



**SUSTAINABILITY DISCLOSURE  
of the CAMPLUS LONG TERM fund**

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## Index

Foreword .....	3
A. Summary .....	3
B. No sustainable investment goal .....	3
C. Environmental or social characteristics of the financial product .....	3
D. Investment strategy .....	5
E. Share of investments.....	6
F. Monitoring of environmental or social characteristics.....	6
G. Methodologies .....	6
H. Sources and processing of data.....	7
I. Limitations of methodologies and data .....	7
J. Due diligence.....	7
K. Engagement policies.....	8
L. Designated Reference Index.....	8

## Foreword

This disclosure is based on the guidance contained in the European Commission Delegated Regulation (EU) 2022/1288 of 6 April 2022 supplementing Regulation (EU) 2019/2088 of the European Parliament and of the Council with regard to regulatory technical standards specifying the details of the content and presentation of the information on the principle

"not cause significant harm," which specify the content, methodologies and presentation of information related to sustainability indicators and adverse sustainability effects, as well as the content and presentation of information related to the promotion of environmental or social characteristics and sustainable investment objectives in pre-contract documents, on websites and in periodic reports.

### A. Summary

The Camplus Long Term Fund (hereinafter, the "**Fund**"), managed by Quinta Capital SGR S.p.A. (hereinafter, the "**SGR**"), in line with the provisions of Article 8 of Regulation (EU) 2019/2088 (hereinafter, the "**SFDR Regulation**"), promotes specific environmental ("A") and social ("S") characteristics (hereinafter, the "**Characteristics**").

The Fund is dedicated to investments in the residential sector, primarily intended, in accordance with the applicable urban planning regulations, for residences for university students and young workers, or to be converted to such use, creating lasting positive social results for the communities that use them. In particular, the Fund promotes the creation and development of real estate initiatives, the implementation of investment policies having social purposes and, at the same time, capable of generating positive impacts on the environment.

The SGR has therefore adopted an investment strategy aimed at promoting the A/S Characteristics by verifying, through appropriate indicators (the "**Indicators**"), the extent to which these have been met. Monitoring is done annually using a special monitoring and data collection tool in order to assess the contribution of each *asset* in the portfolio to the promotion of the identified Characteristics.

At all stages of the investment process, the SGR applies a high degree of diligence, conducting specific *due diligence* activities, also using the support of external consultants where appropriate.





### B. No sustainable investment goal

This financial product promotes Characteristics A/S, but does not aim for sustainable investment.





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



The Fund has identified the Characteristics it intends to promote under Article 8 of the SFDR Regulations by drawing inspiration from the United Nations Sustainable Development Goals (UN SDGs), as follows.

#### *Environmental characteristics*

		<p><b>Mitigation of climate change impacts through investments aimed at more efficient use of resources.</b> The Fund intends to promote (within the limits of technical feasibility and financial affordability and where not already in place at the date of purchase) energy-saving solutions within its <i>assets</i>.</p>
		<p><b>Promotion of sustainable mobility among end users.</b> The Fund intends to promote sustainable mobility among users of its <i>assets</i> to encourage sustainable practices and help mitigate climate change, including through the presence of dedicated infrastructure (within the limits of technical feasibility and financial affordability and where not already present at the date of purchase).</p>

### Social characteristics

		<p><b>Enhancement of housing facilities dedicated to secondary education and young workers.</b> The Fund invests in residential projects that are overall capable of promoting social characteristics, without making sustainable investments, and generating additional, measurable and favorable social impact, and/or suitable for enabling the expansion of the supply of university student housing to achieve an equitable and efficient tertiary education system aimed at developing qualified human capital and overcoming social and economic inequalities. In particular, the Fund invests in new <i>assets</i> used for university residence and housing for young workers, also investing in secondary cities that show shortages of beds.</p>
		<p><b>Increasing the inclusiveness of spaces, comfort and well-being of end-users of facilities owned by the Fund.</b> The Fund intends to select residential facilities with high characteristics in terms of <i>comfort</i> and inclusivity aimed at ensuring greater well-being and social inclusion of the population and younger groups. The Fund intends to select residential facilities that ensure accessibility for people with reduced mobility and/or disabilities. Finally, the Fund invests in the construction of study areas, gyms and other communal facilities aimed at fostering access to services and points of interest that can consolidate the social relations and well-being of residents.</p>

		<p><b><i>Safety and compliance with the rights of workers and tenants of Fund properties and contractors involved in development interventions.</i></b> The Fund will ensure the involvement of contractors in compliance with safety requirements and workers' rights, and the selection of tenants in compliance with safety requirements and workers' rights. In addition, the Fund will ensure the safety and respect for workers' rights of contractors working in the owned facilities through a process for their selection and a system of periodic monitoring of their <i>performance</i>.</p>
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A benchmark index has not been designated for the purpose of measuring the achievement of the Characteristics promoted by the Fund. Such measurement will take place as indicated below.

