

Altaroc Odyssey 2024 ELTIF

Article 10 (SFDR)

Website disclosure for an Article 8 fund

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V1	04/04/2024	N/A	N/A



Product name: Altaroc Odyssey 2024 ELTIF	Legal entity identifier: [Please insert] ISIN code: [Please insert]
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Does this financial product have a sustainable investment objective?

Yes

No

It will make a minimum of **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 will make a minimum of **sustainable investments with a social objective: ___%**

It **promotes Environmental/Social (E/S) characteristics** and while it does 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 promotes E/S characteristics, but **will not make any sustainable investments**



A. Summary

Altaroc Odyssey 2024 ELTIF (the “Fund”) promotes environmental and social characteristics while seeking a financial return.

Among the environmental and social characteristics promoted by the Fund, Altaroc Partners, as a PRI signatory, favours investments in funds managed by companies that are PRI signatories.

In addition, during the pre-investment phase, the management company ensures that a specific ESG due diligence is carried out. This analysis is incorporated into the investment memo that serves as a basis for the investment committee's decision-making. Before investing, Altaroc Partners ensures that the funds selected comply with the defined ESG standards.



Finally, during the holding period, Altaroc Partners collects ESG indicators from its partner management companies on an annual basis in order to monitor the actions taken with regard to the underlying investments and to assess their ESG performance and progress. The indicators monitored include amongst others, in environmental terms, carbon emissions, electricity and water consumption and, in social terms, job creation and gender diversity within governance bodies.

In order to ensure transparency regarding the application of the Fund's investment procedure, Altaroc Partners monitors and reports on at least the following indicators:

- Percentage of investments aligned with the Fund's ESG standards,
- Percentage of investments having been subject to an ESG due diligence,
- Percentage of partner management companies that have signed the PRI,
- Percentage of partner management companies that have performed an ESG reporting.

The management company works with the management teams of its partners to improve their ESG performance. Thanks to the ESG annual reporting, Altaroc Partners monitors the sustainability indicators of the underlying funds and assesses their evolution over time. Best ESG practices are shared with the partner companies on a regular basis. Finally, whenever possible, Altaroc Partners sit at the Funds' Board of Advisors to promote and monitor the deployment of ESG action.

The ESG reporting and regular interactions with partner companies enable Altaroc Partners to ensure that good governance practices are in place, particularly with regard to management structures, staff relations, remuneration of competent staff and compliance with tax obligations.

Altaroc Partners does not consider key negative impacts on sustainability factors due to uncertainties in the collection of information by partner funds.

All the underlying funds will be aligned with the environmental and social characteristics promoted by the Fund. However, for cash flow purposes, the Fund may hold up to 5% in liquidities.

The Fund has not designated a reference benchmark.



B. No sustainable investment objective

This financial product promotes environmental or social characteristics but does not have as its objective a sustainable investment.



C. Environmental or social characteristics of the financial product

What environmental or social characteristics are promoted by this financial product?



The Fund promotes environmental and social characteristics while seeking a financial return.

Altaroc Partners has signed the Principles for Responsible Investment (PRI) in 2021, thereby committing to integrating responsible criteria into its investment management process and policy. This commitment applies to the Fund. This is why Altaroc Partners favours investments in funds managed by PRI signatory companies.

During the investment phase, Altaroc Partners carries out specific ESG due diligences based on the information provided by the management companies. A dedicated ESG analysis is included in the investment memo that serves as the basis for the investment decision-making. Prior to any investment decision, Altaroc Partners ensures that the funds selected comply with the ESG standards it has defined and may require management companies to sign a side letter specifically covering ESG issues. The ESG standards set by Altaroc Partners are detailed in the next section of this document.

During the holding period and on an annual basis, Altaroc Partners collects ESG indicators from partner management companies in order to monitor the actions taken in relation to the underlying investments and to assess their ESG performance and progress. As a long-term investor and striving for continuous improvement, Altaroc Partners supports and collaborates with the partner companies' senior management to improve their ESG performance. In particular, Altaroc Partners encourages the adoption of internationally recognised ESG benchmarks, such as the UN Sustainable Development Goals, to measure the ESG impact of investments and help them make progress.



D. Investment strategy

What investment strategy does this financial product follow?

