Declaración sobre las principales incidencias adversas de las decisiones de inversión en los factores de sostenibilidad

VERSION HISTORY		
DATE	**LAST UPDATE**	**MAIN CHANGES**
22/05/2025	28/06/2024	Consideration of Principal Adverse Impacts for the period from 1 January 2024 to 31 December 2024
23/04/2026	22/05/2025	Consideration of Principal Adverse Impacts for the period from 1 January 2025 to 31 December 2025

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Financial Market Participant

Nord Est Asset Management S.A. (549300RGBJ3GPNXZJR61)

Resumen

Nord Est Asset Management S.A. (la «**Empresa**» o «**NEAM**») [LEI (Identificador de entidad jurídica): 549300RGBJ3GPNXZJR61] considera los principales impactos adversos de sus decisiones de inversión sobre los factores de sostenibilidad.

La presente es la declaración consolidada sobre los principales impactos adversos en los factores de sostenibilidad de Nord Est Asset Management S.A.

La presente declaración sobre los principales impactos adversos en los factores de sostenibilidad abarca el período de referencia comprendido entre el 1 de enero de 2025 y el 31 de diciembre de 2025.

Esta declaración se aplica a NEAM como sociedad gestora de NEF («**NEF**» o el «**Fondo**»), [LEI de NEF: 549300T0MIVF0XGLQC75] un fondo paraguas y multigestor que consta de varios subfondos (cada uno de ellos un «**Subfondo**»).

El concepto de impacto adverso principal se describe en el Reglamento (UE) 2019/2088 del Parlamento Europeo y del Consejo, de 27 de noviembre de 2019, sobre la divulgación de información relativa a la sostenibilidad en el sector de los servicios financieros (el «**SFDR**»). En particular, los principales impactos adversos deben entenderse como aquellos impactos de las decisiones de inversión que podrían generar consecuencias negativas sobre los factores de sostenibilidad. Estos últimos se definen en el SFDR como cuestiones medioambientales, sociales y laborales, el respeto de los derechos humanos y las cuestiones relativas a la lucha contra la corrupción y el soborno.

NEAM considera los indicadores obligatorios de los principales impactos adversos de conformidad con el Reglamento Delegado (UE) 2022/1288 de la Comisión, Anexo 1 – Tabla 1, tal como se enumeran en la sección «Descripción de los principales impactos adversos en los factores de sostenibilidad», así como dos indicadores adicionales de impactos adversos principales del Anexo 1 – Tablas 2 y 3, a saber:

- Un indicador relacionado con el clima y con otros aspectos del medio ambiente: inversiones en empresas sin iniciativas de reducción de emisiones de carbono, y
- Un indicador relacionado con cuestiones sociales y de los empleados, respeto a los derechos humanos, anticorrupción y antisoborno: falta de una

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política de derechos humanos.

Description of the principal adverse impacts on sustainability factors

The table below takes into consideration the impact derived from the investments of NEF fund. NEF fund is an umbrella fund composed of 17 different Sub-Funds. The investment management activity of each Sub-Fund has been delegated to external investment managers (the "delegated Investment Manager") according to defined investment guidelines. Amongst those 17 sub-funds, ten are Article 8 SFDR and one is Article 9 SFDR and they represent around 72% of the total assets at end of 2025, as follows:

- 10 sub-funds are classified Art. 8 of the SFDR with a minimum of sustainable investments and considerations of PAI indicators (representing around 60% of the total assets)
- 1 sub-fund is classified Art. 9 of the SFDR with a social sustainable objective (representing around 12% of the total assets)

The Management Company selects its delegated investment managers through a process which takes into account, in addition to financial criteria, how sustainability risk is integrated into the investment and risk management process of the delegated investment manager.

NEAM intention s to increase the number of Art. 8 SFDR NEF sub-funds. Since the 13th of June 2025, 3 other Sub-Funds of NEF Fund have been converted into Art. 8 Sub. As a matter of fact, NEAM engagement power is carried over its delegated Investment Managers, who are the investment decision makers at issuer level. Therefore NEAM, as delegating party, leverages its delegated investment managers on the importance of PAI indicators and the need for them to engage with the invested companies in order to plan implementation activities for better disclosure and better management of these adverse impacts.

