 21% in 2023), compared to 45% and 10% respectively for the initial investment universe.

ELEVA Sustainable Impact Europe's SBTi status
(% of each SBTi status)



Investment universe's SBTi status
(% of each SBTi status)



Source: ELEVA Capital based on SBTi data, in weight. Near-Term, Long-Term and Net-Zero validations are considered.

Setting a binding climate target:

We studied the implications of setting a binding climate target with a triple objective: (1) meet the regulatory requirements, and (2) respond to our client's expectations, while (3) adopting a fundamental and unbiased methodology.

We notably contemplated introducing a climate objective based on this Science-Based Target initiative methodology.

Following our investigations and many discussions with data providers, brokers, corporates, and experts, we concluded that the currently available methodologies do not allow us to satisfy this triple objective and that **we will continue to explore the best solutions before setting binding objectives for our portfolios.**

6. Strategy for alignment with long-term biodiversity goals

6.1 Biodiversity consideration

In the continuity of our climate strategy, ELEVA Capital is committed to addressing biodiversity loss and managing the related natural capital risks of our investments. We have taken the first steps and hope that science-based initiatives such as the Taskforce on Nature-related Financial Disclosures (TNFD) or the Science Based Targets for Nature (SBTN) will drive market developments and that more mature methodologies will emerge.

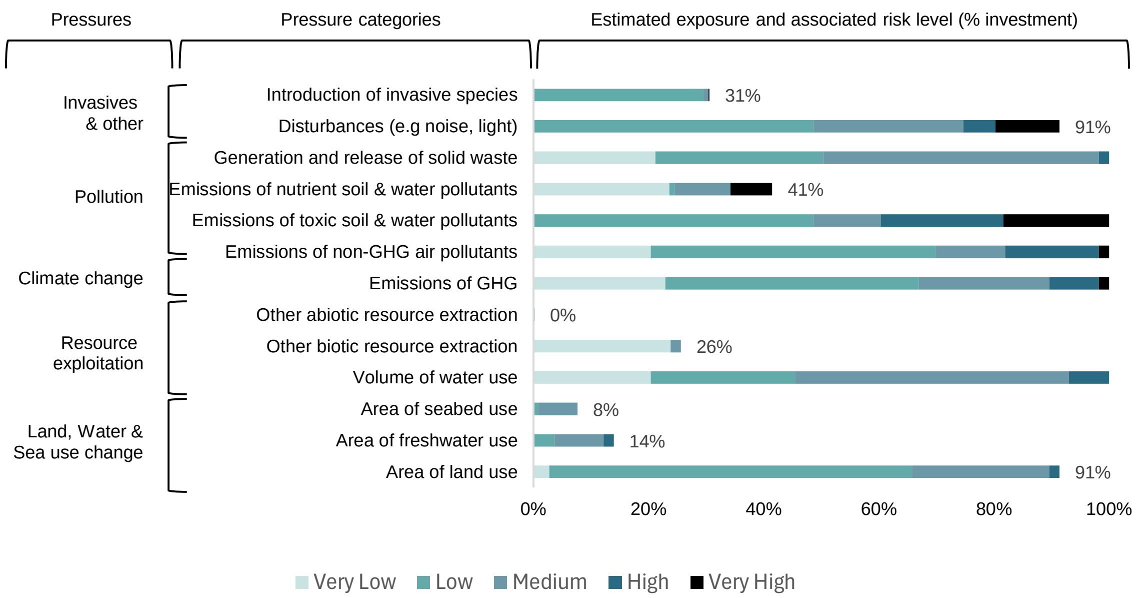
Biodiversity consideration is embedded in all the steps of our ESG approach and notably for **ELEVA Sustainable Impact Europe**. All details of our current practices related to biodiversity are disclosed in the ESG Annual Report of ELEVA Capital available on our website.

For more information on how the Principal Adverse sustainability Impact (SFDR PAI) can be used to monitor biodiversity impacts and risks, as well as our view on aggregated footprinting tools – notably the MSA (Mean Species Abundance) and PDF (Potentially Disappeared Fraction of species) methodologies – please refer to the ESG Annual Report 2024 of ELEVA Capital available on our website.