As part of its ESG commitment, Altaroc Partners integrates sustainability factors across its entire decision-making and investment advice processes.

During the pre-investment phase, Altaroc Partners conducts specific ESG due diligences based on information provided by the management companies and a dedicated ESG analysis is included in the investment memo that serves as the basis for the investment decision-making. Prior to any investment decision, Altaroc Partners ensures that the funds selected comply with the ESG standards it has defined and may require management companies to sign a side letter specifically covering ESG-related issues.

To be considered as being compliant with the defined ESG standards, the selected funds must:

- a- exclude any investment in assets held by companies involved in controversial activities related to weaponry, tobacco, thermal coal, animal testing, genetic engineering, gambling and pornography.



- b- not be involved in controversial business practices (UN Global Compact Principle), related to child labour, forced labour, non-respect of human rights, corruption, tax evasion and lack of environmental protection.

Furthermore, in its selection process, as a signatory of the PRI, Altaroc Partners favours investments in funds that are managed by PRI signatory companies.

Throughout the investment phase, Altaroc Partners ensures that the partner companies publish an annual sustainability report, upon which it monitors the actions taken in relation to the underlying investment targets and assesses their progress over time. In the absence of sustainability reports or if the reports do not provide sufficient data, Altaroc Partners may decide to send the partner management companies a dedicated annual questionnaire.

Based on these documents, the investment team conducts an analysis of certain sustainability factors and monitors those over time. These indicators may include notably, on the environmental front, carbon emissions, electricity and water consumption and, on the social front, job creation and gender diversity within governance bodies. For these different indicators, Altaroc Partners has requested its partner management companies to apply a strict set of specifications to their portfolios of underlying companies. These specifications have been defined and agreed with in advance and are subject to monitoring and a continuous improvement plan.

Finally, Altaroc Partners implements a policy of engagement with partner management companies. Whenever possible, Altaroc Partners promotes and monitors ESG actions through its presence on the funds' Board of Advisors. Where this is not the case, Altaroc Partners will do its best to act as an "ESG committed" investor (engagement with majority shareholders to increase influence in ESG discussions, etc.).

What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

The binding elements defined in the investment strategy are the following:

- A specific ESG due diligence is systematically included in the investment memo that serves as a basis for the investment decision-making.
- Altaroc Partners ensures that all the underlying selected funds are aligned with the ESG standards mentioned above.
- Once the investment has been made, Altaroc Partners ensures that the partner management companies publish an annual sustainability report, upon which it monitors the actions taken in relation to the underlying investment targets and assesses their progress over time.

What is the policy to assess good governance practices of the investee companies?

For the ESG indicators selected, Altaroc Partners requests partner management companies to apply a strict set of specifications, defined and agreed with in advance, to their portfolios of underlying companies. Those are monitored and subject to a continuous improvement plan.



Both annual reporting and regular interactions with partner management companies for example through participations in the Board of Advisors, allow for the monitoring of the application of good governance practices, particularly with respect to sound management structures, staff relations, remuneration of competent staff and compliance with tax obligations.

With regards to employee relations, Altaroc Partners is particularly committed to promoting gender equality. It is also a signatory to the diversity charter drawn up by the members of France Invest, which aims in particular to achieve the following target: 25% of women occupying senior positions by 2030 and 30% by 2035, both within Altaroc Partners and its partner management companies.

What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

Not applicable.

Does this financial product consider principal adverse impacts on sustainability factors?

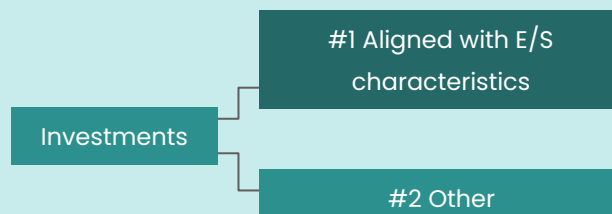
- Yes
 No



E. Proportion of investments

What is the planned asset allocation for this financial product?

All the underlying funds will be aligned with the environmental and social characteristics promoted by the Fund. However, for cash flow purposes, the Fund may hold up to 5% in liquidities. For this reason, the minimum proportion of investments contributing to the environmental and social characteristics promoted by the Fund (#1 Aligned with E/S characteristics) is 95%.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.



How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

Not applicable.

