



This disclosure applies to Beta Innovation – Fundo de Capital de Risco Fechado, NIPC 720016789, code LEI 845000BBD60BDB1450, and is made pursuant to article 10 of Regulation 2019/2088 on Sustainability-Related Disclosure in the Financial Services Sector (SFDR).

A) SUMMARY

No sustainable investment objective

This financial product promotes environmental or social characteristics but does not have objectives of sustainable investment.

Environmental or social characteristics of the financial product

The financial product promotes environmental or social characteristics to the extent that it integrates environmental, social and good governance criteria with traditional financial criteria in its investment decisions. ESG criteria are incorporated firstly by assuming the Beta Capital sustainability commitments, secondly by (negative screening) excluding the sectors referred to as such in its policy and thirdly by carrying out to each analysed project a ESG due diligence; which uses a set of indicators of the main negative sustainability impacts to assess the environmental or social characteristics promoted by the financial product.

Investment strategy

The objective of this financial product is to achieve long-term capital growth by investing in start-ups engaged in research and development projects aimed at technological innovation and the valorization of their results in new products, services and processes, particularly in the fields of information and communication technologies, electronics, new materials, energy and life and health sciences.

The Fund's investment strategy takes into account environmental, social and governance indicators, with relevant materiality, to identify sustainability risks and, if they occur, are likely to have an impact on the value of investment.

Proportion of investments

The fund will invest in companies that promote environmental and/or social characteristics, and at least 10% of its investments in economic activities qualified as environmentally and/or socially sustainable.

Monitoring of environmental or social characteristics

The monitoring of the environmental or social characteristics promoted by the financial product is carried out through the analysis of periodic ESG reports submitted by the investee companies, which make it possible to assess the evolution of the risks and the selected sustainability indicators.



Methodologies

Indicators assessed include all mandatory indicators listed in the Commission Delegated Regulation (EU) 2022/1288, as well as at least one additional climate indicator and other environment-related indicators, indicator “4. Investments in companies without carbon emission reduction initiatives” and one additional indicator related to the principal adverse impacts on social sustainability, employees, human rights, anti-corruption or anti-bribery, indicator “4. Lack of a supplier code of conduct”. Whenever the values of the indicators are materially relevant, action plans and targets are established.

Data sources and processing

Beta Capital takes into account publicly available information and information collected from invested companies.

Limitations to methodologies and data

The methodology for identifying principal adverse impacts depends on the quality of the information received from the investee companies. Beta Capital is aware of this situation and encourages its gradual improvement working together with the management of investee companies

Due Diligence

Due diligence on the underlying assets of the financial product is carried out periodically through the ESG questionnaire, filled by companies with the support of Beta Capital team.

Engagement policies

With its hands-on policy, Beta Capital will seek to influence and improve the ESG practices of its investee companies along the holding period of the investment.

Designated reference benchmark

A benchmark reference has not been designated.

B) NO SUSTAINABLE INVESTMENT OBJECTIVE

This financial product promotes environmental or social characteristics but does not have as its objective sustainable investment

C) ENVIRONMENTAL OR SOCIAL CHARACTERISTICS OF THE FINANCIAL PRODUCT

The financial product promotes environmental or social characteristics to the extent that, in its investments, it will integrate environmental, social and environmental criteria.

The Fund is committed to promoting environmental and social characteristics by adopting ESG criteria in the investment decision-making process jointly with traditional financial criteria.



ESG criteria are incorporated firstly by assuming the Beta Capital sustainability commitments, secondly by (negative screening) excluding the sectors referred to as such in its policy and thirdly by carrying out to each analysed project a ESG due diligence. In addition to the technological, legal and tax aspects of the business plan, sustainability risks and/or the difficulty of overcoming constraints that jeopardize sustainability are assessed. The decision may be not to proceed with the investment.

During the holding period of the investment, an hands-on policy will be followed with active engagement of investee managers, to identify access and manage sustainability risks of the investee companies in the portfolio of the financial product, each year each investee company providing information on the main adverse impacts on sustainability factors. A combination of material indicators on sustainability and principal adverse impacts are used to measure the attainment of the environmental or social characteristics promoted by this financial product.

