

# ESG Policy

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AltamarCAM Partners

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### **Scope of the Policy and explanatory notes**

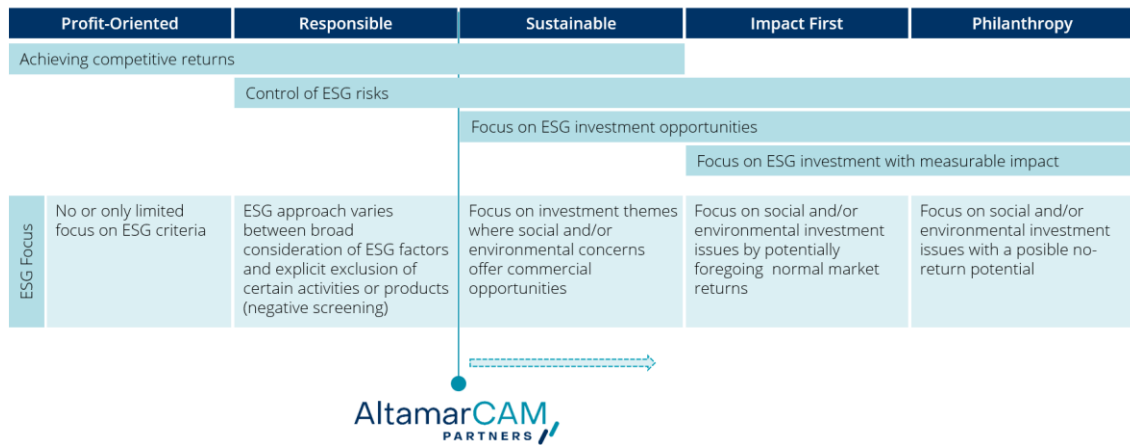
This ESG Policy Document (referred to as the 'Policy') shall apply to Altamar CAM Partners, S.L, and the management companies of collective investment undertakings, more specifically to Altamar Private Equity, S.G.I.I.C., S.A.U., Altan Capital, S.G.I.I.C., S.A.U. and CAM Alternatives GmbH (hereinafter 'AltamarCAM', 'the Firm' or the 'the Group').

In relation to the sections titled 'Integration of sustainability factors and risks in the investment process (SRI)' and 'Focus areas in responsible investments,' it's important to note that this Policy does not place limitations on the Firm's capacity to implement supplementary or more rigorous procedures for certain funds. For such instances, the appropriate procedures should be referred to in the legal documentation or the policies specific to those funds.

# 1. Introduction and general principles

'Responsibility' and 'Sustainability' are fundamental pillars in the culture of AltamarCAM. In an ever-changing world, where environmental and social challenges, along with financial disparities, exert significant influence, Responsible Investment (hereinafter, 'RI') practices not only enhance the value of investments by effectively managing risks and capitalizing on favourable trends but are also a fundamental tool to achieve AltamarCAM's ultimate goal as a responsible investor: **to reinforce our role as a trusted advisor and act as a driver of positive change in the financial sector and society.**

As an investor, AltamarCAM positions itself in the responsible investment segment, carefully and progressively approaching sustainable investment objectives.



As part of this commitment, AltamarCAM goes beyond mere compliance with legal regulation, aligning itself with cutting-edge standards, including the **United Nations Principles for Responsible Investment (UN PRI)**<sup>1</sup>. By doing so, we embrace and incorporate the [six principles of UN PRI](#) into our investment process, underscoring our dedication to responsible and sustainable investing.

At the core of our approach is a **culture deeply grounded in enduring values** that resonate across our entire team and collaborators. We actively promote sustainability as a foundational principle, ensuring that our actions leave a lasting positive legacy in all our activities. Our aim is not only to meet present challenges but to shape a future where responsible practices lead the way to create better and more resilient businesses.

## AltamarCAM values



<sup>1</sup> AltamarCAM Partners is a PRI signatory (since 2016 and 2019, respectively for Altamar and CAM). From the 2023 reporting cycle onwards, a unified PRI Report is published by AltamarCAM Partners.