#### **D. Investment strategy**

SGR has an investment strategy to assess the promotion of Characteristics and check sustainability risks, at all stages of the investment process:

- (i) *ex ante*, prior to the Fund's acquisition of the *asset* (during *scouting*, *screening* and *due diligence*) through:
  - a) The application of the exclusion list (*negative screening*) in order to limit the investable horizon by excluding those sectors deemed controversial by the SGR;
  - b) conducting a preliminary analysis of climate risks, both physical and transitional, using the proprietary *screening* tool in order to integrate sustainability risk considerations pertaining to the specific investment within the Fund's overall risk profile;
  - c) the implementation of *ESG due diligence* to assess (i) the sustainability risks of the *asset* being invested in and (ii) its positioning with respect to the Characteristics, in order to obtain additional information for the evaluation of the *asset*, and to preliminarily identify critical profiles and potential opportunities with respect to ESG issues.
- (ii) *in itinere*, following the acquisition of the *asset*, with periodic monitoring of the results achieved with respect to the Features promoted, through:
  - a) The establishment of an ESG action plan, including the support of external experts, based on the results obtained in the preliminary assessment of the investment opportunity, in order to mitigate sustainability risks (including climate risks) and promote Characteristics;
  - b) Periodic monitoring of the *asset's ESG performance*, including those related to climate risk mitigation and those related to the promotion of Characteristics,

by surveying the Indicators and KPIs defined within the proprietary ESG data collection tool.

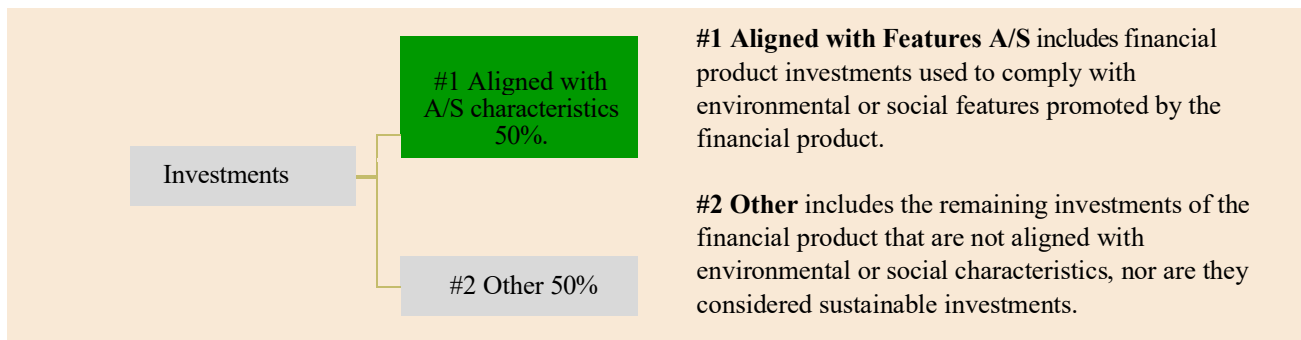
The relevant information is provided annually as part of the Fund's management reports.

(iii) *ex post*, at the divestment stage, when the SGR assesses the results of the measures taken and activities undertaken for the purpose of improving ESG *performance*, through the preparation of an analysis aimed at summarizing the actions implemented by the SGR on behalf of the Fund to mitigate ESG risks (including climate change risks) and how-and to what extent-the Characteristics have been met.

Keep in mind that since the Fund invests in real estate, there is no policy for evaluating good *governance* practices.

### E. Share of investments

The Fund has an *asset allocation* designed to promote A/S Characteristics through direct investment in real estate, not less than 50 percent. The Fund does not target any sustainable investment as defined by the SFDR Regulations.



### F. Monitoring of environmental or social characteristics

In addition to what is reported in Section "D," the Fund monitors the *assets'* progress against each Promoted Feature through the annual activity of collecting and monitoring the pre-selected Indicators, defined based on the materiality analysis and the results of the *due diligence* activity.