6.2 Impact & Dependency screening

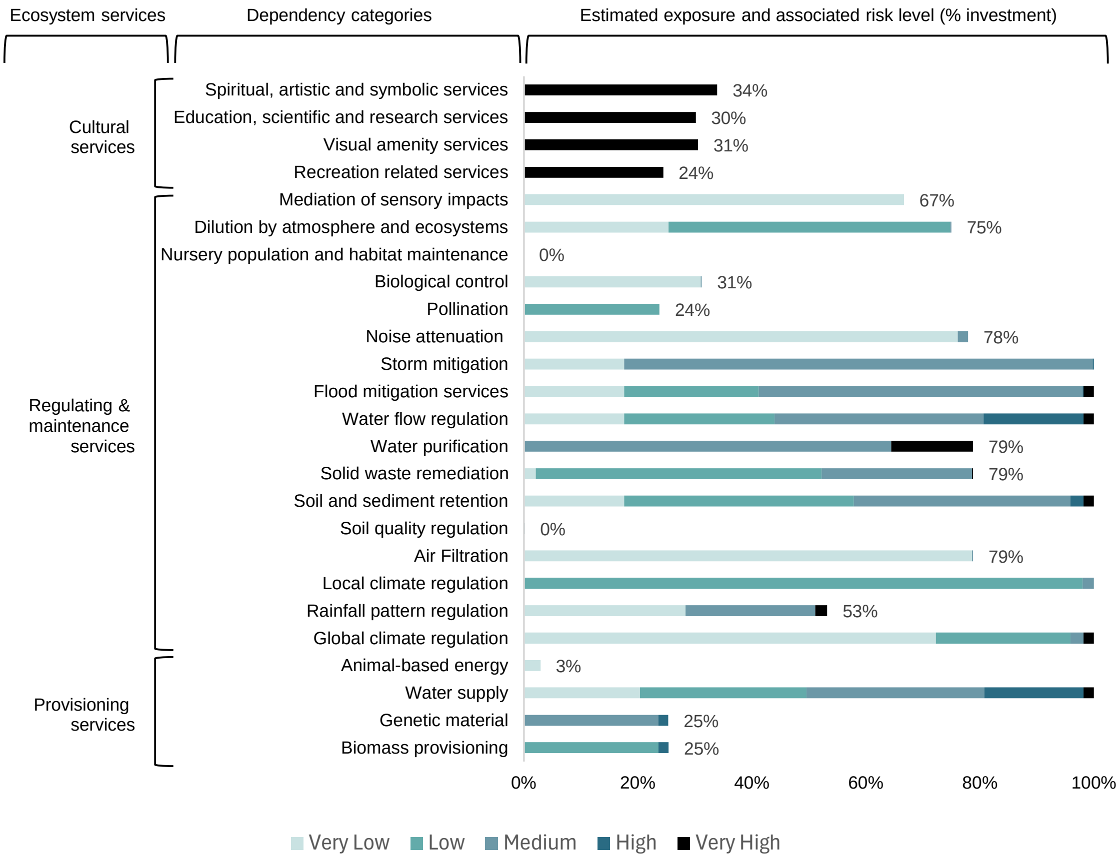
In line with the LEAP (Locate, Evaluate, Assess and Prepare) approach developed by the Taskforce on Nature-related Financial Disclosures (TNFD), we started to Locate and Evaluate the material nature-related impacts and dependencies of the investments made by ELEVA Capital. Given the lack of a widely accepted standard, we adopted a humble approach based on the ENCORE mapping on which we will continue to build.

- **Biodiversity pressures:** As of 31 December 2024, 50% of the investments made by **ELEVA Sustainable Impact Europe** were invested in sub-industries that have very high or high potential impact on at least one of the drivers of nature loss.



Source: ELEVA Capital based on ENCORE data, 100% of eligible investments covered

- **Ecosystem dependencies:** As of 31 December 2024, 56% of the investments made by **ELEVA Sustainable Impact Europe** were invested in sub-industries that have very high or high potential dependency on at least one ecosystem service.



Source: ELEVA Capital based on ENCORE data, 100% of eligible investments covered

6.3 Next steps on ELEVA Capital's biodiversity strategy

Biodiversity remains a nascent topic for companies and investors alike. As mentioned above, the current methodologies are not fully satisfactory and relevant data is still scarce.

We contemplated introducing a biodiversity objective based on an aggregated impact indicator. We studied the implications of setting a binding biodiversity target with a triple objective: (1) meet the regulatory requirements, and (2) respond to our client's expectations, while (3) adopting a fundamental and unbiased methodology. Following our investigations and many discussions with data providers, brokers, corporates, and experts, we concluded that the currently available methodologies do not allow us to satisfy this triple objective and that we will continue to explore the best solutions before setting binding objectives for our portfolios.

It is perhaps too early to expect a quantitative indicator that reflects the real impact of localised corporate assets and the multidimensionality of biodiversity, but we do not believe it should be used as an excuse for inaction. ELEVA Capital will continue to monitor market developments and recommendations from the biodiversity experts (e.g. TNFD, IPBES, SBTN, Finance for Biodiversity Foundation) and will contemplate setting a quantitative biodiversity target at the next reporting iterations. We will also embed biodiversity and nature considerations across the investment process in a more systematic way.

