



# Chelverton Focused Tech Fund

A Sub-Fund of Independent Platform S.A. SICAV-RAIF

This Sub-Fund promotes environmental and social characteristics and qualifies as product in accordance with Article 8(1) of Regulation (EU) 2019/2088.

*This document addresses disclosures pursuant to Article 8(1) of Regulation (EU) 2019/2088 (the “SFDR”), related to the transparency of the promotion of environmental or social characteristics as well as Article 23 and Article 24 to 32 of Commission Delegated Regulation (EU) 2022/1288 (the “SFDR Level II”) with regard to regulatory technical standards content and presentation of the information in relation to the promotion of environmental or social characteristics on websites, as subsequently amended and supplemented.*

## Summary

### **Sub-Fund name: Chelverton Focused Tech Fund**

This Sub-Fund promotes environmental and social characteristics and qualifies as product in accordance with Article 8(1) of Regulation (EU) 2019/2088.

This document shall give investors a concise overview about environmental and social characteristics that this Sub-Fund is promoting, information on the methodologies used to assess, measure and monitor the environmental or social characteristics, including its data sources, screening criteria for the underlying assets and the relevant sustainability indicators used to measure the environmental or social characteristics of the financial product. This section contains a summary of the information referred to the other sections that relates to the Sub-Fund.

### **No sustainable investment objective**

The Sub-Fund promotes environmental or social characteristics but does not commit to making any sustainable investments. As a consequence, the Sub-Fund does not commit to a minimum share of sustainable investments with an environmental objective that are aligned with the EU Taxonomy.

The Sub-Fund considers principal adverse impacts on sustainability factors at the investment level (PAI indicators) as part of its investment process and during the life of the holding.

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

The Sub-Fund will invest 90% of its net assets in underlying funds which promote a broad range of environmental and/or social characteristics. The Sub-Fund intends to promote the following ESG (i.e. Environmental, Social & Governance) features in the investee companies: (i) geographic area of operations (all dimensions), (ii) compliance with ESG reporting standards (UN Global Compact etc.), (iii) designated ESG/ESG staff positions (G), (iv) relevant codes of conduct (AML, anti-bribery etc.) (G), (v) significant climate change mitigation and adaptation efforts in operations (E) including greenhouse gas emissions measurement and energy management, (vi) human rights (S), (vii) ILO Convention (all aspects), (viii) non-discrimination in opportunities and treatment (S), (ix) diversity in senior management positions (S), (x) diversity in non-management positions and (xi) anti-gender discrimination (S). The Sub-Fund considers that the above described characteristics together result in responsible business operations (the “Characteristics”).

### **Investment strategy**

The Sub-Fund follows the Investment Manager’s Responsible Investing Policy (the “**Policy**”). While the Sub-Fund does not apply selection criteria limiting, excluding or selecting investments on sustainability criteria alone, the Policy provides that investment process steps are followed to ensure ESG risks are systematically identified, and exposures monitored, and a structured stewardship plan to ensure appropriate focus on relevant ESG issues.

### **Proportion of investments**

The Sub-Fund intends to promote the Characteristics through a minimum of 90% of the Sub-Fund’s investments, calculated by investment value measured by fair value.

Investments meeting the binding elements of the investment strategy and deemed by the AIFM and the Investment Manager to promote the Characteristics will be categorised in disclosures as ‘aligned with the E/S characteristics’. Investments which do not at the time of disclosure promote the Characteristics will be categorised as ‘other’. Investments held for

liquidity/hedging purposes, cash, cash equivalents and derivatives will also be categorised as 'other'.

### **Monitoring of environmental or social characteristics**

The Sub-Fund applies a quarterly assessment on its investment into underlying funds to verify that their investment strategy is consistent with the promoted environmental and social characteristics.

The Investment Manager's Responsible Investing Policy provides that investment process steps are followed to ensure ESG risks are systematically identified, and exposures monitored, and a structured stewardship plan to ensure appropriate focus on relevant ESG issues.

### **Methodologies**

The Sub-Fund monitors key climate-related indicators across the portfolio companies on a quarterly basis. These metrics include carbon intensity measurements, water usage efficiency, waste management performance, and other relevant ESG indicators that provide insight into both current performance and future climate resilience, including PAIs. The Sub-Fund does not solely rely on third-party ESG ratings. The climate-related metrics are used to assess the holdings' exposures to climate risks and opportunities, and benchmark performance against sector peers.

### **Data sources and processing**

ESG metrics that the Investment Manager uses are sourced or derived from data that it receives from Integrum ESG as the third-party commercial data provider. Integrum provide carbon intensity measurements, water usage efficiency, waste management performance, and other relevant ESG indicators that provide insight into both current performance and future climate resilience, including PAIs. ESG data received do not constitute investment advice or recommendations by such providers.

### **Limitations to methodologies and data**

Notwithstanding the measures taken to ensure a high data quality, the Investment Manager has no direct control on the data collected. In addition, it should be considered that the different data providers use different methodologies to collect their data, which cannot be fully disclosed as to protect the intellectual property rights of the considered data provider.

