

**RUMBO
VENTURES**

Climate Impact and ESG Policy



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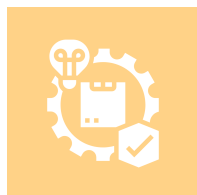
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Purpose

The primary goal of Rumbo Ventures is to spearhead the shift towards a sustainable and equitable future, leveraging innovation and technology to address pressing environmental and social challenges. This policy embodies our commitment and the collective dedication of our team to achieve this aim efficiently, by embedding environmental, social, and governance (ESG) practices at the core of our operations and investment decisions. We aim to responsibly unlock the potential of Latin markets, ensuring our path to success is guided by industry-leading practices and aligned with key international standards, thus fostering a development that benefits not only our stakeholders but also the planet and society at large.

Scope

The scope of our policy encompasses various organizational levels, ensuring engagement with every partner, collaborator, and team member:



Organizational Level

At Rumbo Ventures, we commit to aligning our guidelines and procedures with the latest standards in sustainability and governance, forming strategic partnerships to enhance our commitment to climate impact and ESG objectives, supplemented by regular assessment exercises to gauge our progress towards these goals.



Team Level

We cultivate a culture of responsibility and commitment among our team members, ensuring active contribution to our corporate values through responsible and ethical practices in investments and community support, fully integrating our policy into every team activity.



Portfolio Level

We conduct regular assessments of environmental impact and ESG risks in our investments, constantly refining our approach through a comprehensive climate impact management system. Additionally, we provide workshops and development plans to strengthen the internal policies and strategies of our portfolio companies.

**Associated companies and strategic allies level**

We extend our sustainability principles to the companies we collaborate or advise, and our strategic allies, instilling practices that generate a positive impact and promoting a joint commitment to significant environmental and social objectives. This includes hosting events and creating spaces for sharing experiences and best practices.

**Community and social level**

Our commitment reaches indirectly operated communities, for instance, in our supply chain system, selecting projects and companies aligned with the United Nations' Sustainable Development Goals to maximize local social and environmental impacts.

**Global level**

Rumbo Ventures aims to be a catalyst in the global fight against climate change, aligning our goals and operations with international efforts to achieve carbon neutrality and other global climate objectives, promoting a greener, more sustainable future. This involves investing in research, documentation, and the systematization of successful practices, as well as producing impact reports to ensure transparency and traceability of our actions.

Climate Impact Frameworks

In our commitment to fostering a sustainable and equitable future, Rumbo Ventures integrates globally recognized frameworks into our Policy. Below, we explore how our policies and actions align with these international standards, guiding our investments and operations towards positive environmental and societal outcomes.

Alignment with UN SDGs

How we use it: It guides our KPIs.

Rumbo Ventures aligns with the United Nations Sustainable Development Goals, especially focusing on SDGs 7, 11, 12, 13, 14, and 15. These goals serve as specific markers that have guided the formation of our KPIs:



SDG 7 | Affordable and clean energy. We support initiatives that encourage the use of renewable energy sources and enhance energy efficiency.



SDG 11 | Sustainable cities and communities. We invest in solutions that improve urban living while maintaining balance with the environment.



SDG 12 | Responsible consumption and production. Investments are directed towards companies that engage in sustainable production and waste reduction.



SDG 13 | Climate action. We fund projects aimed at mitigating climate change effects and promoting adaptive responses.

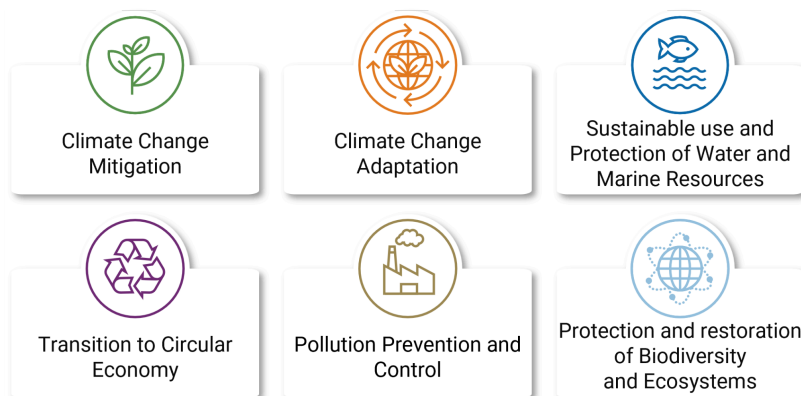


SDGs 14 and 15 | Life below water and life on land. We advocate for biodiversity conservation and the sustainable management of resources.

