

**DISCLOSURE OF POLICIES ON
INTEGRATION OF SUSTAINABILITY RISKS IN
INVESTMENT DECISION-MAKING PROCESSES
(SFDR, Sustainable Finance Disclosure Regulation)**

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Albo delle SGR ex art. 35 TUF - Sez. Gestori FIA n.180

Registro dei Gestori Italiani EuVECA ex art. 4 TUF n.16.

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ART. 4, PARAGRAPH 1 OF REGULATION (EU) 2019/2088

“Statement on Transparency of Principal Adverse Impacts (PAI) of Investment Decisions on Sustainability Factors”

(Publication on the website - ad hoc section¹ "negative impacts on sustainability not considered")

Article 4 of the Regulation (EU) 2019/2088 (hereinafter “SFDR²”) requires fund managers to expressly disclose whether they consider “principal adverse impacts” of investment decisions on sustainability factors.

While ESG topics and sustainability risks are crucial and systematically assessed, EUREKA! Venture (hereinafter also “the Asset Manager”), with reference to the provisions of the article 4 of the SFDR, does not currently take into consideration the negative effects (hereinafter “PAIs”, or "Principal Adverse Impacts") of investment decisions on sustainability factors, defined by the SFDR as “environmental, social and employee concerns, respect for human rights, anti-corruption, and anti-bribery matters”.

This is due to the fact that EUREKA! Venture does not currently have sufficient data and information to allow an adequate evaluation of the potential PAIs of its investment decisions on sustainability factors.

However, the Asset Manager is developing a methodology aimed at evaluating the materiality of potential PAIs, in line with the contents of the final version of the Regulatory Technical Standards (RTS) published by the European Commission on 6 April 2022, effective as of 1 January 2023.

To this end, the Asset Manager, in line with its Responsible Investment Policy, identifies and analyses potential PAIs on sustainability factors in the pre-investment phase, also through the ESG Due Diligence, and has developed a proprietary tool aimed at collecting the sustainability adverse indicators required by the RTS to monitor the PAIs during the portfolio management phase.

EUREKA! Venture reserves the right to update its position regarding the consideration of PAIs, and to update, if necessary, this statement.

¹ Pursuant the Final Report on draft Regulatory Technical Standards, Capitolo II, Sezione 3, Art. 11 (JC 2021 03, 2 February 2021)

² The Regulation (EU) 2019/2088 or Sustainable Financial Disclosure Regulation “SFDR” regulates sustainability-related disclosures in the financial services sector.