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INFORMATION FOR INVESTORS IN FUNDS MANAGED BY TMF FUND MANAGEMENT S.A.

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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, as amended (“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, as amended
(“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.

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FUND/SUB-FUND	
SELECTRA INVESTMENTS SICAV	
J. Lamarck Biotech	The Sub-Fund does not consider the adverse impacts of investment decisions on sustainability factors in line with Article 4.1 (b) of SFDR. In light of the above, the Sub-Fund considers sustainability risks and Principal Adverse Impacts as not relevant according 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 (i.e. the biotechnology industry) is recognized not to have major ESG adverse impacts. As a consequence, the Sub-Fund is neither in scope of 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 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 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 (i.e. the pharmaceutical industry) is recognized not to have major ESG adverse impacts. As a consequence, the Sub-Fund is neither in scope of 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 (in liquidation)	The Sub-Fund 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 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;. As a consequence, the Sub-Fund is neither in scope of 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 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 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. As a consequence, the Fund is neither in scope of 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 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 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. As a consequence, the 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 does not consider the adverse impacts of investment decisions on sustainability factors in line with Article 4 (1) b of the SFDR. The Sub-Fund considers sustainability risks and principal adverse impacts as not relevant according to the following points: ▪ The list of prohibited investments will likely have already integrated the key environmental, social and governance (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 Sub-Fund is neither in scope of Article 8 nor of Article 9 of the SFDR. As a consequence, the investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.
AlphaStar Equity Hedge Fund	The Sub-Fund does not consider the adverse impacts of investment decisions on sustainability factors in line with Article 4 (1) b of the SFDR. The Sub-Fund considers sustainability risks and principal adverse impacts as not relevant according to the following points: ▪ The list of prohibited investments will likely have already integrated the key environmental, social and governance (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.

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	The Sub-Fund is neither in scope of Article 8 nor of Article 9 of the SFDR. As a consequence, 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 does not consider the adverse impacts of investment decisions on sustainability factors in line with Article 4 (1) b of the SFDR. The Sub-Fund considers sustainability risks and principal adverse impacts as not relevant according to the following points: ▪ The list of prohibited investments will likely have already integrated the key environmental, social and governance (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 Sub-Fund is neither in scope of Article 8 nor of Article 9 of the SFDR. As a consequence, the investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

MADE IN ITALY FUND

1. In relation to the investment activity of the Fund, the General Partner enacts an internal policy for the promotion of a sustainable approach for investments (so called environmental, social and governance) as further described in this section 6.7 (the "**ESG Policy**").
2. The Fund, pursuant to the ESG Policy, is not invested in the sectors listed under previous section 6.1 paragraph 6, which are not considered suitable for investments form an ESG standpoint.
3. According to the ESG Policy, where deemed appropriate the General Partner may perform a specific ESG due diligence on potential target companies, aimed at assessing whether and to which extent said potential target companies can be considered ESG compliant, also highlighting potential improvements that may be made from an ESG perspective by such companies through the investment of the Fund.
4. The General Partner takes into account the results of the ESG due diligence (if any) in the context of the performance of each investment transaction retaining full discretion in the decision to carry out investment transactions within the limits set out in this Issuing Document.
5. According to the ESG Policy the General Partner carries out an annual ESG assessment on each Portfolio Company, eventually with the support of an external advisor with specific expertise in verifying the ESG compliance (the "**ESG Advisor**"), for the purpose of assessing its current level of ESG compliance and the improvements (or any lack thereof) (the "**ESG Annual Report**").
6. The ESG Annual Report is presented – upon their respective request – to the Advisory Board and to the Investors by the General Partner with the support of the ESG Advisor. In case the Advisory Board requests so, a specific Advisory Board meeting shall be called every year for the purpose of presenting the ESG Annual Report within 30 (thirty) days from the delivery date of said report under section 18.1, paragraph 5 below. During the Advisory Board meeting the members of the Advisory Board may address to the General Partner and the ESG Advisor any relevant question on the ESG Annual Report.