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

The Fund promotes environmental and social characteristics but does not commit to making sustainable investments. Consequently, the Fund does not commit to making a minimum of sustainable investments with an environmental objective aligned with the EU Taxonomy.

However, Altaroc Partners will do its best to advocate the EU Taxonomy among the Fund's management companies so to:

- Raise awareness about EU Taxonomy alignment,
- Identify investments made in EU Taxonomy eligible sectors,
- In the event of an eligible sector, alert and encourage them to comply with the specifications in order to ensure an increasing proportion of Taxonomy-aligned investments over the years.

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.

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

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

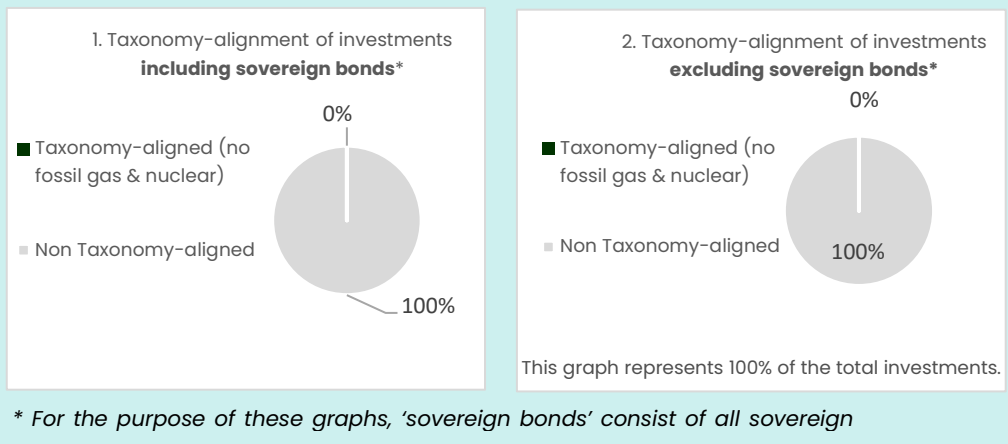
Does the financial product invest in fossil gas and/ or nuclear energy related activities that comply with the EU Taxonomy¹?

¹ 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. 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.



- Yes:
 In fossil gas In nuclear energy
 No

The two graphs below show in green the minimum percentage of investments that are 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 investments of the financial product other than sovereign bonds.



What is the minimum share of investments in transitional and enabling activities?

As the Fund does not commit to making sustainable investments within the meaning of the EU Taxonomy, the minimum proportion of investments in transitional and enabling activities within the meaning of the EU Taxonomy is also set at 0%.

What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

The Fund promotes environmental and social characteristics but does not commit to making sustainable investments. The Fund does not commit to making a minimum of sustainable investments with an environmental objective aligned with the EU Taxonomy.

What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

The category “#2 Other” is made up of liquidities for cash flow purposes. There are no minimum environmental or social safeguards for these investments.





F. Monitoring of environmental or social characteristics

What sustainability indicators are used to measure the attainment of the environmental or social characteristics promoted by this financial product?

To be transparent in the manner in which the Fund's investment procedure is applied, Altaroc Partners communicates at minima the following indicators in the periodic report:

- Percentage of investments aligned with the Fund's ESG standards,
- Percentage of investments having been subject to an ESG due diligence,
- Percentage of partner management companies that have signed the PRI,
- Percentage of partner management companies that have performed an ESG reporting.

How are the environmental or social characteristics and the sustainability indicators monitored throughout the lifecycle of the financial product?

During the pre-investment phase, Altaroc Partners ensures that a specific ESG due diligence has been carried out and incorporated into the investment memo. Without this, no investment decision cannot be taken.

In addition, the management company also ensures that it receives an annual sustainability report on the funds. On the basis of these ESG reports, or, in absence of those, dedicated ESG questionnaires, data on the underlying assets is collected and monitored over the holding period. Amboise Partner holds regular exchanges with partner management companies to discuss and track their ESG performance.



G. Methodologies

What are the methodologies used to measure the attainment of the environmental or social characteristics promoted by the financial product?

Throughout its decision-making and investment advisory process, Altaroc Partners does its utmost best to ensure that the environmental and social characteristics promoted by the Fund are attained.