D) INVESTMENT STRATEGY

The objective of this financial product is to achieve long-term capital growth by investing in start-ups engaged in research and development projects aimed at technological innovation and the valorization of their results in new products, services and processes, particularly in the fields of information and communication technologies, electronics, new materials, energy and life and health sciences. The Fund will diversify its investments in different companies with different strategies in order to mitigate some of the risk.

Environmental, social and governance criteria are taken into account in the investment strategy to the extent that the values of the respective indicators are materially relevant, thus enabling the identification of sustainability risks and their impact on the value of the investment.

The Fund commits to invest in companies that do not fail to comply with minimum safeguards in accordance with Article 18 of Regulation EU 2020/852 (Taxonomy Regulation), respect for the DNSH (Do No Significant Harm) principle in accordance article 2 (17) of Regulation EU 2019/2088 and, takes into account the United Nations Sustainable Development Goals and the United Nations Principles for Responsible Investment.

[Assessment of good governance practices of investee companies](#)

In the assessment of Governance, the following factors are taken into account: good practices in terms of composition, parity, structure and functioning of the management body, including independence of the members, effectiveness of the supervisory body's performance, remuneration structure, and transparency of information.



E) PROPORTION OF INVESTMENTS

The financial product will invest in companies that promote environmental or social characteristics, or a combination of both, with at least 10% of its investments in economic activities qualified as environmentally sustainable according to the European taxonomy and/or with a social objective.

F) MONITORING OF ENVIRONMENTAL OR SOCIAL CHARACTERISTICS

The continued monitoring of environmental or social characteristics promoted by the financial product is based on Sustainability Policy of Beta Capital, the manager of the Beta Innovation Fund.

Its Sustainability Policy defines the guidelines for integrating sustainability risks into to the investment process, which can be summarized as follows:

- 1) an initial screening that excludes the projects and activities referred to in the Exclusion Policy;
- 2) due diligence that analyzes the information provided by the company in the ESG questionnaire and the materiality of the values indicated;
- 3) each company will report annually material adverse impacts on sustainability factors allowin to inform all the investors as defined in Article 11(2) of Regulation (EU) 2019/2088 (SFDR).

G) METHODOLOGIES

The indicators assessed include all mandatory indicators listed in Table 1 of Annex I of the Commission Delegated Regulation (EU) 2022/1288 of April 6, 2022 (RTS) that are relevant to the size, nature and scope of the company's activities, as well as at least one additional climate indicator and other environment-related indicators (Table 2 of Annex I), indicator “4. Investments in companies without carbon emission reduction initiatives”. As well as one additional indicator related to the principal adverse impacts on social sustainability, employees, human rights, anti-corruption or anti-bribery (Table 3 of Annex I), indicator “4. Lack of a supplier code of conduct”. The selection of indicators is based on the probability of occurrence and severity of adverse impacts, including their potentially irremediable character.

H) DATA SOURCES AND PROCESSING



Beta Capital takes into account publicly available information as well as information collected from affiliated companies through an ESG questionnaire.

It is important to note, on the one hand, the materiality of the indicators given the dimension, the nature and scale of the activities of the companies invested in and, on the other hand, that the European legislation on sustainability is a recent and is in accelerated evolution, so that in some cases, the measurement of the principal adverse impacts will be partially subjective and based on a qualitative assessment.

To ensure data quality and coherence across portfolio level, Beta Capital supports participating companies throughout the reporting process, seeking to ensure the accuracy of the reported indicators and conducting internal and/or external reviews as appropriate.

I) LIMITATIONS TO METHODOLOGIES AND DATA

The methodology for identifying principal adverse impacts depends on the information received from the investee companies.

Beta Capital is unable to determine with precision the proportion of data that is estimated. This limitation does not affect how the environmental or social characteristics promoted by the Fund are met.

J) DUE DILIGENCE

The due diligence implemented to the underlying assets of the financial product is carried out through the ESG questionnaire, which is answered by companies with the support of the investment team.

This reporting takes into account the EU Delegated Regulation 2022/1288 (RTS).

K) ENGAGEMENT POLICIES

With its hands-on policy, Beta Capital will seek to influence and improve the ESG practices of its investee companies during the holding period of its investments.

L) DESIGNATED REFERENCE BENCHMARK

A benchmark has not been designated.

Approved on 30-09-2024