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INDUSTRY 4.0 FUND

1. In relation to the investment activity of the Fund, the General Partner enacts an internal policy for the promotion of a sustainable approach for investments (so called environmental, social and governance) as further described in this Section 6.7 (the "**ESG Policy**"). The General Partner has categorised this Fund as a financial product that promotes environmental or social characteristics (Article 8 of SFDR) for the purposes of the SFDR. Information referred in the SFDR, including the information related to the environmental or social characteristics of the Fund, shall be disclosed to investors along with this Issuing Document.
2. Sustainability risks, as in compliance with the ESG Policy, can arise from environmental and social impacts on a potential asset, as well as from the corporate governance of the lessee or seller of an asset. Examples include reputational damage and/or punitive measures, physical risks, and transition risks caused, for instance, by climate change. Sustainability risks may have an amplifying effect on the risks described under the previous Section 6.6(2). To the extent that sustainability risks materialize, they may have a significant impact - up to and including a total loss - on the value and/or return of the assets concerned and, accordingly, on the Fund.
3. The investments underlying this Fund do not take into account the European Union criteria for environmentally sustainable economic activities.
4. The Fund, pursuant to the ESG Policy, is not invested in the sectors listed under previous Section 6.1 (7), which are not considered suitable for investments from an ESG standpoint.
5. According to the ESG Policy, where deemed appropriate the General Partner may:
   (a) perform a specific ESG due diligence on potential target companies, aimed at assessing whether and to which extent said potential target companies can be considered ESG compliant, also highlighting potential improvements that may be made from an ESG perspective by such companies through the investment of the Fund. The objective of the consideration of sustainability risks by the General Partner is to avoid corresponding capital investments as early in the acquisition process or to identify as early as possible the occurrence of these risks and to take appropriate measures to minimize the impact on the affected assets or the impact on the overall portfolio of the Fund; and
   (b) use key risk indicators to measure sustainability risks. Key risk indicators may be of a quantitative or qualitative nature that are based on ESG aspects and serve to measure the risk of the aspects under consideration.
6. The General Partner takes into account the results of the ESG due diligence (if any) in the context of the performance of each investment transaction retaining full discretion in the

decision to carry out investment transactions within the limits set out in this Issuing Document.

7. According to the ESG Policy and the ESG information and data collected during the monitoring of Portfolio Companies the General Partner carries out an annual ESG assessment on each Portfolio Company, eventually with the support of an external advisor with specific expertise in verifying the ESG compliance (the "**ESG Advisor**"), for the purpose of assessing its current level of ESG compliance and the improvements (or any lack thereof) (the "**ESG Annual Report**")

The ESG Annual Report is made available to the Investors at the registered office of the Fund and it is presented – upon request – to the Advisory Board by the General Partner with the support of the ESG Advisor (if any). In case the Advisory Board requests so, a specific Advisory Board meeting shall be called every year for the purpose of presenting the ESG Annual Report. During the Advisory Board meeting the members of the Advisory Board may address to the General Partner and the ESG Advisor any relevant question on the ESG Annual Report.

ENPAPI LIQUIDITY FUND

The sustainability risks and Principal Adverse Impacts are 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

1. In relation to the investment activity of the Fund, the General Partner enacts an internal policy for the promotion of a sustainable approach for investments (so called environmental, social and governance) as further described in this Section 6.7 (the "**ESG Policy**"). The General Partner has categorised this Fund as a financial product that promotes environmental or social characteristics (Article 8 of SFDR) for the purposes of the SFDR. Information referred in the SFDR, including the information related to the environmental or social characteristics of the Fund, shall be disclosed to investors along with this Issuing Document.

2. Sustainability risks, as in compliance with the ESG Policy, can arise from environmental and social impacts on a potential asset, as well as from the corporate governance of the lessee or seller of an asset. Examples include reputational damage and/or punitive measures, physical risks, and transition risks caused, for instance, by climate change. Sustainability risks may have an amplifying effect on the risks described under the previous Section 6.6(2). To the extent that sustainability risks materialize, they may have a significant impact - up to and including a total loss - on the value and/or return of the assets concerned and, accordingly, on the Fund.

3. The investments underlying this Fund do not take into account the European Union criteria for environmentally sustainable economic activities.

4. The Fund, pursuant to the ESG Policy, is not invested in the sectors listed under previous Section 6.1 (7), which are not considered suitable for investments from an ESG standpoint.

5. According to the ESG Policy, where deemed appropriate the General Partner may

(a) perform a specific ESG due diligence on potential target companies, aimed at assessing whether and to which extent said potential target companies can be considered ESG compliant, also highlighting potential improvements that may be made from an ESG perspective by such companies through the investment of the Fund. The objective of the consideration of sustainability risks by the General Partner is to avoid corresponding capital investments as early in the acquisition process or to identify as early as possible the occurrence of these risks and to take appropriate measures to minimize the impact on the affected assets or the impact on the overall portfolio of the Fund; and

(b) use key risk indicators to measure sustainability risks. Key risk indicators may be of a quantitative or qualitative nature that are based on ESG aspects and serve to measure the risk of the aspects under consideration

6. The General Partner takes into account the results of the ESG due diligence (if any) in the context of the performance of each investment transaction retaining full discretion in the decision to carry out investment transactions within the limits set out in this Issuing Document.

7. According to the ESG Policy and the ESG information and data collected during the monitoring of Portfolio Companies the General Partner carries out an ESG assessment on each Portfolio Company, eventually with the support of an external advisor with specific expertise in verifying the ESG compliance (the "ESG Advisor"), for the purpose of assessing its current level of ESG compliance and the improvements (or any lack thereof) (the "ESG Annual Report").