## **Due diligence**

The Sub-Fund conducts analysis and due diligence, including ESG topics, in its pre-trade phase. Follow-up with companies also includes checking on E/S factors to improve or mitigate potential risks. In addition, the Sub-Fund collects and assesses the mandatory PAI indicators during the investment process and continuously during the holding period.

The due diligence process preceding an investment decision is carried out primarily by investment professionals and shall include an analysis of opportunities, risks, relevant legal, fiscal, financial or other value drivers, human, technical and material resources and appropriate strategies, including exit strategies and, among other industry and business specific aspects, ESG risks and opportunities.

## **Engagement policies**

The Sub-Fund does not have any direct engagement with the investee companies.

## **No designated reference benchmark**

No index has been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the financial product.

## **No sustainable investment objective**

The Sub-Fund promotes environmental or social characteristics but does not commit to making any sustainable investments. As a consequence, the Sub-Fund does not commit to a minimum share of sustainable investments with an environmental objective that are aligned with the EU Taxonomy.

The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria. As the Sub-Fund does not commit to invest any sustainable investment within the meaning of the EU Taxonomy, the minimum share of investments in transitional and enabling activities within the meaning of the EU Taxonomy is therefore set at 0%. Whether the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Right is not applicable as the Sub-Fund does not have any sustainable investments.

In its investment, this Sub-Fund considers all the mandatory principle adverse impacts on sustainability factors (“PAI”) listed in the Annex I, Table 1 of the Commission Delegated Regulation EU 2022/1288 (“SFDR Level II”). The Sub-Fund considers the following principal adverse impacts on sustainability factors at the investment level (PAI indicators) as part of its investment process and during the life of the holding:

The 14 PAI Indicators	Official Metric
GHG emissions	Scope 1 2 and 3 GHG emissions
Carbon footprint	Carbon footprint
GHG intensity of investee companies	GHG intensity of investee companies
Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector
Share of non-renewable energy consumption and production	Share of non-renewable energy consumption and non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage
Energy consumption intensity per high impact climate sector	Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector
Activities negatively affecting biodiversity-sensitive areas	Share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas
Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average
Hazardous waste ratio	Tonnes of hazardous waste generated by investee companies per million EUR invested, expressed as a weighted average
Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	Share of investments in investee companies that have been involved in violations of the UNGC principles or 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	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises and/or grievance/complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises
Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies

Board gender diversity	Average ratio of female to male board members in investee companies
Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	Share of investments in investee companies involved in the manufacture or selling of controversial weapons

## Environmental or social characteristics of the financial product

The Sub-Fund will invest 90% of its net assets in underlying funds which promote a broad range of environmental and/or social characteristics. The Sub-Fund intends to promote the following ESG (i.e. Environmental, Social & Governance) features in the investee companies: (i) geographic area of operations (all dimensions), (ii) compliance with ESG reporting standards (UN Global Compact etc.), (iii) designated ESG/ESG staff positions (G), (iv) relevant codes of conduct (AML, anti-bribery etc.) (G), (v) significant climate change mitigation and adaptation efforts in operations (E) including greenhouse gas emissions measurement and energy management, (vi) human rights (S), (vii) ILO Convention (all aspects), (viii) non-discrimination in opportunities and treatment (S), (ix) diversity in senior management positions (S), (x) diversity in non-management positions and (xi) anti-gender discrimination (S). The Sub-Fund considers that the above described characteristics together result in responsible business operations (the “Characteristics”).

The portfolio will be managed in line with SFDR Article 8 classification. Under this framework, a limit will be placed on the percentage of assets invested in companies with low ESG scores as measured through the Investment Manager’s proprietary ESG scoring methodology and/or third-party data.

The “do no significant harm” principle applies only to those investments underlying the Sub-Fund that take into account the EU criteria for environmentally sustainable economic activities. None of the underlying investments take into account these criteria as they are not applicable.

## Investment strategy

The Sub-Fund will invest in technology companies listed and operating globally. The Sub-Fund will focus on areas of long-term structural technology shifts, and aims to identify the winners from those shifts, where returns are under-appreciated or under-valued by the market. The Sub-Fund’s assets will be invested in a concentrated portfolio of equities and equity-linked instruments (including but not limited to ordinary or preferred shares and exchange traded

funds). The Sub-Fund may also be invested in bonds, and cash or cash equivalents such as sight bank deposits and money market instruments.

The Sub-Fund follows the Investment Manager's Responsible Investing Policy (the "**Policy**"). While the Sub-Fund does not apply selection criteria limiting, excluding or selecting investments on sustainability criteria alone, the Policy provides that investment process steps are followed to ensure ESG risks are systematically identified, and exposures monitored, and a structured stewardship plan to ensure appropriate focus on relevant ESG issues.

Further on in the process, the Sub-Fund ensures that investee companies achieve generally high ratings in relation to the E and S criteria adopted by the Sub-Fund through detailed analysis of the companies' activities.

## Proportion of investments

The Sub-Fund intends to promote the Characteristics through a minimum of 90% of the Sub-Fund's investments, calculated by investment value measured by fair value.

