

Art. 10 Disclosure – EU Sustainable Finance Disclosure Regulation No. 2088/2019 (SFDR)

“Roma Santa Palomba SH– Closed-end Alternative Real Estate Investment Fund”

A) DESCRIPTION OF THE ENVIRONMENTAL AND SOCIAL CHARACTERISTICS

The Fund promotes environmental and/or social characteristics under Art. 8 of Regulation (EU) No. 2088/2019 (“SFDR”) but does not have as its objective a sustainable investment according to Regulation (EU) No. 852/2020 (“Taxonomy”).

The Fund promotes the following characteristics:

- environmental: by means of remediation activities and development of assets with specific features aimed at mitigating climate change with related maximisation of energy efficiency, reduction in the consumption of resources and resulting reduction of emissions and pollution, in line with current regulatory requirements;
- social: aimed at mitigating the housing problem for the weaker sections of the society, i.e., households in situations of economic and social disadvantage, through initiatives that provide a wide range of services, attractive and synergic spaces able to stimulate a modern social approach.

B) METHODOLOGIES USED TO ASSESS, MEASURE AND MONITOR THE ENVIRONMENTAL OR SOCIAL CHARACTERISTICS

In order to measure the achievement of each environmental and/or social characteristic promoted by the Fund, the AMC adopts a specific framework based on ESG indicators (“**Framework**”). The Framework is updated from time to time in compliance with applicable regulations, international standards and real estate best practices. The Framework defines the methods for evaluating and monitoring investments, including the positive impacts resulting from development and requalification activities of existing properties.

Furthermore, the Fund has joined the Global Real Estate Sustainability Benchmark (GRESB). It provides a rating on management and integration of ESG factors in Fund’s activities through an independent third-party assessment based on international standards and peer comparison.

The data required to assess and monitor the achievement of environmental and/or social characteristics are collected, directly or through third parties, during the due diligence process. Where possible external or public databases and sources are also used (e.g., land registry, Revenue Agency, etc).

C) INFORMATION UNDER ARTICLE 8 SFDR

The AMC, in the investment decision-making process related to the Fund (i.e., from the scouting to the divestment phase), integrates the relevant sustainability risks adopting the relevant evaluation and mitigation parameters. The AMC also analyses the relevant sustainability factors related to the Fund's investment strategies, with the aim of: (i) completing risk profile of the investment; (ii) identifying possible investment opportunities; (iii) estimating the impact of the aforementioned risks on the value creation process; and (iv) assessing the consistency with the Fund's classification.

There is no reference index designated for the purpose of measuring the achievement of the environmental and/or social characteristics promoted by the Fund.

The Fund does not consider the principal adverse impacts on sustainability factors.

D) INFORMATION UNDER ARTICLE 11 SFDR

Information about the extent to which environmental and social characteristics are achieved is disclosed in the Fund's annual reports.