This Policy serves as a robust framework that guides AltamarCAM's ESG<sup>2</sup> decisions, aligning them with the principles we follow, at both the investment and corporate level. By doing so, we aim to foster a trustworthy relationship with our clients and business partners, emphasizing our values (responsibility, excellence, long-term vision...) as the cornerstone of our approach. This policy underscores our dedication to upholding responsible investment practices and our commitment to making a positive impact in the financial industry and beyond.

## 2. ESG Frameworks & Associations

AltamarCAM is committed to upholding the highest ESG standards, actively engaging with top-tier frameworks and initiatives to steer our sustainable investment and firm management practices forward:

 Principles for Responsible Investment	 Task Force on Climate-related Financial Disclosures	 The Institutional Investors Group on Climate Change	 Initiative of Climate	 A COMMITTEE OF THE IIGCC ON FUTURE CLIMATE-RELATED ISSUES	 LEVEL	 Resiliente, responsable y generadora de impacto	 Operating Principles for Impact Management
 ESG Data Convergence Initiative	 SASB STANDARDS	 UNITED NATIONS HUMAN RIGHTS	 SUSTAINABLE DEVELOPMENT GOALS				

Our ESG strategy and policies are firmly aligned with the 2030 Agenda, both at the company and investment levels. As a responsible investor, we recognize our potential to contribute to this much-needed change and have identified six priority Sustainable Development Objectives (hereafter referred to as 'SDGs'), where our impact can be most significant, considering our field of activity, priorities and level of influence.



Internally, AltamarCAM adheres to various procedures and policies that establish ethical and governance principles, forming a comprehensive and consistent ESG framework for the entire Group. These policies include the Exclusion Policy, Voting Policy, Code of Ethics, Internal Code of Conduct, Remuneration Policy, Diversity, Equity and Inclusion Policy, and other compliance policies related to governance topics.

In terms of societal impact, Fundación AltamarCAM (referred to as 'the Foundation') stands as a cornerstone within the Firm's culture and strategy and serves as a powerful instrument for driving positive change within society by enhancing the human, organizational, relational and economic capabilities of the Firm. Within this framework, the Foundation operates under its own policy ([link](#)), complete with a set of well-defined objectives and lines of action.

## 3. ESG Corporate Governance

We believe that a robust management structure is essential for creating a sustainable culture, enabling informed decision-making, optimizing efficiency, and ensuring the successful permeation of ESG procedures in all organizational levels. With that purpose, AltamarCAM governance framework encompasses the following principal bodies (please refer to the Appendix for detailed information):

- **Board of Directors (BoD):** it is ultimately responsible for all ESG matters and operates through the ESG Committee (composed by 11 members that meet 5-6 times a year).
- **ESG Committee:** it provides top-level strategic guidance and promotes sustainability initiatives. It also serves as a bridge, connecting AltamarCAM Board members and stakeholders with the sustainability function (composed of 7 senior management members that meet on a biannual basis and is led by the Chair of ESG).

<sup>2</sup> Means an environmental, social or governance consideration.

- **ESG Steering Group:** it facilitates ESG policy implementation across the Firm. Leveraging their expertise, the members offer guidance and foster the cultivation of innovative ideas (composed of 11 senior representatives from different areas and ESG team members that meet on a quarterly basis).
- **ESG Team:** it is responsible for the definition and execution of the ESG Strategy and related policies as well as the launch of new initiatives in this area (composed of 7 members and led by the Chief ESG Officer).
- **Investment Team:** it is responsible for integrating RI processes across various investment cycle stages and contributing to RI process definition (>80 members, 6 of them are ESG ambassadors).

