



*Omnes Real Tech 2 – Article 9 fund  
Information on the sustainable objectives*

**a) Summary**

Omnes Real Tech 2 (“ORT-2”) is classified as an **Article 9 fund** under the Sustainable Finance Disclosure Regulation (SFDR). The Fund pursues a **sustainable social investment objective** by investing in the next generation of technology leaders with the capacity to generate a lasting social outcome.

ORT-2 focuses on three strategic areas of Deep Tech: **Applicative AI, Sustainability, and Sovereignty**. Its sustainable objective is reflected in two clear priorities:

1. **Enhancing scientific research, innovation and technological capacity** (aligned with **SDG 9.5**).
2. **Reducing inequalities through employee shareholding** in all portfolio companies, contributing to a fairer distribution of value and improved social relations (aligned with **SDG 10.4**).

To achieve its objectives, ORT-2 integrates **ESG and impact considerations throughout the investment cycle**. This includes pre-due diligence screening in accordance to Omnes exclusion commitments and fund investment restriction, ESG and impact due diligence, the implementation of sustainability action plans, annual monitoring of impact indicators, and the calculation of an Impact Score for each portfolio company. The Fund consolidates these results at portfolio level, ensuring continuous alignment with its sustainable objectives.

No environmental sustainable objective is pursued at this stage, and no benchmark index has been designated.

**b) No significant harm to the sustainable investment objective**

The Fund ensures its investments do no significant harm by applying an exclusion list and ESG criteria during due diligence. A dedicated ESG Scoring Grid helps identify potential high risks to environmental, social, or governance factors. If risks are deemed excessive, an ESG action plan is established.

In addition, the Fund collects and discloses the Principal Adverse Impact (PAI) indicators, including the 14 mandatory PAIs and two voluntary PAIs identified:

- **Environmental:** Share of energy consumption from non-renewable sources.
- **Social/Human rights:** Share of investments in entities without whistleblower protection policies.

**c) Sustainable investment objective of the financial product**

The goal of Omnes Real Tech 2 ('the Fund') is to invest in the next generation of technology leaders who contribute to positive social outcome. To this end, the Fund focuses its investments on three major areas: Applicative AI, Sustainability and

Sovereignty. As such, it will disclose in accordance with the requirements set out in Article 9 of Regulation (EU) 2019/2088 of 27 November 2019 on sustainability-related reporting in the financial sector.

The Fund's sustainable social objective is reflected in the following two priorities:

1. Enhance the positive contribution to the development of scientific research and innovation, and improve technological capabilities and human capital;
2. Fight against inequalities by opening up the capital of all portfolio companies to their employees, thus contributing to a fair distribution of added value and the improvement of social relations.

These priorities are aligned with the following two United Nations Sustainable Development Goals:



### SDG 9: Industry, innovation and infrastructure

Target 9.5: Enhance scientific research, upgrade the technological capabilities of industrial sectors in all countries, in particular developing countries, including, by 2030, encouraging innovation and substantially increasing the number of research and development workers per 1 million people and public and private research and development spending.



### SDG 10: Reduce inequalities within and between countries

Target 10.4: Adopt policies, in particular fiscal, wage and social protection policies, and progressively achieve greater equality.

## d) Investment strategy

- a. Investment strategy used to attain the sustainable investment objective

The Fund's strategy is to generate added value by investing in Deep Tech companies, focusing on three main areas: Applicative AI, Sustainability and Sovereignty.

ORT-2 aims to invest in companies that provide a technological and innovative response to contemporary challenges. We believe that deep-tech companies have the potential to transform our societies. Omnes' Deep Tech team wants to take advantage of Europe's leading scientific ecosystem and its structural need for investment. We have chosen to focus on France and Germany, which we consider to be the strongest economies in Europe, major economic and scientific allies, and which benefit from strong synergies. However, we will not hesitate to invest in other EU countries or outside if the investment opportunity is relevant to our sustainable development objective.

With ORT-2, we seek to invest larger tickets in our portfolio companies where opportunities allow, in order to have a significant influence on corporate



governance, and therefore on ESG practices and the sustainable investment objective.

To support the achievement of the sustainable investment objective set for ORT-2, the ESG considerations are fully integrated into the investment process:

- Pre-due diligence: The investment team ensures a pre-selection of investment opportunities to ensure compliance with the fund investment restriction and Omnes' exclusion commitments.
- Due diligence: An analysis is carried out by the investment team with the aim of assessing (1) companies' sustainability risk management practices, and (2) their level of alignment with both SDG targets 9.5 and 10.4 identified.
- Holding period: Monitoring investments covers the following responsibilities.
  - Supporting management in the development of the company's skills, with our role as a "sparring partner".
  - Contribute to the implementation of a specific monitoring and reporting system, including ESG reporting according to the criteria of the Omnes Venture Capital team.
  - Annually measures and reports the portfolio companies' alignment with SDG targets 9.5 and 10.4 with an in-house developed methodology.

