



COIMA Porta Nuova P35

Transparency of the promotion of environmental or social characteristics and of sustainable investments on websites - Publication referred to Article 10, par. 1, of Regulation (EU) 2019/2088 and Articles 38 to 49 of the Delegated Regulation (EU) 2022/1288

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Summary

COIMA Porta Nuova P35 (hereinafter also referred to as the "financial product" or the "fund") has environmental objectives pursuant to Article 9 of Regulation (EU) 2019/2088 (SFDR) and aims to support the United Nations Sustainable Development Goals (UN SDGs) over the long term. Its environmental objectives are qualified through alignment with the objectives of Regulation (EU) 2020/852 (EU Taxonomy).

For all underlying investments of the financial product that take into account the EU Taxonomy criteria, the DNSH principle (Do No Significant Harm) applies, meaning that they must not cause significant harm to other sustainability objectives. To this end, the applicable technical screening criteria reported in the annexes of EU Regulation 2020/852 are considered.

The PAI indicators (Principal Adverse Impact indicators), i.e. the indicators of the negative effects on sustainability, are taken into consideration in order to understand their impact during the investment phase of the fund and understand which actions to take to limit the negative effects on sustainability of the investment object. The PAIs referring to the fund are monitored and analysed on a quarterly basis, thanks to the use of specific templates and databases.

The investments of COIMA Porta Nuova P35 are aligned with the OECD guidelines for multinational enterprises, the United Nations guiding principles on human rights and the United Nations Global Compact. Furthermore, COIMA takes into consideration the United Nations principles for responsible investments (UN PRI).

The investment allocation programmed to achieve the environmental objectives promoted by COIMA Porta Nuova P35 will be equal to 100% of the investments. Moreover, 100% of these will be qualified as sustainable investments in economic activities considered environmentally sustainable according to the EU Taxonomy. With regard to the investment strategy of the fund, the objectives of environmental sustainability are pursued thanks to a careful initial phase of screening and selection of investment opportunities; in the due diligence phase, the ESG profile of the investment is determined using a methodology developed in-house, by verifying the economic impact relating to the achievement of the ESG objectives.

Finally, the Risk Management function supervises the aforementioned process, with the objectives of: understanding the investment risks and the ESG risks associated with investments, verifying that the risk-return profile is in line with the risk profile of the fund and analysing the areas of ESG improvement of the investment.

The methodologies used to measure the achievement of environmental objectives include the comparison of the Fund's performance with the Global Real Estate Sustainability Benchmark (GRESB) and the use of a proprietary framework for measuring sustainability indicators (KPIs), i.e. the COIMA ESG Metrics.

Furthermore, COIMA is committed to a continuous dialogue and involvement of the Fund's stakeholders, not only with the aim of promoting sustainability and becoming a catalyst in the education and communication of ESG aspects, but also with the aim of reducing and mitigating the main negative effects deriving from its investments, by organizing, for example, periodic meetings with tenants, to measure their degree of satisfaction and spread the culture of sustainability.

At the moment, an index has not been designated as a benchmark to meet the environmental characteristics pursued by the financial product.

No significant harm to the sustainable investment objective

This financial product is designed to achieve sustainable investment objectives. The Fund's investments are aligned with the sustainability criteria outlined in EU Regulation 2020/852 (EU Taxonomy).

To ensure that no significant harm is caused to other sustainability objectives (DNSH), COIMA guarantees that DNSH will be applied and verified for the economic activities that the fund will pursue, carried out within the scope of "7. Construction and real estate activities" of EU Regulation 2020/852.

This financial product does not cause any significant harm to the sustainable investment objective, as it takes into account the Principal Adverse Impact Indicators (PAI) presented in the Tables of Annex I of Delegated Regulation (EU) 2022/1288.

In particular, the following PAIs have been selected:

- Mandatory PAIs for Real Estate sector:
 - Fossil Fuel;
 - Energy efficiency.
- Optional PAIs :
 - GHG Emissions;
 - Energy consumption intensity.

