



# Specific Information

FUND CLASSIFIED AS ARTICLE 8 (SFDR)

**Product Name:** Kurma Diagnostics 2

- I. Summary .....2
- II. No sustainable investment objective .....4
- III. Environmental or social characteristics of the financial product .....4
- IV. Investment strategy .....5
- V. Proportion of investments .....6
- VI. Monitoring of environmental or social characteristics .....7
- VII. Methodologies .....7
- VIII. Data sources and processing .....8
- IX. Limitations to methodologies and data .....8
- X. Due Diligence .....8
- XI. Engagement policies .....9
- XII. Designated reference benchmark .....9

***Versioning of the document***

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## I. Summary

Kurma Diagnostics 2 promotes environmental and/or social characteristics but does not and will not make investments with a sustainable objective. Thus, the underlying investments of Kurma Diagnostics 2 do not take into account EU criteria within the meaning of the Taxonomy Regulation for sustainable economic activities.

ESG is an assurance of sustainability and performance for Kurma Diagnostics 2. Throughout the investment process of Kurma Diagnostics 2, ESG factors fully contribute to the selection, transformation and sustainable growth of companies it finances. Eurazeo formalized this approach through its O+ strategy, anchored by two flagship commitments: achieve carbon net neutrality and foster a more inclusive society.

More specifically, regarding the environmental and/or social characteristics promoted by Kurma Diagnostics 2, in line with O+:

- a) Compliance of the investment target with the Eurazeo Exclusion Policy implemented by Kurma Diagnostics 2.
- b) Conducting an *ESG due diligence* for and prior to each investment, in order to gain a thorough understanding and analyze the main ESG issues, risks and opportunities of the investment target.
- c) Encouraging and supporting the implementation of 20 key ESG actions known as the “O+ Essentials”, that enable the construction of a balanced, comprehensive and effective ESG approach.
- d) Measuring the ESG integration in the business models of financed companies through annual ESG reporting, which includes the PAI.

In addition to the Exclusion Policy, certain governance practices are also excluded by Kurma Diagnostics 2: corruption, money laundering, Human Rights violations, activities located in conflict zones and violations of International Labor Organization (ILO) principles. Even if Kurma Diagnostics 2 does not make and will not make investments with a sustainable objective, compliance with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is covered by O+, Eurazeo's Responsible Investment Policy implemented by Kurma Diagnostics 2.

During the *ESG due diligence* phase, Eurazeo aims to identify and analyze key ESG issues, risks, and opportunities of the investment target. The approach covers the following areas: environment, social, societal, supply chain, ethics and governance. This includes assessing the eligibility and alignment of investment targets with the European Taxonomy and the compliance with the Do Not Significantly Harm (DNSH) technical criteria through the Principal Adverse Impacts (PAI) analysis of SFDR.

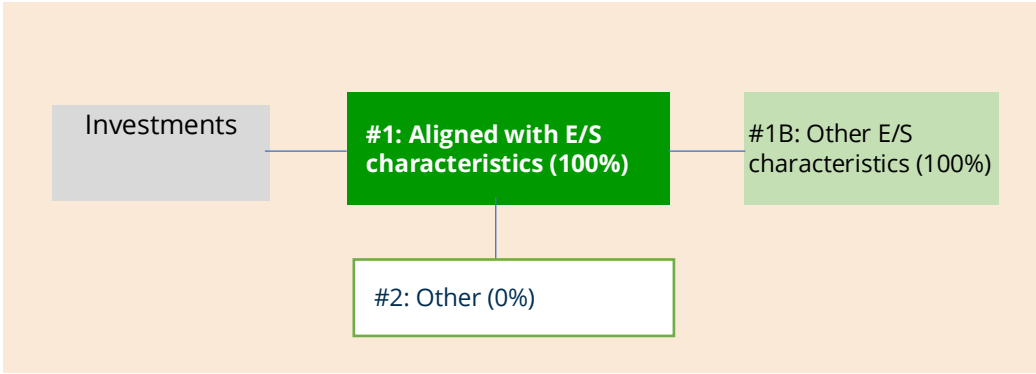
A rigorous examination of an investment target in terms of ESG drives the ability to form strong convictions in the selection of investments. Eurazeo applies the principle of “double materiality”, which aims to study the impact of ESG risks on the company, as well as those that the company poses on society.

Kurma Diagnostics 2 maintains a regular dialogue with the companies it finances. In addition, to facilitate their understanding and integration of ESG issues, a series of documents, tools and training sessions that address the different dimensions of ESG are made available to the Senior Managers and ESG Managers of the companies financed by Kurma Diagnostics 2.

