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INFORMATION FOR INVESTORS IN FUNDS MANAGED BY TMF FUND MANAGEMENT

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Disclosure regarding:
Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector ("SFDR")

Regulation (EU) 2020/852 of The European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment ("Taxonomy")

The SFDR lays down harmonized rules for financial market participants (including UCITS Management Companies and AIFMs) and financial advisers on transparency with regard to the integration of sustainability risks and the consideration of adverse sustainability impacts in their processes and the provision of sustainability-related information with respect to financial products.

The Taxonomy Regulation establishes an EU-wide classification system or 'framework' intended to provide businesses and investors with a common language to identify to what degree economic activities can be considered environmentally sustainable.

1. Mainstream Products

In regards to the Regulation (EU) 2019/2088 and Regulation (EU) 2020/852, the Sub-Funds' below list does not consider the adverse impacts of investment decisions on sustainability factors in line with Article 4 (1) b of the SFDR.

In light of the above, the Sub-Fund considers sustainability risks and Principal Adverse Impacts as not relevant according to but not limited to the following points:

- The list of prohibited investments will likely have already integrated the key ESG impacts according to the Sub-Fund's ESG risk appetite;
- Most of the investments are made in countries covered by the SFDR or equivalent regulation;
- The key investment sector is recognized not to have major ESG adverse impacts.

As a consequence, the below list of Sub-Funds is neither in scope of Article 8 nor of Article 9 of the SFDR.

The investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

For any additional information, please contact legal.fundmanagement@tmf-group.com.

FUND/SUB-FUND	
SELECTRA INVESTMENTS SICAV	
J. Lamarck Biotech	The Sub-Fund considers sustainability risks and Principal Adverse Impacts as not relevant according to the following points: o The list of prohibited investments will likely have already integrated the key ESG impacts according to the Sub-Fund's ESG risk appetite; o Most of the investments are made in countries covered by the SFDR or equivalent regulation; o The key investment sector (Biotech Industry) is recognized not to have major ESG adverse impacts. As a consequence, the Sub-Fund is neither in scope of Article 8 nor of Article 9 of the SFDR. The investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.
J. Lamarck Pharma	The Sub-Fund considers sustainability risks and Principal Adverse Impacts as not relevant according to the following points: o The list of prohibited investments will likely have already integrated the key ESG impacts according to the Sub-Fund's ESG risk appetite; o Most of the investments are made in countries covered by the SFDR or equivalent regulation; o The key investment sector (Pharmaceutical Industry) is recognized not to have major ESG adverse impacts. As a consequence, the Sub-Fund is neither in scope of Article 8 nor of Article 9 of the SFDR. The investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

ICAM First	The Sub-Fund considers sustainability risks and Principal Adverse Impacts as not relevant according to the following points: o The list of prohibited investments will likely have already integrated the key ESG impacts according to the Sub-Fund's ESG risk appetite; o Most of the investments are made in countries covered by the SFDR or equivalent regulation; As a consequence, the Sub-Fund is neither in scope of Article 8 nor of Article 9 of the SFDR. The investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.
Moneikos Balanced Fund	The Sub-Fund considers sustainability risks and Principal Adverse Impacts as not relevant according to the following points: o The list of prohibited investments will likely have already integrated the key ESG impacts according to the Sub-Fund's ESG risk appetite; o Most of the investments are made in countries covered by the SFDR or equivalent regulation; As a consequence, the Sub-Fund is neither in scope of Article 8 nor of Article 9 of the SFDR. The investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.
Shield Opportunities Fund	The Sub-Fund considers sustainability risks and Principal Adverse Impacts as not relevant according to the following points: o The list of prohibited investments will likely have already integrated the key ESG impacts according to the Sub-Fund's ESG risk appetite; o Most of the investments are made in countries covered by the SFDR or equivalent regulation; As a consequence, the Sub-Fund is neither in scope of Article 8 nor of Article 9 of the SFDR.

	The investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

GLOBAL AIFM PLATFORM SICAV-SIF	
Quality & Value Fund	The Sub-Fund considers sustainability risks and Principal Adverse Impacts as not relevant according to the following points: o The list of prohibited investments will likely have already integrated the key ESG impacts according to the Sub-Fund's ESG risk appetite; o Most of the investments are made in countries covered by the SFDR or equivalent regulation; As a consequence, the Sub-Fund is neither in scope of Article 8 nor of Article 9 of the SFDR. The investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.
Banca Profilo - Profilo East German Real Estate	The Sub-Fund considers sustainability risks and Principal Adverse Impacts as not relevant according to the following points: o The list of prohibited investments will likely have already integrated the key ESG impacts according to the Sub-Fund's ESG risk appetite; o Most of the investments are made in countries covered by the SFDR or equivalent regulation; As a consequence, the Sub-Fund is neither in scope of Article 8 nor of Article 9 of the SFDR. The investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

MADE IN ITALY FUND	
Made in Italy Fund	The Sub-Fund considers sustainability risks and Principal Adverse Impacts as not relevant according to the following points: o The list of prohibited investments will likely have already integrated the key ESG impacts according to the Sub-Fund's ESG risk appetite; o Most of the investments are made in countries covered by the SFDR or equivalent regulation; As a consequence, the Sub-Fund is neither in scope of Article 8 nor of Article 9 of the SFDR. The investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

