

Art. 4 Transparency of adverse sustainability impacts at entity level

The Company, in compliance with art. 4 of Regulation (UE) 2019/2088 (“SFDR”) on sustainability related disclosures in the financial services sector, has decided to adopt an “explain” approach to the obligation to consider the principal adverse impacts of its investment decisions on ESG sustainability factors. The Company communicates that although as a general rule, it does consider the principal adverse impacts of its investment decisions on sustainability factors (i.e. environmental, social and personnel issues, respect for human rights and issues around the fight against active and passive bribery), it is not currently able to provide the above disclosure. This is due to the fact that, to date, it has not been possible to identify and objectively measure the principal adverse impacts of said investment decisions on sustainability factors, since precise indicators and metrics have not yet been defined through which to verify the degree of likelihood of their occurrence as well as their intensity and possible irremediable nature. The Company maintains a proactive approach to defining the indicators and metrics with which the aforementioned adverse impacts are determined, also monitoring changes to the relevant regulatory provisions. The Company shall provide prompt updates on this aspect.