Alignment with the EU's Sustainable Taxonomy Objectives

How we use it: It guides our sectors of interest and business models.

Rumbo Ventures' investment strategy aligns with the environmental objectives of the European Union, providing a holistic approach to tackling the climate crisis. This alignment is crucial as we invest in countries such as Italy, Spain, and Portugal, offering a framework to define our sectors of interest and aiding in the identification of specific business models, all within six defined objectives.



Alignment with the United Nations' Principles for Responsible Investment (PRI)

How we use it: It guides our investment practices.

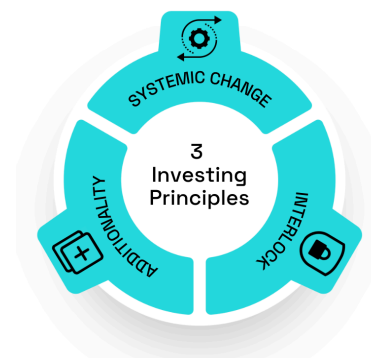
Adhering to these principles provides a clear pathway to contribute to a sustainable and resilient global financial system. Aligning with the PRI strengthens Rumbo Ventures' leadership in responsible investing and integrates us into a worldwide network of investors committed to advancing a more equitable and sustainable economy.



This commitment affords us invaluable insights, access to best practices, and collaborative opportunities within the global investment community, thereby reinforcing our mission and amplifying our positive impact around the globe.

Underlying Principles

At Rumbo Ventures, our strategic decisions and efforts are shaped by three Fundamental Principles that define our identity and mission within the sustainable investment ecosystem:



Systemic Change

We are committed to driving transformation in sectors directly linked to climate change and sustainability. We invest in startups that bring innovative solutions with scalable potential, capable of creating positive shifts beyond their immediate footprint, at a systemic level. This means we target companies that not only address the symptoms of climate change but also focus on altering the underlying structures and practices contributing to these global issues. Our goal is to support businesses that rethink and reshape entire industries towards more sustainable and environmentally friendly practices.

Interlocking

Rumbo Ventures believes that business success and positive environmental and social impacts should reinforce each other. Therefore, we prioritize companies whose growth and profitability are inherently connected to generating positive impacts. This involves seeking out companies

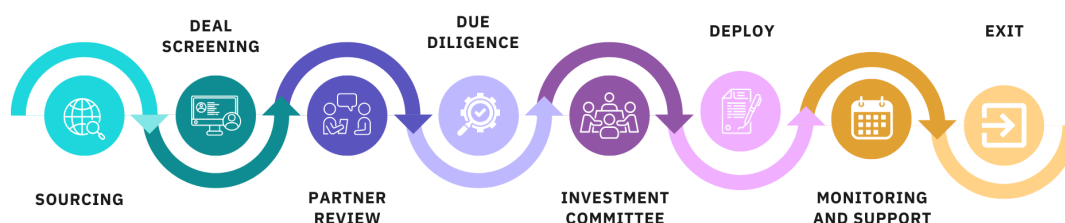
whose operations, products, or services actively contribute to solving environmental or social challenges, supported by a robust financial strategy. This approach ensures that financial gains and positive impacts grow hand in hand, creating a virtuous cycle of sustainable progress and profitability.

Additionality

Our aim is to act as a catalyst for change, investing only in projects and startups where our involvement can make a significant difference. We focus on opportunities where Rumbo Ventures' capital, expertise, and network can enhance environmental and social impacts beyond what would be possible without our intervention. This means choosing investments that can accelerate the development of clean technologies, encourage the adoption of sustainable practices, and fast-track the transition to low-carbon economies. In this regard, we seek not only financial returns but also to make a tangible and measurable contribution to the global fight against climate change.

Policy Guidelines

At Rumbo Ventures, we embed impact and ESG considerations into every stage of our investment process, from initial identification through to the exit of portfolio companies.



Phase 1 | Sourcing

In the sourcing phase, our teams assess investment opportunities based on their alignment with our impact principles and ESG criteria. We focus on identifying startups that not only demonstrate growth potential but also address significant social or environmental challenges, using a rigorous methodology that balances innovation with sustainability.