More broadly, ORT-2's investment strategy is in line with Omnes' commitments as a Management Company. Omnes was a signatory of the Principles for Responsible Investment (PRI) in 2009 and has since reported annually to the PRI on its responsible investment practices. In addition, Omnes has signed the ESG Charter of France Invest and joined the International Climate Initiative in 2016.

b. Binding elements of the investment strategy used for selection

In order to ensure the achievement of the sustainable investment objective, the Fund has set binding elements to its investment strategy:

1. Alignment with UN Sustainable Development Goals 9 and 10, measured and tracked with a methodology based on the Impact Management Project (IMP) as well as best practices in quantitative impact measurement.

During the pre-investment period, the Fund will ensure that all of its investments are aligned with the United Nations Sustainable Development Goals to which we are committed.

Throughout the holding period, the Fund will ensure that portfolio companies are consistently aligned with the two sustainable KPIs identified and therefore aligned with the Fund's sustainable objective.

2. Compliance with the SFDR DNSH criteria.

As the Fund pursues a sustainable objective within the meaning of the SFDR, the ORT-2 team will ensure the collection and publication of the Principal Adverse Impact (PAI) indicators, as well as the implementation of Omnes Capital's ESG



policy at the Fund level. The collection and analysis of PAI indicators will be used as a tool to monitor and improve the ESG performance of portfolio companies.

- c. Policy to assess good governance practices of the investee companies, including with respect to sound management structures, employee relations, remuneration of staff and tax compliance

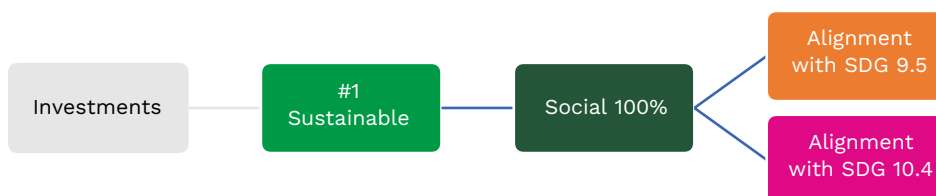
Omnes' Deep Tech team prioritises long-term, trust-based relationships with portfolio companies. This collaborative approach supports constructive dialogue and joint strategy-setting with management teams, strengthening partnerships that often continue beyond the Fund's exit. The team also pays close attention to investment terms and promotes respectful conduct towards counterparties and their obligations.

Governance is a key focus of the ESG due diligence performed before each investment. Pre-screening checks that prospective portfolio companies comply with major international standards of responsible business conduct in line with the Omnes Capital ESG Policy and the Fund's commitments; accordingly, ORT-2 will not invest in companies that seriously and repeatedly breach such standards, including the UN Global Compact, the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. Good governance requirements are also embedded in shareholders' agreements. During the holding period, Omnes' venture capital team regularly monitors portfolio companies' alignment with business ethics and good governance practices through PAI reporting. Lastly, value-sharing mechanisms are supported to help align interests with portfolio company management, including with respect to the prioritisation of good governance.

### e) Proportion of investments

- a. Minimum proportion of sustainable investment and allocation between environmental, social, and other objectives

All investments of ORT-2 contribute to the sustainable objective and are considered sustainable investments within the meaning of Article 2(17) of the SFDR. Therefore, all investments are classified as sustainable investments with a social objective within the meaning of SFDR.



There may be small portion of investments dedicated to liquidity management purposes. These assets will be exclusively maintained for liquidity purpose and will not affect the Fund's ability to meet its sustainable investment objective.



b. Alignment with EU Taxonomy

At this stage, ORT-2 does not pursue a sustainable environmental objective. As a result, the Fund does not necessarily intend to invest in assets aligned with the environmental objectives of the EU Taxonomy.

However, ORT-2 could align its portfolio with the future activities and objectives of the EU social taxonomy, when it becomes fully operational.

f) **Monitoring of sustainable investment objectives**

The monitoring of the sustainable investment objective of ORT-2 is based on an annual assessment of the portfolio companies against the Funds' two SDG-related targets:

- **SDG 9.5 (Development of R&D and innovation):** performance of each portfolio company is measured using a set of quantitative indicators, the core one being the **percentage of R&D expenses**, complemented by three bonus indicators: number of partnerships with laboratories, number of patents filed, and participation in working groups or coalitions. These indicators are collected annually through the ESG reporting process and compared to European benchmarks.
- **SDG 10.4 (Reduction of inequalities through employee shareholding):** three impact indicators are monitored across all portfolio companies: **access to capital authorised to employees, proportion of employees with access, and number of employees with access.**

The results are consolidated at both asset and portfolio levels, providing a clear view of the evolution of the Fund's performance over time. The monitoring process allows Omnes Capital to assess whether portfolio companies are aligned with the Fund's sustainable objectives and to identify areas where engagement is required to improve performance.

g) **Methodology**

Omnes Capital has developed a proprietary Impact Tool<sup>1</sup>, co-created with an external consultant, to measure ORT-2's contribution to its sustainable investment objectives.