Environmental and/or social characteristics and good governance practices can therefore influence the decisions of Kurma Diagnostics 2 to invest, reinvest or divest part of certain of its investments. The characteristics promoted are applied within the limits of Kurma Diagnostics 2's investment objective.

The Fund's investment strategy and its implementation are set out in Kurma Diagnostics 2's constitutive documentation. Please refer to it for further information.

It is expected that 100% of Kurma Diagnostics 2's assets will be aligned with environmental and/or social characteristics – excluding cash and interest rate/exchange hedging.



The methodology for measuring how the environmental and/or social characteristics promoted by Kurma Diagnostics 2 are achieved relies on the integration of ESG at every stage of the investment process.

Eurazeo has defined indicators to measure this integration of environmental and/or social characteristics into the investment process:

- % of investments made during the year that comply with the Exclusion Policy;
- % of investments made during the year that underwent ESG due diligence;
- % of financed companies that carried out the annual ESG reporting.

The achievement of the environmental and/or social characteristics promoted by Kurma Diagnostics 2 are measured as follows:

- Each investment made during the year complies with the Exclusion Policy.
- Each investment made during the year underwent ESG due diligence.
- All financed companies were covered by the annual ESG reporting and their response rate measured.

Eurazeo's ESG team collects data from the investment teams on the integration of ESG into Kurma Diagnostics 2's investment process. This data is subject to consistency checks. PwC has been appointed as an independent third-party by Eurazeo.

For the annual ESG reporting, the data comes entirely from the companies financed by Kurma Diagnostics 2. It is collected annually through a digital platform, Reporting21, made available to the companies financed by Kurma Diagnostics 2.

In addition, each year, the 14 mandatory PAI indicators and the 2 additional relevant indicators are measured using financial data, collected from Eurazeo's Finance Department, and non-financial data, collected from each company financed by Kurma Diagnostics 2 as part of the annual ESG reporting mentioned above. Checks (evolution and consistency checks) are carried out.

Given the investment universe of Kurma Diagnostics 2, no index has been designated as reference benchmark.

## **II. No sustainable investment objective**

Kurma Diagnostics 2 promotes environmental and/or social characteristics but does not and will not make investments with a sustainable objective. Thus, the underlying investments of Kurma Diagnostics 2 do not take into account EU criteria within the meaning of the Taxonomy Regulation for sustainable economic activities.

## **III. Environmental or social characteristics of the financial product**

ESG is an assurance of sustainability and performance for Kurma Diagnostics 2. Throughout the investment process of Kurma Diagnostics 2, ESG factors fully contribute to the selection, transformation and sustainable growth of companies it finances. Eurazeo formalized this approach through its O+ strategy, anchored by two flagship commitments: achieve carbon net neutrality and foster a more inclusive society.

More specifically, regarding the environmental and/or social characteristics promoted by Kurma Diagnostics 2, in line with O+:

### **a) Compliance of the investment target with the Eurazeo Exclusion Policy implemented by Kurma Diagnostics 2.**

Investment restrictions related to companies that operate in sectors or that have activities with potential negative impacts on the environment, human health or society have been defined and formalized in the Eurazeo's Exclusion Policy, implemented by Kurma Diagnostics 2. There are two categories:

- The first category includes certain sectors whose direct or indirect negative impacts are incompatible with Eurazeo's responsible investment approach or cannot be overcome by transforming the business, such as the pornography sector. Kurma Diagnostics 2 will not invest in these sectors.
- The second category includes sectors for which a materiality threshold is provided. This approach avoids the exclusion of companies with less than 20% revenue in the sectors concerned. If a company meets the above-mentioned exclusion criteria, Eurazeo through Kurma Diagnostics 2, is prepared to support it in transforming its activities, provided that the transformation objectives are formalized to ensure compliance as soon as possible.

Please refer to the Eurazeo Exclusion Policy, available on Eurazeo's website, for more information.

In addition to the Exclusion Policy, certain governance practices are also excluded by Kurma Diagnostics 2: corruption, money laundering, Human Rights violations, activities located in conflict zones and violations of International Labor Organization (ILO) principles. Even if Kurma Diagnostics 2 does not make and will not make investments with a sustainable objective, compliance with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is covered by O+, Eurazeo's Responsible Investment Policy implemented by Kurma Diagnostics 2.