Phase 2 | Deal Screening

Once opportunities are identified, we rank startups using a specialized scoring system based on impact and ESG criteria, among four other factors. This initial evaluation process helps determine each startup's potential to meet our impact goals. Our investment associates then meet with those that align best with our investment thesis and have achieved the highest scores, for a more in-depth review.

Phase 3 | Partner Review

The most promising startups are reviewed by our senior partners to ensure their alignment with our vision of impact and ESG, among other factors. Only those companies that pass this level of scrutiny proceed to a more detailed evaluation.

Phase 4 | Due Diligence

In this critical phase, we conduct a comprehensive assessment of impact and ESG aspects for each selected startup. This in-depth analysis helps identify risks and opportunities and set clear expectations and action plans for each potential investment. Additionally, before moving to the Investment Committee, they are evaluated by the Impact Committee.

Phase 5 | Investment Committee

Investment proposals, complete with detailed impact and ESG evaluations and having been analyzed by the Impact Committee, are presented to the Investment Committee. This ensures all investment decisions are made with a full understanding of the impact potential and ESG risks associated with each startup.

Phase 6 | Deploy

Following investment approval, we include impact and ESG clauses in investment agreements and oversee the implementation of agreed strategies. This monitoring ensures startups meet impact and ESG commitments from the start.

Phase 7 | Monitoring and Support

We maintain ongoing monitoring of startups' adherence to established impact and ESG KPIs, providing support and advice to ensure continuous improvement in their impact and ESG performance. To achieve so, we onboard our portfolio companies to a platform that allows them to define and keep track of their impact metrics, and also provides us with an impact landscape of our portfolio, allowing us to identify common gaps to support.

Phase 8 | Exit

Before divesting, we evaluate the achieved impact and ESG performance to ensure they align with our initial goals. This final assessment and integration of lessons learned into our future strategies and investment decisions reflect our ongoing commitment to responsible investment.

Our systematic and consistent approach across all phases of the investment cycle ensures we not only generate financial returns but also make a significant contribution to society and the environment.

Environmental, Social and Governance

Rumbo Ventures' Environmental and Social Management System (ESMS) is designed for deep ESG integration in investment processes and internal operations, ensuring high ethical, environmental, and social standards.

Training and Development. Continuous ESG-related training for all team members to enhance decision-making and management practices.

Operational Practices: Embracing a virtual office model to minimize the carbon footprint.

Best Practice Exchange. Actively engaging various stakeholders, including employees, investors, and portfolio companies, in sharing ESG best practices to ensure transparency and alignment with ESG goals.

Monitoring and Reporting. Implementing clear metrics and KPIs to monitor and report ESG performance, enabling continuous improvement and accountability.

By aligning internal actions with these ESG principles, Rumbo Ventures aims to lead by example in the venture capital industry, showing that responsible investment practices can foster sustainable growth and positive social impact.

Monitoring and Reporting

To ensure accountability and review, Rumbo has set KPIs to gauge the effectiveness of its internal and external Impact and ESG policy. Rumbo also compiles quarterly reports detailing identified environmental and social risks, alongside mitigation strategies for the fund and its portfolio companies, which are required to report relevant social and environmental performance data, including carbon emissions, water and energy usage, supply chain management, diversity and inclusion, and community engagement.

For annual impact reports, Rumbo collaborates with independent auditors to verify all data, which might include auditing compliance with environmental and social standards. When necessary, Rumbo engages with stakeholders like local communities, NGOs, and industry experts to gain insights into the portfolio companies' social and environmental performance.

All findings are incorporated into the annual impact report, with Rumbo committed to periodically reviewing and updating its ESG policy based on stakeholder feedback and evolving social and environmental trends.

In conclusion, Rumbo Ventures' Impact and ESG Policy is a testament to our commitment to integrating sustainable and ethical practices throughout our investment lifecycle and internal operations. This policy reflects our dedication to transparency, accountability, and continuous improvement, ensuring our activities promote positive environmental and social outcomes. By adhering to this policy, we aim to lead by example in the venture capital industry, demonstrating the potential for responsible investments to drive meaningful change. We thank all stakeholders for their commitment and invite ongoing collaboration to refine and enhance our impact initiatives.

**Rumbo Ventures.
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