

DISCLOSURE PURSUANT TO REGULATION (EU) 2019/2088**ON SUSTAINABILITY-RELATED DISCLOSURES IN THE FINANCIAL SERVICES SECTOR**

In relation to the transparency obligations introduced by Regulation (EU) 2019/2088 on sustainability related disclosures in the financial services sector (so-called *Sustainable Finance Disclosure Regulation*, “**SFDR**”), the SGR hereby discloses the following.

Disclosure pursuant to Article 3 of the SFDR

According to Article 3 of the SFDR “financial market participants shall publish on their websites information about their policies on the integration of sustainability risks in their investment decision-making process”.

The objective of a large banking group such as Intesa Sanpaolo, of which Neva SGR is part, is to create long-term sustainable value for itself and its stakeholders. Achieving the Net-Zero target by 2050, supporting companies' transition plans, offering an increasing number of sustainable investment products, supporting inclusion and breaking down social inequalities are some of the commitments contained in the ESG pillar of the 2022-2025 Business Plan.

The documents which summarize the Intesa Sanpaolo Group's guiding values, strategies, achievements and new objectives for the next three years are available at the following link <https://group.intesasnpaolo.com/it/sezione-editoriale/un-anno-di-sostenibilita>. For further details please refer to the full version of the Consolidated Non-Financial Statement and to the TCFD Report 2022.

The SGR, aware that innovation, development of new products and services and corporate responsibility can contribute to the reduction of the impacts on society of phenomena such as climate change and social inequalities, intends to take action with due diligence to promote climate and environmental sustainability in line with the Group's Business Plan.

The AIFs managed by the SGR are not among the products referred to in Article 8 of the SFDR, which promote environmental and social characteristics, nor among the products referred to in Article 9 of the SFDR, which aim at sustainable investments.

The SGR's activity is in any case carried out in a manner consistent with the principles of conduct that inspire the Intesa Sanpaolo Group and, among them, the principles of respect for human rights and the environment, the principles on *diversity* and *inclusion* contained in the Code of Ethics and in the Group's Policies.

In addition, it should be noted that the investment policy of the AIFs provides for certain exclusion criteria, or limits the investment operations in certain sectors of activity - punctually identified in the respective AIF management Regulations - including, in particular:

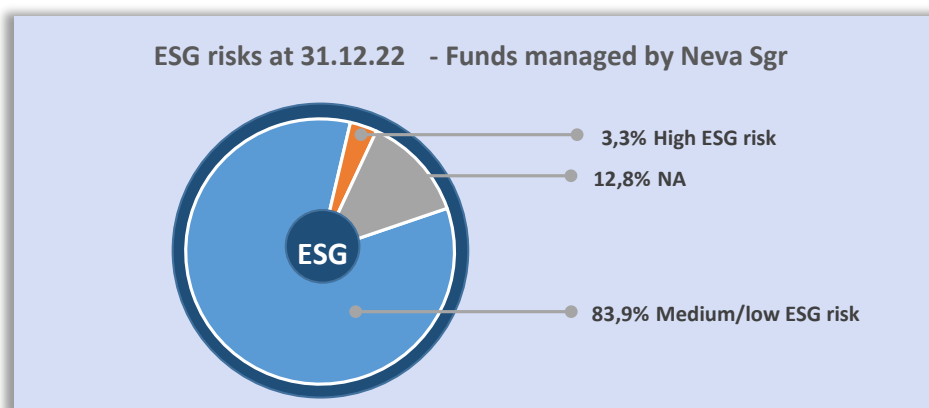
1. manifest infringement of human rights;
2. production, trade or other activities which are prohibited under the laws in force in the countries where they take place, including, in any case, human cloning;
3. production of and/or trade of tobacco;
4. production and/or trade of distilled alcoholic beverages and related products;
5. production of and/or trade of firearms and/or explosives;

6. gambling and equivalent activities;
7. pornography and child pornography;
8. production of and/or trade in fur;
9. research, development and/or technical application of electronic solutions and/or programmes that are specifically designed for the following activities:
 - (i) the production of goods substantially similar to those referred to in 1. to 8. above;
 - (ii) Internet betting and/or *online* gambling; or systems that are specifically designed to enable unlawful:
 - access to electronic networks and/or electronic data storage systems; or
 - downloading data in electronic format.

