Alpine Venture Capital

EUREGIO^{+} ALPINE VENTURE CAPITAL FUND

SFDR Website disclosure

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EUREGIO^{+} ALPINE VENTURE CAPITAL SICAF S.P.A./AG

Sede legale - Rechtssitz • Passaggio Duomo - Dompassage, 15 • I-39100 Bolzano - Bozen
Tel.: +39 / 0471 068 700 • Fax +39 / 0471 068 766 • PEC: eplusalpine@pec.it • Web: www.eplusalpine.com

Albo Banca d'Italia: SICAF n. 73 • Verz. der Banca d'Italia: SICAF Nr. 73 • Cap. Soc. deliberato - Ges. kap. Beschlossen 60.050.000€, 12.550.000€ sottoscritto -Gezeichnet, 4.925.000€ versato - Eingezahlt. - P. IVA, cod. fisc. e n. iscr. Registro Imprese Bolzano - MwSt. Nr. Steuernr. und Eintragungsnr. im Handelsregister Bozen 03254540218

Summary

A. Summary

No Sustainable Investment Objective: EUREGIO+ ALPINE VENTURE CAPITAL – Fixed Capital Investment Company S.p.A ("the SICAF") promotes environmental and/or social characteristics, or a combination of both, but does not have as its objective sustainable investment.

Environmental or Social Characteristics of the Financial Product: The SICAF promotes environmental and social characteristics through its investment strategy, which integrates sustainability risk management and focuses on Target Companies that contribute to selected Sustainable Development Goals (SDGs), specifically SDG 9 (Industry, Innovation and Infrastructure), SDG 12 (Responsible Consumption and Production), and SDG 13 (Climate Action).
The fund applies exclusion criteria, avoiding investments in sectors such as gambling, pornography, or companies with poor governance or high environmental harm. It favours companies that demonstrate environmental responsibility, social inclusion, fair working conditions, and strong governance.

Investment Strategy: The SICAF invests in companies within the EUSALP region that operate in sectors such as digital innovation, green technologies, and life sciences. The strategy is implemented through:
- **Negative screening**, excluding companies in controversial sectors;
- **Positive screening**, investing in companies aligned with SDGs;
- **Engagement**, setting ESG targets and tracking improvements via KPIs.

Proportion of Investments: At least 60% of the SICAF's assets are allocated to investments aligned with the environmental or social characteristics it promotes. Up to 40% may be allocated to other assets for liquidity and treasury management purposes.

Monitoring of Environmental or Social Characteristics: Environmental and social characteristics are monitored throughout the investment lifecycle. During due diligence, companies are screened against exclusion and positive screening criteria. Annually, portfolio companies report relevant sustainability data, including Principal Adverse Impact (PAI) indicators, through a dedicated platform.

Methodologies: The SICAF uses a structured methodology, supported by an external platform, to measure the attainment of environmental and social characteristics. This includes alignment with EU regulatory standards for carbon emissions, PAI indicators, and other ESG metrics. Data is collected from portfolio companies annually and processed consistently across the portfolio.

Data Sources and Processing: Data is sourced directly from portfolio companies, ensuring investment-specific accuracy. Data is submitted through a digital platform designed to validate, process, and report ESG information. No estimated data is used; all inputs reflect actual company-reported data.

Limitations to Methodologies and Data: Some limitations exist due to data availability and the evolving regulatory definitions of ESG criteria. The SICAF acknowledges that assessments may be affected by incomplete or non-harmonized ESG data. However, these limitations are mitigated through internal controls, engagement, and board-level involvement in portfolio companies.

Due Diligence: Due diligence includes ESG-specific analysis of each Target Company, ensuring alignment with the SICAF's investment strategy. ESG assessments are conducted before using the platform, and compliance is periodically reviewed by internal structures.

Engagement Policies: Engagement is ongoing throughout the investment lifecycle and includes:

- Regular dialogue with portfolio companies;
- Board representation, ensuring direct involvement in governance and strategy;
- Management of sustainability-related controversies through active engagement.

Designated Reference Benchmark: The SICAF has not designated a reference benchmark to measure the attainment of the environmental or social characteristics it promotes.

B. No sustainable investment objective

The SICAF promotes environmental and/or social characteristics, or a combination of both, but does not have as its objective sustainable investments.

C. Environmental or social characteristics of the financial product

The SICAF promotes environmental and social characteristics through its investment approach, which integrates sustainability risk management as a core principle to safeguard the long-term value and profitability of its assets. The SICAF selects Target Companies whose activities, driven by innovation and sustainable solutions, contribute to positive environmental and social outcomes, including alignment with selected United Nations Sustainable Development Goals (SDGs) as outlined in Resolution A/RES/70/1 of 25 September 2015.

