

Extract out of the Offering Memorandum March 2026

### **Sustainability risk**

Pursuant to Article 2 of the EU Regulation 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability reporting in the financial services sector ("SFDR"), sustainability risk is defined as an environmental, social or governance event or condition that, if it occurs, could cause an actual or potential material adverse impact on the value of an investment. The impact of environmental, social and governance factors on the value of an investment may vary not only according to its assets (e.g. type of business, sector, size, geographical location and stage of life cycle and liabilities), but also according to the company's governance and strategy for managing them.

Sustainability risks are integrated into the Fund's risk management process as well as investment decisions for those Sub-Funds for which this is provided for in the relevant Appendices. Risk assessments and, where appropriate, investment decisions are based on internal and external research and assessments of sustainability factors and sustainability risks.

At the present the Fund does not consider "principal adverse impacts" of investment decisions on sustainability factors (as described at the article 4 and 7.2 of the SFDR). The decision not to consider principal adverse impacts of investment decisions on sustainability factors is motivated by a lack of relevant data of a satisfactory quality.

*With specific reference to each single sub-fund:*

NEVERMIND (NVM) SICAV RAIF - NEVERMIND VENTURE I (ex Art. 8 SFDR)

NEVERMIND (NVM) SICAV RAIF - NEVERMIND VENTURE LAZIO (ex Art. 8 SFDR)

The Sub-Fund operates in accordance with Article 8 of the Sustainable Finance Disclosure Regulation (Regulation (EU) 2019/2088 – "SFDR"), which provides for the promotion of environmental, social and governance (ESG) factors. In line with this principle, the Sub-Fund

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integrates ESG considerations into its investment process, focusing on the generation of sustainable long-term returns.

In the context of promoting environmental and social characteristics, the Sub-Fund seeks to invest in companies that make a significant contribution to selected Sustainable Development Goals (SDGs), including, by way of example and without limitation: Good Health & Well-being, Clean Water and Sanitation, Affordable and Clean Energy, Decent Work & Economic Growth, Industry, Innovation & Infrastructure, Sustainable Cities and Communities, and Climate Action.

The ESG assessment process forms an integral part of the Sub-Fund's due diligence, ensuring that each investment is not only financially sound but also aligned with ESG principles. This assessment includes both qualitative and quantitative factors. The Sub-Fund engages with Portfolio Companies to foster the continuous improvement of their ESG performance and, where appropriate, will provide guidance on the implementation of more robust sustainability measures across their operations.