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CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS

Indicators applicable to investments in investee companies

Adverse sustainability indicator		Metric	Impact FY 2025	Impact FY 2024	Explanation	Actions taken, and actions planned and targets set for the next reference period
Greenhouse gas emissions	1. GHG emissions	Scope 1 GHG emissions	543,215.62	398,017.11	FY 2025: coverage 74.12%; FY 2024: coverage 73.55% The FY 2025 figure shows a +36.5% increase from FY 2024, primarily due to changes in asset allocation and increase in Assets Under Management (AUM). Despite a slight reduction in the fund's allocation to some high-emitting sectors, the metric has risen. This increase is also attributed to the performance deterioration of companies within carbon-intensive sectors such as Manufacturing, Electricity & Gas, and Transportation, which have contributed significantly to the overall variation.	**Actions Taken:** NEAM conducted a comprehensive analysis of the contribution of each Sub-Fund to greenhouse gas (GHG) emissions, identifying issuers, at the FY 2025 end, that exhibited deterioration in terms of GHG Scope 1+2+3 compared to the previous year. These issuers and their GHG emission metrics were discussed with delegated investment managers of the Article 8 and Article 9 NEF Sub-Funds to understand their dynamics in GHG reduction and any engagement efforts undertaken to mitigate emissions. Moreover, NEAM has converted three existing Art. 6 Sub-Funds into Art.8 Sub-funds. **Actions Planned and Targets Set:** NEAM intends to continue monitoring the extent to which the Principal Adverse Impacts (PAIs) of companies within the portfolio have improved or deteriorated compared to the previous year. This monitoring aims to highlight the proportion of the portfolio comprised of companies that are reducing their negative impact year-over-year. In instances where there is evidence of significant worsening of any material PAI, NEAM plans to continue to engage in discussions with the delegated investment manager. NEAM asserts that the most pertinent evaluation of PAIs, as of today, is to determine whether a company is trending towards reducing its negative impacts rather than adhering to fixed absolute thresholds without considering the evolution. This approach is particularly relevant for high-emitting sectors such as Manufacturing, Mining and Quarrying, and Electricity, Gas, Steam, and Air Conditioning, which are known to be substantial GHG emitters due to their operational activities. These sectors are integral to the global economy and cannot simply be phased out but should instead strive for improvement. Consequently, NEAM will challenge its delegated Investment Managers throughout its oversight process to consider such evolutionary trends.
		Scope 2 GHG emissions	100,450.09	65,463.98	FY 2025: coverage 74.12%; FY 2024: coverage 73.55%; The FY 2025 figure increases by 53.4% from the FY 2024 figure due to changes in the asset allocation and increase in AUM. Additionally, the metric has risen as a result of deteriorating performance levels of companies active mainly in the manufacturing and mining and quarrying sectors, which have shown higher emissions.	
		Scope 3 GHG emissions	4,284,607.36	4,238,665.99	FY 2025: coverage 74.12%; FY 2024: coverage 73.55% The FY 2025 figure increases by 1.1% from the FY 2024 figure due to changes in the asset allocation and increase in AUM. The metric has also risen owing to the deterioration in performance levels of companies in sectors such as Financials and Insurance Activities, which account for most of the variation. It is noteworthy that the rate of corporate disclosure for value-chain emissions is significantly lower compared to other emission metrics, due to various factors such as the availability of data from corporate value chains. This limited disclosure presents a challenge. To address this, estimated emissions models are applied by service providers (ISS ESG) to generate emissions data when issuers do not report their emissions or when the reported data does not meet quality standards. Supervisory assessments by the European Supervisory Authorities have highlighted that data availability, methodological differences and the use of modelled values continue to affect the robustness and comparability of Scope 3 disclosures, particularly for financial institutions.	
		Total GHG emissions	4,928,273.07	4,702,147	FY 2025: coverage 74.12%; FY 2024: coverage 73.55% The FY 2025 figure is fairly in line with the FY 2024 figure, increasing by 4.8% due to changes in the asset allocation and increase in AUM. This change is consistent with the increases in the preceding metrics, as this metric represents an aggregation of those prior values.	
	2. Carbon footprint	Carbon footprint	508.41	583.37	FY 2025: coverage 74.12%; FY 2024: coverage 73.55% The FY 2025 figure decrease by 12.8% compared to the previous FY 2024 figure due to change in the asset allocation.	
	3. GHG intensity of investee	GHG intensity of investee companies	1,267.24	967.30	FY 2025: coverage 74.21%; FY 2024: coverage 74.51%	