During the pre-investment phase, Altaroc Partners conducts a specific ESG due diligence based on the information provided by the funds. This ESG analysis is included in the investment memo that serves as the basis for the investment decision. Prior to any investment decision, Altaroc Partners ensures that the funds selected comply with the ESG standards it has defined and may require them to sign a side letter specifically covering ESG-related issues (compliance with applicable laws and regulations, Altaroc Partners' exclusion policy, adoption of a globally recognized ESG standards benchmark, etc.).

In addition, Altaroc Partners, as a signatory of the PRI since 2021, is committed to integrating responsible criteria into its management and investment policy. This



commitment also applies to the Fund, which is why during its selection process, Altaroc Partners favours investments in funds managed by PRI signatory companies.

During the holding period, Altaroc Partners ensures that the funds publish a dedicated annual ESG report (sustainability report) from which it monitors the actions taken with the underlying investment targets and assesses their progress over time. In the absence of ESG reports or if the reports do not provide sufficient data, Altaroc Partners may decide to send the funds a dedicated annual questionnaire.

Based on these documents, the Altaroc Partners investment team conducts an analysis of ESG indicators over time and shares best practices with partner management companies. Partner management companies are also asked to provide their ESG roadmap for the following year.

Wherever possible, Altaroc Partners promotes and monitors ESG actions through its presence on the funds' Board of Advisors. Where this is not possible, Altaroc Partners makes every effort to act as an "ESG committed" investor (engagement with majority shareholders to increase influence in ESG discussions, etc.).



H. Data sources and processing

What are the data sources used to attain each of the environmental or social characteristics?

On a "best effort" basis, Altaroc Partners collects the ESG performance indicators annually from its partners. It relies on their annual sustainability report to monitor those indicators and their progress over time. If there is no ESG report, or if it does not provide sufficient data, an annual ESG monitoring questionnaire may be sent to the partner management company concerned.

The data is processed and reviewed annually by Altaroc Partners' ESG Manager with the support of an external consultant. If obvious inconsistencies are identified (e.g. significant deviations from benchmarks or inconsistent trends compared to the previous year), discussions with the partner management companies may be requested.



I. Limitations to methodologies and data

What are the limitations to the methodologies and data sources?

As a fund of funds, Altaroc Odyssey 2024 relies on partner management companies to receive annual sustainability reports with the underlying ESG data. Although the relationship between Altaroc Partners and partner companies is based on transparency and communication, the limitations of the methods and data are intrinsically linked to the source of the ESG data and the ability of the partner management companies to collect and report it on a sufficiently large and relevant sample.



The data is always reviewed and analysed by Altaroc Partners with the support of an external consultant. In the absence of sustainability reports or if these reports are of insufficient quality, an ESG questionnaire is sent to the partner management companies to collect the necessary data. For total transparency, Altaroc Partners always communicates to its investors the scope of ESG reporting and the data made available by partner management companies.



J. Due diligence

What is the due diligence carried out on the underlying assets?

During the investment phase, Altaroc Partners carries out a specific ESG due diligence based on information provided by the funds. This dedicated ESG analysis is included in the investment memo and presented to the Investment Committee, which serves as the basis for the investment decision. The memos presented to the Investment Committee systematically include a review and analysis of how potential future partners integrate ESG factors into their own investment decision-making. Prior to any investment decision, Altaroc Partners ensures that the funds selected comply with the ESG standards it has defined and may require them to sign a side letter specifically covering ESG-related issues (compliance with applicable laws and regulations, compliance with Altaroc Partners' exclusion policy, adoption of a globally recognised ESG standards benchmark, etc.).



K. Engagement policies

Is engagement part of the environmental or social investment strategy?

- Yes
- No

What are the engagement policies?

Altaroc Partners collaborates actively with its partner companies to improve their ESG performance. Thanks to the provision of sustainability reports, the company is able to monitor and evaluate the performance of ESG indicators. Altaroc Partners regularly shares with its partners best ESG practices. In addition, whenever possible, the company sits at the funds' Board of Advisors to promote and monitor the deployment of ESG action.



L. Reference benchmark



Has a specific index designated as a reference benchmark to meet the environmental or social characteristics promoted by the financial product?

- Yes
 No

Where can more product-specific information be found?

More product-specific information will be made available in the periodic reports when published.

