

Disclosure under Art. 4 SFDR Regulations - Failure to take into account the negative effects of investment decisions on sustainability factors

In accordance with the provisions of Article 4(1)(b) of the SFDR, the SGR does not currently consider the main adverse effects of its investment decisions on sustainability factors (the "**PAIs**") in the manner prescribed by Delegated Regulation (EU) 2022/1288.

At the same time, however, understanding and measuring ESG *performance* is a strategic aspect for the SGR, which pays attention to the negative externalities of its investment decisions through:

- a *negative screening* directed at excluding, by way of example, investments in properties in protected or prohibited natural areas for the purpose of biodiversity conservation, or intended for the extraction, storage, transportation, or production of fossil fuels, or tenants of managed real estate AIFs or *target* companies that engage in activities that could have a negative impact on communities and the environment;
- specific *due diligence* conducted by qualified *advisors* in order to define the ESG profile of the investment opportunity;
- with reference to funds characterized as "Article 8" under the SFDR Regulations, a collection of data and information structured with a view to reporting to stakeholders, including for the purpose of identifying opportunities to enhance and improve ESG *performance*, particularly in the environmental sphere.

SGR reserves the right to change its position with respect to the consideration of PAIs and to update this disclosure accordingly.

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