

ANNEX IV

Template periodic disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

Product name: Beta Innovation Fundo de Capital de Risco Fechado

Legal entity identifier: LEI 845000BBD60BDB14150

Environmental and/or social characteristics

Did this financial product have a sustainable investment objective? *[tick and fill in as relevant, the percentage figure represents sustainable investments]*

Yes

No

It made **sustainable investments with an environmental objective:** ___%

- in economic activities that qualify as environmentally sustainable under the EU Taxonomy
- in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

It made **sustainable investments with a social objective:** ___%

It **promoted Environmental/Social (E/S) characteristics** and while it did not have as its objective a sustainable investment, it had a proportion of 55% of sustainable investments

- with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
- with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
- with a social objective

It promoted E/S characteristics, but **did not make any sustainable investments**

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



To what extent were the environmental and/or social characteristics promoted by this financial product met?

The financial product promotes environmental or social characteristics to the extent that it has integrated environmental, social and good environment criteria into new investments. i. Within the scope of environmental sustainability, it has invested in companies with characteristics that promote mitigation and adaptation to climate change, pollution prevention and control, efficiency in the use of raw materials, namely water resources and other scarce resources, as well as the protection and restoration of biodiversity and ecosystems. ii. In the context of

Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.

social sustainability, it took into account respect for human, economic, social and cultural rights, including labor issues such as forced and child labor and the minimum wage, and non-discrimination. This financial product, although not aimed at sustainable investment, has dedicated a proportion of 15% to sustainable investments with an environmental objective in economic that qualify as environmentally sustainable under the EU taxonomy and 40% with a social objective. "Sustainable investment" means an investment in an economic activity that contributes to an environmental or social objective, provided that such investment does not do significant harm to any other environmental or social objective and that the investee companies comply with good governance practices. The EU Taxonomy is a classification system provided for in Regulation (EU) 2020/852, which establishes a list of environmentally sustainable economic activities. iii. Within the scope of governance, it took into account the transparency of corporate information, as well as its security, namely to shareholders, the absence of anti-corruption practices and the remuneration structure. The Fund has fulfilled its commitment to promoting environmental and social characteristics by adopting ESG criteria in the investment decision-making process in conjunction with traditional financial criteria.

● ***How did the sustainability indicators perform?***

There was an increase in the values of the indicators related to greenhouse gas emissions as a result of the increase in the number of companies benefiting from the investment. However, the values are not materially relevant and do not call into question the environmental or social characteristics promoted by the financial products. The indicator " Board gender diversity " also showed a negative trend as a result of the increase in the number of companies. The gender pay gap has narrowed. And more companies are including carbon reduction initiatives in their policies. In addition to what was defined in the pre-contractual information, there has been an increase in the number of indicators considered; Beta Innovation Fundo de Capital de Risco Fechado evaluates the negative impact on sustainability factors of seven additional indicators related to social and labor issues, the monitoring of which allows Beta Capital to strengthen its commitment to promoting environmental and/or social characteristics. The absolute values of the other indicators reported are not significant, given the nature of the Fund's investments, the stage of the companies in which it invests and their size.

● ***What were the objectives of the sustainable investments that the financial product partially made and how did the sustainable investment contribute to such objectives?***

The financial product contributes to one or more of the following environmental objectives a) climate change mitigation; b) adaptation to climate change; c) the sustainable use and protection of water and marine resources; d) the transition to a circular economy; e) pollution prevention and control; f) the protection and restoration of biodiversity and ecosystems, taking into account the principle of "Do No Significant Harm" (DNSH); The investment of the financial product has contributed to these objectives by financing companies whose economic activities contribute or will contribute to these objectives during the period in which the investment is held in the portfolio of the financial product, in a percentage that clearly exceeds the objective set out in the pre-contractual information.

The Fund fulfilled its commitment to increase the promotion of environmental and social characteristics through investments in companies. The Fund allocated approximately 15% to sustainable investments with an environmental objective and 40% to socially sustainable investments.

How did the sustainable investments that the financial product partially made not cause significant harm to any environmental or social sustainable investment objective?

In addition to excluding investments in companies in the sectors listed below from the investment policy of the financial product, conducting ESG due diligence on the projects in which investments are made ensures that the DNSH of the projects in which investments are made are respected.

1. Illegal economic activities;
2. Activities that limit individual rights and freedoms or violate human rights;
3. Activities with a large negative environmental impact and limited capacity for improvement;
4. Activities directly or indirectly exposed to the fossil fuel industry;
5. Activities that produce large amounts of non-recyclable or reusable waste.
6. Activities that negatively affect areas sensitive to biodiversity
7. Manufacture and/or sale of weapons or ammunition;
8. Human cloning;
9. Pornography and related media;
10. Gambling industry, including online gambling and betting;
11. Collection of personal data, research, development and implementation of technical applications related to electronic solutions and data programming specifically intended to support the activities listed above.