**b) Conducting an ESG due diligence for and prior to each investment, in order to gain a thorough understanding and analyze the main ESG issues, risks and opportunities of the investment target.**

This approach covers the following areas: environment, social, societal, supply chain, ethics and governance. The ESG due diligence can be based on (i) documentary research from studies, sectoral and thematic benchmarks, press articles on the industry as well as on competitors, (ii) analysis of documents made available via the data room and (iii) analysis of an ESG questionnaire completed by the management of the investment target. As appropriate, more in-depth research may be carried out through interviews with management or experts, or through due diligence made by external firms and site audits.

**c) Encouraging and supporting the implementation of 20 key ESG actions known as the “O+ Essentials”, that enable the construction of a balanced, comprehensive and effective ESG approach.**

Eurazeo has developed an ESG Progress Plan that allows financed companies to integrate ESG into their business model and progress over years, regardless of their size or maturity in this area. This progress plan includes 20 “O+ Essentials” that enable the construction of a balanced, comprehensive, and effective ESG approach.

Companies' progress is measured on four levels – bronze, silver, gold, and platinum – depending on the number of criteria implemented. In line with the two flagship commitments of the Eurazeo O+ strategy, Kurma Diagnostics 2 encourages financed companies to decarbonize their activities and make progress on diversity, equity and inclusion (DEI). This plan constitutes a common framework but is not exclusive: companies' material issues must be identified and the action plans to address them defined.

**d) Measuring the ESG integration in the business models of financed companies through annual ESG reporting, which includes the PAI.**

Eurazeo has set up an ESG reporting campaign to collect and report information on the main ESG actions implemented by the investments of Kurma Diagnostics 2. Each year, all companies financed by Kurma Diagnostics 2 are asked to complete a comprehensive annual ESG reporting on a set of indicators for all companies.

In addition, Kurma Diagnostics 2 considers Principal Adverse Impacts (PAI) which are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee issues, respect of human rights and anti-corruption.

**Environmental and/or social characteristics and good governance practices can therefore influence the decisions of Kurma Diagnostics 2 to invest, reinvest or divest part of certain of its investments.**

#### **IV. Investment strategy**

Kurma Diagnostics 2 is a fund dedicated to invest in early stage portfolio companies active in the field of medical diagnostic, patient prognosis and monitoring, which have their principal place of business in the European Union with a specific focus in France (2/3<sup>rd</sup>).

More specifically, regarding the promotion of environmental and/or social characteristics, Kurma Diagnostics 2 is aligned with Eurazeo's Responsible Investment Policy, O+. Kurma Diagnostics 2 contributes through its investments to achieving carbon net neutrality and to fostering a more inclusive society. Kurma Diagnostics 2 integrates the environmental and/or social characteristics mentioned above as well as good governance practices throughout the investment process.

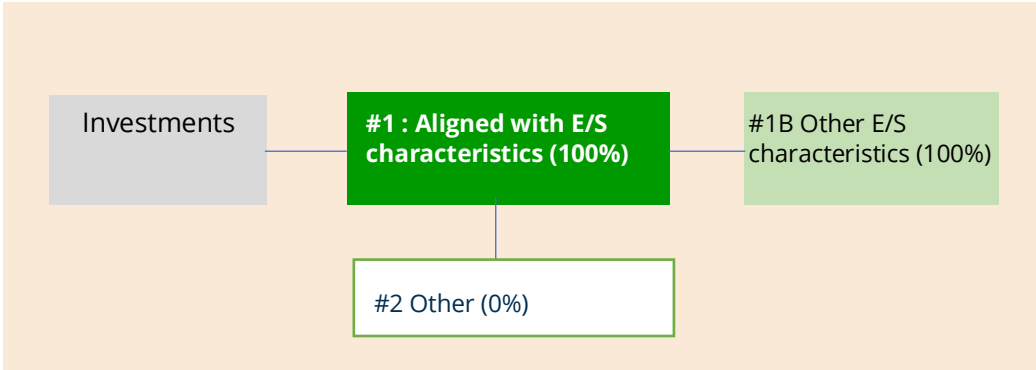
In addition to the Exclusion Policy, certain governance practices are also excluded by Kurma Diagnostics 2: corruption, money laundering, Human Rights violations, activities located in conflict zones and violations of International Labor Organization (ILO) principles. Even if Kurma Diagnostics 2 does not make and will not make investments with a sustainable objective, compliance with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is covered by O+, Eurazeo's Responsible Investment Policy implemented by Kurma Diagnostics 2.

**Environmental and/or social characteristics and good governance practices can therefore influence the decisions of Kurma Diagnostics 2 to invest, reinvest or divest part of certain of its investments.**

The characteristics promoted are applied within the limits of Kurma Diagnostics 2's investment objective. The extent to which the environmental and/or social characteristics of Kurma Diagnostics 2 are promoted is regularly monitored and reported in the Kurma Diagnostics 2's periodic reports.