INDUSTRY 4.0 FUND	
Industry 4.0 Fund	The Sub-Fund considers sustainability risks and Principal Adverse Impacts as not relevant according to the following points: o The list of prohibited investments will likely have already integrated the key ESG impacts according to the Sub-Fund's ESG risk appetite; o Most of the investments are made in countries covered by the SFDR or equivalent regulation; As a consequence, the Sub-Fund is neither in scope of Article 8 nor of Article 9 of the SFDR. The investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

ENPAPI LIQUIDITY FUND	
ENPAPI Liquidity Fund	The Sub-Fund considers sustainability risks and Principal Adverse Impacts as not relevant according to the following points: o The list of prohibited investments will likely have already integrated the key ESG impacts according to the Sub-Fund's ESG risk appetite; o Most of the investments are made in countries covered by the SFDR or equivalent regulation;

	As a consequence, the Sub-Fund is neither in scope of Article 8 nor of Article 9 of the SFDR. The investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

SILVER ECONOMY FUND SICAV-RAIF	
Silver Economy Fund	The Sub-Fund considers sustainability risks and Principal Adverse Impacts as not relevant according to the following points: o The list of prohibited investments will likely have already integrated the key ESG impacts according to the Sub-Fund's ESG risk appetite; o The limited available ESG data on target funds limits the utility of the integration of these indicators in the investment process. As a consequence, the Sub-Fund is neither in scope of Article 8 nor of Article 9 of the SFDR. The investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

MAGNETICA S.A. SICAV-RAIF	
China Century Fund	The Sub-Fund considers sustainability risks and Principal Adverse Impacts as not relevant according to the following points: o The list of prohibited investments will likely have already integrated the key ESG impacts according to the Sub-Fund's ESG risk appetite; o The limited available ESG data on target funds limits the utility of the integration of these indicators in the investment process. As a consequence, the Sub-Fund is neither in scope of Article 8 nor of Article 9 of the SFDR. The investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

WAVE Fund II European Feeder	The Sub-Fund considers sustainability risks and Principal Adverse Impacts as not relevant according to the following points: o The list of prohibited investments will likely have already integrated the key ESG impacts according to the Sub-Fund's ESG risk appetite; o Most of the investments are made in countries covered by the SFDR or equivalent regulation; o The key investment sector of the Master Fund is limited in Renewable Energies, hence the limited exposure to ESG adverse impacts. As a consequence, the Sub-Fund is neither in scope of Article 8 nor of Article 9 of the SFDR The investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

GEODETICA S.C.A. SICAV-SIF	
Italian Stars	The Sub-Fund considers sustainability risks and Principal Adverse Impacts as not relevant according to the following points: o The list of prohibited investments will likely have already integrated the key ESG impacts according to the Sub-Fund's ESG risk appetite; o Most of the investments are made in countries covered by the SFDR or equivalent regulation; As a consequence, the Sub-Fund is neither in scope of Article 8 nor of Article 9 of the SFDR. The investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

COURTY LUXURY REAL ESTATE FUND S.C.A. SICAV – RAIF	
Courty Prime Assets	The Sub-Fund considers sustainability risks and Principal Adverse Impacts as not relevant according to the following points: o The list of prohibited investments will likely have already integrated the key ESG impacts according to the Sub-Fund's ESG risk appetite; o Most of the investments are made in countries covered by the SFDR or equivalent regulation;

	As a consequence, the Sub-Fund is neither in scope of Article 8 nor of Article 9 of the SFDR. The investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

FIDEURAM UNICUM FUND	
Fideuram Unicum Fund - AB Corporate	The Sub-Fund considers sustainability risks and Principal Adverse Impacts as not relevant according to the following points: o The list of prohibited investments will likely have already integrated the key ESG impacts according to the Sub-Fund's ESG risk appetite; o Most of the investments are made in countries covered by the SFDR or equivalent regulation; As a consequence, the Sub-Fund is neither in scope of Article 8 nor of Article 9 of the SFDR. The investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

ALBEN FUND S.C.A. SICAV-RAIF	
Armonia Fund	The Sub-Fund considers sustainability risks and Principal Adverse Impacts as not relevant according to the following points: o The list of prohibited investments will likely have already integrated the key ESG impacts according to the Sub-Fund's ESG risk appetite; o Most of the investments are made in countries covered by the SFDR or equivalent regulation; As a consequence, the Sub-Fund is neither in scope of Article 8 nor of Article 9 of the SFDR. The investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

XEON INTERNATIONAL PROPERTY FUND S.A. SICAV-RAIF	
Xeon-Oasis Property Fund	The Sub-Fund considers sustainability risks and Principal Adverse Impacts as not relevant according to the following points: o The list of prohibited investments will likely have already integrated the key ESG impacts according to the Sub-Fund's ESG risk appetite; o Most of the investments are made in countries covered by the SFDR or equivalent regulation; As a consequence, the Sub-Fund is neither in scope of Article 8 nor of Article 9 of the SFDR. The investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.
Excelion-Cap	The Sub-Fund considers sustainability risks and Principal Adverse Impacts as not relevant according to the following points: o The list of prohibited investments will likely have already integrated the key ESG impacts according to the Sub-Fund's ESG risk appetite; o Most of the investments are made in countries covered by the SFDR or equivalent regulation; As a consequence, the Sub-Fund is neither in scope of Article 8 nor of Article 9 of the SFDR. The investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