Additionally, the ESG team invites specialists from different areas of AltamarCAM to participate in certain projects through ad hoc task forces. This structure involves top management and senior profiles from the Firm's different areas of activity, each playing vital roles in the ESG strategy and related initiatives. By leveraging this structured approach, we communicate clearly, execute ESG practices efficiently, and maintain our commitment to responsible investing across all hierarchical levels of AltamarCAM. In order to ensure the alignment of interests with the ESG Strategy, **team members, including the BoD and C-level members, have annual ESG objectives linked to their variable remuneration.**

#### 4. Integration of sustainability factors and risks<sup>3</sup> in the investment process (SRI)

AltamarCAM incorporates the assessment of sustainability opportunities and risks throughout the entire investment process, from investment opportunity analysis to the exit phase. The Firm seeks to improve the General Partner's (hereafter referred to as 'GP') and investee companies' commitment to sustainability factors by **giving great importance to dialogue (engagement) and regular monitoring.**

Although the theoretical principles of responsible investment underpin the entire portfolio managed and/or advised by AltamarCAM, the practical application may vary significantly based on the unique characteristics of each product, including the type of assets and investment strategies involved. AltamarCAM invests in 6 different asset classes (Private Equity, Venture Capital, Life Sciences, Real Estate, Infrastructure and Private Debt) through primaries, secondaries, co-investments, direct investments and platforms in private markets. ESG-integration guidelines throughout the investment cycle are detailed below, considering product-specific characteristics when applicable:

##### Screening

AltamarCAM applies a preliminary negative screening by following its **Exclusion Policy**<sup>4</sup>, which specifies a list of restricted sectors and activities in which the Firm does not wish to invest.

- **For fund of funds activity:** In the case of primaries, AltamarCAM will try to obtain a formal statement from the managers via side letter, confirming that no investments will be made in companies whose activity is restricted. In the event that this formal confirmation cannot be obtained, AltamarCAM will refer the situation to the Investment Committee (hereafter referred to as 'IC') to evaluate the potential sustainability risks and obtain final approval or rejection of the investment (in practice, side letter negotiation is typically carried out during the 'Formalization of the investment' phase). Additionally, when assessing a secondary opportunity, the Firm will evaluate whether there are underlying assets performing an activity that matches the Exclusion Policy. If a potential conflict arises, the team shall

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<sup>3</sup> A sustainability risk means an environmental, social or governance event or condition that, if it occurs, could cause a negative material impact on the value of the investment (or could have a negative impact on the environment, the organization or the society) as specified in sectoral legislation, in particular in Directives 2009/65/EC, 2009/138/EC, 2011/61/EU, 2013/36/EU, 2014/65/EU, (EU) 2016/97, (EU) 2016/2341, or delegated acts and regulatory technical standards adopted pursuant to them.

<sup>4</sup> For more details about the Exclusion Policy, please refer to the document on AltamarCAM's website: <https://www.altamarcam.com/wp-content/uploads/2023/07/Exclusion-Policy-Web-ENG-July-2023.pdf>

evaluate its significance and will take all steps to try to exclude the asset from the secondary transaction. In any case, the IC will be duly informed and will evaluate the sustainability risks of the transaction.

- **For direct investment and co-investments:** AltamarCAM avoids investing in companies whose activity is included in the Exclusion Policy.

For specific management or advisory mandates (SMAs), AltamarCAM shall use its best efforts to ensure the application of the Exclusion Policy, subject to the particularities of this type of vehicles.

## **Due Diligence**

- **For fund of funds activity:** during the due diligence process, AltamarCAM conducts a comprehensive analysis of the GP's sustainability approach, which is included as a fundamental part of the overall due diligence.

On the one hand, the Investment Team (with the eventual support of the ESG Team) reviews the information package provided by the GP, which contains all relevant information regarding sustainability policies, practices, and any relevant events.

As an essential step in the assessment, the Firm also requests the GP to complete the Firm's ESG Due Diligence Questionnaire (hereafter referred to as 'ESG DDQ'), which is adapted per asset class and thoughtfully designed to assess the GP's capabilities, commitment, and performance regarding the integration of sustainability factors across the entire investment process. The ESG DDQ includes the following modules: Policies and Risk Management, Governance and Leadership, Memberships, Climate Change, ESG Regulatory Compliance, Investment Process, Reporting, and Asset Class Specific Module, and is aligned with the SDGs promoted by the Firm.

