

Octopus Apollo VCT Plc

Responsible Investment Policy

June 2025

Purpose

This Responsible Investment Policy is set by the VCT Board to ensure the Investment Manager (“the Manager”) considers responsible investment within investment decisions in relation to Octopus Apollo VCT plc (“Apollo” or “the Fund”).

Approach

The Policy ensures the Manager follows a three-step approach to responsible investment which is aligned with the Octopus Group Responsible Investment Policy. This framework considers:

1. **Mission:** the mission of an investment
2. **Materiality:** the materiality of sustainability issues
3. **Responsibility:** an investee company’s values, culture, and behaviour

The Manager is responsible for implementing the Policy. As the nature of the responsible investment, our investors, and the wider business environment evolves, the Policy will be reviewed and if necessary updated. This Responsible Investment Policy replaces previous policies.

Responsible Investment Process

1. Mission

While Apollo does not target specific social or environmental outcomes, the Manager will track the amount invested and the value of companies that are aligned with Octopus’s three sustainable themes: building a sustainable planet, revitalising healthcare and empowering people.

2. Materiality

The Manager will consider environmental, social and governance risks within the investment process and identify sustainability issues (including climate risks) that could impact the financial performance of an investment.

To do this, the Manager has developed a responsible investment tool which uses guidance from the Sustainability Accounting Standards Board (‘SASB’) to help identify and manage issues which could impact fund performance.

3. Responsibility

The Manager will not engage with any person or entity on an internationally recognised ‘deny list’ and will not invest in any business whose principal activities or practices appear on Octopus

Ventures' Exclusion List, which includes sectors such as tobacco, arms, fossil fuels, gambling and deforestation.

The Manager will also expect investment companies to:

- Provide safe and healthy working conditions for all;
- Treat people fairly, irrespective of race, gender, nationality, disability, political or religious beliefs;
- Accept no bribes; and
- Uphold high standards of business integrity at all times.

All investee companies are asked to complete the Manager's Engagement Tool as part of the due diligence process and at least annually thereafter.

The Engagement Tool helps the Manager understand whether the company considers its wider stakeholders (community, customers, people, planet & shareholders) within decision making and provides tools and guidance to help companies adopt responsible practices.

The Manager will collect data on diversity of the management teams within the portfolio and actively work with investee companies to support talent management, recruitment and diversity.

Oversight

The Manager will integrate Octopus's responsible investment tools to provide oversight over the implementation of this approach:

- The Responsible Investment Tool (to be completed by the investment team) will capture data on each investment company across all three aspects of responsible investment: mission, materiality and responsibility.
- The Engagement Tool (to be completed by the portfolio company) will provide information on each of the 5 B Corp stakeholder groups
- Information from these tools will feed into the Responsible Investment Dashboard which will provide oversight over fund and firm level data. The Octopus Responsible Investment Committee will review this data in quarterly meetings.

Reporting

The Manager will commit to reporting on responsible investment on at least an annual basis. This reporting will cover the three-step approach to responsible investment (mission, materiality and responsibility) and will incorporate guidance from TCFD (the taskforce on climate related financial disclosures).