PROFILO ALTERNATIVE SOLUTIONS SICAV-RAIF	
Profilo Global Student Housing Fund	The Sub-Fund considers sustainability risks and Principal Adverse Impacts as not relevant according to the following points: o The list of prohibited investments will likely have already integrated the key ESG impacts according to the Sub-Fund's ESG risk appetite; o Most of the investments are made in countries covered by the SFDR or equivalent regulation; As a consequence, the Sub-Fund is neither in scope of Article 8 nor of Article 9 of the SFDR.

	The investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

COMOI FUND S.C.A. SIF-SICAV	
Italy Export Credit Fund	The Sub-Fund considers sustainability risks and Principal Adverse Impacts as not relevant according to the following points: o The list of prohibited investments will likely have already integrated the key ESG impacts according to the Sub-Fund's ESG risk appetite; o Most of the investments are made in countries covered by the SFDR or equivalent regulation; As a consequence, the Sub-Fund is neither in scope of Article 8 nor of Article 9 of the SFDR. The investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

PALLADIUM FUND MANAGEMENT S.C.A. SICAV-SIF	
Palladium Fund 1	The Sub-Fund considers sustainability risks and Principal Adverse Impacts as not relevant according to the following points: o The internal exclusion list of the Sub-Fund's AIFM will likely have already integrated the major risks entailed in investing in sectors with high ESG adverse impacts; o The United States and other countries, in which the Sub-Fund intends to invest, possess some of the most developed legal systems in the world, hence their building, environmental, and other laws contain considerable safeguards against sustainability risks, such as pollution and forced labour; o The investments follow local, state, and federal regulations that minimize the ESG impact of the investment; o Many of the investments include additional enhancements that reduce the ESG impact of the investment. As a consequence, the Sub-Fund is neither in scope of Article 8 nor of Article 9 of the SFDR. The investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

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BRAZIL REAL ESTATE OPPORTUNITIES FUND III S.C.S.	
Brazil Real Estate Opportunities Fund III S.C.S.	The Sub-Fund considers sustainability risks and Principal Adverse Impacts as not relevant according to the following points: o The list of prohibited investments will likely have already integrated the key ESG impacts according to the Sub-Fund's ESG risk appetite; o The key investment sector (Real Estate Development) is regulated by local standards which mitigate major ESG adverse impacts. As a consequence, the Sub-Fund is neither in scope of Article 8 nor of Article 9 of the SFDR. The investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

CREMISI FUND SICAV-RAIF	
Ouverture Pentagramma	The Sub-Fund considers sustainability risks and Principal Adverse Impacts as not relevant according to the following points: o The list of prohibited investments will likely have already integrated the key ESG impacts according to the Sub-Fund's ESG risk appetite; o The limited available ESG data on target funds limits the utility of the integration of these indicators in the investment process. As a consequence, the Sub-Fund is neither in scope of Article 8 nor of Article 9 of the SFDR. The investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

LAGUNA INVESTMENT RAIF	
Laguna Global Fund	The Sub-Fund considers sustainability risks and Principal Adverse Impacts as not relevant according to the following points: o The list of prohibited investments will likely have already integrated the key ESG impacts according to the Sub-Fund's ESG risk appetite; o The limited available ESG data on target funds limits the utility of the integration of these indicators in the investment process.

	As a consequence, the Sub-Fund is neither in scope of Article 8 nor of Article 9 of the SFDR. The investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

PRADERA REAL ESTATE INVESTMENT SICAF S.P.A.	
Pradera Real Estate Investment	The Sub-Fund considers sustainability risks and Principal Adverse Impacts as not relevant according to the following points: o The list of prohibited investments will likely have already integrated the key ESG impacts according to the Sub-Fund's ESG risk appetite; o The limited available ESG data on target funds limits the utility of the integration of these indicators in the investment process. As a consequence, the Sub-Fund is neither in scope of Article 8 nor of Article 9 of the SFDR. The investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

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Products Promoting Environmental or Social Characteristics

In regards to the Regulation (EU) 2019/2088 and and Regulation (EU) 2020/852, the below list Sub-Fund's falls within the scope of Article 8 of SFDR, i.e. qualifies as a products that promote environmental or social characteristics.

SELECTRA INVESTMENTS SICAV
BEST OF SRI

The Target Funds of the Sub-Fund shall contribute to at least one of the environmental objectives defined by article 3 and 9 of the Taxonomy Regulation. The main environmental objectives of the Sub-Fund will be, but not limited to the below:

- Climate change mitigation,
- Climate change adaptation,
- the transition to a circular economy,
- the sustainable use and protection of water and marine resources,
- pollution prevention and control.

As of its nature of fund of funds, the promotion of the above-mentioned environmental objectives is implemented through investing into Target Funds that promote these environmental objectives in their investment policy, and / or that disclose in public reporting their positive contribution to the above environment objectives.