The responses provided by the GP are analysed, first by the Investment Team and afterward by the ESG Team to identify any errors or inconsistencies following a four-eyes principle process, as well as to identify any significant gaps that would require further analysis. Following the review, each GP is assigned an ESG score, categorizing them into one of four distinct categories: Beginner, Compliant, Good and Outstanding.

Additionally, for funds classified as Article 8 or 9 under the Regulation (EU) 2019/2088 (referred to as 'Art.8 and Art. 9 products') in secondary transactions, AltamarCAM analyses the bottom-up composition of the portfolios from the ESG risk-perspective, with its proprietary 'ESG Portfolio Analysis Model'. This involves analysing ESG events and including relevant industry, country and climate-related ratings for the invested portfolio companies in the assessment. The respective rating parameters are capital-weighted at the portfolio company level and aggregated at the target fund level with the corresponding investment amount.

- **For direct investments and co-investments:** when undertaking a direct investment or co-investment, AltamarCAM integrates environmental, social and governance aspects in the due diligence process through a specific ESG questionnaire extended to cover company-specific aspects, based on the materiality factors (sector, business model, type of asset...) as well as other priorities identified in each particular case. This questionnaire is backed up by a risk-focus analysis performed with the 'ESG Portfolio Analysis Model' and by a continuous dialogue process, with the company (for direct investment) or through the GP (for co-investments), helping AltamarCAM to focus on the identification of the ESG risks and opportunities associated with the potential investment. In the case of co-investments, the Firm will additionally carry out a due diligence of the GP, leveraging on the 'ESG DDQ' process, as indicated in the previous paragraph 'For the fund of funds activity'.

Additionally, when necessary, the Firm may seek the assistance of an external advisor to provide further support during the due diligence.

## Formalization of the investment

The main conclusions of the ESG due diligence are included in the investment memorandum and presented to the IC, which holds the ultimate responsibility for investment decisions. The ESG Team remains actively informed about the distribution or presentation of the investment memorandum to the IC, and if an ESG deficit that poses any risk is identified during the due diligence process, it provides a comprehensive set of recommendations (including ESG-related questions to be addressed by the Investment Team in the meeting with the GP). These recommendations will form the basis of a well-defined plan, outlining all feasible actions within the Firm's control to address the deficit and secure alignment of the underlying assets with its ESG standards.

Subsequently, during the formalization of an investment proposal, AltamarCAM reviews the sustainability regulations in the legal documents. The GP/investee company is then requested by the Investment Team to incorporate a series of clauses in the side letters/term sheets, formalizing the key commitments that AltamarCAM seeks to attain in terms of sustainability. In case any clause is modified or not accepted by the GP, the Investment Team will inform the ESG Team, which will decide whether to proceed with the process or escalate it to the IC.

## Holding Period

- **For the fund of funds activity:** when investing in a manager, AltamarCAM adheres to its 'Engagement Protocol', which seeks to facilitate positive changes in the GP's operations, aligning them with AltamarCAM's responsible investment principles and correcting any material deficiency or risk exposure. This protocol is composed by 3 main steps: selection, involvement and monitoring. After the initial GP's evaluation and scoring obtained during the GP's ESG due diligence process, AltamarCAM initiates the protocol with the *selection* phase, identifying those managers with the greatest areas for improvement, which will become the priority for the Firm in terms of engagement. Subsequently, during the *involvement* phase, the Firm actively participates in a transparent and constructive dialogue with the selected fund managers. This includes sharing their current internal ESG scores and anonymized benchmarking data from AltamarCAM's portfolio, alongside a comprehensive set of recommendations and an offer of assistance/support (depending on the particular case, actions as the following may be considered: training, technical advisory, setting specific goals and action plan, etc.). All of which, contribute significant value to the GP and establish the groundwork for continuous improvement. Finally, for the *monitoring* phase, AltamarCAM performs a regular evaluation of the GPs, resending the ESG DDQ on an annual basis for funds classified as 'Beginner' and 'Compliant' and bi-annually to those classified as 'Good' or 'Outstanding'. This periodic assessment allows AltamarCAM to track progress, update strategies, and make necessary adjustments to its engagement approach. Additionally, for Art.8 and Art. 9 products, AltamarCAM analyses at least annually the bottom-up composition of the portfolios from the ESG perspective, with its proprietary ESG Portfolio Analysis Model.
- **For direct investments and co-investments:** AltamarCAM follows a structured and product-adapted approach for direct investments and co-investments, which involves regular data collection using a specific ESG questionnaire as the primary tool to monitor progress, together with the application of the 'ESG Portfolio Analysis Model' for Art.8 and Art. 9 products. Depending on its stake, in direct investments, AltamarCAM will consider to have a seat on the board. When participating in co-investments the Firm will additionally apply the Engagement Protocol at the GP level. In any case, AltamarCAM will use constant dialogue and leverage all its capabilities in order to accelerate the integration of sustainability practices and the achievement of ESG-specific objectives, where applicable.