In order to ensure data consistency, the SGR *team* verifies the quality of reported information and discusses inconsistencies and major changes from the previous year with the *asset* holder. In addition, the SGR *team* meets periodically with the *asset* holder to monitor the progress of the ESG action plan and, if necessary, conduct additional *active ownership* activities. When necessary, SGR enlists the support of external ESG consultants.

### G. Methodologies

The SGR, on behalf of the Fund, has developed a methodology based on the use of proprietary tools aimed at monitoring sustainability risks and promoting Characteristics.

Specifically, during the pre-investment phase, the Fund uses a proprietary pre-screening tool to assess climate and environmental risks and performs *ESG due diligence* to assess, overall, the sustainability risks of the *asset being* invested in and its positioning against the Characteristics.

*During the ownership* phase, the Characteristics are promoted based on materiality analysis and the results of *due diligence* activities. The contribution of *assets* to the achievement of the Characteristics are monitored at least once a year using a proprietary tool for collecting and monitoring pre-selected Indicators.

## **H. Sources and processing of data**

ESG data and information is provided by *asset* tenants both during the pre-investment phase (data collection is carried out during *due diligence*) and *ownership* (through an annual collection), using external *data providers* where necessary. The SGR, on behalf of the Fund, also with the support of external ESG consultants, processes and aggregates the data provided by the *assets* in order to assess ESG *performance* and undertakes to disclose, within the Fund's annual reports, quantitative and qualitative information regarding the results achieved in the promotion of the Characteristics.

The SGR, on behalf of the Fund, also processes the information received in compliance with applicable data processing regulations, as well as in accordance with its own internal data processing *policies*.

## **I. Limitations of methodologies and data**

No limitations to the methodologies or data have been identified at this time. Should any limitations arise, they will be promptly notified and corrective actions will be implemented to resolve them.

## **J. Due diligence**

The SGR exercises a high degree of diligence on the Fund's underlying assets with reference to both the monitoring of sustainability risks and negative externalities of the *assets* in the portfolio and the promotion of Characteristics through the methods described in Section "D."

In addition, the SGR has defined specific roles, responsibilities and information flows for the implementation of the Fund's sustainability strategy. In particular, the Board of Directors, which plays a role in guiding the SGR's sustainability strategies, policies and plans, has at present identified the Managing Director as the person responsible for implementing it and ensuring the integration of ESG factors in the development, investment and enhancement of the portfolio under management. For the efficient implementation of the Fund's investment strategy, the SGR has also equipped itself with an organizational structure that sees the involvement of a plurality of individuals, each within their respective areas of responsibility, and in particular: (i) the Structuring & Acquisition Function, which follows the activities preparatory to the finalization of the Fund's investments, including a specific pre-acquisition *due diligence* on ESG issues; (ii) the Fund Management Real Estate Function, which, supported by the Asset Management Real Estate Function, carries out on the Fund's properties the preparatory actions for the promotion of the identified Characteristics (also in terms of relations with tenants); (iii) the Administration & Treasury / Planning & Control Function, which represents in the relations

periodic reviews of the Fund's initiatives undertaken with reference to sustainability issues; (iv) the Risk Management Function, which assesses sustainability risks because of their impact on other specific risk factors and provides evidence of them to the Board of Directors through periodic *reports*.

#### **K. Engagement policies**

The SGR, on behalf of the Fund, invests primarily in residential projects overall capable of promoting the Characteristics and generating value for the community and the local area, and, within the limits of the asset allocation allocated to the promotion of the Characteristics, makes the necessary interventions so that the *assets* in the portfolio generate a benefit for the community and the local area. In particular, through the Fund the SGR aims to promote the creation and development of initiatives with social purposes, which see the involvement and development of the local communities concerned.

In addition, for real estate development and redevelopment projects, SGR considers ESG factors in both material and location choices, as well as plant and architectural solutions, taking into account environmental sustainability *standards*, certifications and protocols (e.g. LEED, BREEAM, etc.).

More generally, the SGR is committed to the involvement and awareness of the tenants of portfolio *assets* on ESG issues because of their primary role in the implementation of the Fund's sustainability strategy and as users of the buildings and holders of the information needed to improve ESG *performance*.

To implement the above policy, the SGR has defined specific roles and responsibilities in ESG as described in section "J."

#### **L. Designated Reference Index**

The Fund has not designated a benchmark index for the purpose of verifying whether the Characteristics have been met.