How were the indicators for adverse impacts on sustainability factors taken into account?

Through an initial screening process that eliminated investments in the excluded sectors. After the initial screening, a detailed due diligence was conducted by the investment team, which analyzed the information provided by the company in the ESG questionnaire, assessing the technological, legal and tax aspects of the business plan, as well as the sustainability risks and/or the difficulty in overcoming constraints that could jeopardize sustainability, taking into account materiality, and possibly deciding not to proceed with the investment.

The following sustainability factors were considered in the analysis of the investment opportunities of the financial product:

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

Environmental

1. GHG Emissions
2. Carbon footprint
3. GHG emission intensity of investment beneficiary companies
4. Exposure to companies operating in the fossil fuel sector
5. Share of non-renewable energy consumption by companies benefiting from the investment
6. Intensity of energy consumption by sector with high climate impact
7. Activities with a negative impact on sensitive areas from the point of view of biodiversity
8. Emissions into the aquatic environment of companies benefiting from the investment
9. Ratio of hazardous waste and radioactive waste Social and Labor
10. UN Compact Principles and the Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises
11. Lack of processes and mechanisms for monitoring compliance with the UNGC principles or the OECD Guidelines for Multinational Enterprises
12. Unadjusted gender pay gap
13. Gender diversity on boards of directors
14. Exposure to controversial weapons (antipersonnel mines, cluster munitions, chemical weapons, and biological weapons)

Additional climate and other environment-related indicators:

15. Investments in companies without carbon emission reduction initiatives

Additional indicators for social and employee, respect for human rights, anti-corruption anti-bribery matters:

16. Investments in companies without workplace accident prevention policies
17. Lack of a supplier code of conduct
18. Lack of grievance/complaints handling mechanism related to employee matters

19. Incidents of discrimination

20. Excessive CEO pay ratio

21. Number of identified cases of severe human rights issues and incidents

22. Cases of insufficient action taken to address breaches of standards of anti-corruption and antibribery

23. Number of convictions and amount of fines for violation of anti-corruption and anti-bribery laws

The financial product has therefore taken into account indicators of negative impact on sustainability factors through a selection of investment opportunities that are in line with the investment policy. Beta Innovation Fundo de Capital de Risco Fechado has adopted a hands-on policy with regard to the investments in its portfolio, actively collaborating with the respective managers to identify and manage sustainability risks throughout the different investment phases, with the aim of limiting the impact on the above indicators.

Were sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:

The financial product invests in companies taking into account:

1- United Nations Sustainable Development Goals

2- United Nations Principles for Responsible Investment

3 - Minimum safeguards, pursuant to Article 18 of Regulation EU 2020/852 (Taxonomy Regulation)

4- Respect for the principle of DNSH (Do No Significant Harm), with regard to the environmental objectives referred to in Article 9 of Regulation EU 2020/852

The "Do No Significant Harm" principle only applies to the investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the rest of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.



How did this financial product consider principal adverse impacts on sustainability factors?

Through a hands-on policy regarding the investments of this financial product, there has been active engagement with the respective managers to identify and manage sustainability risks throughout the various stages of the period in which the investments are held in the portfolio of the financial product. The environmental, social and governance (ESG) impacts of the financial product's subsidiaries were monitored, together with an assessment of the main negative impacts and the implementation of the outlined strategy to achieve the defined objectives. Each investee company provided information on the above-mentioned IAPs, which is disclosed in accordance with Article 11(2) of the SFDR Regulation (Regulation (EU) 2019/2088).



What were the top investments of this financial product?

The list includes the investments constituting the **greatest proportion of investments** of the financial product during the reference period which is: 01.01.2023 a 31.12.2023

Asset allocation describes the share of investments in specific assets.

<i>Investimentos mais avultados</i>	<i>Setor</i>	<i>% ativos</i>	<i>País</i>
300000€	6311. Data processing, hosting and related activities	26,5%	Portugal
300000€	5829. Other software publishing	26,5%	Portugal
210000€	7211. Research and experimental development on biotechnology	19%	Portugal
173386,67€	7112. Engineering activities and related technical consultancy	15%	Portugal
150000€	6209. Other information technology and computer service activities	13%	Portugal



What was the proportion of sustainability-related investments?

