Disclosure pursuant to Article 10 of Regulation (EU) 2019/2088
Transparency of the promotion of environmental or social characteristics on websites

Product name: **B4 H III - Fondo EuVECA**

Legal entity identifier: **B4 Investimenti SGR S.p.A.**

Does this financial product have a sustainable investment objective?	
☐ Yes	☒ No
☐ It will make a minimum amount of **sustainable investments with an environmental objective**: ___% ☐ in economic activities that qualify as environmentally sustainable under the EU taxonomy ☐ in economic activities that do not qualify as environmentally sustainable under the EU taxonomy ☐ It will make a minimum amount of **sustainable investments with a social objective**: ___%	☐ It promotes **Environmental/Social characteristics (E/S)** and while it does not have as its objective a sustainable investment, it will have a **minimum share** of ______% **of sustainable investments** ☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU taxonomy ☐ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU taxonomy ☐ with a social objective ☒ It promotes **E/S characteristics, but will not make any sustainable investment**

A. Preliminary remarks

B4 H III - Fondo EuVECA (hereinafter the "**Fund**") is a European venture capital fund, or an Alternative Investment Fund (AIF) under Italian law, reserved and closed-ended, which has the characteristics and operates in compliance with the requirements and limitations envisaged by Regulation (EU) no. 345 of 17 April 2013 relating to European venture capital funds, as subsequently amended and supplemented.

The Fund qualifies as a financial product that promotes environmental and/or social characteristics and makes investments in companies whose objective is to comply with good governance practices, pursuant to Article 8 of Regulation (EU) 2019/2088.

B. No sustainable investment objective

The Fund promotes environmental and/or social characteristics, but does not pursue sustainable investment objectives aligned with the EU taxonomy.

C. Environmental or social characteristics of the Fund

The Fund aims to promote ESG characteristics, as part of the Sustainable Development Goals (*SDGs*), with particular reference, *inter alia*, to:

- **SDG Goal no. 8 (DECENT WORK AND ECONOMIC GROWTH)**: focus on the sustainable growth of SMEs, through support for entrepreneurship, training and objectives of retaining (and potentially increasing) the workforce of (target) companies;
- **SDG Goal no. 9 (INDUSTRY, INNOVATION AND INFRASTRUCTURE)**: focus on the development of (target) SMEs, within production (and/or distribution) niches/value

chains of local/national interest, also through investments in improving (and/or increasing) production equipment, technological upgrading/innovation and research and development;

as well as to:

- **SDG Goal no. 4 (QUALITY EDUCATION)**: promotion of skills and training for the development of entrepreneurship, companies and human resources of the (target) companies; collaboration with universities by the (target) companies;
- **SDG Goal no. 5 (GENDER EQUALITY)**: promotion of gender parity and, possibly, the presence and empowerment of women in (target) companies; promotion of welfare programmes (also in support of households) in (target) companies;
- **SDG Goal no. 7 (AFFORDABLE AND CLEAN ENERGY)**: promotion of a (gradual) switch of the energy mix towards renewable sources by (target) companies;
- **SDG Goal no. 11 (SUSTAINABLE CITIES AND COMMUNITIES)**: promotion by (target) companies of integration measures with – and support for – the local environments in which they are based;
- **SDG Goal no. 12 (RESPONSIBLE CONSUMPTION AND PRODUCTION)**: promotion of sustainable waste management by (target) companies; promotion of the dissemination of internal and external communications on sustainability by (target) companies;
- **SDG Goal no. 13 (CLIMATE ACTION)**: promotion of communication and training for the benefit of the workforce by the (target) companies in order to improve knowledge and increase awareness of climate change.

D. Investment strategy

The investment process adopted by B4 Investimenti SGR S.p.A. (hereinafter "**B4 Investimenti**"), in relation to the Fund, provides for the integration of sustainability risks on the basis of an approach that combines "exclusion" and "inclusion" criteria.

➢ Exclusion criteria ("Negative screening")

The Fund does not make investments and does not provide financial or other support directly or indirectly to any company:

- engaging in criminal activities;
- that is, or has been, involved in serious and/or repeated damage to the environment;
- that carries out criminal or illegal activities pursuant to the regulations to which the Fund is subject;
- that is, or has been, involved in serious and systematic violations of human rights;
- that is, or has been, involved in serious cases of manifest corruption;
- whose business is the production, distribution, promotion, sale, import, export and/or any other activity or service associated with (including directly associated technological research) with Controversial Weapons – meaning the following categories of weapons: nuclear weapons, chemical weapons, biological weapons, depleted uranium weapons, anti-personnel mines, anti-tank mines, ammunition and cluster submunitions/bombs or cluster ammunition.