The environmental and social characteristics promoted by the SICAF include:

- **Sectoral Exclusions:** The SICAF does not invest in companies that:
  - Are involved in the production or marketing of gambling, betting-related products (including online platforms), or pornographic material;
  - Operate outside the principles of good governance, assessed through indicators such as board structure, internal controls, and ethical and anti-corruption practices. Companies found to violate human rights, for example, are excluded;
  - Promote products or services that significantly increase greenhouse gas emissions or contribute to climate change.
- **Environmental Responsibility:** The fund supports companies that demonstrate a commitment to reducing their environmental impact, including lowering carbon emissions, adopting renewable energy sources, and implementing energy-efficient technologies.
- **Social Inclusion and Fair Working Conditions:** The SICAF invests in companies that respect human rights, ensure safe and equitable working conditions, and foster diversity and inclusion throughout their operations and supply chains.
- **Strong Governance Practices:** The fund favours companies with robust governance structures, emphasizing transparency, ethical conduct, responsible management, and regulatory compliance.

In addition, the SICAF aligns its investment strategy with key Sustainable Development Goals, focusing on areas where its portfolio companies can create the most meaningful and measurable impact:

- **SDG 9 – Industry, Innovation, and Infrastructure:** Supporting sustainable industrialization and environmentally sound technologies that drive innovation and improve resource efficiency.

- **SDG 12 – Responsible Consumption and Production:** Promoting circular economy principles, responsible supply chains, and sustainable production methods.
- **SDG 13 – Climate Action:** Investing in companies that actively mitigate climate change through emissions reduction, energy efficiency, and renewable energy integration.

D. Investment Strategy

The SICAF's assets are mainly invested in target companies with a proven link to one of the territories forming part of the EUSALP and operating in the areas of specialisation "automation and digital", "food and life sciences", "Alpine technologies", "green technologies" and "hospitality and tourism".

In the selection and evaluation of investment opportunities, the SICAF also considers the ESG risk profile of the Target Companies to promote environmental, social, and governance factors according to the defined strategy.

The ESG risk profile is determined by an external information provider, which uses ESG metrics to verify that the Target Companies have adopted corporate policies regarding privacy, cybersecurity, diversity and inclusion, gender equality, and workplace safety. This platform identifies and monitors specific ESG key performance indicators (KPIs) relevant to the Target Companies, based on their sector and business model.

The SICAF promotes the integration of these ESG factors through a strategy based on the following three approaches:

I. *Negative screening*: The SICAF excludes Target Companies that operate directly in controversial sectors.

II. *Positive screening*: The SICAF invests in Target Companies that, through their activities involving innovative technologies and sustainable solutions, contribute to achieving one or more Sustainable Development Goals (SDGs) listed in the United Nations Resolution A/RES/70/1 adopted by the UN General Assembly on September 25, 2015;

III. *Engagement*: The SICAF promotes the improvement of the ESG profile of the Target Companies by setting sustainability goals, measured by specific KPIs and continuously monitored to verify the progress achieved by the Target Companies.

To evaluate the good governance policies of investee companies, the SICAF utilizes a platform to track and monitor sustainability indicators. This includes a set of questions specifically designed to assess the governance practices of investee companies.

E. Proportion of investments

The planned asset allocation for the SICAF is as follows:
#1 Aligned with the E/S characteristics: At least 60% of the SICAF’s assets are allocated to Typical Investments (as defined in Section "A. Summary") pursued using a strategy based on the following three approaches: negative screening, positive screening, and engagement.
#2 Other: up to 40% of the Company's assets are allocated to ensure efficient liquidity management for the SICAF's treasury needs. This category may include various types of assets:

a) bank deposit;
b) money market investments;
c) Instruments usable as collateral for credit operations conducted by the ECB or individual national central banks of EU member states, as well as financial instruments for which inclusion in the collateral list has been requested and approved within one year of issuance;
d) funds that invest exclusively in bank deposits, money market instruments, and/or other financial assets, as described in points a), b), and c) above, in accordance with their offering documents;
e) financial instruments traded on a regulated market of an EU member state or the European Economic Area, including fixed-rate financial instruments.

With reference to the "Pre-contractual Information for Financial Products pursuant to Article 8, paragraphs 1, 2, and 2bis, of Regulation (EU) 2019/2088 (SFDR Regulation) - Financial Products Promoting Environmental and Social Characteristics," as well as the statement on the main adverse impacts on sustainability factors resulting from the SICAF's investment activities, please refer to the specific Annex to the Offering Document.

F. Monitoring of environmental or social characteristics

The SICAF monitors the environmental and social characteristics of its investments throughout the entire investment lifecycle, from the due diligence phase to the holding period, to ensure alignment with its sustainability objectives.