These indicators are measured and analysed by the SGR, which establishes from the technical due diligence activity the mitigation actions to be taken. COIMA SGR measures these indicators at a portfolio management level in order to assess the impacts of investment decisions on sustainability factors, taking into account tolerance thresholds.

The data required for the determination of PAIs is also collected during the pre-acquisition due diligence of the assets subject to the investment.

All information regarding PAI indicators will be published on COIMA's website by June of each year, as required by EU Regulation 2019/2088 (SFDR).

COIMA Porta Nuova P35's sustainable investments are aligned with the OECD guidelines for multinational enterprises, the United Nations Guiding Principles on Human Rights and the United Nations Global Compact. Furthermore, in its investment due diligence activities, COIMA takes into consideration the principles of the United Nations for responsible investments (UN PRI - *Principle for Responsible Investment*). COIMA also requires acknowledgment of its Code of Ethics, ensuring that stringent supervision and control requirements are complied with in places at greater risk for occupational health and safety, ensuring that equal opportunities and workers' rights are respected.

Sustainable investment objective of the financial product

The Fund has environmental objectives pursuant to Article 9 of EU Regulation 2019/2088.

The Fund's objective is to grow the value of capital over time and generate a stable, low-risk income through investments in high-quality real estate located in strategic locations. At the same time, the Fund is committed to promoting the sustainability of its investments, integrating sustainability risks into the decision-making process. In particular, the Fund pursues the objectives of "Climate change mitigation" and "Climate change adaptation" through the economic activity "7.7 Acquisition and ownership of buildings" for the sector "7. Construction and real estate activities" in line with the EU Taxonomy, respecting the technical screening requirements defined by the Regulation.

These characteristics and objectives are aligned with the Sustainable Development Goals (SDGs) set by the United Nations, and are realized through the development of quality, reliable, sustainable and resilient infrastructure (SDG 9), and the improvement of urban planning and infrastructure to reduce their negative environmental impact (SDG 11).

The Fund's sustainability objectives are to be achieved over its useful life and guide the investment decisions that will be made from time to time for each asset.

Investment strategy

The investment process involves analysing the necessary refurbishment and/or optimization activities of real estate properties to improve their environmental performance and energy efficiency in management. With the aim of achieving the Fund's objective of seizing the best market opportunities and developing a positive impact on the real economy, the portfolio will be invested with the goal of acquiring, developing, and managing high-quality real estate assets consistent with the Fund's sustainable investment objectives.

During the investment phase, sustainability risk management consists of the following activities:

- Screening and selection of investment opportunities (negative screening): this activity is carried out on the base of specific exclusion criteria. The exclusion criteria considered are the following¹:

¹ It is specified that the exclusions set out in Article 12, paragraph 1, letters (a) to (g) of Regulation (EU) 2020/1818 apply exclusively to corporate investments that may be held by the Fund, without extending to the real estate it directly owns.

- Exclusion of the possibility of developing in protected natural areas;
- Exclusion of the possibility of constructing new buildings intended for the extraction, storage, transport or production of fossil fuels.
- Due Diligence: due diligence is performed with the aim of
 - Understanding the financial and sustainability risks of the investment
 - Verifying that the risk-reward profile is in line with the risk profile of the Fund
- Calculate the sustainability risk associated with the investment using the COIMA ESG Metrics analyses:
 - "As-is" Situation: assessment of the risk associated with the investment at the time of acquisition and throughout the management period;
 - "Target" Situation: assessment of the risk associated with the investment following the redevelopment interventions or the new construction of the building.

