Sustainable Development Policy Summary

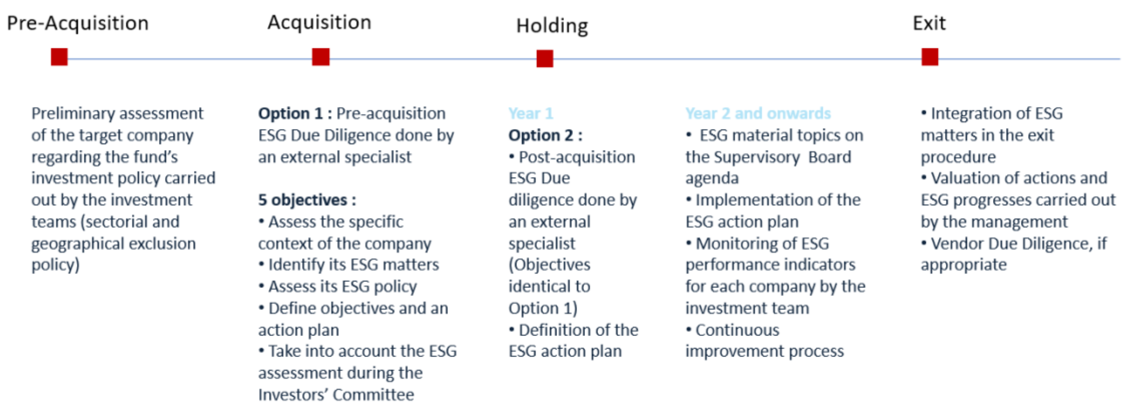
Sustainability risk is taken into account by integrating ESG criteria into the funds management, exclusion policies and governance.

EU Rule no. 2019 / 2088 (referred to as “SFDR” or “Disclosure”) defines adverse impacts as the impact of investment decisions on sustainability factors (environmental and social matters, respect of human rights and the fight against corruption). Management companies with more than 500 employees are required to consider these adverse impacts on sustainability factors.

For funds classified as Article 8 “SFDR” that promote environmental and social characteristics (i.e., Sagard 4 and Sagard NewGen funds), Sagard SAS considers non-financial criteria such as “ESG” (Environmental, Social and Governance) in its investment, development and portfolio companies support strategy. This translates into:

- consideration of ESG assessments at Investment Committees;
- ESG Due Diligences performed by an external provider.
- the definition of an ESG action plan that is monitored annually,
- annual monitoring of ESG performance indicators

In practice, at each stage of the investment cycle, Sagard SAS raises awareness of the portfolio companies with ESG challenges and integrates its ESG approach into its investment procedures:



Sagard SAS is also attentive to the preservation of biodiversity in its operations and investments.