To the extent that a material breach in the portfolio has been observed during the monitoring phase, AltamarCAM would, first, thoroughly analyse the issue in search for consequences and implications, evaluating any material risks that it may generate. AltamarCAM would contact the GP of the Underlying Fund or direct investment or co-investment to seek for the rationale behind the issue identified, and if necessary, agree an appropriate action plan to mitigate such deficiencies and take steps towards improvement. If AltamarCAM is not satisfied with the evidence requested, the issue would be escalated to the Investment Committee and the ESG Committee.

## **Exit**

In the exit phase (referring to the secondary transaction of a fund or the divestment of a direct investment), AltamarCAM performs a comprehensive assessment of the fund or company's ESG performance, analysing its evolution from entry to exit of the fund/company in question. Additional analyses or ad-hoc documents may be developed to meet specific investors' requirements.

## **5. Focus areas in responsible investments**

### **Legal framework**

AltamarCAM is committed to adhering to any applicable sustainable finance regulatory requirements and leveraging them to enhance ESG integration in our investment processes while providing clear and accurate information to our investors.

Regarding the Regulation (EU) 2019/2088, AltamarCAM prioritizes classifying new products under Article 8 and Article 9, as such classification enhances transparency in the investment processes and helps investors identifying products that align with their sustainability goals. Currently, Principal Adverse Indicators (referred to as 'PAIs') are not considered in the fund of funds activity, although some of them are limited through AltamarCAM's Exclusion Policy. The Firm keeps this position under review, closely monitoring market advancements and using all its capabilities to report PAIs in the investment decisions and advice, as soon as they are feasible and measurable. For more information, refer to the SFDR section on the Firm's website (<https://www.altamarcam.com/esg-4/>).

AltamarCAM also considers its clients' sustainability preferences, as required under MiFID II regulation.

### **Climate Change**

AltamarCAM places specific emphasis on climate-related risks and opportunities. In line with this, in addition to adhering to the aforementioned initiatives, the Firm avoids investing in enterprises engaged in specific activities associated with the fossil fuel industry (for more details, refer to AltamarCAM's Exclusion Policy).

As part of its fund of funds activity, AltamarCAM analyses both exposure to climate-related risks and the current management of climate risks and opportunities. To evaluate funds' current climate-related risk and opportunity management, GPs are asked through the ESG DDQ a series of questions aligned with the Task Force on Climate-related Financial Disclosures (TCFD) recommendations, which are then scored. By applying the TCFD approach in its assessments, AltamarCAM actively supports the implementation of the TCFD recommendations. At the portfolio level (for Art. 8 and Art. 9 products), the Firm conducts scenario analyses through its ESG Portfolio Analysis model to assess future potential climate physical and transition-related risks, evaluating risks associated with sectoral or geographical exposure under various climate change scenarios.

Lastly, in all activities, including fund of funds, co-investments, and direct investments, the Firm requests information on scope 1 and 2 emissions of the portfolio assets and is committed to offering assistance regarding decarbonization purposes.