During the due diligence phase, all potential investments are screened against the SICAF's exclusion policy and positive screening criteria to determine their eligibility based on environmental and social factors.

Throughout the holding period, the SICAF monitors the sustainability indicators used to measure the attainment of the promoted environmental and social characteristics, as well as the Principal Adverse Impact (PAI) indicators. This monitoring is conducted annually through a data collection platform, where relevant sustainability information is requested from portfolio companies.

G. Methodologies

The SICAF applies a structured methodology to measure the attainment of its environmental and social characteristics, ensuring alignment with regulatory standards and industry best practices.

The methodology relies on an external platform, supported by an external information provider, which facilitates a standardized and consistent approach to monitoring sustainability performance across the portfolio.

The platform applies methodologies and calculation approaches aligned with European regulations, including those used for Principal Adverse Impact (PAI) indicators and carbon footprint data. These methodologies ensure compliance with regulatory requirements and facilitate comparability across investments.

To maintain data accuracy and consistency, sustainability-related data is collected annually from all portfolio companies via an external platform. Each portfolio company is granted access to the platform during the data collection period and can directly input its information. If a portfolio company does not provide a response, the SICAF has the ability to submit the data on their behalf. Once data collection is complete, the platform automatically calculates the final results based on the methodologies defined by the standards tracked by the SICAF.

H. Data source and processing

1. Data sources: The data used to assess the attainment of the SICAF's environmental and social characteristics is provided directly by portfolio companies. This ensures that the information collected is specific to each investment and reflects the actual sustainability performance of the underlying assets.
2. Data Quality: Since the data is sourced directly from portfolio companies, it enhances data reliability and accuracy by reducing reliance on third-party estimates or assumptions. To further ensure data quality, the SICAF encourages consistent reporting methodologies, aligns data collection with regulatory frameworks, and promotes transparency in reporting processes.
3. Data Processing: Sustainability-related data is collected annually from portfolio companies, which directly input their data into a dedicated platform. This platform is designed to streamline data aggregation, validation, and reporting, ensuring compliance with European regulatory standards.
4. Data Estimation: The SICAF does not use estimated data in its sustainability reporting. All data is obtained directly from portfolio companies.

I. Limitations to methodologies and data

The SICAF leverages an external ESG data platform to facilitate the collection, processing, and calculation of sustainability-related information. Each portfolio company is granted access to the platform during the data collection period and is expected to input relevant information directly. In instances where a portfolio company does not provide the required data, the SICAF may input information on their behalf based on available documentation and reasonable assumptions.

While the use of a centralized platform improves consistency and data traceability, certain limitations may still apply. These include potential gaps in data availability, differences in reporting maturity across portfolio companies, and the lack of harmonized ESG definitions and standards at the European level. Furthermore, the platform's calculations rely on methodologies aligned with market standards, which may evolve over time or be subject to interpretation.

Despite these limitations, the SICAF ensures that the environmental and social characteristics promoted by the financial product are met by applying robust internal validation processes, using the best available data, and applying conservative assumptions where necessary. These measures help mitigate the impact of any data or methodological constraints on the overall sustainability assessment.

J. Due diligence

The investment strategy extensively described in sections "C. Environmental or Social Characteristics of the Financial Product" and "D. Investment Strategy" requires, during the due diligence phase on investment opportunities, a specific investigation into how the Target Company approaches ESG issues before proceeding to the analysis processed by the platform. Compliance with the criteria of the investment strategy is subject to periodic monitoring by the competent structures of the SICAF.

K. Engagement policies

Egagement is a key component of the SICAF's environmental and social investment strategy and is conducted throughout the investment lifecycle. The process is structured and proactive, with the following core elements:

- **Action-Oriented Dialogue:** Where risks or gaps are identified, the SICAF initiates targeted dialogue with the company to encourage the implementation of corrective measures and continuous improvement. This dialogue is maintained over the duration of the investment.
- **Ongoing Engagement:** Engagement is not a one-off event but an ongoing process. The SICAF monitors progress and continues the conversation with the company to support sustainable growth and mitigate ESG-related risks over time.
- **Board Representation:** As part of its investment structure, the SICAF typically secures board representation in its portfolio companies. Upon closing the first round of investment, it is contractually required that one member of the SICAF becomes part of the start-up's board. This direct involvement allows the SICAF to actively engage with management and influence strategic decisions, including on sustainability-related matters.

In cases of sustainability-related controversies, the SICAF uses its board presence and ongoing communication to assess the situation, engage with the company, and determine appropriate actions to ensure alignment with its ESG expectations.

L. Designated reference benchmark

The Company has not identified a specific index to measure its alignment with the environmental and social values it promotes.