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	companies				The FY 2025 figure increases by 31% compared to FY 2024 due to changes in asset allocation and the deterioration of intensity levels in several sectors.	
	4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	5.12%	5.46%	FY 2025: coverage 74.08%; FY 2024: coverage 75.14% The FY 2025 figure decreased compared to the previous FY 2024 figure due to change in the asset allocation. The fossil fuel involvement flag utilized to complete this indicator captures any revenues generated by a company from fossil fuel activities. It does not differentiate between the sub-sectors in which the issuer operates, nor does it account for the possibility that such activities may constitute only a minor portion of the company's overall operations. The most significant contributor to this indicator variation is the Electricity, Gas, Steam, and Air Conditioning sector (46%).	**Actions taken:** NEAM has improved its exclusion policy for all NEF Art.8 and Art. 9 Sub-Funds by covering the most impactful fossil fuel sub-sectors. NEAM regularly monitors invested companies related to the fossil fuel sector such as: oil and gas exploration and production, drilling, services and equipment, and integrated oil and gas. Additionally, NEAM excludes companies with a large portion of their revenues derived from unconventional oil and gas and coal. Moreover, NEAM has enlarged the number of Art.8 Sub-funds converting some of the already existing Sub-Funds from Art.6 to Art.8. Hence increasing the constraints to which the converted Sub-funds are subject to. **Actions planned and Target Set:** NEAM will be continuing to engage with the delegated investment managers of the Art. 8 and Art. 9 NEF Sub Funds to reduce the investment towards companies that have increasing revenues generated from fossil fuel activities.
	5. Share of non-renewable energy consumption and production	Share of non-renewable energy consumption and non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage of total energy sources	25.40% of non-renewable versus renewable energy consumption by investee companies.	25.47% of non-renewable versus renewable energy consumption by investee companies.	FY 2025: coverage 50.91%; FY 2024: coverage 48.08% The FY 2025 figure shows a slight decrease compared to FY 2024. Most of the variation is explained by a reduction in non-renewable energy consumption by investee companies operating in the manufacturing sector. Despite the limited coverage, the indicator remains relatively stable across the two reporting periods.	**Actions taken:** This PAI is currently used as an added information due to lack of reliable data linked mainly to lack of data published. However, NEAM has engaged with the delegated investment Managers each time a large variation has been detected. **Actions planned and Target Set:** NEAM will be continuing to improve the monitoring and to point out to the delegated investment managers of the Art. 8 and Art. 9 Sub-Funds the importance of these indicators and stress the need to engage with the invested companies in order to plan implementation activities for their calculation and disclosure.
			1.53% of non-renewable versus renewable energy production by investee companies.	1.72% of non-renewable versus renewable energy production by investee companies.	FY 2025: coverage 72.10%; FY 2024: coverage 73.23% The FY 2025 figure decreased compared to FY 2024. A large share of the variation is explained by a reduction in the portion of non-renewable energy production by companies operating in the Electricity, Gas, Steam and Air Conditioning sector.	
	6. Energy consumption intensity per high impact climate sector	Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector	Agriculture: -	Agriculture: -	FY 2025: coverage 26.65%(overall); FY 2024: coverage 28.04%(overall) Despite the low level of disclosure from companies operating in these sectors, there was a slight worsening of the FY 2025 figures compared to the previous FY 2024 figures.	**Actions taken:** This PAI is currently used as an added information due to low coverage of each high impact sector linked mainly to lack of data published. **Actions planned and Target Set:** NEAM will be continuing to point out to the delegated investment managers of the Art.8 and Art. 9 Sub-Funds the importance of these indicators and stressing the need to engage with the invested companies in order to plan implementation activities for their calculation and disclosure.
			Mining: 0.03	Mining: 0.02		
			Manufacturing: 0.09	Manufacturing: 0.08		
			Electricity: 0.05	Electricity: 0.03		
			Water Supply: -	Water Supply: -		
			Construction: 0.02	Construction: -		
			Wholesale, Retail, Motor Vehicle Repair: -	Wholesale, Retail, Motor Vehicle Repair: -		
			Transportation and Storage: 0.02	Transportation and Storage: 0.02		
			Real Estate Activities: -	Real Estate Activities: -		
Biodiversity	7. Activities negatively	Share of investments in	0.03%	0.06%	FY 2025: coverage 73.91%; FY 2024: coverage	**Actions taken:**

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	affecting biodiversity-sensitive areas	investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas			74.80% The current percentage of companies negatively affecting the biodiversity-sensitive areas remains small. However, there was a slight decrease of 0.03% in the FY 2025 figure compared to the previous FY 2024 figure. The current percentage of companies negatively affecting the biodiversity-sensitive areas is low and is concentrated around issuers operating in the construction sector.	This indicator is analyzed whenever an issuer is publishing it. NEAM has reached the delegated Investment Managers in order to discuss the issuers for which there was an impact on biodiversity. **Actions planned and targets set:** NEAM will continue to monitor these investments to assess their impact on biodiversity. Should evidence of significant impacts be identified, engagement will be initiated with the delegated Investment Managers of the relevant NEF Sub-funds to devise appropriate solutions.
Water	8. Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	0.02	0.01	FY 2025: coverage 2.02%; FY 2024: coverage 2.47% The percentage of companies disclosing this information remains low. However, the indicator remains stable across the reference periods.	**Actions taken:** These indicators are analyzed on a quantitative basis whenever an issuer is publishing it. NEAM has reached the investment managers of Art. 8 and Art. 9 Sub-funds in order to discuss the issuers for which the emissions to water were really important or that had significant degradation in the numbers published from previous years. **Actions planned and targets set:** NEAM will be continuing to point out to the delegated Investment Managers of the Art. 8 and Art. 9 Sub-Funds the importance of these indicators and will continue stressing the need to engage with the invested companies for better disclosure and, over time, better management of these adverse impacts.
Waste	9. Hazardous waste and radioactive waste ratio	Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average	2.12	0.41	FY 2025: coverage 31.35%; FY 2024: coverage 33.26% The FY 2025 figure increased by 1.71 tonnes per EUR invested compared to the previous FY 2024 figure due to deterioration of specific invested companies, many of which operate in the mining and quarrying sector.	**Actions taken:** This indicator is analyzed whenever an issuer is publishing it. NEAM has reached the investment managers in order to discuss the issuers for which there was a substantial deterioration of the metric. **Actions planned and targets set:** NEAM will be continuing to point out to the delegated investment managers of Art. 8 and Art. 9 Sub-Funds the importance of these indicators and stressing the need to engage with the invested companies for better disclosure and, over time, better management of these adverse impacts.