Investments meeting the binding elements of the investment strategy and deemed by the AIFM and the Investment Manager to promote the Characteristics will be categorised in disclosures as 'aligned with the E/S characteristics'. Investments which do not at the time of disclosure promote the Characteristics will be categorised as 'other'. Investments held for liquidity/hedging purposes, cash, cash equivalents and derivatives will also be categorised as 'other'.

## Monitoring of environmental or social characteristics

The attainment of the environmental and/or social characteristics promoted by the Sub-Fund is monitored on a continuous basis as part of the investment process. On a post-trade basis, the Sub-Fund applies a quarterly assessment on its investment into underlying positions to verify that their investment strategy is consistent with the promoted environmental and social characteristics. The attainment of the environmental and/or social characteristics promoted by the Sub-Fund is monitored on a continuous basis as part of the investment process. On a post-trade basis, the Sub-Fund applies a quarterly assessment on its investment into underlying positions to verify that their investment strategy is consistent with the promoted environmental and social characteristics.

The Investment Manager's Responsible Investing Policy provides that investment process steps are followed to ensure ESG risks are systematically identified, and exposures monitored, and a structured stewardship plan to ensure appropriate focus on relevant ESG issues. The risk monitoring process follows the framework:

- **Identify:** The identification of risk comes both pre and post investment, and is managed either by deeming an investment to be un-investible, or via the engagement process
- **Measure:** Assuming the stock has been deemed investible, any material ESG risks will be measured using data insights from Integrum ESG in combination with the Sub-Fund's proprietary investment process
- **Respond:** Any changes to the risk profile of the stock and how it impacts the portfolio will be monitored. In the first instance, any change to the portfolio composition will be investigated
- **Control:** Any material change will be controlled via the company's engagement process. If the investment risk is deemed too high, the Sub-Fund may divest depending on prevailing market conditions
- **Monitor:** If the investment is retained, the risk will be monitored via the Sub-Fund's engagement plan and Integrum ESG data as appropriate

## Methodologies

The Sub-Fund monitors key climate-related indicators across the portfolio companies on a quarterly basis. These metrics include carbon intensity measurements, water usage efficiency, waste management performance, and other relevant ESG indicators that provide insight into both current performance and future climate resilience, including PAIs. The Sub-Fund does not solely rely on third-party ESG ratings. The climate-related metrics are used to assess the holdings' exposures to climate risks and opportunities, and benchmark performance against sector peers.

## Data sources and processing

ESG metrics that the Investment Manager uses are sourced or derived from data that it receives from Integrum ESG as the third-party commercial data provider. Integrum provide carbon intensity measurements, water usage efficiency, waste management performance, and other relevant ESG indicators that provide insight into both current performance and future climate resilience, including PAIs. ESG data received do not constitute investment advice or recommendations by such providers.

The Sub-Fund has a dedicated function whose responsibilities include assessing and analysing ESG data collected via publicly available information and data from third party providers.

## Limitations to methodologies and data

Notwithstanding the measures taken to ensure a high data quality, the Investment Manager has no direct control on the data collected. In addition, it should be considered that the different data providers use different methodologies to collect their data, which cannot be fully disclosed as to protect the intellectual property rights of the considered data provider.

The external ESG data is a source of information but is not solely relied upon. The data is assessed by the fund managers to identify ESG risks and opportunities at an early stage of the process and thus design an investment decision-making process based on those findings, with the aim of minimising the risk of these materialising.

## Due diligence

The Sub-Fund conducts analysis and due diligence, including ESG topics, in its pre-trade phase. Follow-up with companies also includes checking on E/S factors to improve or mitigate potential risks. In addition, the Sub-Fund collects and assesses the mandatory PAI indicators during the investment process and continuously during the holding period.

Good governance in the investee companies is ensured through the Sub-Fund's investment process where "ESG issues" and/or comprehensive screening are an integral part of the initial analysis of a potential investment. This approach allows investment professionals to identify ESG risks and opportunities at an early stage of the process and thus design an investment decision-making process based on such findings, with the aim of minimising the risk of these materialising.

The due diligence process preceding an investment decision is carried out primarily by investment professionals and shall include an analysis of opportunities, risks, relevant legal, fiscal, financial or other value drivers, human, technical and material resources and appropriate strategies, including exit strategies and, among other industry and business specific aspects, ESG risks and opportunities.

Based on the due diligence process, a second line of defence risk assessment is performed on the potential investment. This is to ensure that the investment is in line with this investment policy and the respective Sub-Fund's information on whether the main negative impacts of the investment on sustainability factors linked to the identified sustainability risks have been considered.

The risk assessment is documented and forms part of the basis on which a decision will be made to authorise the investment. ESG risks, as well as other risks identified with the potential investment, may, to the extent considered commercially reasonable, be addressed in the reporting or other commitments, in the pricing model or otherwise by conveying the AIFM's and Investment Manager's expectations on the relevant investment.

## Engagement policies

The Sub-Fund does not have any direct engagement with the investee companies.

## No designated reference benchmark

No index has been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the financial product.