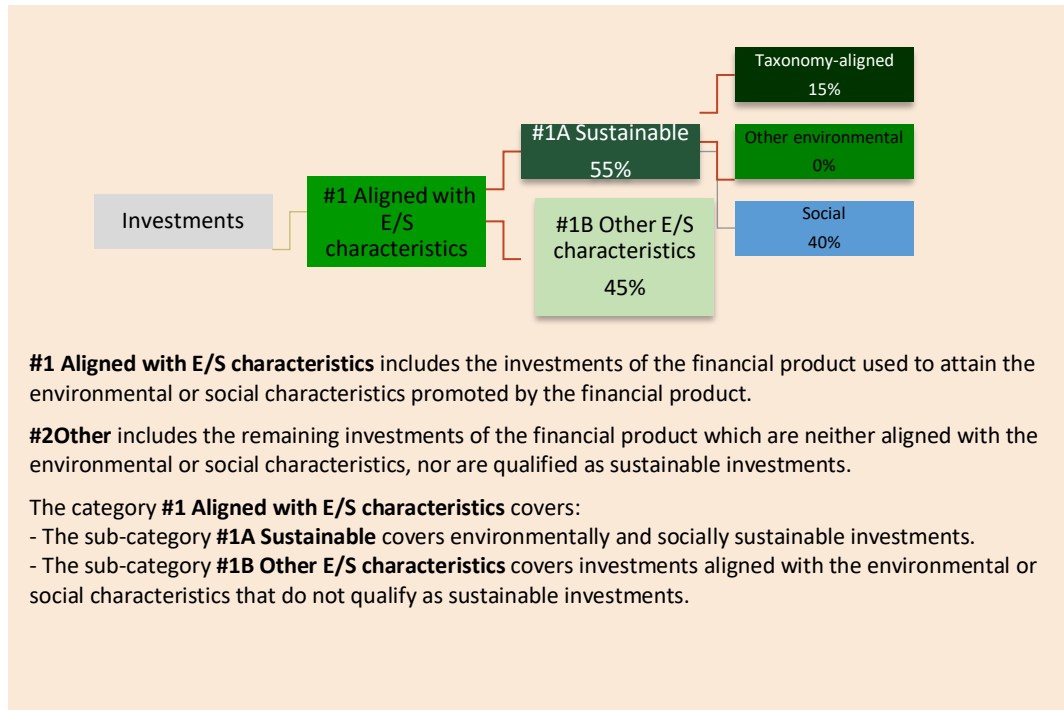
In terms of new investments, the financial product invested in companies that promote environmental or social characteristics, or a combination of these, and part of its investments, around 15%, were in investments in economic activities qualified as environmentally sustainable according to the European taxonomy.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

● **What was the asset allocation?**



● **In which economic sectors were the investments made?**

The investments were made in the following areas of the business:

Section J — Information and communication

Section M — Professional, scientific and technical activities



To what extent were the sustainable investments with an environmental objective aligned with the EU Taxonomy?

The financial product invests 15% of new investments in companies whose economic activities are classified as environmentally sustainable according to the European taxonomy.

● **Did the financial product invest in fossil gas and/or nuclear energy related activities complying with the EU Taxonomy¹?**

Yes:

In fossil gas In nuclear energy

No

¹ Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation”) and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

● **What was the share of investments made in transitional and enabling activities?**

The percentage was 0%.



What was the share of sustainable investments with an environmental objective not aligned with the EU Taxonomy?

The percentage was 0%.



What was the share of socially sustainable investments?

The percentage was 40%.



What investments were included under “other”, what was their purpose and were there any minimum environmental or social safeguards?

The percentage was 0%.



What actions have been taken to meet the environmental and/or social characteristics during the reference period?

In order to achieve the environmental and/or social characteristics during the reference period, the following measures were taken in accordance with the investment strategy:

1. The integration of sustainability risks, taking into account the size, nature and scale of activities and the principal adverse impacts of investment decisions on sustainability factors.
2. Minimum safeguards, pursuant to Article 18 of EU Regulation 2020/852 (Taxonomy Regulation).
3. Respect for the DNSH criteria (Do No Significant Harm), with regard to the environmental objectives referred to in Article 9 of EU Regulation 2020/852
4. Transparency of information provision, taking into account what is stated in paragraph 1 above.
5. Compliance with the Exclusion Policy

The member of Beta Capital's investment team responsible for monitoring the project met regularly with the promoters on ESG issues, namely strategy, performance analysis and planning of actions to be implemented to achieve environmental and/or social characteristics. The provisions of Article 3g of Directive 2007/36/EC on the exercise of certain rights of shareholders in listed companies do not apply.



How did this financial product perform compared to the reference benchmark?

A benchmark has not been designated.

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

- ***How does the reference benchmark differ from a broad market index?***
NA
- ***How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the environmental or social characteristics promoted?***
NA
- ***How did this financial product perform compared with the reference benchmark?***
NA
- ***How did this financial product perform compared with the broad market index?***
NA