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INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS

Indicators applicable to investments in investee companies

Adverse sustainability indicator		Metric	Impact FY 2025	Impact FY 2024	Explanation	Actions taken, and actions planned and targets set for the next reference period
Social and employee matters	10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	0.00%	1.67%	FY 2025: coverage 73.91%; FY 2024: coverage 74.80% The FY 2025 figure decreased compared to FY 2024 figure. This figure takes in account violations of guidelines and/or principles according to the data provider evidence. At the end of previous reference period, the ManCo has implemented this PAI as an exclusion criteria for the Art. 8 and Art. 9 Sub-Funds.	**Actions taken:** NEAM monitors daily compliance with the exclusion policy that prohibits any exposure to companies violating OECD/UNGC Guidelines/Principles in Art.8 and Art.9 sub-funds. NEAM has engaged in discussions with delegated Investments managers of Art.8 and Art.9 Sub-Funds in regard to issuers for which, according to NEAM data provider and further internal analyses, UNGC and OECD guidelines may have been potentially violated. This metric's intrinsic variability and interpretative need necessitates a well-structured approach to their assessment. The approach followed is based on the inherent complexity and multifaceted nature of the subject matter. The goal is to assess the potential violation and eventually decide the strategy to be applied, either through engagement or divestment if the violation is confirmed. **Actions planned and targets set:** NEAM will be continuing to engage with delegated investment managers of Art. 8 and Art. 9 Sub Funds to stress the importance of the assessment of potential violation.
Social and employee matters	11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance/complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	4.73%	7.15%	FY 2025: coverage 66.40%; FY 2024: coverage 66.96% The FY 2025 figures decreased by 2.42% compared to the FY 2024 figure. Companies that do not monitor their compliance with these standards remain at a low level overall. Considering the issuers flagged for lacking monitoring processes, there is a predominant concentration on investments in developing and non-European countries. As global sustainability regulations become more prevalent, this trend is anticipated to continue, resulting in a decline in this metric.	**Actions taken:** This PAI is currently used as an added information to evaluate the monitoring of compliance of the issuers with the UNGC principles or OECD Guidelines for Multinational Enterprises for periodic monitoring. **Actions planned and targets set:** NEAM will be continuing to engage with delegated investment managers of Art.8 and Art. 9 NEF Sub-Funds whenever some issuers are flagged and to point out to the delegated investment managers of NEF art 8. and art 9. Sub-Funds the importance of this indicator and the need to engage with the invested companies in order to plan implementation activities for their calculation and disclosure.
	12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	3.66%	0.94%	FY 2025: coverage 26.47%; FY 2024: coverage 10.16% The FY 2025 figure is increased by 2.72% compared to the FY 2024 figure. Despite the growing importance of this topic, a standardized method for reporting the mean gender pay gap percentage has yet to be universally adopted. This lack of standardization poses significant challenges for comprehensive data collection and analysis.	**Actions taken:** No specific actions have been taken in FY 2025 due to the low coverage. This indicator is however monitored when an issuer is publishing it. **Actions planned and targets set:** NEAM will be continuing to analyse this indicator when available and to point out to the delegated investment managers of Art.8 and Art. 9 NEF Sub-Funds the importance of this indicator and the need to engage with the invested companies in order to plan implementation activities for this metric calculation and disclosure.
	13. Board gender diversity	Average ratio of female to male board members in investee companies, expressed as a percentage of all board members	22.11%	21.44%	FY 2025: coverage 58.36%; FY 2024: coverage 58.18% The FY 2025 figure is consistent with the FY 2024 figure increasing by 0.67%. The majority of the variation is attributable to increase in this metric among companies in the financial and insurance activities sector.	**Actions taken:** No specific actions have been taken in FY 2025. This indicator is however monitored when an issuer is publishing it. **Actions planned and targets set:** NEAM intention is to continue analysing this indicator when available and point out to the delegated investment managers of Art. 8 and Art. 9 Sub-Funds the importance of this indicator and the need to engage with the invested companies in order to plan implementation activities for their calculation and disclosure and emphasize the importance of greater