This analysis will also be conducted during the investment management phase. The constraining elements of the investment strategy can be traced back to:

- ESG rating calculated using COIMA ESG Metrics equal to maximum: 40/100
- Two exclusion criteria²:
 - Exclusion of the possibility of developing in protected natural area
 - Exclusion of the possibility of constructing new buildings intended for the extraction, storage, transport or production of fossil fuels

The Fund's ESG investment strategy and process are monitored on a regular basis with regards to specific roles and responsibilities attributed to the governance described below and in particular by the Fund Manager with the contribution of the Sustainable Innovation Committee (SIC):

- Board of Directors: approves the investment transactions, the business plan of the Fund and of the investments and any annual changes, taking into account the Policy for Integrating Sustainability Risks into the Investment Process
- Investment Committee: is responsible for applying the ESG guidelines defined in the Policy for Integrating Sustainability Risks into the Investment Process to the selection process of each investment. It has an advisory function in defining the proposals to be presented to the Board of Directors regarding sustainable and responsible investment issues, aimed at guaranteeing the innovation of the methodologies and processes adopted, the monitoring of compliance with the ESG indicators and the ways in which they are taken into account for the various products and services offered to customers
- *COIMA Sustainable Innovation Committee (SIC)*: is an advisory and proactive committee set up to support the Chief Executive Officer of COIMA SGR in the

² Refer to the previous note.

corporate management of "ESG" (Environmental, Social & Governance) issues, "Impact Investing" and product innovation.

- Control Functions: the Risk Management function is responsible for monitoring and assessing the impact of ESG factors on the risk of the Fund and on its financial performance

With regard to the policy for the assessment of good governance practices of the companies benefiting from the investments, it should be noted that given the type of asset class, as well as the intrinsic characteristics of the real estate sector, the assessment relating to good governance practices is not applicable.

In fact, COIMA Porta Nuova P35 does not invest in issuing companies, but in real estate. Reason why the drafting of a policy to evaluate the good governance of the asset in which one invests is not applicable.

Proportion of investments

The minimum allocation of the investment used to achieve environmental objectives of COIMA Porta Nuova P35, in compliance with the binding elements referred to in the previous paragraph, will be equal to 100% of the investments. Furthermore, 100% of the investments will be classified as sustainable investments in economic activities considered environmentally sustainable in accordance with the EU Taxonomy, as provided for by the "Climate Change Mitigation" and "Climate Change Adaptation" objectives.

Finally, it should be noted that COIMA Porta Nuova P35 does not use derivatives to achieve the environmental objectives set by the financial product but only as a risk hedge.

It is specified that the exclusions set out in Article 12, paragraph 1, letters (a) to (g) of Regulation (EU) 2020/1818 apply exclusively to corporate investments that may be held by the Fund, without extending to the real estate it directly owns.

Monitoring of sustainable investment objective

During the entire life cycle of the financial product, a rigorous procedure is followed for monitoring the performance of the Fund. Through the periodic calculation of the sustainability indicators (KPIs) identified within the COIMA ESG Metrics (a description of the methodology is provided in the following paragraph), the pursuit of the environmental objectives promoted by the Fund is assessed and any corrective actions from undertake to improve the Fund's ESG performance or reduce the Fund's ESG risks. The Risk Management function supervises the entire process.

Investors will be provided with a periodic report illustrating the evolution of the investment's ESG and financial performance, with respect to the identified targets: the identification, analysis and continuous management of ESG risks and opportunities are an integral part of the active management of assets owned by the Fund.

Methodologies

The pursuit of the objectives the Fund has identified is assessed and measured through KPIs examined in the COIMA ESG Metrics tool³.

The COIMA ESG Metrics includes three areas of analysis:

- Environmental, area in which the risks and related environmental objectives and parameters are identified:
 - Calculation of the physical risk of the asset;
 - Calculation of asset transition risk;
 - Application of voluntary environmental certifications (e.g. LEED® Leadership in Energy and Environmental Design) of buildings and neighbourhoods;
- Social, area in which risks and related objectives and parameters are identified in terms of integration and/or social impact such as:
 - Decent working conditions;
 - Living standards and well-being;
 - Community and society;
 - Engagement and relationship with stakeholders
- Governance, area in which risks and related objectives and parameters are identified in terms of corporate governance of sustainability:
 - Ethics;
 - Transparency;
 - ESG Rating of the company.

In addition, the Fund is subject to the Global Real Estate Sustainability Benchmark (GRESB), an independent global ESG rating that allows the performance of COIMA Porta Nuova P35 to be compared to an international benchmark, compared to the rating calculated internally using COIMA ESG Metrics.