7. Approach to take into account ESG criteria in risk management

ELEVA Sustainable Impact Europe follows ELEVA Capital’s approach on ESG risks management.

Consequently, sustainability risks in our investments are identified, monitored and managed through scoring our companies on ESG criteria. Our ESG score reflects the sustainability risks a company is exposed to and how well managed they are.

More information is given in the ESG Annual Report of ELEVA Capital available on our website.

8. Statement on Principal Adverse sustainability Impacts indicators (SFDR PAI)

This section is published using the tools and information available at the time of writing of this report. Metrics are calculated according to PAI SFDR Methodology at portfolio level. Reweighting has not been applicated when data is missing, so we disclose simultaneously the coverage rate of each indicator. For indicators with a coverage rate below 50%, we decided to not publish the metric. The data used is from MSCI.

Financial market participant: ELEVA Sustainable Impact Europe - **Legal entity identifier**: 2138001PQ9NN545H2U64
Summary ELEVA Sustainable Impact Europe considers the principal adverse impacts of its investment decisions on sustainability factors within the meaning of Article 7 of the SFDR regulation. The present statement is the consolidated statement on principal adverse impacts on sustainability factors which was included in the 2024 SFDR periodic reporting of ELEVA Sustainable Impact Europe. This statement covers the reference period from 1 January to 31 December 2024.

Indicators applicable to investments in investee companies							
Adverse sustainability indicator		**Metric**	**Impact 2024**	**Impact 2023**	**Coverage rate and Explanation**	**Actions taken, and actions planned and targets set for the next reference period**
CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS						
Greenhouse gas emissions	1. GHG emissions	Scope 1 GHG emissions (tons of CO2 equivalent)	751	2,078	2024: 100.0% 2023: 98.7%	This metric is analysed in the planet pillar of our ESG scoring methodology
		Scope 2 GHG emissions (tons of CO2 equivalent)	551	1,178	2024: 100.0% 2023: 98.7%	This metric is analysed in the planet pillar of our ESG scoring methodology
		Scope 3 GHG emissions (tons of CO2 equivalent)	5,535	10,525	2024: 100.0% 2023: 98.7%	This metric is analysed in the planet pillar of our ESG scoring methodology
		Total GHG emissions (tons of CO2 equivalent)	6,787	13,781	2024: 100.0% 2023: 98.7%	This metric is analysed in the planet pillar of our ESG scoring methodology
	2. Carbon footprint	Carbon footprint (tons of CO2 equivalent / EUR million invested)	156	184	2024: 100.0% 2023: 98.7%	
	3. GHG intensity of investee companies	GHG intensity of investee companies (tons of CO2 equivalent / EUR million of revenue)	542	555	2024: 100.0% 2023: 99.0%	Binding indicator for ELEVA Sustainable Impact Europe (Scope 1+2 emissions)
	4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	0.0%	1.1%	2024: 100.0% 2023: 96.9%	This metric is analysed in the planet pillar of our ESG scoring methodology
	5. Share of non-renewable energy consumption and production	Share of non-renewable energy consumption and non-renewable energy production of investee companies from non-renewable energy sources compared to renewable	58.1%	59.0%	2024: 100.0% 2023: 80.4%	

Indicators applicable to investments in investee companies						
Adverse sustainability indicator		Metric	Impact 2024	Impact 2023	Coverage rate and Explanation	Actions taken, and actions planned and targets set for the next reference period
		energy sources, expressed as a percentage of total energy sources				
	6. Energy consumption intensity per high impact climate sector	Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector	NACE Code A: NA NACE Code B: NA NACE Code C: 0.43 NACE Code D: 0.06 NACE Code E: 2.75 NACE Code F: NA NACE Code G: 0.46 NACE Code H: NA NACE Code L: 0.52	NACE Code A: NA NACE Code B: NA NACE Code C: 0.55 NACE Code D: 0.07 NACE Code E: 1.09 NACE Code F: NA NACE Code G: 0.43 NACE Code H: NA NACE Code L: NA	2024: 97.2% 2023: 94.0%	This metric is analysed in the planet pillar of our ESG scoring methodology for all sectors except Financials
Biodiversity	7. Activities negatively affecting biodiversity-sensitive areas	Share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas	5.9%	-	2024: 100.0% Thanks to improvements in data quality and availability, we disclosed this PAI for the first time in 2024.	
Water	8. Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	-	-	2024: 0.8% 2023: 3.2%	As the coverage rate was below 50%, we decided to not publish the metric in 2023 and 2024.
Waste	9. Hazardous waste and radioactive waste ratio	Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average	0.51	-	2024: 65.7% 2023: 48.1%	As the coverage rate was below 50%, we decided to not publish the metric in 2023.
INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS						
Social and employee matters	10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	0.0%	-	2024: 100.0% 2023: 99.0%	Binding indicator at ELEVA Capital level as it is part of the overall exclusion list
	11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance /complaints handling mechanisms to address	8.7%	12.5%	2024: 100.0% 2023: 96.9%	The share of investments in signatory companies of the UNGC is a binding indicator for ELEVA Sustainable Impact Europe fund