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						diversity within the Board of Director.
	14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	Share of investments in investee companies involved in the manufacture or selling of controversial weapons	0.00%	0.00%	FY 2025: coverage 74.22%; FY 2024: coverage 74.98% NEF Sub-Funds have no exposure controversial weapons. Therefore, the FY 2025 figure is consistent with the FY 2024 figure.	**Action taken:** NEAM monitors daily compliance with the exclusion policy that prohibits any exposure to controversial weapons. The exclusion of such investments is grounded in international humanitarian law and various international treaties and conventions, which seek to mitigate the devastating effects of these weapons. By adhering to these principles, NEAM and the parent company Cassa Centrale Banca demonstrate a commitment to ethical investment practices and the promotion of global peace and security. **Actions planned and targets set:** No actions or targets are envisaged as this metric is a component of the fund's exclusion strategy.

Indicators applicable to investments in sovereigns and supranationals

Adverse sustainability indicator		Metric	Impact FY 2025	Impact FY 2024	Explanation	Actions taken, and actions planned and targets set for the next reference period
Environmental	15.GHG intensity	GHG intensity of investee countries	51.08	55.95	FY 2025: coverage 21.35%; FY 2024: coverage 74.98% The FY 2025 figure slightly decreased (4.87 tonnes/EUR GDP) compared to previous FY 2024 figure due to changes in Countries allocation. The decreasing level is partially explained by NEF large exposure to developed Countries. This metric is expected to decrease overtime.	**Action taken:** NEAM monitors this indicator but no specific actions have been taken so far. **Actions planned and Targets set:** NEAM intention is to monitor to what extent the countries GHG Intensity improves or deteriorate compared to the previous year. This to highlight which are the countries that are reducing their negative impact year-over-year. Where there is evidence of a relevant worsening, the Manco intention is to engage in a discussion with the delegated Investment manager. NEAM expects this indicator to decrease overtime.
Social	16..Investee countries subject to social violations	Number of investee countries subject to social violations (absolute number and relative number divided by all investee countries), as referred to in international treaties and conventions, United Nations principles and, where applicable, national law	4.94% (32)	6.73% (36)	FY 2025: coverage 20.58%; FY 2024: coverage 22.32% The FY 2025 figure decreased by 1.79% compared to previous FY 2024 figure due to changes in Countries allocation. However, the low data coverage of this indicator does not allow an accurate assessment of result comparisons. Moreover, the data provider flags as Countries subject to social violations, among the others, the US (due to hate crimes, gun violence, excessive use of force by law enforcement and similar), Japan and Brazil. Investments in these Countries explain a large portion of the metric result.	**Actions taken:** NEAM monitors the sustainability risk of sovereigns issuers through an ESG scoring and through a ML/TF Geographical Risk Rating matrix which identify high risk countries mainly in terms of corruption and ML/TF risk but also by means of social violation. Investment in the highest risk countries according to these criteria is not allowed on some of the NEF Sub-Funds. NEAM monitors the application of its exclusion criteria as well as the level of risk. **Actions planned and Targets set:** NEAM will continue monitoring social issues at country level and eventually discuss with the relevant delegated investment managers.

Indicators applicable to investments in real estate assets

Adverse sustainability indicator		Metric	Impact FY 2025	Impact FY 2024	Explanation	Actions taken, and actions planned and targets set for the next reference period
Fossil fuels	17..Exposure to fossil fuels through real estate assets	Share of investments in real estate assets involved in the extraction, storage, transport or manufacture of fossil fuels	N/A	N/A	N/A	N/A
Energy efficiency	18..Exposure to energy-inefficient real estate	Share of investments in energy-inefficient	N/A	N/A	N/A	N/A

	assets	real estate assets				

Other indicators for principal adverse impacts on sustainability factors

ADDITIONAL CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS

Indicators applicable to investments in investee companies

Adverse sustainability indicator		Metric	Impact FY 2025	Impact FY 2024	Explanation	Actions taken, and actions planned and targets set for the next reference period
Emissions	4. Investments in companies without carbon emission reduction initiatives	Share of investments in investee companies without carbon emission reduction initiatives aimed at aligning with the Paris Agreement	34.70%	34.20%	FY 2025: coverage 74.22%; FY 2024: coverage 22.17% The FY 2025 figure slightly increased (0.5%) compared to previous FY 2024 figure due to changes in asset allocation. A large portion of companies that explain the variation of the share of investments in investee companies without carbon emission reduction initiatives mainly operate in manufacturing and financial and insurance sectors.	**Actions taken:** NEAM used this PAI as an additional useful qualitative information to be used in order to assess the overall impact of an issuer in terms of GHG emission together with all the other PAIs linked to GHG emission. **Actions planned and Targets set:** NEAM will continue analysing the various GHG emission related indicators as a whole in order to gain an overall view of the impact of NEF Sub-Funds on GHG emissions and to understand the impact from companies invested and whether they engage in emission reduction activities.