8. The ESG Annual Report is made available to the Investors at the registered office of the Fund and it is presented – upon request – to the Advisory Board by the General Partner with the support of the ESG Advisor (if any). In case the Advisory Board requests so, a specific Advisory Board meeting shall be called every year for the purpose of presenting the ESG Annual Report. During the Advisory Board meeting the members of the Advisory Board may address to the General Partner and the ESG Advisor any relevant question on the ESG Annual Report.

MAGNETICA S.A. SICAV-RAIF	
China Century Fund (in liquidation)	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 EU MASTER FEEDER FUND	The Sub-Fund 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 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.; o As a consequence, the Sub-Fund is neither in scope of Article 8 nor of Article 9 of the SFDR

IMMOBEL REAL ESTATE FUND SCSP, SICAV-RAIF

This disclosure being applicable for each compartment of the Fund :
Pursuant to EU Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector (the “SFDR”), the Partnership is required to disclose the manner in which Sustainability Risks (i.e. environmental, social or governance events or conditions that, if they occur, could cause an actual or a potential material negative impact on the value of the investments made by the Partnership (each a “Sustainability Risk”)) are integrated into the investment decision and the results of the assessment of the likely impacts of Sustainability Risks on the returns of the Partnership.

The Partnership does not actively promote Sustainability Factors (i.e. environmental, social and employee matters, respect for human rights, anti ‐ corruption and anti ‐ bribery matters ("Sustainability Factors")) and does not maximize portfolio alignment with Sustainability Factors, however it remains exposed to Sustainability Risks. Such Sustainability Risks are integrated into the investment decision making and risk monitoring to the extent that they represent a potential or actual material risks and/or opportunities to maximizing the long-term risk-adjusted returns.

The impacts following the occurrence of a Sustainability Risk may be numerous and vary depending on the specific risk, region and asset class. In general, where a Sustainability Risk occurs in respect of an asset, there will be a negative impact on, or entire loss of, its value.
Such assessment of the likely impact must therefore be conducted at portfolio level. Accordingly, further detail and specific information is given for each relevant Sub-Fund, if appropriate.

The AIFM does not consider the adverse impacts of its investment decisions on Sustainability Factors because there is no sufficient and satisfactory data available to allow the AIFM to adequately assess the potential adverse impact of its investment decisions on Sustainability Factors. The AIFM might consider it as the situation evolves.
Notwithstanding the above, the Partnership does not follow a dedicated ESG investment strategy and sustainability is neither the objective, nor a mandatory part of the investment process of the Partnership and the Sub-Fund. In particular, the underlying investments of the Sub-Fund do not take into account the EU criteria for environmentally sustainable economic activities which are determined by the 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, as amended from time to time.

PALLADIUM FUND MANAGEMENT S.C.A. SICAV-SIF	
Palladium Fund I	Palladium USA incorporates ESG strategies, employs energy efficiency measures, and green building resilience standards throughout the lifecycle of the projects. The Sub-Fund does not however promote social or environmental characteristics and does not have sustainable investment as its objective within the meaning of article 8 and article 9 of SFDR. The investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

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.

LAGUNA INVESTMENT RAIF	
LAGUNA GLOBAL FUND	The Compartment does not follow a dedicated environmental, social and governance ("ESG") investment strategy and sustainability is neither the objective, nor a mandatory part of the investment process of the Compartment. In particular, the underlying investments of the Compartment do not take into account the EU criteria for environmentally sustainable economic activities. The AIFM does not consider directly at its level the principal adverse impacts of its investment decisions on sustainability factors according to article 6 of SFDR. The Compartment does not consider adverse impacts of investment decisions on sustainability factors within the meaning of article 4 SFDR, given that the Compartment does not follow a dedicated ESG investment strategy and sustainability factors are not a part of the Compartment's investment process.
LAGUNA ALTERNATIVE FUND	The Compartment does not follow a dedicated environmental, social and governance ("ESG") investment strategy and sustainability is neither the objective, nor a mandatory part of the investment process of the Compartment. In particular, the underlying investments of the Compartment do not take into account the EU criteria for environmentally sustainable economic activities. The AIFM does not consider directly at its level the principal adverse impacts of its investment decisions on sustainability factors according to article 6 of SFDR. The Compartment does not consider adverse impacts of investment decisions on sustainability factors within the meaning of article 4 SFDR, given that the Compartment does not follow a dedicated ESG investment strategy and sustainability factors are not a part of the Compartment's investment process.

LIFESTYLE FUND II
The 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.

RINASCIMENTO FUND S.C.A. SICAV-RAIF	
ETHICAL FUND	Pursuant to the SFDR, the Fund is required to disclose the manner in which sustainability risks are integrated into the investment decision and the results of the assessment of the likely impacts of sustainability risks on the returns of the Fund. The Fund recognises the importance of sustainability factors, but the specific framework for how sustainability factors are managed within a portfolio will be specified in each Sub-fund's Appendix. If not disclosed otherwise in the relevant Appendix, the Fund does not actively promote sustainability factors and does not maximize portfolio alignment with sustainability factors. The Fund is also exposed to sustainability risks. Such sustainability risks are integrated into the investment decision making and risk monitoring to the extent that they represent a potential or actual material risks and/or opportunities to maximizing the long-term risk-adjusted returns. The impacts following the occurrence of a sustainability risk may be numerous and vary depending on the specific risk, region and asset class. In general, where a sustainability risk occurs in respect of an asset, there will be a negative impact on, or entire loss of, its value.

