

Fasanara Investments SA, SICAV-RAIF  
CGM Fasanara Fund  
(the “financial product”)

## Sustainability-related disclosures

### **DISCLAIMER**

*Any reference to “We” throughout this document shall be construed as a reference to the person(s) in charge of portfolio management.*

### 1. Summary

The primary investment objective of the financial product is to generate stable, long-term, uncorrelated returns by investing the subscription proceeds in diversified alternative credit instruments. More specifically, the financial product's main investment will be represented by trade receivables, payables, invoices, SME loans and other alternative credit instruments in connection with corporate exposures traded in those geographical areas specified in the investment memorandum.

The financial product promotes climate change mitigation, as well as the transition to circular economy and gender diversity in senior leadership.

The financial product is classified as promoting environmental or social characteristics (Article 8 SFDR), but it does not have Sustainable Investment as its objective, nor does it commit to making Sustainable Investments.

Minimum 2% of the exposure will be allocated to the promotion of environmental and social characteristics.

Minimum 85% of the exposure will be allocated to “other” investments, not promoting E/S characteristics.

Minimum 0% of the exposure will be allocated to investments with an environmental objective within the meaning of the EU Taxonomy final and provisional criteria.

0% of the exposure will be allocated to sustainable investments with a social objective within the meaning of art 2(17) SFDR.

No index has been designated for the financial product as a reference benchmark for sustainability.

## 2. No sustainable investment objective

Due to the very high exposure to non-Non-financial Reporting Directive (NFRD) companies (unlisted SMEs), the calculation of precise indicators of principal adverse impacts of investment decisions on sustainability factors (PAIS) in accordance with RTS Table 1, Annex 1 has not been feasible at this stage. Instead, company specific controversy-screening has been considered a more detailed assessment. The alignment with OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights and ILO Conventions has been verified following the above process as well. Due to the impossibility of providing accurate estimation of PAIS at this stage, we are not committing to a minimum share of sustainable investments.

## 3. Environmental or social characteristics of the financial product

The financial product promotes an environmental objective in line with article 3 of Reg.2020/852, and particularly climate change mitigation (following article 9 ibidem): "through the avoidance or reduction of greenhouse gas emissions [...] including through process innovations or product innovations".

Furthermore, the product promotes the transition to circular economic models through investment in the economic activity "Product-as-a-service and other circular use and result-oriented service models" (activity eligible under objective d), article 9 Reg.2020/852. Despite the publication of the draft technical screening criteria (TSC), we are following the TEG's recommendations to not estimate Taxonomy alignment for environmental objectives that do not have a finalized TSC yet.

We, therefore, took the cautious approach of classifying this investment as promoting an environmental objective, but not being Taxonomy-aligned. Nonetheless, we have applied it to the technical screening criterion suggested by the TEG draft document, using product "lifespan times use intensity" as a monitoring metric.

The financial product promotes as well gender equality in senior management, monitored by employing a binomial test on gender distribution data as provided by investee companies.

## 4. Investment strategy

The primary investment objective of the financial product is to generate stable, long-term, uncorrelated returns by investing the subscription proceeds in diversified alternative credit instruments. More specifically, the financial product's main investment will be represented by trade receivables, payables, invoices, SME loans and other alternative credit instruments in connection with corporate exposures traded in those geographical areas specified in the investment memorandum. These underlying instruments are all inherently related to social characteristics as they are investments in the real economy.

Furthermore, these underlying investments are mostly originated through technology enabled originating platforms across the globe providing an additional layer of violations screenings through their KYC assessments.

The sustainability risks that might impact issuers/companies as well the opportunities linked to ESG investments and Sustainable Investments within the portfolio of the product are assessed using the investment manager's methodology that was developed in-house and is based on numerous statistical indicators provided by international organisations, universities and government bodies and external data providers.

More information on this methodology can be found on the website: <https://www.fasanara.com/esg> . As stated previously, good governance practices on the portion of the investment that is classified as sustainable is assessed through controversy screening by a third-party data provider (RepRisk), and for the entire financial product through the use of country indexes, such as the Worldwide Governance Indicators as provided by the World Bank.

## 5. Proportion of investments

Minimum 2% of the exposure will be allocated to the promotion of environmental and social characteristics.

Minimum 85% of the exposure will be allocated to "other" investments, not promoting E/S characteristics.

Minimum 0% of the exposure will be allocated to investments with an environmental objective within the meaning of the EU Taxonomy final and provisional criteria.

0% of the exposure will be allocated to sustainable investments with a social objective within the meaning of art 2(17) SFDR.

## 6. Monitoring of environmental or social characteristics

This depends heavily on the asset allocation strategy and on the lifecycle of underlying assets.

We will monitor the share of investment that is contributing to the climate change mitigation, and we will keep monitoring our exposure to investee companies that promote circular economy business models. We will also monitor the share of exposures that are pursuing gender equality among their respective senior management (applying a Binomial Test).