The methodology is aligned with the **Impact Management Project (IMP)** framework, which assesses impact across **five dimensions**:

- **WHAT:** the nature of the impact and alignment with SDG targets.
- **WHO:** the stakeholders affected, their characteristics, and level of need.
- **HOW MUCH:** the scale, depth, and duration of the impact.
- **CONTRIBUTION:** the influence of Omnes Capital and/or the asset on the outcome achieved, including specific levers such as board representation, voting rights, dialogue, and support.

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<sup>1</sup> Omnes Capital has developed an Impact Tool aligned with the Impact Management Project framework to assess the Funds' contribution towards its designated SDG targets through a structured methodology. While the Fund pursues sustainable investment objectives and measures positive outcomes, Omnes Capital does not categorize or market ORT-2 as an "Impact Fund" as defined under applicable market practice and regulatory frameworks.



- **RISK:** the likelihood that the expected impact is not achieved, assessed across nine sub-risks (evidence, external, stakeholder participation, drop-off, efficiency, execution, alignment, endurance, and unexpected impact).

Each portfolio company receives an **Impact Score ranging from 1 to 100**, calculated from these five dimensions and adjusted by a performance multiple based on European benchmarks. Scores are categorised as follows:

- 1–35: Does or may cause harm
- 36–50: Acts to avoid harm
- 51–65: Benefits stakeholders
- 66–100: Contributes to solutions

Impact scores are then consolidated at the portfolio level using a weighted average approach based on asset valuation, highlighting the societal transformation potential of the Fund.

#### h) Data sources and processing

The assessment of contribution to the Fund’s sustainable investment objectives relies on both **internal and external data sources:**

- **Portfolio companies:** ESG questionnaires provide company-level data on R&D expenditure, employee shareholding practices, and other impact-related indicators.
- **Omnes Capital deal teams:** qualitative inputs on contribution levers (e.g., engagement activities, board participation) and risk assessments.
- **Public international databases:** macroeconomic benchmarks used for comparison, including OECD and Eurostat data.

Data is processed in an Excel-based model designed to automatically compute impact scores at both the asset and portfolio levels.

#### i) Limitations to methodologies and data

The Fund recognises several limitations to its methodology:

- **Perimeter limitation:** the methodology focuses on two SDG targets (9.5 and 10.4) linked to ORT-2’s SFDR thesis, while other societal or environmental impacts are not assessed in the model.
- **Calculation limitations:** the scoring system and performance multiples are based on methodological choices, which, while consistent with IMP guidance, are subject to interpretation.
- **Data dependency:** results depend on the availability and quality of company and benchmark data. In cases where specific data is missing, estimates or nearest available data points are used, which may reduce accuracy.



- **Scope:** downstream and upstream impacts of portfolio companies are not assessed.

Despite these limitations, the methodology allows for internal comparisons over time and across portfolio assets.

#### j) Due diligence

Due diligence on sustainability factors is integrated into ORT-2's investment process and relies on a structured set of internal tools. The investment team follows several key steps before and during the investment:

- **Exclusion list:** ORT-2 applies a formalised exclusion list to ensure that no investments are made in prohibited sectors or activities.
- **Scoring grid:** Potential portfolio companies are assessed against sustainability criteria across four dimensions: **Environment, Social, Governance, and Impact**. This scoring helps identify red flags and guides investment decisions.
- **Maturity grid:** Once a company is ready to join the portfolio, the investment team assesses its sustainability maturity and establishes a tailored sustainability action plan. The maturity grid builds on the results of the scoring grid and provides guidance for relevant actions.
- **Impact tool:** During the holding period, impact scores are computed annually using the ORT-2 Impact Tool, aligned with the Fund's sustainable objectives (SDG 9.5 and SDG 10.4).
- **Reporting framework:** Annual data collection is carried out through ESG questionnaires and dedicated SaaS platform (Novata), covering Principal Adverse Impact (PAI) indicators, ESG performance, and progress on action plans. This data feeds into the Impact Tool and Fund-level reporting.

#### k) Engagement policies

The engagement process of ORT-2 Fund relies on a combination of structured tools and active dialogues:

- **Sustainability action plans:** For each company, a sustainability action plan is formalised during the investment process using the maturity grid. These action plans are monitored annually and updated in collaboration with portfolio company management.
- **Ongoing monitoring and reporting:** During the holding period, the investment and ESG teams collaborate with portfolio companies to report on sustainable performance. This includes completing ESG and impact questionnaires, PAIs, and progress on sustainability action plans.
- **Impact measurement:** Companies' impact scores are computed annually with the ORT-2 Impact Tool.
- **Active shareholder role:** Omnes Capital uses its position as investor to influence decision-making. Contribution levers include integration of impact-related





criteria in investment processes, use of voting rights, board participation, dialogue with management, and providing additional expert support.

- **Stakeholder communication:** At fund level, consolidated sustainable performance is disclosed to stakeholders through regular reporting.

**l) Reference benchmarks**

No specific index has been designated as a reference sustainable benchmark for the Fund.