	Unless specified otherwise in an Appendix, each Sub-fund has a highly diversified portfolio. Therefore, the AIFM believes that the Sub-funds will be exposed to a broad range of sustainability risks, which will differ from investment to investment. Some markets and sectors will have greater exposure to sustainability risks than others. For instance, some sectors or individual companies may be subject to greater regulatory or public pressure than other sectors and, thus, greater risk. However, it is not anticipated that any single sustainability risk will drive a material negative financial impact on the value of the Sub-funds. Notwithstanding the above, the investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities which are determined by the 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, as amended from time to time.

VORIANA SPECIAL SITUATIONS FUND III SCSP

The European Commission adopted its Action plan on Financing Sustainable Growth in May 2018, targeting all financial market participants, and cutting across every aspect of financial services and beyond. It aims to introduce measures to clarify asset managers' duties in integrating environmental, social and governance ("ESG") factors and risks into investment, as well as to clarify and standardise transparency duties and ESG reporting requirements. There are currently a series of initiatives at an EU level that are at varying stages of progress to implement of the EU's Action plan on Financing Sustainable Growth. Regulation (EU) 2019/2088 on Sustainability-related disclosures in the financial services sector (the "Disclosure Regulation") was published on 9 December 2019 and entered into force on 29 December 2019, and has been further amended by Regulation (EU) 2020/852 on the Establishment of a Framework to Facilitate Sustainable Investment (the "Taxonomy Regulation"). The Disclosure Regulation will have a staggered application. Although the Disclosure Regulation has direct effect on the AIFM and the Fund and the majority of its provisions have applied since March 10, 2021, the practical implementation of the Disclosure Regulation is contingent on the Regulatory Technical Standards ("RTS") put in place by the Joint Committee of the ESAs (which includes the European Securities and Markets Authority). These RTS have now been finalized but their application has been delayed until July 1, 2022. The European Commission's Action plan on Financing Sustainable Growth also includes a number of delegated regulations amending MiFID II Delegation Regulation 2017/565 ("Level 2 MiFID II") and Commission Delegated Regulation (EU) 231/2013 ("Level 2 AIFMD") to integrate ESG considerations into investment advice and portfolio management and to incorporate sustainability risks. Compliance with the Disclosure Regulation, the RTS, the Taxonomy Regulation and other ESG related rules is expected to result in increased legal, compliance, reporting and other associated costs and expenses which will be borne by the Fund.

VORIANA FEEDER SCSP

The manner and extent to which the AIFM integrates "sustainability risks" within the meaning of the EU Sustainable Finance Disclosure Regulation ("SFDR") into the Fund's investment decision making policy is set out below.

In the AIFM's view, sustainability risks may adversely affect the value of investments held by the Fund and/or the ability of the Fund to dispose of investments at attractive valuations, but it is not possible to meaningfully forecast the likely impact of sustainability risks on the returns of the Fund at this time.

As part of the Fund's investment processes the AIFM may consider sustainability and seek to manage sustainability risks to avoid any material impact on the returns of the Fund, but given the lack of certainty as to future sustainability developments it is impossible to say with any certainty that this will be successful.

The AIFM will not be considering principal adverse impacts on sustainability factors at this time. Although the AIFM may consider sustainability as part of its investment processes, the uncertainties surrounding the content and implementation date of the regulatory technical standards relating to the SFDR make it impossible to determine what would be an appropriate level of assessment to carry out at this time, and the AIFM believes that the most appropriate course of action is to wait for the regulatory technical standards before undertaking this exercise in order to ensure that the assessment undertaken is appropriate.

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

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PRADERA REAL ESTATE INVESTMENT SICAF S.P.A.

The sustainability risks and Principal Adverse Impacts are 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 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.

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 TMF Fund Management 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:

- **Environmental dimension**

  - **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).

- <u>**Social dimension**</u>

  - **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 TMF Fund Management 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.

TMF Fund Management 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

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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.

Global reach
Local knowledge

EUROPEAN STUDENT ACCOMMODATION CORE FUND SCA SICAV-RAIF

Sustainable Finance Disclosure Regulation
The European Commission has introduced a series of legal measures (the primary one being the Sustainable Finance Disclosure Regulation (Regulation (EU) 2019/2088), “SFDR”) requiring firms that manage investment funds to provide transparency regarding how financial market participants integrate sustainability risks into the investment process.

