

## Act Venture Capital

### ESG Responsible Investment Policy

#### Document Control

Version	Date	Notes	Policy Owner
1.0	9 <sup>th</sup> January 2024	Policy Introduced	Shanice Callinan
1.1	2 <sup>nd</sup> December 2024	Policy Reviewed	Shanice Callinan
1.2	11 <sup>th</sup> November 2025	Policy Reviewed & Amended	Shanice Callinan

#### ■ Introduction

ACT Venture Capital (“Act”) is a venture capital manager focused on seed and expansion investment opportunities. We invest in business and management teams who have the ambition and potential to become market leaders.

The Sustainable Finance Disclosure Regulation (“SFDR” or “the Regulation”), effective from 10 March 2021, was introduced by the European Commission as part of the Action Plan on Sustainable Finance. The Regulation requires fund managers to disclose to investors the integration of sustainability risks, consideration of adverse sustainability impacts, promotion of environmental or social characteristics, and the overall practice of sustainable investing.

The EU Sustainable Finance Disclosure Regulation (2019/2088) on sustainability-related disclosures in the financial services sector defines “sustainability risks” as environmental, social or governance events or conditions that, if they occur, could cause an actual or potential material negative impact on the value of the investment”.

Act’s mission is to realise the potential of portfolio companies, management teams and employees to create sustainable long-term value, which in turn will generate market-leading returns for our investors. We recognize the effective assessment and management of ESG matters can have a positive effect on the financial performance and value of our portfolio companies.

This ESG Responsible Investment policy is overseen by Act’s Managing Partners, who are responsible for ensuring implementation and periodic review. This policy is reviewed annually by the Compliance Analyst.

Act Venture Capital continues to monitor developments under the European Commission’s review of the Sustainable Finance Disclosure Regulation (“SFDR 2.0”) and will update this policy once the revised framework is formally adopted.

#### ■ Our definition of responsible investment

The incorporation of environmental, social and corporate governance (ESG) factors into our investment processes, decision-making and ownership practices.

#### ■ Commitments and principles

To adhere to the principles of responsible investment, we will:

- ◆ Incorporate relevant ESG factors into our investment processes, decision-making and ownership practices that directly influence portfolio companies to enhance performance in these areas;
- ◆ Prior to an investment, ESG matters are evaluated as part of the due diligence process. Furthermore, all portfolio companies are required to periodically report on ESG criteria;
- ◆ Sustainability risks are assessed during due diligence to identify potential environmental, social or governance factors that could materially affect the financial performance or valuation of portfolio companies;
- ◆ Ongoing engagement with the company on material ESG issues is carried out. Where appropriate, agree an ESG action plan to address material ESG risks and opportunities;
- ◆ Seek appropriate disclosures and assurances on relevant ESG issues from the entities in which we invest and its management team;
- ◆ Be active shareholders and incorporate relevant ESG issues into our ownership policies and practices;
- ◆ Actively work to improve diversity and inclusion in our portfolio companies as well as within Act Venture Capital.

#### ■ Remuneration

Act Venture Capital's Remuneration policy addresses SFDR Article 5 on transparency of remuneration policies in relation to the integration of sustainability risks which states that:

*"Financial market participants and financial advisers shall include in their remuneration policies information on how those policies are consistent with the integration of sustainability risks and shall publish that information on their websites".*

Remuneration is generally provided on a fixed basis and may include a variable bonus element for relevant staff, which takes into account their compliance with policies and procedures in relation to sustainability risk.

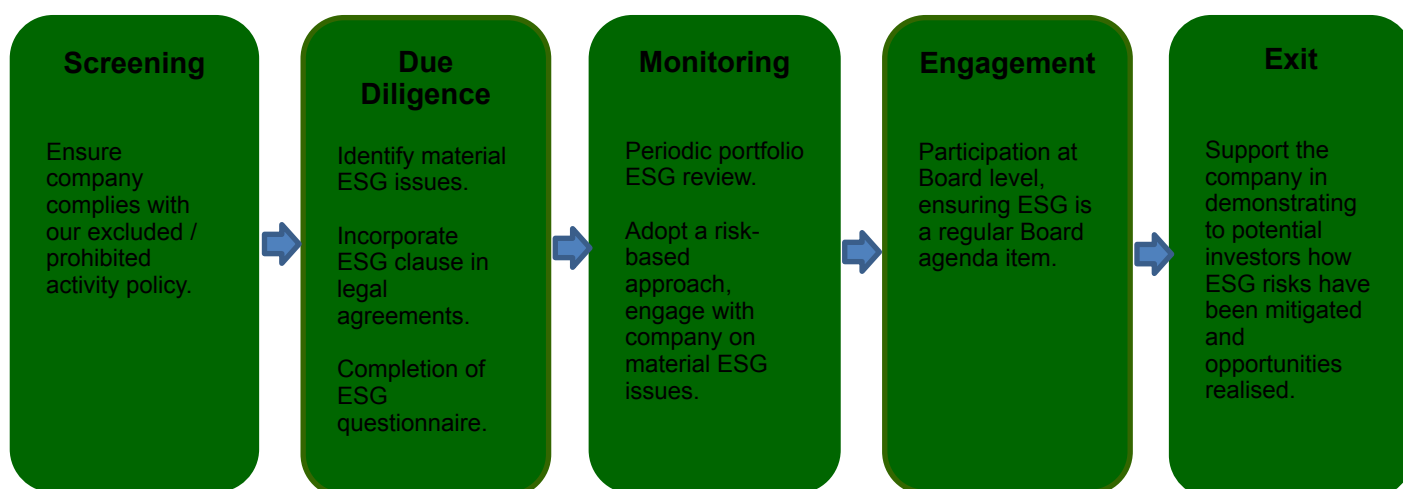
## ■ No Consideration of Sustainability Adverse Impacts

The SFDR Article 4 defines principal adverse impacts (PAI) as those impacts caused by, contributed to, or directly linked to investments decisions and advice that results in negative, material, or likely to be material impacts on sustainability factors.

Sustainability is the practice of operating business in a way that meets the economic, social and environmental needs of the present without compromising the ability of future generations to meet their own needs.

Act Venture Capital does not currently consider PAIs within the meaning of Article 4(1)(a) SFDR due to resource limitations and data availability in early-stage digital economy investments. This position is reviewed annually, and Act Venture Capital will monitor evolving regulatory expectations and update this policy as appropriate.

## ■ Our ESG Approach



*This policy was reviewed November 2025; it will be reviewed again November 2026.*