Data sources and processing

The data needed to determine the sustainability goals of the investment is collected on a periodic basis from internal data rooms. In these data rooms, information about the materials used, the Energy Performance Certificate of the building, the sustainability certifications achieved, etc. is available. In some cases, the data are also obtained from regional or national public databases, while the data relating to the consumption and

³ The COIMA ESG Metrics is a proprietary sustainability risk measurement and monitoring tool that allows for a quantitative assessment in the form of a score on a 100 basis (where 0 is minimum ESG risk and 100 is maximum risk) of the investment's contribution to the sustainability dimensions indicated below. In particular, the process of investing in the Fund is tied to the achievement of a maximum ESG risk score of 40/100, which will be monitored throughout the life of the Fund.

actions of tenants or suppliers are collected by filling in specific questionnaires relating to their ESG performance.

The quality of the data is verified through control measures that are carried out during due diligence and periodic annual checks. In most cases the data are actual and real, but, when necessary, estimations are made. Those could occur because data that comes from third parties is not directly controllable by COIMA.

Limitations to methodologies and data

With regards to environmental data, particularly physical and transition risk, COIMA uses third-party tools. However, the lack of a guideline on benchmarks and reference scenarios makes it difficult to compare data at market level.

With regards to social data, at the time of writing the Social Taxonomy is not yet being finalized, therefore, the requirements of the first two social indicators explained in the "Methodologies" will not necessarily be aligned with what will be requested in the final version of the Social Taxonomy.

Furthermore, with regard to data relating to "Stakeholder engagement", this data will be progressively collected by tenants and contractors, therefore it can be estimated or not on the basis of the availability of information received from stakeholders. In any case, COIMA will try to minimize the use of estimates, so that the characteristics of the investment are not affected.

Due Diligence

The Risk Management function supervises the entire due diligence process, which is performed with the aim of:

- a. understanding the investment risks and the ESG risks associated with investments through the evaluation of specific elements included in the COIMA ESG Metrics;
- b. verifying that the risk-return profile is in line with the risk profile of the fund;
- c. analysing the areas for improvement in terms of the ESG objectives of the investment identified, with the purpose to identify an "as-is" and a "target" scenario.

The results of the analysis and the ESG targets for investment management are integrated in the investment memorandum presented to the Investment Committee and the Board, which also contains a summary of the main findings of the due diligence.

Engagement policies

Investment preferences, in addition to stakeholder involvement, are crucial elements for COIMA's business: collaboration is an integral part of all projects and is necessary to obtain the best results on the market and to be a catalyst in the education and communication of ESG issues.

Through the commitment with the Stakeholders, COIMA aims not only to promote sustainability but also to reduce and mitigate the main negative effects deriving from its investments. The cultural events organized by the Riccardo Catella Foundation, for example, intend to involve the public and non-profit sector with the aim of developing civic projects for the community aimed at spreading the culture of sustainability and promoting

a responsible approach to urban development. This culture is further developed with the involvement of contractors and service providers engaged in the building construction/refurbishment process, who are reminded of the importance of using eco-sustainable and recycled materials as much as possible, in order to promote economic circularity and use of renewable sources.

In meetings with tenants, the degree of satisfaction with the management of the property is measured, while the need to adopt sustainable behaviours within their homes and offices is also underlined, encouraging lower energy consumption, where possible. In the same way, the engagement with designers and architects aims to promote the reduction of energy use and greenhouse gas emissions, through the development of buildings characterized by advanced insulation and ventilation systems and the use of low energy consumption equipment / appliances.

Finally, COIMA is aware of the influence that the choices of investors and partners have in promoting a more sustainable future. For this reason, the Company is committed to promoting the choice of ESG investments during quarterly updates and industry conferences and events, in order to direct towards increasingly sustainable investments.

Designated reference benchmark

An index has not currently been designated as a benchmark to meet the environmental or social objectives pursued by the financial product, excluding the Global Real Estate Sustainability Benchmark (GRESB).

The Fund's sustainability objectives are to be achieved over its useful life and guide the investment decisions to be made from time to time for each asset.