

Periodic disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

Product name:

Published on: 27 June 2025

- MED Access S.L.P.

Legal entity identifier:

- MED Access S.L.P.: 969500ACTYZO4PXBK189

Environmental and/or social characteristics

Did this financial product have a sustainable investment objective?

☒ ☒ ☐ **Yes**

☐ It made **sustainable investments with an environmental objective**: ____%

- ☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy
- ☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

☐ It made **sustainable investments with a social objective**: ____%

☒ ☐ ☒ **No**

☐ It **promoted Environmental/Social (E/S) characteristics** and while it did not have as its objective a sustainable investment, it had a proportion of ____ % of sustainable investments

- ☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
- ☐ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
- ☐ with a social objective

☒ It promoted E/S characteristics, but **did not make any sustainable investments**

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



To what extent were the environmental and/or social characteristics promoted by this financial product met?

- As an article 8 fund following a fund-of-funds investment strategy focusing on investment opportunities in alternative investment funds managed by ARCHIMED, MED Access (the "**Fund**") and its management are focused on the promotion of social and environmental factors, as well as the contribution to a social sustainable investment by investing in funds managed by ARCHIMED (the "**Portfolio Vehicles**") and in particular such funds qualifying as article 8, article 8+, and article 9. Each of the Portfolio Vehicle in which the Fund will invest will

follow its own specific strategy in respect to impact and ESG which it is not possible to describe in detail in this schedule, also because part of the expected Portfolio Vehicles have not yet been designed and raised.

- Further to seeking to invest in Portfolio Vehicles qualifying as article 8, article 8+, and article 9, the Fund promotes the importance of sustainability considerations when investing in Portfolio Vehicles regardless of SFDR classification and undertakes reasonable due diligence efforts to ensure that the Fund does not provide any non-material exposure to investments into companies, through the Portfolio Vehicles, which expose the Fund to material ESG risks by:
 - being directly involved in production or sale of thermal coal or palm oil (unwanted environmental risk); or
 - being directly involved in production or sale of tobacco, distilled alcoholic beverages, Human Reproductive Cloning, Weapons and ammunition, Casinos and gambling activities, and/or pornography, and prostitution (unwanted social risk); or
 - materially and repeatedly breaches principles for good governance practices, including the 10 principles of the United Nations Global Compact, engages in activities banned in one or several European Union or North American countries or fails to comply with the most demanding regulations on some contentious healthcare topics.

(Companies exposed to the above listed material ESG risks shall be referred to as "**Non-Complying Companies**")

- While the Fund may also invest in Portfolio Vehicles which do not qualify as article 8, article 8+, and article 9 funds, it is expected that such Portfolio Vehicles will constitute a minority of the Portfolio Vehicles of the Fund. In addition to the investments in Portfolio Vehicles which after the ramp-up period is expected to represent the vast majority of the assets of the Fund, the Fund may invest in money market funds, other short-term negotiable instruments, public and private debt and other securities or cash holdings as part of the Funds liquidity reserve or to place any cash-surplus awaiting investment opportunities in Portfolio Vehicles. While the liquidity reserve is expected to represent a limited portion of the Funds' assets after the ramp-up period, it may during the ramp-up period represent the majority of assets and can do the same for periods awaiting investments in Portfolio Vehicles. While the Fund will promote the importance of sustainability considerations when investing in Portfolio Vehicles, sustainability and ESG factors will not be considered when constructing and investing the liquidity reserve.

As of 31/12/24, 2024, MED Access has three Portfolio Vehicles in the portfolio: MED Bio, a continuation vehicle raised to support the continued growth of Clean Biologics and Biodextris where MED Access committed €12M; MED Rise, ARCHIMED's 2024 vintage €400M small-cap buyout fund, where MED Access committed €32M; and MPIICOI-NMI, the no fee no carry co-investment vehicle of Natus Neuro and Natus Sensory where MED Access committed €12M.

Please refer to ARCHIMED's [Sustainability & Impact Report](#) for detailed 2024 information on the sustainability performance of the investee companies of MED Access's Portfolio Vehicles.

● ***How did the sustainability indicators perform?***

All investee companies of MED Access' Portfolio Vehicles have completed their 2024 ESG reporting. For details on 2024 vs. 2023 performance, please refer to Appendix I of each Portfolio Vehicle's SFDR Periodic Disclosure.

Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.

● ***...and compared to previous periods?***

As above.

● ***What were the objectives of the sustainable investments that the financial product partially made and how did the sustainable investment contribute to such objectives?***

Not applicable. The financial product does not have a sustainable investment objective.

● ***How did the sustainable investments that the financial product partially made not cause significant harm to any environmental or social sustainable investment objective?***

Not applicable (see above).

— ***How were the indicators for adverse impacts on sustainability factors taken into account?***

Not applicable (see above).

— ***Were sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:***

Not applicable (see above).

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 Union criteria.

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the Union criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the Union criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.