With reference to the "**Supervisory Expectations on Climate and Environmental Risks**" issued by the Bank of Italy in April 2022, the SGR has prepared an Action Plan, proportionate to the level of exposure to the aforesaid risks and to the size and complexity of the company's operations, approved by the Board of Directors on 30/03/2023 and submitted to the Supervisory Authority, which outlines, according to principles of proportionality and materiality, a series of actions, with relative timing and completion priorities, to meet the aforesaid objectives. The action plan includes the inclusion of the SGR's internal regulations - in particular the "**Responsible Investment Policy**" - in order to regulate the ways in which the SGR integrates sustainability risks into the investment decision-making processes of the assets managed. This report will be consequently updated to record progress and objectives achieved from time to time.

The rationale and results of the materiality test performed on the portfolio of funds managed by the SGR at 31/12/2022 are detailed below.

In the Intesa Sanpaolo Group, the ESG risk governance framework attaches great importance to the ESG Sectoral Assessment. Starting from the sector classification based on the ATECO/NACE code, the sectors and subsectors most affected by climate change and ESG risks are identified. Considering investments totaling Euro 112.6 million (total AuM) of the three funds managed by Neva SGR, the amounts allocated to companies belonging to sectors with a high ESG risk according to this preliminary analysis, which is subject to further refinements following the methodological clarifications underway, amount to Euro 3.7 million (relating to companies belonging to the biotechnology and pharmaceutical production sectors), corresponding to 3.3% of the total portfolio. The NA share (12.8%) refers to the portion of investments in OICRs that, following the look through analysis, can be assimilated to the Medium/low ESG risk share.



With specific reference to climate transition risks, there are no investments in high transition risk sectors and 16% (Euro 18.5 millions) of the total portfolio is invested in intermediate risk sectors.

Despite the low exposure to climate and environmental risks, the SGR will continue to carefully and punctually monitor the exposure to these risks, benefiting from methodological developments and the consolidation of the Intesa Sanpaolo Group's ESG risk management system.

Disclosure pursuant to Article 4 of the SFDR - No consideration of adverse impacts of investment decisions on sustainability factors

According to Article 4 of the SFDR, “Financial market participants shall publish and maintain on their websites:

- a) where they consider principal adverse impacts of investment decisions on sustainability factors, a statement on due diligence policies with respect to those impacts, taking due account of their size, the nature and scale of their activities and the types of financial products they make available; or**
- b) where they do not consider adverse impacts of investment decisions on sustainability factors, clear reasons for why they do not do so, including, where relevant, information as to whether and when they intend to consider such adverse impacts”.**

The SGR does not take into account the negative effects of investment decisions on sustainability factors as set out in Article 4 of the SFDR.

The reason for this is due to the investment policies of the managed AIFs, which do not include explicit “sustainable investment” objectives as defined by the SFDR.

Disclosure pursuant to Article 5 of the SFDR

According to Article 5 of the SFDR “Financial market participants and financial advisers shall include in their remuneration policies information on how those policies are consistent with the integration of sustainability risks, and shall publish that information on their websites”.

The SGR's remuneration and incentive policies are consistent with the sustainability risk integration provisions under the SFDR.

In fact, the SGR is aware that it has a considerable impact on the social and environmental context in which it carries out its activities, choosing to act also with the aim of creating long-term value for the SGR, its people, its clients, the community and the environment.

The SGR wants to be responsible and generate long-term value, aware that innovation, the development of new products and services and corporate responsibility can contribute to reducing the impact on society of phenomena such as climate change and social inequality.

Consistently with its commitment to social, cultural and environmental sustainability, as well as in line with the provisions of the SFDR and with what has been defined by the Intesa Sanpaolo Group, as from 2021 the SGR has decided to introduce among the strategic action objectives that will be assigned to all management a specific “ESG” KPI (*environmental, social and governance*).

This KPI represents the evolution of the previous transversal KPI of the Intesa Sanpaolo Group, i.e. *Diversity & Inclusion*, which was focused on a specific area related to the social factor. The new KPI, on the other hand, takes into account several ESG factors and areas, in line with specific activities and projects carried out by the Company.



ESG KPI is assessed both at Intesa Sanpaolo Group level, with a view to acknowledging the commitment of the Group as a whole, and at the level of the Government Area to which the SGR belongs, in order to enhance the areas of action of the individual Group structures.