



HAT SGR

**Website Disclosure
Art.3, Art.4 and Art.5 SFDR**



HAT SGR S.p.A. Sustainable Finance Disclosure Regulation ("SFDR") Statement

Information pursuant to Regulation (EU) 2019/2088 of the European Parliament on sustainability-related disclosures in the financial services sector

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 (Sustainable Financial Disclosure Regulation - SFDR) lays down harmonized rules on transparency regarding the integration of sustainability risks and the consideration of adverse sustainability impacts in the investment process, as well as the provision of sustainability-related information with respect to financial products.

The information hereunder is intended to describe how HAT SGR S.p.A. (hereafter also "HAT" or "the Asset Manager Company" or "AMC") applies the requirements of the SFDR within its investment process.

Art. 3 Transparency of sustainability risk policies

Sustainability risks are defined as environmental, social or governance (ESG) events or conditions that could cause a material adverse impact on the value of the investment.

HAT believes that the introduction of ESG criteria throughout the life cycle of an investment is an essential factor in the creation of lasting value shared by all stakeholders. In particular, HAT integrates ESG criteria in a balanced and gradual manner at all stages of investment strategies, defining, based on the characteristics of each transaction, the best way to achieve this integration.

To do this, the Asset Management Company has defined an exclusion list that identifies the sectors in which HAT has decided not to invest or financially support.

After this initial selection, the second step that acts as a binding element once the investment does not fall under the above-mentioned exclusion list is the analysis that is carried out through an ESG pre-screening tool that identifies simple criteria and checks to be carried out on the existing portfolio and during the preliminary due diligence phase.

Having positively assessed the opportunity of a given transaction, the investment teams, if necessary, evaluate the support of specialised external consultants, identify the areas of investigation for a due diligence activity that, in parallel with the financial criteria, also includes the analysis of ESG aspects that may identify aspects that make the investment incompatible with their own policy.

The results of the ESG risk analysis are then integrated into the overall risk assessment of the investment objective and described in the investment memorandum. The memorandum is provided to the board/investment committee to enable an informed investment decision.

Art. 4 Transparency of adverse sustainability impacts at entity level

HAT SGR S.p.A. is committed to generating a positive impact through its investments. However, the Asset Management Company is aware that, in pursuing its strategy, it is necessary to monitor the general context to ensure that potential unforeseen negative impacts are not generated.

The AMC will not consider the main adverse impacts (PAI) of its investment decisions on sustainability factors. HAT will integrate its own monitoring tools and assess, after an initial data collection based on their availability, the possible consideration of PAIs. During the management phase of the investment, HAT will actively engage with the investees using a proprietary ESG data collection and monitoring tool, which will track several ESG KPIs, including PAI indicators (listed in Tables 1, 2 and 3 of Annex 1 of the Commission Delegated Regulation (EU) adopted on 6 April 2022).

Based on the aforementioned approach and in line with the requirements of the SFDR, the declaration of key negative sustainability impacts, as set out in the Regulatory Technical Standards (RTS), will be disclosed after the assessment of the first phase of monitoring of the PAIs.

Transparency of remuneration policies regarding the integration of sustainability risks pursuant to Article 5 of EU Regulation 2019/2088.

As an AIFM sub-threshold manager, the SGR is exempt from adopting specific remuneration policies according to the AIFMD directive.