➢ Inclusion criteria ("Positive screening")

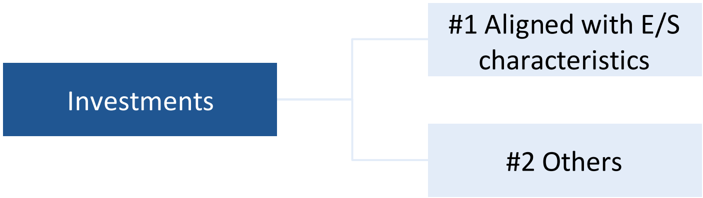
B4 Investimenti, in relation to the Fund, undertakes:

- to take action so that the (target) companies in which the Fund has invested or intends to invest do not present substantial discriminatory behaviour towards employees, suppliers, customers and associates deriving from differences of gender, ethnicity, language, religion, political opinions,

personal or social conditions, as well as operating in a socially integrated and attentive manner towards their stakeholders and the relevant community;
- to dialogue with the (top) management of the (target) companies in which the Fund has invested or intends to invest, in relation to the adoption of adequate systems, controls and organisational processes, taking into consideration the size and structure of the companies themselves.

E. Share of investments

The Fund does not envisage a minimum share of allocation in financial assets aligned with the environmental and/or social characteristics promoted by the Fund itself.



#1 Aligned with E/S characteristics includes the investments of the Fund used to attain the environmental and/or social characteristics promoted by the Fund.

#2 Other includes the Fund's remaining investments which are neither aligned with the environmental and/or social characteristics, nor are qualified as sustainable investments.

F. Indicators established to monitor the environmental and social characteristics promoted by the Fund

With reference to the indicators to monitor and assess the performance of each investment with respect to the environmental and social characteristics promoted, please refer to the following paragraph "G. Methodology used to assess, measure and monitor environmental or social characteristics".

G. Methodology used to assess, measure and monitor environmental or social characteristics

B4 Investimenti has opted for an assessment of the ESG performance of the (target) companies in which the Fund has invested, through which it is possible to measure the system for managing ESG factors and the related risks. The assessment of ESG performance is carried out by a prominent specialised agency, using a methodology that considers the sustainability aspects of the (target) companies in which the Fund has invested.

The ESG analysis is essentially based on standards and recommendations issued by international bodies (such as the UN, OECD and ILO regarding, *inter alia*, the protection of human rights, workers and the environment).

The assessment process is broken down into the environmental, social and governance areas, through several indicators that make it possible to correctly interpret the responsibility profile of the (target) companies being measured.

The indicators are weighted to consider the size (in terms of turnover and number of employees) of the (target) companies in which the Fund has invested and the sector to which it belongs.

The assessment is based on documentary analysis (guidelines and internal company processes) and on information collected from the (target) companies in which the Fund invested and from external sources, also to verify the possible presence of disputes, defined as situations of conflict that a company may be involved in with its stakeholders.

The final result is a numerical rating that measures the company's sustainability profile, the management of environmental, social and good governance variables, the degree of awareness of ESG risks and provides guidelines on areas for improvement that can be monitored by B4 Investimenti during the so-called “holding period” phase.

The ESG performances of the individual (target) companies in which the Fund has invested are consolidated to obtain an overall assessment of sustainability at Fund level.

B4 Investimenti also estimates the ESG risk factors through an internal assessment model that analyses specific KPIs, as resulting from a questionnaire completed by the (target) companies in which the Fund invests or intends to invest.

H. Sources and data processing

The data sources mainly derive from the (target) companies in which the Fund has invested or intends to invest. Additional data sources may come from competent third-party data providers. Exceptionally, estimated data may be considered if real data is not available and it is possible to proceed with estimates.

B4 Investimenti is responsible for the processing and management of all data used.

I. Limitations to methodologies and data

B4 Investimenti has not currently identified any limitations to the methodologies and data. If limitations should emerge, these will be promptly communicated within this section.

J. Due Diligence

As previously illustrated, the investment process adopted by B4 Investimenti, in relation to the Fund, provides for the integration of sustainability risks based on an approach that combines “exclusion” and “inclusion” criteria. In this regard, B4 Investimenti carries out an ESG assessment – if necessary, also through a specific ESG analysis/due diligence activity conducted by an agency specialised in the collection and analysis of data on sustainability aspects – aimed at identifying the risks and opportunities associated to the potential investment by the Fund. If significant critical issues emerge from the ESG assessment, B4 Investimenti may decide to interrupt the investment process.

K. Commitment policies

B4 Investimenti believes that the adoption of ESG criteria represents an important qualifying and incremental factor in relation to the value creation process for its stakeholders, as part of the implementation of a (more) sustainable development strategy in the medium-long term for the (target) companies held by the Fund and, more generally speaking, for the Country. In this regard, as previously illustrated, B4 Investimenti, in relation to the Fund, undertakes to engage in dialogue with the (top) management of the (target) companies in which the Fund has invested or intends to invest, in relation to the adoption of adequate systems, controls and organisational processes, taking into account the size and structure of the companies themselves.

L. Designated reference benchmark

B4 Investimenti has not designated a specific reference benchmark to determine whether the Fund is aligned with the environmental and/or social characteristics that it promotes.