### **2030 Agenda**

AltamarCAM adopts the Agenda 2030, as the primary framework for reporting the sustainability performance of its products, including the structure of periodic disclosures for Art. 8 and Art. 9 products.

Regarding the fund-of-funds activity, where the portfolio nature is often generic across sectors, AltamarCAM's primary focus is on promoting the six priority SDGs selected by the Firm. This is achieved by closely monitoring a set of indicators aligned with these objectives and collaborating with the GPs on this matter. Furthermore, the ESG Team reviews the products' investment strategy, identifying when applicable other relevant SDGs by considering factors such as invested sectors, geographical area, investee companies' size, or asset type.

For direct investment funds and co-investments, the Firm conducts a dedicated analysis of the fund and the material aspects of the portfolio companies. Based on this assessment, a specific list of SDGs and a tailored reporting framework may be developed for each product under consideration.



## **Human rights**

AltamarCAM recognizes the responsibility to respect and uphold internationally recognized human rights as the United Nations Guiding Principles on Business and Human Rights. The firm has zero tolerance for any possible investment in GPs that manage portfolio companies presenting any material breach of UN conventions and declarations on human rights (for more details, refer to AltamarCAM's Exclusion Policy).

Additionally, AltamarCAM gathers periodically data on human rights in its investments based on materiality principles, which allows the Firm to enhance its understanding of the portfolio's companies, with a particular focus on human rights strategies.

## **6. Reporting**

One of the key differentiating factors of AltamarCAM is its close relationship with investors. The Firm actively addresses client expectations regarding sustainability by informing them about its ESG Strategy and providing regular updates on progress. Alongside the annual report, pertinent information, such as due diligence questionnaires, is accessible in the data rooms of AltamarCAM funds, on the Firm's website, and through its social media channels. Moreover, AltamarCAM periodically shares sustainability updates in investor-focused documents, including Quarterly Activity Reports, Annual Reports, Supervisory Committee presentations, the AltamarCAM Annual General Meeting of investors, the ESG Report, the PRI Report, and corporate presentations. Furthermore, AltamarCAM is dedicated to personally responding to each investor's inquiries.

## **7. Internal Awareness of sustainability**

To ensure the effective integration of sustainability criteria, AltamarCAM is dedicated to fostering a comprehensive understanding of the Firm's ESG policies and procedures among its team members. To achieve this, team members are actively kept well-informed about updates and trends through a range of engaging and impactful initiatives included in AltamarCAM's annual training plan. These initiatives encompass annual mandatory ESG training for employees, courses conducted by experts and external organizations, periodic snapshots, and a quarterly ESG newsletter, among others (as well as including ESG related objectives in their annual objectives).

## **8. Sustainability at the corporate level**

Beyond the investment decisions, sustainability is an inherent aspect of the entire corporate framework of AltamarCAM, crucial for aligning the Firm's culture and values with the daily operations. The Firm diligently integrates ESG considerations across all its offices, working closely with other departments such as Talent and Facilities.

At the environmental level, addressing climate change and advancing the circular economy stand out as central focal points. AltamarCAM is carbon neutral at the operational level and has an emissions reduction plan, guided by an annually reviewed climate strategy, that aligns with the Oxford Offsetting Principles. Additionally, AltamarCAM office's practices embrace circular economy principles, actively encouraging the three Rs (Reduction, Reuse, and Recycling) through practical steps, such as phasing out single-use cups and bottles.

On the social front, the Firm places significant emphasis on employee well-being, diversity, and inclusion, backed by specific policies. Similarly, through the AltamarCAM Foundation, resources are channelled to achieve the overarching objective of creating a positive societal impact.

## **9. Modification of the Policy**

"The Policy, as well as any amendments thereto, must be approved by the ESG Committee and ratified by the Board of Directors of AltamarCAM Partners, S.L. AltamarCAM's ESG guidelines and processes are reviewed at least annually to ensure that they are up to date, adapted and continually improved.