## 7. Methodologies

We have calculated the exposure to companies with the environmental objective climate change mitigation based on eligible sectors as listed in Delegated Regulation 2021/2139. For the substantial

contribution screening we have employed sectoral TACs (Taxonomy Alignment Coefficients) as estimated by the Joint Research Centre. This means that we have taken a very conservative approach by never attempting to estimate alignment for economic sectors for which we have no factual basis.

The "do no significant harm" (DNSH) assessment has been performed on the investee companies belonging to sectors with provided TACs through the aid of controversy screening provided by RepRisk when criteria were based on EU legislation compliance requirements and through proxy data for DNSH criteria based on performance metrics.

The Minimum Social Safeguards (MSS) has been performed as well through controversy screening on those investees having passed the DNSH screening.

With regards to the share that promotes the transition to circular economy, we employed the draft technical screening criteria proposed by the Platform for Sustainable Finance Technical Expert Group for the eligible economic activity 2.13 "Product-as-a-service and other circular use and result-oriented service models" economic activity. Despite the publication of the draft technical screening criteria (TSC), we followed the TEG's recommendation to not estimate Taxonomy alignment for environmental objectives that do not have a finalized TSC yet. We therefore took a precautionary approach by classifying this investment as promoting an environmental objective, but not being Taxonomy-aligned. Nonetheless, we have applied the TSC suggested in the draft document, using product "lifespan times use intensity" as a monitoring metric. The DNSH and MSS screening has been performed as well through RepRisk.

For the share of investment promoting gender equality in senior management, a Binomial Test was employed to assess whether a company is pursuing a gender equal approach in choosing its management or not.

Without considering the remaining exposures that are not classified as sustainable investment, we assessed at fund level ESG performance based on the Yale EPI, the ITUC GRI and the World Bank WGI, estimated as weighted averages.

## 8. Data sources and processing

- a) Alignment for climate change mitigation: company sector classification coming from recognized data providers, official data and reports by the EU JRC, EU Environmental Energy Agency, IEA, industry associations such as the ACEA, recognized indices such as those provided by the World Bank, controversy screening coming from RepRisk; Transition to circular economy: internal data provided by investee companies, scientific reports by the EU JRC, academic papers, Eurostat data; senior leadership gender diversity: data from investee companies.
- b) Data are mostly coming from official bodies such as the EU JRC, IEA, WB, Eurostat and recognized industry associations such as the ACEA and NGOs such as the ITUC. Company profiles come from multiple sources which are checked for consistency. Data on controversies come from an established third-party (RepRisk). The sectoral classification has been taken as a proxy for companies' main activities, as the current state of technology does not allow for a more in-depth look-through and more detailed data on companies' activities are not present consistently for SMEs at a reasonable effort.

- c) Due to the above expressed points, the share of alignment is estimated, as exposed to non-NFRD entities, whereas the remaining share is based on data coming from investee companies

## 9. Limitations to methodologies and data

- a) Main limitations are coming from company insufficient information on economic activities, which can't be assessed at large scale without the use of more sophisticated technology for company sector classification. In addition, some official resources, while being the most trusted source for accurate data, often have not enough up-to-date information. There is also insufficient and/or outdated data on sectoral benchmarks for a variety of dimensions required by the Taxonomy Regulation as source of comparison (e.g. average use intensities for personal products, average lifespan of products).
- b) Through the use of official and recognized data sources, it is deemed that the outcome represents a best-effort exercise, considering the large exposure to non-NFRD entities and the level of disclosure that such companies provide. We aim at increasing the accuracy of the assessment through the use of more sophisticated technology.

## 10. Due diligence

By assessing ESG issues through a methodology developed in-house, we examine the sustainability risks that impact debtors as well as the opportunities linked to ESG investments and sustainable investments by analysing individual line-items in the portfolio numerically against specific social development goal criteria. The model is based on numerous statistical indicators provided by international organisations, universities and government bodies and external data providers. Thanks to such methodology, better informed investment decisions from a risk-return perspective can be taken. ESG criteria also are systematically integrated into the investment due diligence processes.

The ESG findings are formally documented within the due diligence reports, with potential concerns flagged for consideration. All investments are subject to varying degrees of ongoing ESG monitoring. As stated previously, good governance practices on the portion of the investment that is classified as sustainable is assessed through controversy screening by a third-party data provider (RepRisk), as well as the use of country indexes on the entire financial product, such as the Worldwide Governance Indicators as provided by the World Bank.

## 11. Engagement policies

The investment manager takes an active interest in how the financial product's originators manage ESG issues and, on behalf of the financial product, encourages and supports these originators to adhere to best-practice standards for responsible business. In some cases, the investment manager negotiates ESG

margin ratchets with originator platforms, linking the cost of funding to specific ESG Key Performance Indicators (KPIs).

These ESG KPIs are captured as legal provisions in the transaction documents with these platform originators and are monitored by the investment team. The performance of these KPIs input into the investment manager's investment thinking and decision-making, influencing the extent of the financial product's exposure to an originator platform.

## 12. Designated reference benchmark

No reference benchmark has been designated for this financial product.