For clarity sake, only Target Funds which classify themselves respectively as environmentally sustainable funds or funds which do promote environmental characteristics, according respectively to art. 9 and 8 SFDR, could be considered as eligible funds.

The contribution to the environmental objectives stated above should be of at least 15% of the Sub-Fund AUM at an aggregate portfolio level, among which with a minimum 10% in climate change mitigation objectives

ESG Considerations

A proprietary ESG investment process has been implemented and integrated within the portfolio management process of FIA Asset Management S.A. ("FIA AM"), acting as delegated portfolio manager of the sub-fund. Before investments are performed by the appointed Investment Manager, each single target investment has to be assessed via the ESG Score Card, which takes into account qualitative and quantitative metrics for the ESG segments. Each Target Fund is rated in a range from 5 (the highest) to 0 (the lowest).

The analysed Target Fund is accepted only if its overall score is higher than 3.5 over 5. No exceptions will be granted. Due diligences and active engagements are performed with the relevant fund managers to better understand the data received and access their accuracy / reliability.

Data from all the Target Funds are monitored and reviewed at least once per year, including:

The ESG scores

The ESG data received from the relevant fund managers, which are used to assess if the underlying investments are still compliant with the requirements of the Sub-Fund;
The Sustainable Development Goals (SDG) mapping which represents the breakdown of the portfolio showing the percentage of alignment to each SDG. At portfolio level, the ESG scores of each issuer are attributed according to the weight of the issuer in the portfolio. The Investment Manager assesses the overall ESG rating of the portfolio by following the above mentioned ESG calculation methodology and by applying the abovementioned thresholds.
The Investment Manager monitors the ESG score of its investment portfolio, both at single security level and on an aggregate basis. ESG scores on each individual investment are taken into consideration alongside the traditional criteria of analysis and evaluation: this means that the Investment Manager ensures that its financial portfolios are financially efficient and as much sustainable as possible.

The sustainability risks that the Sub-Fund may be subject to are likely to have an immaterial impact on the value of the sub-fund's investments in the medium to long term.

The Investment Manager is furthermore committed to implement one or more of the following methods within its investment strategies or investment processes, and therefore monitors the extent of the application of these methods in the underlying funds:

- Positive selection: the investor actively selects the companies in which to invest. This can be done either by following a defined set of ESG criteria or by the best-in-class method (where a subset of high performing ESG compliant companies is chosen for inclusion in an investment portfolio), or using a norms-based screening that allows investors to assess the degree to which each asset in their portfolio respects ESG criteria by adhering to global norms on environmental protection, human rights, labour standards and anti-corruption.
- Engagement and voting: investment funds monitoring the ESG performance of all portfolio companies and leading constructive shareholder engagement dialogues with each company to ensure progress, also through strategic voting by shareholders in support of a particular issue, or to bring about changes in the governance of the company.
- Exclusion: the removal of certain sectors or companies from consideration for investment, based on ESG specific criteria.

- ESG integration: the inclusion of ESG risks and opportunities into traditional financial analysis of equity and bonds/debt instruments value.
- Sustainability themed strategies and impact investing: strategies that include a variety of themes, which allows investors to choose specific areas of investments, typically with a close link to sustainable development. Impact investing concerns strategies focused on assets that have a positive measurable impact on environment or society.

Sustainability Risk Policy

FIA AM vision is being a sustainable investment firm that takes responsibility for its actions and engagements, as a member of society with its own impact on the planet and on people, but also as a provider of financial services with an indirect impact through the activities of its clients and investments. The mission will be achieved by fully incorporating sustainability into the investment firm's daily business, and by bolstering the investment firm's sustainability risk management.

For FIA AM, sustainability means adhering to the values and business principles of the investment firm and bringing sustainable solutions to the current and future environmental, economic and social challenges of the investment firm's stakeholders and the organization itself, that are in line with the investment firm's risk profile.

By managing Environmental, Social and Ethical risks, mitigating their impacts and grasping the opportunities deriving from sustainable solutions, the Sustainability Risk Policy has incorporated sustainability into the investment firm's business objectives.

In line with SFDR (Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019) FIA Sustainability Risk Policy defines the investment guidelines principles. FIA AM has first identified which are the sustainable risks that intend to affect in its decision-making processes and then FIA AM has built the Risk Management framework in order to identify, analyze, monitor, mitigate and report them for its investment choices.

FIA AM implements its Sustainability Risk Policy and underlying policies according to the three lines of defense. This approach ensures that sustainability risk management has a firm basis within the organization by dividing risk management responsibilities between different roles. The first line of defense (business management) has risk ownership, the second line (risk management and supporting functions) has risk control while the third line (audit) verifies risk assurance.

FIA AM ensures that its financial portfolios are financially efficient and as much sustainable as possible.

Sustainability Risks

Sustainability Risk is an environmental, social or governance event or condition that, if occurs, could cause an actual or a potential negative impact on the value of the investment.
FIA AM takes into consideration the following sustainability risks:

- Greenhouse gas emissions
- Energy performance
- Water
- Social and employee matters
- Human rights
- Governance

FIA AM assesses the risk exposure of each target investment principally against these factors.

