

An aerial photograph of a beach. The left side of the image is a solid, warm orange-brown color, representing the sand. The right side shows the ocean with white, foamy waves crashing onto the shore. The water transitions from a light turquoise near the beach to a deeper blue further out. The overall composition is split vertically between the land and the sea.

OMADA IM

# **Responsible Investment Policy**

# Responsible Investment Policy

Responsible investment is a fundamental principle at OMADA IM

Omada IM views the integration of extra-financial criteria as a powerful tool for risk management, resilience, stability and performance enhancement.

The Omada IM team strongly believes that considering these principles aligns investor objectives with wider societal goals. Integrating these considerations also meets the expectations expressed by Omada IM's investors.

## WHAT IS RESPONSIBLE INVESTMENT?

Responsible investment involves the integration of Environmental, Social and Governance ( ESG ) factors into investment decision-making and portfolio monitoring processes.

## COMMITMENT

As a responsible investor, Omada IM has a duty to act in the best interests of its investors.

In its role as a manager, Omada IM strongly believes that ESG issues can affect the performance of investment portfolios over time, with varying impacts depending on companies, sectors, and regions.

Omada IM is a member of the France Invest association and a signatory of the Growth Commitment Charter.

Omada IM actively encourages its team members to engage in working groups and discussions within organizations like France Invest.

## OBJECTIVE

The objective of the responsible investment policy is to define Omada IM's approach and process for integrating ESG risks into value creation opportunities for private equity investments.

## SCOPE

This responsible investment policy applies to all private equity investments, including fund investments and co-investments.

## ROLES AND RESPONSABILITIES

The investment teams at Omada IM are responsible for considering ESG factors in investment decisions.

Omada IM's approach involves analyzing the ESG-related risks and opportunities associated with its investments at all stages of the investment cycle, from pre-investment to exit.

The scope of ESG due diligence efforts is specific to each investment process. ESG due diligence findings are explicitly documented in the investment recommendations presented to the investment committee

Pre-investment :

Every new investment undergoes Omada IM's ESG due diligence process:

- For primary fund commitments, the General Partner (GP) completes a due diligence questionnaire inspired by France Invest's Responsible Investment Questionnaire. This tool facilitates dialogue to understand and assess the GP's ESG integration practices and key responsible parties.
- For co-investments in unlisted companies alongside a GP, Omada IM reviews the GP's ESG due diligence. During the investment evaluation, Omada's investment team analyzes and discusses significant ESG risks and opportunities identified by the GP or Omada itself.

## Investment Monitoring :

- As a primary fund investor, Omada IM ensures that invested funds adhere to agreed ESG policies and practices by :
  - Reviewing annual ESG reports prepared by GPs ;
  - Attending annual investor meetings ;
  - Participating in advisory committees for Limited Partners (LPs) where Omada is a member ;
- For co-investments, monitoring is conducted via the GP, who ensures portfolio companies allocate adequate resources and possess necessary ESG expertise to manage key ESG factors. Omada IM plays an active role in monitoring ESG incidents. If a significant ESG incident arises, discussions with the GP focus on managing the situation with the company's leadership team. Omada IM tracks progress over time.

## EXCLUSION POLICY

As part of its ESG policy, Omada IM implements an ESG exclusion policy. OMADA IM acts in compliance with applicable national and international laws, prohibitions, treaties and embargoes to define its investment universe.

Beyond these legal requirements, Omada IM will also consider the following exclusion criteria when evaluating potential investments

To be eligible, Omada IM ensures that:

(a) The fund considered for investment does not and has not invested in a company that:

(b) Or that the co-investment does not target a company that:

- Is involved in the production, sale, storage, or services related to anti-personnel mines and cluster bombs, which are prohibited by the Ottawa and Oslo treaties;
- Is involved in the production, sale, or storage of chemical, biological, and depleted uranium weapons;
- Seriously and repeatedly violates one or more of the ten principles of the Global Compact (as described below);
- Derives more than twenty percent (20%) of its revenue from coal extraction or production;
- Generates more than twenty percent (20%) of its revenue from coal-based electricity production;
- Develops new coal-fired energy production capacities;
- Generates more than ten percent (10%) of its revenue from tobacco;
- Generates more than twenty percent (20%) of its revenue from palm oil.

Omada IM also excludes investments in controversial jurisdictions – (EU sanctions list).

## The Ten Principles of the Global Compact :

### Human Rights :

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.

### Labor Standards:

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labour.

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation.

### Environment:

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

### Anti-Corruption:

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

## TRANSPARENCY

As a regulated entity, Omada IM complies with relevant local and European regulatory requirements regarding non-financial communication, particularly the SFDR and the EU Directive on Corporate Sustainability Reporting ("CSRD").

In addition to the non-financial disclosures required by the regulatory frameworks mentioned above, Omada IM will also communicate on the evolution of its ESG charter.

In the current environment, Omada IM's ESG policy will inevitably evolve. To anticipate, justify, and monitor these developments, Omada IM will regularly report on its ESG positioning. Indeed, these commitments are meaningful today and in the future only if they are shared in a simple and transparent manner.

**Omada IM, Responsible Investment Policy, Version 1.0,  
July 2024**