ADDITIONAL INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS

Indicators applicable to investments in investee companies

Adverse sustainability indicator		Metric	Impact FY 2025	Impact FY 2024	Explanation	Actions taken, and actions planned and targets set for the next reference period
Human Rights	9. Lack of a human rights policy	Share of investments in entities without a human rights policy	19.86%	25.26%	FY 2025: coverage 63.99%; FY 2024: coverage 64.97% The FY 2025 decreased by 5.34% compared to previous FY 2024 figure due to changes in asset allocation. The improvement of the metric is explained for a significant portion by divestments in companies operating in the manufacturing and administrative and support service activities sectors.	**Actions taken:** NEAM used this PAI as an additional useful qualitative information to be used in order to assess the overall impact of social related indicators together with all the other PAIs linked to social matters. **Actions planned and Targets set:** NEAM will continue analysing the various social related indicators as a whole in order to gain an overall view of the impact of NEF Sub-Funds on social matters and to understand the impact from companies invested and whether they have not satisfying metrics on social and employees matters.

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Description of policies to identify and prioritize principal adverse impacts on sustainability factors

The Company implemented a Sustainability Risk Policy which applies for the assessment of principal adverse impacts and which last version has been approved on April 23, 2026. The responsibility for the implementation of this policy is allocated at several levels:

- Management Committee;
- Board of Directors;
- Permanent Risk Management Function.

The Company assesses and monitors indicators that are deemed to indicate the presence of a principal adverse impact.

NEAM selected the following optional indicator in Table 2, Annex 1 and in Table 3, Annex 1:

- Indicator 4: Investments in companies without carbon emission reduction initiatives as additional climate and other environment-related indicators. The selection of this indicator is directly linked to NEAM approach of focusing on the improvement of adverse impacts over time rather than on an absolute value. Indeed, this PAI is considered as an additional useful qualitative information to be used in order to assess the overall impact of an issuer in terms of emission together with all the other PAIs linked to GHG emission. Additionally, data is becoming largely available for this indicator.
- Indicator 9: Lack of a human rights policy as additional indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters. This indicator was chosen because it is considered as an additional useful qualitative information to complete the other PAIs linked to social matters. Additionally, data is largely available for this indicator.

The additional indicators selected by NEAM have also been decided in accordance with NEAM parent company, Cassa Centrale Banca - Credito Cooperativo Italiano. NEAM considers these additional indicators in the same approach and methodology as the mandatory ones, with the same data limitations mentioned below.

The adverse impacts can affect the underlying holdings and hence indirectly the sub-funds and the Company; that's why several controversial sectors, which are considered to have a major contributor to adverse impacts are either completely or partially excluded from the investment universe.

The approach to assess principal adverse impacts is also based on identifying companies with poor ESG practices and performance. The ESG data sources used to assess and monitor the sustainability risks are mainly companies' public information, direct

dialogue with delegated Investment Managers, financial press as well as external ESG data providers (i.e. Refinitiv, MSCI, ISS and internal ESG research from the delegated Investment Managers).

The Company identifies principal adverse impacts on sustainability factors primarily through the data provider ISS ESG. When information related to any of the indicators used is not readily available, the Company will make its best effort to assess the adverse impacts either directly through the research and analysis conducted by delegated Investment Managers on sustainable matters, or by carrying out additional research, cooperating with third-party data providers, and utilizing publicly available information.

When evaluating principal adverse impacts, NEAM relies on information and data sources provided by both internal and external research, which might be incomplete or might include a margin of error, leading to potential risk, notably when assessing an adverse impact. This principal adverse impact statement will be the result of the Company's own view on sustainability risk.

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Engagement policies

NEAM implemented a voting rights policy which foresees the delegation of the exercise of voting rights for NEF sub-funds to the delegated Investment Managers who are required to comply with the provisions of Directive (EU) 2017/828 of the European Parliament and of the Council of 17 May 2017 (the "**SRD II**"). NEAM encourages its delegated Investment Managers to take part in the active and responsible role as shareholder in the companies the sub-funds invest in with emphasis on sustainability, activity and responsibility.

NEAM engagement power is carried over its delegated Investment Managers, who are the investment decision makers at issuer level. Therefore NEAM, as delegating party, leverage towards its delegated Investment Managers on the importance of PAI indicators and the need for them to engage with the invested companies in order to plan implementation activities for better disclosure and better management of these adverse impacts.

