

Product disclosure for financial products that promote environmental or social characteristics as per Section I of the COMMISSION DELEGATED REGULATION (EU) 2022/1288 of 6 April 2022

Product name: NEVERMIND (NVM) SICAV RAIF – NEVERMIND VENTURE LAZIO
Legal entity identifier: 213800N9M68E8SR6IQ44

(a) Summary

This document provides information on sustainability pursuant to Regulation (EU) 2022/1288 and it does not constitute marketing material.

The information is intended to detail the characteristics of sustainability, as well as related risks.

In particular, the following sections describe the environmental and social characteristics promoted by financial products, the investment strategy adopted to meet these characteristics and how this is continuously monitored, the engagement policies adopted by the investment manager and the data sources used to ensure promotion of the environmental and social characteristics.

The information should be considered together with the other relevant documents on the financial product.

(b) No sustainable investment objective

This financial product promotes environmental and/or social characteristics but does not have as a goal a sustainable investment.

(c) Environmental or social characteristics of the financial product

The financial product promotes environmental and social characteristics by integrating ESG considerations into its investment process, by seeking, as part of its core investment strategy, to invest in portfolio companies whose activities contribute to selected United Nations Sustainable Development Goals (SDGs), and by applying an exclusion policy designed to avoid exposure to activities considered materially inconsistent with such characteristics.

In particular, the financial product focuses on companies contributing to: SDG 3 (Good Health and Well-being), through products and services supporting healthcare, prevention, well-being and quality of life; SDG 4 (Quality Education), through improved access to education, training and skills development; SDG 7 (Affordable and Clean Energy), through the advancement of sustainable energy solutions and energy transition; SDG 8 (Decent Work and Economic Growth), through the promotion of quality

employment, productivity, entrepreneurship and inclusive economic growth; SDG 9 (Industry, Innovation and Infrastructure), through technological innovation, resilient infrastructure and sustainable industrial development; SDG 13 (Climate Action), through climate change mitigation, adaptation and the reduction of environmental and carbon impact; and SDG 16 (Peace, Justice and Strong Institutions), particularly through the development and deployment of advanced dual-use technologies with both civilian and security applications that support resilient infrastructures, energy transition, environmental monitoring, public health, and institutional and sovereign capacity.

Accordingly, the environmental characteristics promoted by the Sub-Fund include, specifically, climate action, the advancement of clean and affordable energy solutions and the energy transition, resource efficiency, circular economy and circularity (e.g., waste reduction, reuse and recycling of materials), and the development and deployment of technologies that contribute to reducing environmental impact and enabling environmental monitoring, in particular through innovative and resilient infrastructure. The social characteristics promoted by the Sub-Fund include include, specifically, health and well-being, access to education training and skills development, decent work, productivity and inclusive economic growth, as well as the promotion of strong institutions, public safety, and the rule of law.

These characteristics are promoted through the financial product's ESG due diligence and investment decision-making process, including the assessment of relevant qualitative and quantitative ESG factors, the application of exclusion criteria in respect of sectors or activities deemed incompatible with the financial product's ESG approach, and a strong emphasis on robust governance and responsible use frameworks. In addition, the Sub-Fund prioritises investments in companies that demonstrate effective end-use controls, compliance with applicable export control regimes, transparent customer selection processes, and alignment with international norms and standards.

Post-investment engagement with portfolio companies is also undertaken with a view to supporting the continuous improvement of their ESG practices and performance over time, while ensuring that their activities, including those involving dual-use technologies, appropriately balance security objectives with the promotion of peace, stability, and the rule of law, consistent with the spirit and objectives of the relevant SDGs.

No reference benchmark has been designated for the purpose of attaining the environmental and/or social characteristics promoted by the financial product.

(d) Investment strategy

The financial product follows an investment strategy that systematically integrates environmental, social, and governance (ESG) factors into its selection and management process, including: the screening and due diligence of potential investments; the ongoing monitoring of portfolio

companies; and the active engagement with investee companies to promote sustainable and responsible practice. Such practices should be embedded both in the entrepreneurial development of the portfolio companies and in the design, development, and market deployment of their technologies, products, and services, including advanced dual-use technologies with both civilian and security applications. ESG considerations are embedded alongside financial analysis, with the aim of identifying risks and opportunities, supporting long-term value creation, and ensuring alignment with the environmental and social characteristics promoted by the financial product.

The strategy is designed to promote the environmental and social characteristics through a three-pillar approach:

- Exclusion, through the application of binding elements;
- ESG integration, using a questionnaire to assess companies' alignment with selected UN SDGs;
- ESG engagement, monitoring post-investment ESG performance and engaging with portfolio companies' management to encourage continuous improvement.

(e) Proportion of investments

The minimum proportion of investments aligned with E/S characteristics envisaged for the financial product is 70%.

(f) Monitoring of environmental or social characteristics

These characteristics are monitored through the assessment of relevant qualitative and quantitative ESG factors, through the application of exclusion criteria in respect of sectors or activities deemed incompatible with the financial product ESG approach, and through post-investment engagement with portfolio companies with a view to supporting the continuous improvement of their ESG practices and performance over time.

Derivatives are not used to promote environmental and social characteristics.

(g) Methodologies

The methodology applied to promote environmental and/or social characteristics is based on the application of constraints and investment limits (binding elements).

The financial product is bound by the following additional investment restrictions:

- the average portfolio ESG Rating will be equal or greater than 60/100;
- no more than 10% of the portfolio is invested in companies with ESG rating lower than 60/100;
- investment in issuers involved in the development, production, or sale of controversial weapons (cluster bombs, anti-personnel mines, biological or chemical weapons), as defined by international treaties and conventions, is not allowed. This exclusion also extends to issuers involved in the development, production, maintenance, or distribution of nuclear weapons outside the framework of international non-proliferation agreements;
- without prejudice to the above, investment in companies operating in the broader defence or security sector may be permitted where it is aligned with the Sub-Fund's ESG strategy and contribute to innovation, resilient infrastructure, and the strengthening of institutions, in particular through the development of advanced dual-use technologies. Such investment is subject to strict safeguards, including robust governance frameworks, effective end-use controls, compliance with applicable export control regimes, and alignment with international norms and standards, ensuring that its activities support legitimate security objectives while promoting peace, stability, and the rule of law;
- investment in issuers that are in breach of internationally recognized norms and standards, including those related to human rights, labor standards, environmental protection, and anti-corruption, is not allowed;
- investment in issuers in activities such as tobacco production, thermal coal extraction or power generation, and other activities deemed to have a materially negative environmental or social impact, is not allowed.

(h) Data sources and processing

The sustainability of small-sized companies is rarely analysed by major information providers who use standard methodologies that are not suitable for micro-cap companies. The data source is represented by a database that is constantly updated on the basis of public documentation produced by the companies and by ad-hoc questionnaire submitted by the investment manager to each company.

The data is collected on databases that are regularly backed up.

(i) Limitations to methodologies and data

The main limitation of the data collection methodology is the lack of data in corporate disclosures.

It should be considered that the data communicated by the companies could be incomplete or incorrect and, at the same time, some relevant information may be missed or misinterpreted, involving a risk of incorrect evaluation of a security or an issuer, causing incorrect exclusions or inclusions of such issuers.

(j) Due diligence

In the event of missing data or anomalies in the ESG data provided by the info providers, random due diligence activities will be carried out.

(k) Engagement policies

The investment manager monitors post-investment ESG performance and engages with portfolio companies' management to encourage continuous improvement.

(l) where an index is designated as a reference benchmark to attain the environmental or social characteristics promoted by the financial product, 'Designated reference benchmark'

Not applicable