How did this financial product consider principal adverse impacts on sustainability factors?

As per the Fund's SFDR Pre-Contractual Disclosures, the Fund does not consider PAIs. As described in the Fund's LPA (Article 6.1), the Fund follows a fund-of-funds investment strategy focusing on investments in alternative investment funds managed by ARCHIMED funds which by nature have already been constituted and, subject to exceptions, have already finalized their portfolio construction.

PAIs may however be calculated annually and made available to investors upon request based on the Fund's composition at the time and excluding cash (and cash invested in market funds and other securities). In practice, such figures do not reflect the sustainability performance of each underlying investee company nor provide a solid year-on-year comparison due to the changing nature of the Fund's composition. The calculation however allows for the delivery of market-practice reports considered relevant by specific investors.

For details on 2024 vs. 2023 PAI performance, please refer to Appendix I of each Portfolio Vehicle's SFDR Periodic Disclosure.



What were the top investments of this financial product?

Largest investments ¹	Sector	% Assets	Country
Cash & Other ²	-	80.3	-
MED Bio	Life Sciences Tools & Biologic Services	14.4	France and Canada
MP II COI NMI	MedTech	5.0	USA
MED Rise	Healthcare	0.3	Europe and USA

The list includes the investments constituting the **greatest proportion of investments** of the financial product during the reference period which is:

01/01/24 – 31/12/24



What was the proportion of sustainability-related investments?

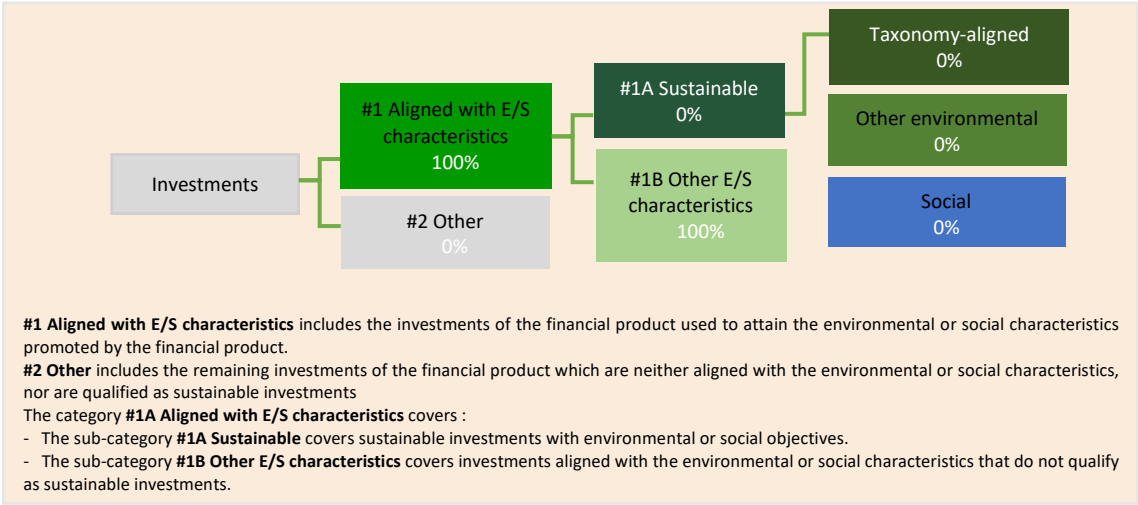
MED ACCESS currently holds investments in 3 Portfolio Vehicles within the healthcare industries which are all actively promoting E/S characteristics.

¹ As a fund of fund, MED ACCESS's asset allocation is based on total commitments as of 31/12/24. These include invested amounts ("Funded" – MED Bio, MP II COI NMI and MED Rise) and called but to be invested amounts ("Unfunded" – Cash & Other).

² As of 31/12/24, 100% of this amount was invested in financial products that promote E/S characteristics.

Asset allocation describes the share of investments in specific assets.

● **What was the asset allocation?**



As at 31/12/24, 100% of the Fund’s invested amounts were allocated to assets that promote E/S characteristics.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

● ***In which economic sectors were the investments made?***

All investments in Portfolio Vehicles made through MED ACCESS lifetime were made in healthcare industries comprising eight different sectors:

- Biopharma Products
- Consumer Health
- Healthcare IT
- Diagnostics
- Life Science Tools and Biologic Services
- MedTech
- Pharma Services
- Animal and Environmental Health



To what extent were the sustainable investments with an environmental objective aligned with the EU Taxonomy?