The Company's intention is to consider the evolution of all the mandatory PAI in the Table 1 of Annex 1 and the selected indicators from Table 2 and 3 of the Annex 1, taking into consideration the materiality of these PAIs in relation to the industry of the investee companies. For sub-funds classified Article 8 or Article 9 of the SFDR, in the event that there is evidence of a relevant worsening of any material PAI, the Company will engage discussions with the delegated Investment Manager to explain the dynamics that led to the deterioration of the indicators and the actions taken and/or planned notably with regard to engagement activities.

Engagement activities towards invested companies on the main PAI categories (GHG emissions, Biodiversity, Water and Waste management, Social and employees matter) are required and expected from the delegated Investment Managers of sub-funds classified Article 8 or Article 9 of the SFDR.

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References to international standards

NEAM adheres to international principles and standards that can reinforce its role as a sustainable and responsible investor. In particular, the ManCo recognizes the importance of participating in international initiatives that support businesses to operate in a more sustainable manner.

United Nations Principles for Responsible Investment

In this respect, whether the delegated investment manager is a signatory of the United Nations Principles for Responsible Investment (the "**UNPRI**"), an initiative established to promote the integration of ESG principles in the traditional management of assets and in investment decisions, is taken into consideration in the selection process. This is a key criterion for NEAM while assessing the commitment towards sustainability risk management of the investment managers. NEAM's appointed investment managers, or via their parent companies, are signatories to the UNPRI.

UN Global Compact principles and OECD Guidelines for Multinational Enterprises

With reference to the Principal Adverse Impact related to Violations of the principles of the United Nations Global Compact and the OECD (PAI 10) and Lack of processes and compliance with UN Global Compact principles and OECD (PAI 11), it is considered by the ManCo in its investment process.
Companies in violations of the UNGC or the OECD guidelines are monitored through ISS ESG's Norm-Based Research, which identifies corporate controversies and assesses how companies manage these controversies. The goal is to identify controversial practices that have adverse impacts on society and the environment in line with established expectations for Responsible Business Conduct. The analysis results are categorised and presented according to ISS ESG's traffic-light system (Green, Amber, Red) and 10-1 rating scores.
Companies identified as having violated OECD Guidelines or UNGC Principles by ISS are deemed non-investable. For issuers that present complex or evolving controversy profiles, the ManCo applies an internal escalation framework that complements ISS assessments. This framework ensures that cases with heightened severity or insufficient remediation are subject to enhanced review and may lead to the issuer's being deemed non-investable. Through this structured approach, the ManCo ensures a consistent and robust integration of international norms into the monitoring and oversight of issuers' eligibility.

Controversial international weapons standards

With specific reference to the Principal Adverse Sustainability Impacts related to controversial

weapons (PAI 14), As general principal, NEAM discourages the financial of companies which are oriented toward armaments or warfare. The ManCo has adopted suitable measures to avoid investing in manufacturers of controversial weapons and their strategic partners, and has strengthened the negative screening phase already part of the definition process of the Investment Universes of listed companies; the strengthened was based on the implementation of international conventions such as the *Ottawa Convention on Anti-personal mines*, the *Oslo Convention on Cluster Munitions* and other international and national standards geared toward preventing the spread of controversial weapons such as the *Convention on the Prohibition of the Development, Production, Stockpiling and Use of Chemical Weapons and on their Destruction* (CWC), the *Convention on the Prohibition of the Development, Production and Stockpiling of Bacteriological and Toxin Weapons and on their Destruction* and the *Treaty on the Non-Proliferation of Nuclear Weapons* (NPT). NEAM uses third party data provider ISS as a base to identify companies flagged for involvement in controversial weapons.

Additionally, to identify issuers' exposure to armaments and warfare, NEAM uses Refinitiv LSEG. The Refinitiv flag consider if the issuers' revenue generated from services/products which are oriented toward armaments or warfare is greater than 5%. It considers if the company provides products or services which are specifically designed, engineered and produced for use in weapons systems and combat materials such as military aircraft, combat vehicles, bombs, and other combat devices and it includes if the company provides services such as maintaining armaments or if it involves training of personnel for combat or producing radars and surveillance equipment for the military. Moreover, the flag considers information if the company has a stake in another company involved in armaments. However, information is not considered related to dual-use products that are used in both civil and military applications such as trucks, land-moving equipment, semiconductors, general communications devices, software, etc. The latter is mostly relevant for the industrial, technology as well as commodity chemicals sectors.

In relation to the financing of the armaments production, whenever there is a detection about a company where the revenue coming from the production of the armaments sector is above 5% of the total revenue, NEAM engages in a discussion with the delegated investment manager concerned.

