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**Disclosure in accordance with article 3 of the Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector related to 21 Invest SGR SpA.**

**Transparency of sustainability risk policies**

21 Invest SGR integrates the analysis and management of sustainability risk, as defined by Regulation (EU) 2019/2088 (the “**Regulation**”), in its investment process. This analysis is conducted prior to investment and during the holding period of a portfolio company in the funds under management. The analysis is aimed at identifying the impact of these risks on a target company’s growth prospects in terms of sales, margins and future value.

During the due diligence process, the investment team examines environmental and social risk factors related to a target company’s activity and, if critical elements are found, analyzes them in-depth by conducting specific due diligence. For each new investment, a specific sustainability checklist is completed and attached to the investment memorandum and is presented to the investment committee, in order to have the necessary elements to assess the sustainability risk related to the investment opportunity.

During the holding period of a portfolio company of the funds under management, annual monitoring on sustainability factors is carried out based on information provided directly by the portfolio companies and specific sustainability related KPIs. Moreover, the risk management officer will annually examine the overall risk of the portfolio, including the risk related to environmental and social issues. If necessary, the investment team works with the portfolio company management to mitigate any risk factors.