Indicators applicable to investments in investee companies						
Adverse sustainability indicator		**Metric**	**Impact 2024**	**Impact 2023**	**Coverage rate and Explanation**	**Actions taken, and actions planned and targets set for the next reference period**
	Guidelines for Multinational Enterprises	violations of the UNGC principles or OECD Guidelines for Multinational Enterprises				
	12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	10.7%	-	2024: 71.8% 2023: 31.6%	As the coverage rate was below 50%, we decided to not publish the metric in 2023.
	13. Board gender diversity	Average ratio of female to male board members in investee companies, expressed as a percentage of all board members	41.0%	43.4%	2024: 100.0% 2023: 99.0%	This metric is analysed in the Shareholders pillar of our ESG scoring methodology
	14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	Share of investments in investee companies involved in the manufacture or selling of controversial weapons	0.0%	0.0%	2024: 100.0% 2023: 99.0%	Binding indicator at ELEVA Capital level as it is part of the overall exclusion policy

Other indicators for principal adverse impacts on sustainability factors						
Adverse sustainability indicator		**Metric**	**Impact 2024**	**Impact 2023**	**Coverage rate and Explanation**	**Actions taken, and actions planned and targets set for the next reference period**
Emissions	4. Investments in companies without carbon emission reduction initiatives	Share of investments in investee companies without carbon emission reduction initiatives aimed at aligning with the Paris Agreement	26.2%	15.6%	2024: 100.0% 2023: 99.0%	
Social and employee matters	1. Investments in companies without workplace accident prevention policies	Share of investments in investee companies without a workplace accident prevention policy	0.0%	1.7%	2024: 100.0% 2023: 96.9%	

9. Continuous improvement plan and concordance table with regulation

Theme	Article 29 of the Energy-Climate law	SFDR Regulation	Corresponding section of this report	Comments	Improvement Plan	Target date
Adverse impacts		Description of the principal adverse sustainability impacts and indicators	Section 8			
Alignment with Paris Agreement	Quantitative objective until 2030		Section 5.2	No quantitative objective set at this stage due to the lack of viable methodology	Discussion with our data provider and scan other methodologies for carbon emissions monitoring in line with Paris Agreement	2025 at the latest
	Quantitative results		Section 5.2			
	Methodology		Section 5.2			
	Changes in the investment strategy: coal policy		Section 5.1			
Alignment with long-term biodiversity goals	Respect of the objectives of the Convention on Biological Diversity		Section 6	No biodiversity footprint indicator selected at this stage, and no quantitative objective due to the lack of viable methodology	Scan new methodologies and indicators proposed in the market, for instance, by the TNFD and SBTN	2025 at the latest
	Impacts reduction analysis		Section 6			
	Biodiversity footprint indicator		Section 6			
Risk management	Identification, assessment and prioritization process and management of risks		Section 7			
	Climate risks		Section 7			
	Biodiversity loss risks		Section 7			

Disclaimer

This report has been written in compliance with the Article 29 of the French Energy Climate Law (the decree implementing this Article 29 of the energy-climate law (LEC) of 8 November 2019 was published on 27 May 2021). This report is a regulatory requirement for information purpose only.

This report should not be considered as a marketing material nor an investment advice for ELEVA Capital products.

The information used to write this report has been obtained from a wide range of sources that ELEVA Capital considers to be accurate. The main sources are the annual report of companies mentioned in the report. Proprietary ESG (Environment, Social, Governance) scores are used. They are the latest available, and could be up to two years old, given the fact that these proprietary scores are updated at least every two years. Some ESG key performance indicators are calculated based on MSCI data.

The sources used to carry out this reporting are considered reliable, however ELEVA Capital declines all responsibility for any omission, error or inaccuracy. ELEVA Capital accepts no responsibility for any direct or indirect losses caused by the use of the information provided in this document. The information presented in this document is simplified, for more information please refer to the KIID and the prospectus of the relevant UCITS available on our website (www.elevacapital.com). The figures quoted relate to past years and past performance is not a reliable indicator of future performance.

The Fund's management company is ELEVA Capital S.A.S., a French société par actions simplifiée, registered with the Paris Trade and Companies Register under number 829 373 075 having its registered office at 61 rue des Belles Feuilles, 75116 Paris France. ELEVA is a French portfolio management company, duly authorised under number GP 17000015 and regulated by the Autorité des Marchés Financiers (the French supervisory authority).

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