The Fund's investment strategy and its implementation are set out in Kurma Diagnostics 2's constitutive documentation. Please refer to it for further information.

**V. Proportion of investments**



"#1 Aligned with E/S characteristics" includes the investments of Kurma Diagnostics 2 used to achieve environmental and/or social characteristics promoted by Kurma Diagnostics 2. Subcategory "#1B Other E/S characteristics" covers investments aligned with environmental and/or social characteristics that do not qualify as sustainable investments.

**It is expected that 100% of Kurma Diagnostics 2's assets will be aligned with environmental and/or social characteristics – excluding cash and interest rate/exchange hedging.**

Given Kurma Diagnostics 2's investment strategy, exposure will be to portfolio companies. There is no exposure to other assets.

## VI. Monitoring of environmental or social characteristics

**Eurazeo has defined indicators to measure this integration of environmental and/or social characteristics into the investment process:**

- % of investments made during the year that comply with the Exclusion Policy;
- % of investments made during the year that underwent ESG due diligence;
- % of financed companies that carried out the annual ESG reporting.

This data on the integration of ESG at all stages of the investment process is subject to consistency checks. PwC has been appointed as an independent third-party by Eurazeo.

Also, a part of the senior management's variable compensation is linked to these indicators.

In addition, each year, Kurma Diagnostics 2 measures and controls (evolution and consistency checks) the 14 mandatory PAI indicators and the 2 additional relevant indicators.

## VII. Methodologies

The methodology for measuring how the environmental and/or social characteristics promoted by Kurma Diagnostics 2 are achieved relies on the integration of ESG at every stage of the investment process. Eurazeo takes all appropriate measures to integrate environmental and/or social characteristics at each stage of the investment process:

- During the identification phase, Kurma Diagnostics 2 refers to Eurazeo's Exclusion Policy to ensure that the investment complies with the Exclusion Policy. A tool has been developed internally to facilitate its application Kurma Diagnostics 2, which can always rely on the ESG team in case of doubt. **The compliance of the investment with the Exclusion Policy is reviewed at the Investment Committee.**
- During the identification phase, Kurma Diagnostics 2 conducts an ESG due diligence prior to each investment in order to gain a thorough understanding and analyze the various ESG risks and opportunities. **The sharing of the ESG due diligence main conclusions for each investment is a prerequisite for going before the Investment Committee.**
- During the holding period, Kurma Diagnostics 2 encourages companies to deploy an ESG progress plan and to carry out the annual ESG reporting to measure the deployment and progress of ESG programs. To this end, Eurazeo has developed an ESG Progress Plan that allows financed companies to integrate ESG into their business model and progress over years, regardless of their size or maturity in this area. This progress plan includes 20 "O+ Essentials" that enable the construction of a balanced, comprehensive, and effective ESG approach. Companies' progress is measured on four levels – bronze, silver, gold, and platinum – depending on the number of criteria implemented. Kurma Diagnostics 2 notably includes ESG clauses in its investment documentation. In addition, to facilitate their understanding and integration of ESG issues, a series of documents, tools and training sessions that address the different dimensions of ESG are made available to the Senior Managers and ESG Managers of the companies financed by Kurma Diagnostics 2. All the material is available on *Connect*, a digital platform developed by Eurazeo in 2020. **Each year, an annual ESG reporting campaign is organized and covers all the companies in the portfolio. The data collected is formalized into an annual ESG report, sent to each company.**

**The achievement of the environmental and/or social characteristics promoted by Kurma Diagnostics 2 are measured as follows:**

- Each investment made during the year complies with the Exclusion Policy.
- Each investment made during the year underwent ESG due diligence.
- All financed companies were covered by the annual ESG reporting and their response rate measured.

In addition, each year, Kurma Diagnostics 2 measures and controls (evolution and consistency checks) the 14 mandatory PAI indicators and the 2 additional relevant indicators.

## VIII. Data sources and processing

Eurazeo's ESG team collects data from the investment teams on the integration of ESG into Kurma Diagnostics 2's investment process (see ESG integration indicators above). **This data is subject to consistency checks.** PwC has been appointed as an independent third-party by Eurazeo.

For the annual ESG reporting, the data comes entirely from the companies financed by Kurma Diagnostics 2. It is collected annually through a digital platform, Reporting21, made available to the companies financed by Kurma Diagnostics 2. **Data quality is taken into account:** If there is doubt about the data quality or if the response rate is less than 60%, then it is not taken into account.