FIA AM has implemented a proprietary ESG investment process and integrated within the portfolio management and risk management processes in order to analyse, monitor, mitigate and exclude sustainability risks.

Before investments are performed each single target investment has to be assessed via the ESG Score Card, which takes into account qualitative and quantitative metrics for the ESG segments. Each target investment is rated in a range from 5 (the highest) to 0 (the lowest) and is accepted only if its overall score is higher than 3.5 over 5. No exceptions will be granted.

For the time being, and until further harmonised data on sustainability risks will be made available from our underlying vehicles, the metrics taken into consideration to assess the sustainability risks have been mainly focused on assessing the internal investment policies/procedure/reports focused on Environmental, Social and Governance factors. The data used to assess the sustainability risks are received directly from the Investment Manager of the target investments, and are challenged during the engagement and due diligence process.

Data from all the target investments are monitored and reviewed at least once per year, including:

- The ESG scores;
- The ESG data received from the relevant fund managers, which are used to assess if the underlying investments are still compliant with FIA requirements;
- The Sustainable Development Goals (SDG) mapping which represents the breakdown of the portfolio showing the percentage of alignment to each SDG.

At portfolio level, the ESG scores of each issuer are attributed according to the weight of the issuer in the portfolio. FIA AM assesses the overall ESG rating of the portfolio by following the above mentioned ESG calculation methodology and by applying the above-mentioned thresholds.

FIA AM monitors the ESG score of its investment portfolio, both at single security level and on an aggregate basis. ESG scores on each individual investment are taken into consideration alongside the traditional criteria of analysis and evaluation: this means that FIA AM ensures that its financial portfolios are financially efficient and as much sustainable as possible.
FIA AM is furthermore committed to implement one or more of the following methods within its investment strategies or investment processes, and therefore monitors the extent of the application of these methods in the underlying funds:

- Positive selection: where the investor actively selects the companies in which to invest. This can be done either by following a defined set of Environmental, Social and Governance (ESG) criteria or by the best-in-class method (where a subset of high performing ESG compliant companies is chosen for inclusion in an investment portfolio), or using a norms-based screening that allows investors to assess the degree to which each assets in their portfolio respects issues that impact Environmental, Social and Governance ESG criteria by adhering to global norms on environmental protection, human rights, labour standards and anti-corruption.
- Engagement and Voting: investment funds monitoring the ESG performance of all portfolio companies and leading constructive shareholder engagement dialogues with each company to ensure progress, also through strategic voting by shareholders in support of a particular issue, or to bring about change in the governance of the company.
- Exclusion: the removal of certain sectors or companies from consideration for investment, based on ESG specific criteria.
- ESG Integration: the inclusion of ESG risks and opportunities into traditional financial analysis of equity and bonds/debt instruments value.
- Sustainability themed strategies and impact investing: strategies that include a variety of themes, which allows investors to choose specific areas of investments, typically with a close link to sustainable development. Impact investing concerns strategies focused on assets that have a positive measurable impact on environment or society.

EOS ENERGY FUND II S.C.A. SICAV-RAIF

DISCLOSURE UNDER ARTICLE 3 SFDR

In accordance with article 3 of the Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector (hereinafter, "Sustainable Finance Disclosure Regulation" or "SFDR"), EOS Investment Management Ltd ("EOS IM") and SELECTRA Management Company S.A. (the "AIFM") foresee the inclusion of sustainability risks into their investment decisions within the greenfield renewable energy practices. For the purpose of this statement, a sustainability risk means an environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of the investment.

The AIFM and the EOS IM seek the integration of sustainability risks into the investment decisions with the aim of ensuring that these risks are considered similarly to all other risks that are integrated in the investment decisions.

The investment strategy in greenfield renewable energy practices is based on establishing long-term partnerships with successful and experienced developers, investing and creating value by being significantly involved from the development stage when possible, first-hand overview in the construction stage, and active involvement in the financing and operational stages of a greenfield project. In consideration of that, the investments are exposed to a variety of ESG risks associated with such energy infrastructures. The main ESG risks include but are not limited to the following:

- <u>**Environmental dimension**</u>
  - **climate risks**: physical risks arising from climate change could cause damage to assets and infrastructure resulting in their enduring unavailability. The transition towards a zero-emissions energy model could involve risks arising from normative/regulatory, political, legal, technological and market changes associated with the fight against climate change;
  - **environmental risks**: more restrictive regulations concerning environmental protection may require investee companies to implement specific actions to minimise their environmental impact. In particular, the rising concern about the scarcity of resources and management of land (applicable both to solar and wind projects) may result in a longer investment cycle or increased costs to comply with regulations. The land use or changes in the land use can also have impacts in terms of limitations and/or prescription with regards to biodiversity and preservation of ecosystems. To a lesser extent the same risks and adverse impacts can be envisaged with regard to the use of water which is more relevant to certain energy technologies such as offshore wind farms rather than solar photovoltaics which is the main focus the focus of the greenfield renewable energy. There is also an exposure to risks and costs connected to hazardous waste management and disposal of key equipment. This is with particular reference to equipment such as photovoltaic panels, wind turbines and pales, which call for specific requirements in terms

of decommissioning. The processes associated with the equipment can use (potentially) toxic substances and generation of toxic wastes (both at the manufacturing stage as well as at other stages of the product/equipment lifecycle).