## Appendix: ESG Governance at AltamarCAM

	Board of Directors	ESG Committee	Steering Group	ESG Team	Investment Team
<b>Composition</b>	Board members (11 members)	Senior Management members (including several Board members). Led by the Chair of ESG (7 members)	Members of the ESG Team and senior representatives from different areas of the Firm (11 members)	Composed by full time ESG employees and members with a fixed partial dedication from other key areas. Led by the Chief ESG Officer (7 members)	Members of the different investment teams. Each assets class also has its own ESG Leader (>80 members, 6 of which are ESG ambassadors)
<b>Objective</b>	Ultimately responsible for all ESG matters and operates through the ESG Committee	Provides top-level strategic guidance and promotes sustainability initiatives. It also serves as a bridge, connecting AltamarCAM Board members and stakeholders with the sustainability function	Facilitates ESG policy implementation across the Firm. Leveraging their expertise, they offer guidance and foster the cultivation of innovative ideas	Responsible for the definition and execution of the ESG Strategy and related policies as well as the launch of new initiatives in this area	Responsible for integrating RI processes across various investment cycle stages and contributing to RI process definition
<b>Frequency</b>	5-6 meetings per year	Biannual basis + ad hoc meetings	Quarterly basis	Ongoing	Ongoing
<b>Main Functions</b>	<p>To ratify the ESG Strategy and review its degree of progress.</p> <p>To approve corporate procedures and policies regarding ESG matters (e.g., this policy, the ESG Training Plan, etc.).</p> <p>To decide on strategic issues raised by the ESG Committee.</p> <p>To oversee on a periodic basis ESG KPIs and follow the progress of AltamarCAM in the sectoral benchmark analysis.</p>	<p>To provide strategic guidance for the definition and fulfilment of AltamarCAM sustainability objectives.</p> <p>To promote, assess and approve proposals for AltamarCAM participation in sustainability-related initiatives.</p> <p>To approve the ESG Strategy (ratified by the Board) and the subsequent annual plan.</p> <p>To approve the budget allocation of the ESG department.</p> <p>To monitor the processes related to the integration of sustainability at AltamarCAM and, especially, in its investment process.</p> <p>To promote the consolidation of an organizational culture that integrates sustainable values, among AltamarCAM employees and Senior Management.</p>	<p>To contribute to the definition and implementation of the ESG Strategy.</p> <p>To ensure the implementation of sustainability policies and procedures in their departments.</p> <p>To share knowledge and make proposals regarding best ESG practices, investors and other stakeholders' expectations, market trends etc.</p> <p>To act as ambassadors of the ESG function at AltamarCAM by promoting employee commitment to ESG values and initiatives.</p>	<p>To define the ESG Strategy and related objectives, lead its execution and monitor its degree of progress.</p> <p>To elaborate and ensure the correct reception and implementation of ESG policies and procedures by the teams involved.</p> <p>To analyse the ESG data of funds from the due diligence to the exit.</p> <p>To produce ESG reporting</p> <p>To analyse impact investment opportunities.</p> <p>To be updated on ESG regulatory developments and analyse their impact on AltamarCAM.</p> <p>To periodically analyse market trends, best practices as well as AltamarCAM positioning in terms of sustainability with respect to its peers</p> <p>To design the ESG training plans and awareness-raising actions.</p> <p>To provide support to areas and clients' requests</p> <p>To identify the initiatives and forums to which AltamarCAM should adhere, developing the actions related to registration and participation.</p> <p>To elaborate the department's annual budget allocation</p>	<p>To analyse the ESG data of funds from the due diligence to the exit.</p> <p>To present to the Investment Committee the main findings of the ESG due diligence for each fund.</p> <p>To ensure compliance with the Exclusion Policy in investments and report any incidents in this regard to the ESG team.</p> <p>To negotiate ESG side-letter clauses with underlying managers/companies.</p> <p>To report to the ESG Team any significant incident in the investments.</p> <p>To participate in the definition and review of IR policies and procedures (ESG Leader only)</p>