Not Applicable. MED ACCESS does not conduct sustainable investments with an environmental objective aligned with the EU taxonomy. Instead, the Fund’s focus is on the promotion of environmental and social characteristics.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

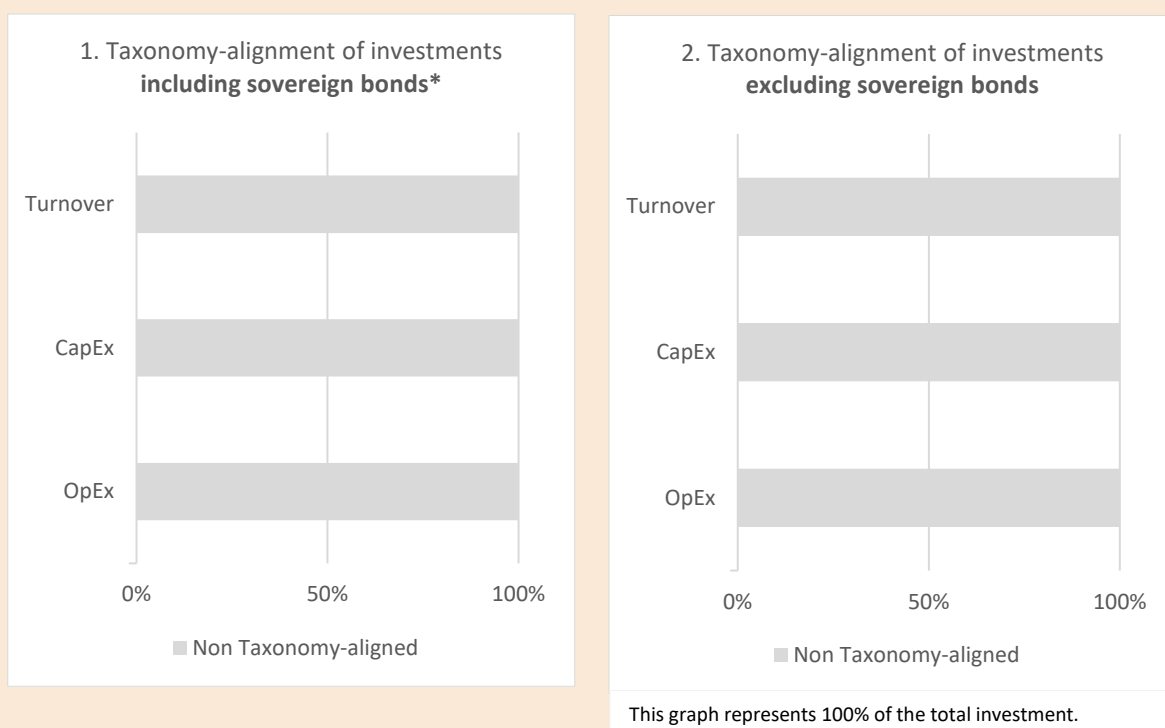
● **Did the financial product invest in fossil gas and/or nuclear energy related activities that comply with EU Taxonomy³?**

☐ Yes :

☐ In fossil gas ☐ In nuclear energy

☒ No

The graphs below show in green the percentage of investments that were aligned with the EU Taxonomy. As there is no appropriate methodology to determine the taxonomy-alignment of sovereign bonds, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investment of the financial product other than sovereign bonds.*



**For the purpose of these graphs, "sovereign bonds" consist of all sovereign exposure.*

● **What was the share of investments made in transitional and enabling activities?**

Not applicable. The Fund does not invest or plan to invest in transitional nor enabling activities in the sense of the EU Taxonomy.

³ Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

● **How did the percentage of investments that were aligned with the EU Taxonomy compare with previous reference periods?**

Not applicable. As stated above, MED ACCESS's investments do not follow an environmentally sustainable investment objective in the sense of the EU Taxonomy. Instead, they focus on the promotion of social and environmental characteristics.



What was the share of sustainable investments with an environmental objective not aligned with the EU Taxonomy ?

MED ACCESS's investments do not pursue an environmental objective as laid out in the EU Taxonomy. Hence, 0% of the Fund's investments are aligned with the EU Taxonomy.



What was the share of socially sustainable investments ?

Not applicable, as the Fund's investments contributed to E/S characteristics and do not commit to investing in socially sustainable investments.



What investments were included under "other", what was their purpose and were there any minimum environmental or social safeguards ?

None of MED ACCESS's investment fall into this category.



What actions have been taken to meet the environmental and/or social characteristics during the reference period?

During the reference period, ESG data was collected for the portfolio companies invested from MED ACCESS's Portfolio Vehicles, comprising over one hundred indicators. At the end of the reference period, follow-up reviews were conducted including overall progress, gap analysis and establishment of priorities for 2025.

Specific actions implemented at investee companies' level are specified in the Fund's [Sustainability & Impact Report](#), and regularly to our investors in quarterly reports of the Fund.




How did this financial product perform compared to the reference benchmark?

Not applicable. The Fund does not use a benchmark.

● **How does the reference benchmark differ from a broad market index?**

Not applicable.

 are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under Regulation (EU) 2020/852.

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

- ***How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the environmental or social characteristics promoted?***

Not applicable.

- ***How did this financial product perform compared with the reference benchmark?***

Not applicable.

- ***How did this financial product perform compared with the broad market index?***

Not applicable.