- **Social dimension**

  - **risks linked to occupational health and safety**: these risks arise from the execution of construction activities on the plant sites. The operations are relatively limited and mainly carried-out by external engineering and construction suppliers;
  - **risks linked to local communities' engagement**: the development of infrastructural projects could result in criticism or situations of partial acceptance, exposing the investee companies to reputational and operational risks linked, for example, to delays in execution of projects;
  - **compliance risks**: possible infringements of laws, regulations and the principles set down in internal policies could result in exposure to the risk of judicial or administrative penalties, economic or financial losses and reputational damage.

There are additional risks inherent to infrastructure investments, including construction, environmental, regulatory, permitting, commissioning, start-up, operating, economic, commercial, political, and financial risks, which have or can have ESG risk features. Other factors that may affect the operations of projects and their positive ESG characteristics include innovations in technology that could render the way in which the investee companies substantially contribute to environmental and social objectives obsolete or less than expected performing.

ESG risks and opportunities are strictly intrinsic in the investment focus of greenfield renewable energy practices. The environmental and social considerations are core aspects of the investment thesis and financial value proposition. ESG risks considerations are integral part of the investment process and are standardised for each investment in terms of regulatory framework, internal policies, managerial practices, business relationship with advisors and suppliers who are well familiar with major ESG issues linked to renewable energy power plants. All the projects are designed and managed to mitigate or eliminate, after a proper identification, any relevant environmental and social risks. When possible, these are substantially allocated to external/ contractual parties, according to best practices of the structured finance industry, with the pre-requisite of keep valid the authorization, along with operating the power plants in full compliance with environmental, safety and health requirements set by the relevant competent authorities.

Hence, the integration of ESG risks occurs at different stages of the investment process: assessment, decision making and actions to progress. The investment team oversees selecting, identifying, and picking new investment opportunities. The screening process includes an initial screening assessment that takes into consideration ESG viability. After this analysis, a preliminary proposal is made to the investment committee of EOS IM; the standard information expected to be presented is also related to risks and mitigants analysis. If the proposal is accepted, projects, which may involve developments, will be required to be assessed and subject to the due diligence process, which includes ESG criteria. The ESG assessment will encompass material potential ESG issues, concerns, and impact areas, which were found to be problematic following the assessment, the subsequent review and the analysis process. ESG due diligence findings may take into consideration elements such as: (i) savings in terms of CO_2 produced, (ii) contribution to creation of employment opportunities, with particular reference to local communities, (iii) strong preference to utilise, for the installation of power plants, low grade agricultural land, preferably not used for agricultural purposes, (iv) selection of key suppliers (project developer, PV and inverter suppliers and EPC contractors) after duly consider their ESG ethos and track record. The assessment will include an outline of identified key remedial actions, designed to address the issues highlighted in the due diligence report.

As seen above, all the relevant ESG risks are generally site-specific rather than portfolio-wide, usually reversible, and promptly addressed and mitigated.

The risk management team of the AIFM also performs a regular (*ex-post*) review of these risks as part of the fulfilment of its duties.

DISCLOSURE UNDER ARTICLE 4 SFDR

In accordance with article 4 of the Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector (hereinafter, "Sustainable Finance Disclosure Regulation" or "SFDR"), EOS Investment Management Ltd ("EOS IM") and SELECTRA Management Company S.A. (the "AIFM"), taking due account of their size, the nature and scale of their activities and the types of financial products they make available, consider the principal adverse impacts of their investment decisions on sustainability factors within the greenfield renewable energy practices. Principal adverse impacts (PAIs) should be understood as those impacts of investment decisions and advice that result in negative effects on sustainability factors.

The mentioned adverse impacts are identified with a bottom-up approach to material topics, these latter being firstly, but not exclusively, related to (i) metric tons of greenhouse gas emissions avoided, (ii) homes' electricity use for a year powered by renewable energy, (iii) land use, alongside with social aspects such as (iv) level of employment during and post construction and (v) awarding contracts locally where feasible to promote the development of local economies where the infrastructure projects are located.

In particular, the most relevant ESG topics identified and scrutinized are baseline environmental and social conditions of the planned construction, endangered species and sensitive ecosystems, pollution prevention, cumulative impacts of existing projects, socio-economic impacts, protection of cultural property, health, safety, and security.

For the sake of clarity, the renewable energy practices are pursued through the Fund, which is a closed-end investment fund launched in December, currently in fund raising status and the projects planned are still in the pre-construction stage. Therefore, the impacts that are now considered are limited to that investment phase. Notwithstanding this premise, the principal adverse impacts considered, which will be considered in all the other investment phases, and of the related indicators to monitor them, follow and will follow the applicable regulatory technical standards, such as those listed below.