The following is designed to address the AIFM’s disclosure obligations in respect of the Fund:

Integration of Sustainability Risks
The AIFM and the Investment Adviser believe that material environmental, social and governance (“ESG”) factors are an important driver of long-term investment returns from both an opportunity and a risk-mitigation perspective. As such, the AIFM and the Investor Adviser consider sustainability risks and opportunities in their assessment of each investment of the Fund. The AIFM and the Investment Adviser consider such analysis as crucial given that the Fund promotes ESG and is classified as Article 8 under the SFDR.

In respect of the Fund, the responsible investment policy (the "Responsible Investment Policy") intends to provide a broad framework for the approach to ESG integration. The Responsible Investment Policy is a guideline for formalizing and focusing responsible investment efforts, while recognising the importance of the built environment in matters of environmental sustainability and that ESG issues have a meaningful impact on delivering investment results for investors. In managing the Fund and in providing non-discretionary investment advice with respect to the Fund, each of the AIFM and the Investment Adviser respectively have regard to the terms of the Responsible Investment Policy when determining what investments the Fund should make. In doing so, the AIFM and the Investment Adviser will integrate ESG factors (including but not limited to the consideration of sustainability risks) into the investment decision-making process and its investment advice, respectively.

The investment selection process for each proposed real estate asset acquisition follows a structured process through selection, review and approval:

1. Pre-due diligence on each real estate asset, during which ESG factors, including sustainability risks, are assessed; and
2. Post-due diligence on each real estate asset, during which the results of the initial ESG screening as well as any post-acquisition measures are considered.

Further details on the AIFM’s and the Investment Adviser’s approach to ESG integration and sustainability-related stewardship can be found at www.esacf.com/esg.

Assessment of the likely impacts of sustainability risks on the returns of the Fund

Factoring an assessment of the likely impact of sustainability risks into the investment decision-making process (and the investment advice) has the potential to impact the returns of the Fund. For example, it is possible that such an assessment may influence a decision by the AIFM not to make an investment or dispose of an existing investment that would otherwise be considered as attractive to invest in or retain when confining the factors considered to financial-related elements such as financial position, revenue, capital structure, etc. Accordingly, the Fund, which is classified as Article 8 under SFDR, may underperform or perform differently relative to other comparable funds that do not promote environmental and/or social characteristics.

Ultimately, it is difficult to predict with any accuracy the precise impact of sustainability risks on the returns of the Fund. The impact would depend on the nature, scope and severity of such risks.

Environmental or social characteristics promoted by the Fund

The Investment Adviser has established a Responsible Investment Policy for the Fund which sets long-term ESG objectives and defines clear short and medium-term milestones for achieving these long-term ESG objectives.

To meet these objectives, a strategy that has five main components has been formulated:

1. **Strategic Risk Framework**: Our investment process and a distinctive value creation approach is constructed and implemented in order to future-proof asset classes, being conscious on the one hand on the fiduciary duty towards investors and on the other hand considering our ESG limits. With this in mind the AIFM in conjunction with the Investment Adviser always strives to ensure an effective response to risk factors through critical exclusions and active ESG risk screening and management. This includes ensuring that mitigation measures, such as improving the carbon performance of the asset (Environmental) or improving students' wellbeing (Social) are underwritten and embedded in the asset business plans. On the other hand, the AIFM in conjunction with the Investment Adviser actively pursues all opportunities to enhance value through green practices, to set and achieve ambitious targets with respect to climate change, e.g. improving carbon performance, obtaining EPC certifications, etc. (Environment) and effect positive social impact and support the well-being of users of the Fund's real estate assets in alignment with the WELL Health-Safety Rating for Facility Operations and Management (Social), while delivering competitive risk-adjusted financial returns. While good governance for real estate assets cannot be assessed at the real estate level itself, the lessor of the real estate assets and other external counterparties and/or service providers engaged in the acquisition, holding and disposal of the real estate assets will be subject to proper initial and ongoing due diligence reviews.

2. **Investment Plan**: The purpose of the investment plan is to set out the key objectives for the portfolio in the forthcoming year, based on the current portfolio composition and past performance, as well as revised forecasts for each asset in the portfolio based on the latest market forecasts and recommendations.

3. **Investment Selection**: Investment selection follows a structured process through selection, review, and approval and involves the investment committee of the Investment Adviser and the investment committee of the AIFM, together the "**Investment Committees**". The AIFM's investment committee has the objective of delivering the Fund's target return within a pre-defined strategic risk framework and considering the environmental and social characteristics that it promotes. The Investment Adviser's investment committee may include a representative from the General Partner's and the AIFM's ESG teams, providing insight and oversight on relevant topics. Approval for any proposed acquisition is divided into two distinct stages: (1) pre-due diligence, when initial ESG screening is undertaken, and (2) post-due diligence (final approval), when due diligence results and any post-acquisition measures/underwriting are considered. The Investment Committees consider the findings of the pre- and post-due diligence, screening and analysis during the investment selection process. The Investment Committees seek to apply an asset-class specific set of criteria when evaluating assets and key counterparties. This information is presented in each deck prepared by the Investment Committees and as otherwise deemed appropriate.