The PAI indicators are measured on an annual basis using financial data, collected from Eurazeo's Finance Department, and non-financial data, collected from each company financed by Kurma Diagnostics 2 as part of the annual ESG reporting mentioned above. **Data verification and consistency checks are performed.**

This information is available in the Kurma Diagnostics 2's Annual Management Report.

## IX. Limitations to methodologies and data

**Limitations in data collection are related to the lack of data produced or data of sufficient quality from the companies in Kurma Diagnostics 2's portfolio.** To reduce this risk, Eurazeo assists the companies in Kurma Diagnostics 2 's portfolio to help them provide the reliable and relevant data needed to build ESG reporting and develop ESG best practices. Data verification and consistency checks are performed.

## X. Due Diligence

**During the ESG due diligence phase, Eurazeo aims to identify and analyze key ESG issues, risks, and opportunities of the investment target.** The approach covers the following areas: social, environment, societal, supply chain, ethics and governance. This includes assessing the eligibility and alignment of investment targets with the European Taxonomy and the compliance with the Do Not Significantly Harm (DNSH) technical criteria through the Principal Adverse Impacts (PAI) analysis of SFDR.

A rigorous examination of an investment target in terms of ESG drives the ability to form strong convictions in the selection of investments. Eurazeo applies the principle of "double materiality", which aims to study the impact of ESG risks on the company, as well as those that the company poses on society.

Themes studied:



SOCIAL	ENVIRONMENT	SOCIETAL	ETHICS AND GOVERNANCE
<b>Employment</b> (workforce, variations, turnover and compensation)	<b>General policy</b> (approach, awareness raising/training, risk prevention, provisions and guarantees)	<b>Territorial, economic and social impact</b> (employment, local development)	<b>Fair trade practices</b> (ethics, corruption, tax)
<b>Organization of work</b> (working time and absenteeism)	<b>Climate change</b> (sources of emissions, decarbonation trajectory, physical and transition risks, resilience contribution)	<b>Relations with stakeholders</b> (expectations, dialogue, partnership)	<b>Health and safety of consumers and users</b> (quality, communication, transparency)
<b>Labor relations</b> (organization of social dialogue and collective agreements)	<b>Water</b> (fresh water, ocean, impact assessment, ability to reduce impact, protect)	<b>Corporate philanthropy</b> (donations to associations)	<b>Human rights</b> (actions undertaken)
<b>Health and safety</b> (working conditions, health insurance, workplace accidents)	<b>Biodiversity</b> (impact to species and areas, ability to reduce impact, protect)	<b>SUPPLY CHAIN</b>	<b>Company governance and gender equality and independence</b> on the Supervisory Board (SB)
<b>Training</b> (policy, hours delivered)	<b>Other planetary boundaries</b> (impact assessment, Ability to reduce impact, protect)		<b>Risk management</b> and internal control tools
<b>Equal treatment</b> (gender equality, fight against discrimination)	<b>Principal Adverse Impacts</b> related to GHG emissions, carbon footprint, GHG intensity of investee companies, exposure to companies active in the fossil fuel sector, share of non-renewable energy consumption and production, energy consumption intensity per high impact climate sector, activities negatively affecting biodiversity sensitive areas, emissions to water, hazardous waste ratio and water management strategy.	<b>Suppliers and subcontractors</b> (procurement policy and subcontracting)	<b>Crisis management, reputation</b>
<b>ILO Conventions</b> (freedom of association, discrimination, forced labor and child labor)		<b>Social and environmental impacts</b> related to the supply chain	<b>Principal Adverse Impacts</b> related to violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises, lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises and exposure to controversial weapons (antipersonnel mines, cluster munitions, chemical weapons and biological weapons)
<b>Principal Adverse Impacts</b> related to unadjusted gender pay gap and Board gender diversity	<b>Taxonomy eligibility and alignment</b>	<b>Circular economy &amp; raw materials</b> (waste management, use of resources, depletion & restoration)	
		<b>Principal Adverse Impacts</b> related to Responsible procurement charter.	

## XI. Engagement policies

**Kurma Diagnostics 2 maintains a regular dialogue with the companies it finances.**

If Kurma Diagnostics 2 is a shareholder, this would particularly occur at Supervisory Boards or Boards of Directors. Please refer to the Shareholder Engagement Policy, available on Eurazeo's website.

In addition, to facilitate their understanding and integration of ESG issues, a series of documents, tools and training sessions that address the different dimensions of ESG are made available to the Senior Managers and ESG Managers of the companies financed by Kurma Diagnostics 2.

## XII. Designated reference benchmark

**Given the investment universe of Kurma Diagnostics 2, no index has been designated as reference benchmark.**