PRINCIPAL ADVERSE IMPACTS (PAIs)	INDICATORS
GHG Emissions	GHG Emissions
	Carbon footprint
	GHG intensity of investee companies
	Exposure to companies active in the fossil fuel sector
	Share of non-renewable energy consumption and production
	Energy consumption intensity per high impact climate sector
Biodiversity	Activities negatively affecting biodiversity-sensitive areas
Water	Emissions to water
Waste	Hazardous waste ratio
Social and employee matters	Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (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
	Unadjusted gender pay gap
	Board gender diversity

	Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons, and biological weapons)

After having defined the principal adverse impacts and the specific indicators, EOS IM and the AIFM assess them, whenever possible, before entering into the transaction and properly analyses them during the pre-due-diligence or "red-flag" analysis and in the context of the overall due diligence processes, which include the ESG Due Diligence. The ESG Due Diligence standards will include, whenever applicable: (i) environmental impact assessment, (ii) planning permission, (iii) environmental and social management system requirements, (iv) stakeholder engagement, (v) grievance mechanism, (vi) independent monitoring and reporting programme, (vii) reporting & transparency. Findings of the ESG Due Diligence are relevant key investment decision points and the recommendation from Risk Management and the Investment Committees in terms of possible remediations/actions are mandatory and cannot be waived. Apart from overarching due diligence requirements, all projects also require technical due diligence assessments by independent external experts, to confirm the inclusion of the requirements set out to construct the project, including the competency of the key contractors to deliver the construction, meeting the required specifications, and additional requirement arising from environmental impact assessment.

EOS IM and the AIFM require the planning of specific actions to mitigate the potential adverse impacts, including ESG engagement activities, which envisage the active involvement of project companies, promote their sustainable growth, and gather continuous feedback for the evolutions of the strategy itself. Some operational requirements have been drawn up with the aim of managing key topics during the phases of investment (meaning construction, operation, divestment and decommissioning phases) with reference to energy consumption, water consumption, greenhouse gas emissions, waste management, other emissions and products when applicable or relevant.

It has to be clarified that if for whatsoever reason EOS IM, in evaluating any potential investment opportunity, identifies material risks endangering the ability of the assets to positively contribute to climate change mitigation in comparison to power generation from fossil, the firm will most likely quit the investment opportunities, rather than scaling down the investment. Moreover, where potential adverse impacts are identified, these will be considered and assessed in terms of impact/rectification initially at investment team level and by the Investment Committees for more material issues. As part of the investment requirements, proportionate and appropriate remedial actions will be required to be implemented. Depending upon the nature and timing of the adverse impact raised, the matter will require resolution as a condition precedent (before completion), a contractual condition subsequent (after completion) or as part of a longer-term plan.

As previously mentioned, EOS IM and the AIFM conduct ESG engagement activities which envisage the involvement of project companies. Engagement is conducted through a combination of formal and informal direct meetings and communication exchanges, fostering personal interactions, and encouraging the information flow. Moreover, EOS IM has actively engaged through the Fund's significant ownership and it has appointed board directors of the project companies.

When considering the principal adverse impacts, EOS IM and the AIFM consider the sound practice of international standards in terms of responsible business conduct codes and internationally recognized standards for due diligence and reporting; indeed, EOS IM is a signatory of the United Nations Principles for Responsible Investment (UN PRI).

DISCLOSURE UNDER ART. 10 SFDR
Regulation (EU) 2019/2088 (or "SFDR") establishes harmonised rules for sustainability-related disclosures by financial market participants and financial advisers.
Financial market participants shall publish and maintain on their websites information for each financial product referred to in article 8 of SFDR and should use website disclosures to expand on topics disclosed in a concise way in pre-contractual documents and to provide further information relevant to end investors to better understand the investment strategies offered.

Environmental or social characteristics of the financial product
For the purpose of SFDR and EU Taxonomy disclosures, in light of the investment objective, strategy and guidelines applicable to EOS Energy Fund II S.C.A. SICAV-RAIF (the "Fund") and as part of the implementation of such objective and strategy, the Fund seeks to promote, among other characteristics, environmental characteristics in the context of article 8 of SFDR, by investing in a diversified portfolio of projects which generate or enable the generation of electricity from renewable energy sources with a particular focus (but not exclusively) on greenfield unsubsidised solar photovoltaic parks. Therefore, the Fund will seek to predominantly invest in economic activities which are intended to contribute substantially to climate change mitigation, being investments in projects generating, transmitting, storing, distributing or using renewable energy in line with Directive (EU) 2018/2001, as defined in the applicable provisions of EU Taxonomy. As far as the "'The "do no significant harm" principle as per EU Taxonomy is concerned, this applies only to those investments that are intended to take into account the EU criteria for environmentally sustainable economic activities.

Investment strategy
The investment strategy of the Fund is based on establishing long-term partnerships with successful and experienced developers, investing, and creating value by being significantly involved since the development and lead first-hand the construction, financing and operational stage of a greenfield project. Once the infrastructure projects have been running for several years and fully optimised, the Fund will exit the projects by selling them on to industrial or financial players in the secondary infrastructure market.

Within the promotion of environmental characteristics scope, the Fund uses non-financial criteria during the pre-investment phase, meaning the commitment to ESG integration and the consideration of exclusion criteria. In particular, the Fund adopt, among others, the following strategies:

- *positive screening*: relates to the inclusion of economic activities that are contributing to the environmental characteristics promoted by the Fund, also following the criteria mentioned below (1-5). The same reasoning is applicable on the supply chain side, where positive screening helps selecting reputable major suppliers that adopt an ESG approach;
- *negative screening*: relates to the exclusion of business that fall short of a set of absolute environmental, social, or economic standards.