4. **Asset Management**: Following acquisition, each asset is on-boarded onto an appropriate ESG data monitoring system ("**DMS**"), including the data collected during the DMS profile which is the responsibility of the lessor(s). The Investment Adviser works in collaboration with external specialist advisors, property managers, tenants, third-party data providers and other parties. An ESG action plan is developed for each individual investment, as appropriate for the asset type taking into account the environmental and social characteristics promoted by the Fund. The action plan is based on an assessment of the asset's sustainability performance. The actions and targets are embedded in the asset business plan and executed.

5. **Reporting**: Yearly reporting is shared with investors where the identified environmental and social characteristics promoted by the Fund are considered in the portfolio performance: (1) backward looking performance against the Fund's ESG strategy and timeline applicable for the investment strategy including all metrics and KPIs; (2) ESG risk profile; and (3) annual ESG action plan and implementation status.

Detailed information on the Responsible Investment Policy can be found on: www.esacf.com/esg

Please refer to the Fund's SFDR Annex attached to this Memorandum which contains additional SFDR disclosures for the Fund.

The SFDR Annex has been prepared for the purpose of meeting the specific financial product level disclosure requirements contained in the SFDR applicable to an Article 8 financial product, and follows the form of the template in Annex II of the Commission Delegated Regulation (EU) 2022/1288. Unless defined in the SFDR Annex, all defined terms used in the SFDR Annex shall have the same meaning as in the Memorandum.

It is noted that some matters of interpretation of SFDR remain open (subject to ongoing exchanges between the European Supervisory Authorities and the European Commission). It is likely that the SFDR Annex will need to be reviewed and updated once further clarification is provided on the open matters of interpretation of SFDR. Such clarifications could require a revised approach to how the Fund seeks to meet the SFDR disclosure obligations.

Disclosures in the SFDR Annex may also develop and be subject to change due to ongoing improvements in the data provided to, and obtained by, financial market participants and financial advisers to achieve the objectives of SFDR in order to make sustainability-related information available to investors.

Compliance with the SFDR pre-contractual disclosure obligations is therefore made on a best efforts basis and the Fund issues the SFDR Annex as a means of meeting these obligations.

IMPORTANT: Investors should note that as a financial product which promotes environmental or social characteristics, the Fund may underperform or perform differently relative to other comparable funds that do not promote environmental or social characteristics.

Taxonomy Regulation disclosure

The Fund promotes environmental and/or social characteristics, but it does not have a sustainable investment objective and will not make any sustainable investments. In addition, the AIFM does not integrate a consideration of environmentally sustainable economic activities into the investment process for the Fund. Therefore, for the purpose of the Taxonomy Regulation, it should be noted that the investments underlying the Fund do not take into account the EU criteria for environmentally sustainable economic activities.

Where the Fund is classified as Article 8 under the SFDR, i.e., a financial product which seeks to promote ESG, such fund bears the risk that because investments are selected and managed taking into account both financial and non-financial considerations, the fund may underperform the broader market or other funds that do not utilize ESG criteria when selecting and managing assets. ESG investing is to an extent subjective and there is not guarantee that all investments made by the Fund will reflect the beliefs or values of any particular investor.

Exclusion or disposal of assets which do not meet the Fund's ESG criteria may cause the Fund to perform differently compared to similar funds that do not have an ESG focus.

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The AIFM, in consultation with the Adviser, has categorized the Partnership as a financial product which promotes environmental characteristics, within the meaning of Article 8 of the EU Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector (the "**SFDR**"), but does not have sustainable investment as its objective. The Partnership's pre-contractual disclosures, as financial product which promotes environmental characteristics, have been produced in line with applicable laws and regulations and are available at **Error! Reference source not found.** of this Offering Document.

Pursuant to Article 6 of the SFDR, the Partnership is required to disclose (a) the manner in which Sustainability Risks (as defined hereafter) are integrated into the investment decision and (b) the results of the assessment of the likely impacts of the Sustainability Risks on the returns of the Partnership.

"**Sustainability Risks**" is defined as 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 Investments made by the Partnership. Such risks are principally linked to climate-related events resulting from climate change (i.e. a physical risks) or to the society's response to climate change (i.e. transition risks), which may result in unanticipated losses that could affect the Partnership's Investments and financial condition. Social events (e.g. inequality, inclusiveness, labour relations, investment in human capital, accident prevention, changing customer behaviour, etc.) or governance shortcomings (e.g. recurrent significant breach of international agreements, bribery issues, products quality and safety, selling practices, etc.) may also translate into Sustainability Risks.