Moreover, at this time NEAM monitors climate-related risks using Sub-Fund-level indicators provided by ISS. These indicators include forward-looking assessments of transition and physical climate risks, based on sector- and region-specific pathways, issuer-level emissions data and projections of physical climate hazards. Given their model-based and long-term nature, these metrics are primarily used to enhance NEAM's understanding of potential climate-related exposures rather than to drive short-term investment decisions.

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Historical comparison

This statement provides below the historical comparison of data between the reference periods from 2022 to 2025.

CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS

Adverse sustainability indicator		Metric		Impact FY 2022	Impact FY 2023	Impact FY 2024	Impact FY 2025
Greenhouse gas emissions	1. GHG emissions	Scope 1 GHG emissions		250,635.78	251,232.46	398,017.11	543,215.62
		Scope 2 GHG emissions		61,115.64	64,157.04	65,463.98	100,450.09
		Scope 3 GHG emissions		3,020,642.91	4,213,897.45	4,238,665.99	4,284,607.36
		Total GHG emissions		3,332,394.32	4,529,286.96	4,702,147	4,928,273.07
	2. Carbon footprint	Carbon footprint		594.30	698.84	583.37	508.41
	3. GHG intensity of investee companies	GHG intensity of investee companies		909.81	969.70	967.30	1,267.24
	4. sure to companies active in the fuel sector	Share of investments in companies active in the fossil fuel sector		6.70%	6.90%	5.46%	5.12%
	5. Share of non-renewable energy consumption and production	Share of non-renewable energy consumption of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage of total energy sources		23.96%	27.87%	25.47%	25.40%
		Share of non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage of total energy sources		2.04%	2.25%	1.72%	1.53%
	6. Energy consumption intensity per high impact climate sector	Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector	Agriculture	-	-	-	-
			Mining	0.01	0.01	0.02	0.03
			Manufacturing	0.07	0.09	0.08	0.09
			Electricity	0.09	0.04	0.03	0.05
			Water Supply	-	-	-	-
			Construction	-	0.04	-	0.02
			Wholesale, Retail, Motor Vehicle Repair	-	-	-	-
			Transportation and Storage	0.02	0.04	0.02	0.02
			Real Estate Activities	-	-	-	-
Biodiversity	7. Activities negatively affecting biodiversity-sensitive areas	Share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas		0.10%	0.11%	0.06%	0.03%
Water	8. Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average		0.00	0.01	0.01	0.02
Waste	9. Hazardous waste and radioactive waste ratio	Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average		0.77	2.32	0.41	2.12

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INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS

Adverse sustainability indicator		Metric	Impact FY 2022	Impact FY 2023	Impact FY 2024	Impact FY 2025
Social and employee matters	10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	1.37%	1.15%	1.67%	0.00%
Social and employee matters	11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance/complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	11.09%	13.91%	7.15%	4.73%
	12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	0.41%	0.66%	0.94%	3.66%
	13. Board gender diversity	Average ratio of female to male board members in investee companies, expressed as a percentage of all board members	9.77%	21.52%	21.44%	22.11%
	14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	Share of investments in investee companies involved in the manufacture or selling of controversial weapons	0.00%	0.00%	0.00%	0.00%

Indicators applicable to investments in sovereigns and supranationals

Adverse sustainability indicator		Metric	Impact FY 2022	Impact FY 2023	Impact FY 2024	Impact FY 2025
Environmental	15. GHG intensity	GHG intensity of investee countries	77.22	68.86	55.95	51.08
Social	16. Investee countries subject to social violations	Number of investee countries subject to social violations (absolute number and relative number divided by all investee countries), as referred to in international treaties and conventions, United Nations principles and, where applicable, national law	9.86% (46)	7.98% (42.5)	6.73% (36)	4.94% (32)

Indicators applicable to investments in real estate assets

Adverse sustainability indicator		Metric	Impact FY 2022	Impact FY 2023	Impact FY 2024	Impact FY 2025
Fossil fuels	17. Exposure to fossil fuels through real estate assets	Share of investments in real estate assets involved in the extraction, storage, transport or manufacture of fossil fuels	N/A	N/A	N/A	N/A
Energy efficiency	18. Exposure to energy-inefficient real estate assets	Share of investments in energy-inefficient real estate assets	N/A	N/A	N/A	N/A

Additional climate and other environment-related indicators

Adverse sustainability indicator		Metric	Impact FY 2022	Impact FY 2023	Impact FY 2024	Impact FY 2025
Emissions	4. Investments in companies witho	Share of investments in investee companies without carbon emission reduction initiatives aimed at aligning with the Paris Agreement	34.42%	33.00%	34.20%	34.70%

Additional indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters

Adverse sustainability indicator		Metric	Impact FY 2022	Impact FY 2023	Impact FY 2024	Impact FY 2025
Human Rights	9. Lack of a human rights policy	Share of investments in entities without a human rights policy	13.67%	33.63%	25.26%	9.86%

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