SELECTRA Management Company S.A. (the "AIFM") and EOS Investment Management Ltd ("EOS IM") integrate ESG Policy as part of their investment decision process, taking into account the following non-financial criteria:

1. **Sustainable Development**: contribution to the protection of natural resources by developing renewable and alternative energy infrastructures;
2. **Environmental Footprint**: contribution towards decarbonization and development of innovative energy efficient services;
3. **Local Engagement**: contribution to local development of non-polluting solutions protective of the population health while assuring the proper conservation of flora and fauna;
4. **Social Governance**: assuring that at the level of investee, economic activities are carried out to substantially align with the applicable and relevant minimum safeguards laid down in the EU Taxonomy, setting forth human rights, labour, environmental and anti-corruption principles and standards are met;
5. **Third Party Interactions**: selection of supply chain including sustainability criteria in terms of environment and social standards;
6. **Controversial activity**: exclusion of sectors that are proven to have a detrimental impact on society and environment, such as coal, tobacco, pornography, gambling, tobacco, alcoholic beverage, production financing and trade of weapons.

The above criteria will be assessed in the pre-due diligence and due diligence phases according to sound practices, internationally commonly recognized standards and the applicable technical standards, from time to time set by the applicable regulations including but not limited to regulatory technical standards envisaged in EU Taxonomy and reflected in the Fund's policies.

EOS IM and the AIFM also assess good governance practices of investee companies, including, if applicable, compliance with legal requirements (e.g., adoption of Organizational and Management Model pursuant to Italian Legislative Decree no. 231/2001), sound management structures, employee relations, remuneration of staff and tax compliance, as seen in point 4 above.

Within the scope of SFDR and EU Taxonomy regulation, and unless differently stated in the applicable law and regulation, from the financial year ending on the 31 December 2022, the Fund will issue to Investors periodic disclosure, on annual basis, including sustainability indicators measure which how the environmental and/or social characteristics promoted by the Fund are attained.

Type of investments

The Fund is formally and substantially focused on renewable energies with a focus on greenfield solar photovoltaics (PV) energy generation plants. The Fund will also take into consideration other opportunities, with particular reference to wind, energy storage and (but this would not change the focus) energy generation from renewable sources to allow production of "green" energy.
For the sake of clarity, the Fund may also invest a limited amount of commitment in the development stage (i.e., before the construction permit for a PV plant is issued) of greenfield projects.

Monitoring of environmental or social characteristics

The Fund ensures the attainment to the promotion of the above-mentioned environmental characteristics through monitoring efforts. During the post-investment phase, the investee companies in the portfolio are assessed to ensure the implementation of recommendations arising during the investment acquisition process. In addition, concerning the stakeholder's engagement in relation to the Fund and its investments (portfolio companies), EOS IM also actively engages through the Fund significant ownership and its appointment of board directors of the portfolio companies.

Methodologies & Data sources

EOS IM and the AIFM are elaborating an internal monitoring process using ESG data as metrics to assess during the overall investment process, starting from the construction of the plants. The source of this data comes from both (i) the suppliers involved during the construction phase of investments, that are contractually bound to give all the information as agreed, and (ii) the plants themselves, that are owned by the SPV, over which the fund manager retains control.
The standardized process in place allows to assess each metrics with respect to an established threshold deemed acceptable. A remediation plan will be put in place, whenever required in relation to the status when assessed against the aforementioned thresholds. This is designed overcome potential issues and in order to guarantee the respect of the environmental characteristics promoted by the Fund.

Due diligence

ESG topics and issues are included in the transaction documents as resulting from ESG due diligence findings which take into consideration elements such as: (i) savings in terms of CO_2 produced, (ii) contribution to creation of employment opportunities in local communities, (iii) strong preference to utilise, for the installation of power plants, low grade agricultural land, preferably not used for agricultural purposes, no hampering ecosystems and in underdeveloped social areas, (iv) selection of key suppliers (seller of the project developer, landlord, PV and inverter suppliers and EP contractors) after duly consider their ESG ethos and track records. All those contractual agreements are structured in order to grant, during both the construction and operational phases, the full compliance with legal and voluntary environmental and social (including safety) undertakings. All the material ESG issues are kept under due control along the power plants life cycle with e ongoing controls and prevention measures.

Engagement policies

Fund's preferred investment strategy is to acquire SPVs owning the rights to the projects, over which the Fund manager retains control. Objective is to oversee and have full control on their operations and effectively implement the performance optimisation strategy and ESG issues and risks management while timing the best exit opportunity. The combination of the assets being PV Plants and the owning structures being SPVs, without the requirement for extensive personnel resource, the ESG factors are encompassed and managed directly by EOS IM and the AIFM.

As stated before, for the type of investment and business model, EOS IM is directly exposed to ESG considerations. Thus, EOS IM actively manages rather than simply influence of ESG topics. In relation to the Fund, investees SPVs always establish boards of directors who receive training designed to ensure the appropriate awareness and understanding of relevant ESG topic