(a) Integration of Sustainability Risks (Article 6(1)(a) of the SFDR)

An assessment of the likely impacts of Sustainability Risks on the returns of the Partnership has been carried out, and the findings show that the impacts following the occurrence of a Sustainability Risk event may be numerous and vary in significance depending on industries, regions and asset classes. The Sustainability Risks that are particularly relevant to the Partnership include:

- The exposure to potential physical risks resulting from climate change (for example, the tail risk of significant damage due to increasing erratic and potentially catastrophic weather phenomena such as droughts, flooding and heavy precipitations, heat/cold waves, landslides or storms). As the frequency of extreme weather events increases, the Partnership's assets exposure to these events will also increase.

- The exposure to environmental risks emerging from the need to mitigate climate change. The Partnership may face public pressure calling for improvement in energy and water management, among other, in order to reduce emissions. Efforts to cope with this pressure and to meet strengthening regulatory requirements may impose higher financial input, which could impede the total performance of the Partnership. Failure for the Partnership to cope with this pressure may lead to reputational damage, which could also impede the Partnership's returns.

Such Sustainability Risks are integrated, directly or indirectly, into the investment decision-making and risk-monitoring of the Partnership to the extent they represent a potential or actual material risk and/or an opportunity to maximize the long-term risk-adjusted returns of the Partnership. Before any investment decisions are made with respect to the Partnership, the proposed asset will be subject to in-depth due diligence processes designed to identify the material risks, including Sustainability Risks, associated with such potential investment. The result of these due diligences will be taken into consideration alongside other relevant factors when making investment decisions in relation to the Partnership.

Sustainability factors include environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

(b) Assessment of Sustainability Risks' likely impact on return (Article 6(1)(b) of the SFDR)

The identification and assessment of the Sustainability Risks will take place on an investment-by-investment basis. As a result of such risk management process it is not anticipated that the Sustainability Risks will have a material negative impact on the returns of the Partnership, although there could be no guarantee that the process will identify and mitigate all material risks.

(c) Transparency of adverse sustainability impacts of investment decisions on sustainability factors (Article 7 (2) of the SFDR)

The AIFM, together with the Adviser, does not specifically consider the adverse impacts of the investment decisions on sustainability factors at the level of the Partnership, as it believes that there is not sufficient data available in satisfactory quality in order to allow the AIFM and the Adviser to adequately assess such potential impact on sustainability factors.

The position will be kept under review as the underlying rules are finalized and are embedded in the short to medium term.

NECRON HOSPITALITY FUND 1 SCSP

The AIFM, in consultation with the Adviser, has categorized the Partnership as a financial product which promotes environmental characteristics, within the meaning of Article 8 of the EU Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector (the "**SFDR**"), but does not have sustainable investment as its objective. The Partnership's pre-contractual disclosures, as financial product which promotes environmental characteristics, have been produced in line with applicable laws and regulations and are available at **Error! Reference source not found.** of this Offering Document.

Pursuant to Article 6 of the SFDR, the Partnership is required to disclose (a) the manner in which Sustainability Risks (as defined hereafter) are integrated into the investment decision and (b) the results of the assessment of the likely impacts of the Sustainability Risks on the returns of the Partnership.

"**Sustainability Risks**" is defined as 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 Investments made by the Partnership. Such risks are principally linked to climate-related events resulting from climate change (i.e. a physical risks) or to the society's response to climate change (i.e. transition risks), which may result in unanticipated losses that could affect the Partnership's Investments and financial condition. Social events (e.g. inequality, inclusiveness, labour relations, investment in human capital, accident prevention, changing customer behaviour, etc.) or governance shortcomings (e.g. recurrent significant breach of international agreements, bribery issues, products quality and safety, selling practices, etc.) may also translate into Sustainability Risks.

(d) Integration of Sustainability Risks (Article 6(1)(a) of the SFDR)

An assessment of the likely impacts of Sustainability Risks on the returns of the Partnership has been carried out, and the findings show that the impacts following the occurrence of a Sustainability Risk event may be numerous and vary in significance depending on industries, regions and asset classes. The Sustainability Risks that are particularly relevant to the Partnership include:

- The exposure to potential physical risks resulting from climate change (for example, the tail risk of significant damage due to increasing erratic and potentially catastrophic weather phenomena such as droughts, flooding and heavy precipitations, heat/cold waves, landslides or storms). As the frequency of extreme weather events increases, the Partnership's assets exposure to these events will also increase.

- The exposure to environmental risks emerging from the need to mitigate climate change. The Partnership may face public pressure calling for improvement in energy and water management, among other, in order to reduce emissions. Efforts to cope with this pressure and to meet strengthening regulatory requirements may impose higher financial input, which could impede the total performance of the Partnership. Failure for the Partnership to cope with this pressure may lead to reputational damage, which could also impede the Partnership's returns.

Such Sustainability Risks are integrated, directly or indirectly, into the investment decision-making and risk-monitoring of the Partnership to the extent they represent a potential or actual material risk and/or an opportunity to maximize the long-term risk-adjusted returns of the Partnership. Before any investment decisions are made with respect to the Partnership, the proposed asset will be subject to in-depth due diligence processes designed to identify the material risks, including Sustainability Risks, associated with such potential investment. The result of these due diligences will be taken into consideration alongside other relevant factors when making investment decisions in relation to the Partnership.

Sustainability factors include environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

(e) Assessment of Sustainability Risks' likely impact on return (Article 6(1)(b) of the SFDR)

The identification and assessment of the Sustainability Risks will take place on an investment-by-investment basis. As a result of such risk management process it is not anticipated that the Sustainability Risks will have a material negative impact on the returns of the Partnership, although there could be no guarantee that the process will identify and mitigate all material risks.

(f) Transparency of adverse sustainability impacts of investment decisions on sustainability factors (Article 7 (2) of the SFDR)

The AIFM, together with the Adviser, does not specifically consider the adverse impacts of the investment decisions on sustainability factors at the level of the Partnership, as it believes that there is not sufficient data available in satisfactory quality in order to allow the AIFM and the Adviser to adequately assess such potential impact on sustainability factors.

The position will be kept under review as the underlying rules are finalized and are embedded in the short to medium term.

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The AIFM, in consultation with the Adviser, has categorized the Partnership as a financial product which promotes environmental characteristics, within the meaning of Article 8 of the EU Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector (the "**SFDR**"), but does not have sustainable investment as its objective. The Partnership's pre-contractual disclosures, as financial product which promotes environmental characteristics, have been produced in line with applicable laws and regulations and are available at **Error! Reference source not found.** of this Offering Document.

Pursuant to Article 6 of the SFDR, the Partnership is required to disclose (a) the manner in which Sustainability Risks (as defined hereafter) are integrated into the investment decision and (b) the results of the assessment of the likely impacts of the Sustainability Risks on the returns of the Partnership.

"**Sustainability Risks**" is defined as 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 Investments made by the Partnership. Such risks are principally linked to climate-related events resulting from climate change (i.e. a physical risks) or to the society's response to climate change (i.e. transition risks), which may result in unanticipated losses that could affect the Partnership's Investments and financial condition. Social events (e.g. inequality, inclusiveness, labour relations, investment in human capital, accident prevention, changing customer behaviour, etc.) or governance shortcomings (e.g. recurrent significant breach of international agreements, bribery issues, products quality and safety, selling practices, etc.) may also translate into Sustainability Risks.

(g) Integration of Sustainability Risks (Article 6(1)(a) of the SFDR)

An assessment of the likely impacts of Sustainability Risks on the returns of the Partnership has been carried out, and the findings show that the impacts following the occurrence of a Sustainability Risk event may be numerous and vary in significance depending on industries, regions and asset classes. The Sustainability Risks that are particularly relevant to the Partnership include:

- The exposure to potential physical risks resulting from climate change (for example, the tail risk of significant damage due to increasing erratic and potentially catastrophic weather phenomena such as droughts, flooding and heavy precipitations, heat/cold waves, landslides or storms). As the frequency of extreme weather events increases, the Partnership's assets exposure to these events will also increase.

- The exposure to environmental risks emerging from the need to mitigate climate change. The Partnership may face public pressure calling for improvement in energy and water management, among other, in order to reduce emissions. Efforts to cope with this pressure and to meet strengthening regulatory requirements may impose higher financial input, which could impede the total performance of the Partnership. Failure for the Partnership to cope with this pressure may lead to reputational damage, which could also impede the Partnership's returns.

Such Sustainability Risks are integrated, directly or indirectly, into the investment decision-making and risk-monitoring of the Partnership to the extent they represent a potential or actual material risk and/or an opportunity to maximize the long-term risk-adjusted returns of the Partnership. Before any investment decisions are made with respect to the Partnership, the proposed asset will be subject to in-depth due diligence processes designed to identify the material risks, including Sustainability Risks, associated with such potential investment. The result of these due diligences will be taken into consideration alongside other relevant factors when making investment decisions in relation to the Partnership.

Sustainability factors include environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

(h) Assessment of Sustainability Risks' likely impact on return (Article 6(1)(b) of the SFDR)

The identification and assessment of the Sustainability Risks will take place on an investment-by-investment basis. As a result of such risk management process it is not anticipated that the Sustainability Risks will have a material negative impact on the returns of the Partnership, although there could be no guarantee that the process will identify and mitigate all material risks.

(i) Transparency of adverse sustainability impacts of investment decisions on sustainability factors (Article 7 (2) of the SFDR)

The AIFM, together with the Adviser, does not specifically consider the adverse impacts of the investment decisions on sustainability factors at the level of the Partnership, as it believes that there is not sufficient data available in satisfactory quality in order to allow the AIFM and the Adviser to adequately assess such potential impact on sustainability factors.

The position will be kept under review as the underlying rules are finalized and are embedded in the short to medium term.