



PAI Statement 2025

Reporting of "Principal Adverse Impact" indicators for the reference year 2024

Statement on principal adverse impacts of investment decisions on sustainability factors

Financial market participant: Prelios SGR S.p.A. **LEI Code:** 81560096C87A5161B705

Summary

Prelios SGR S.p.A. 81560096C87A5161B705 considers principal adverse impacts of investment decisions on sustainability factors. This statement is the consolidated statement on the principal adverse impacts on the sustainability factors of Prelios SGR S.p.A.

This statement on the main adverse effects on sustainability factors concerns the reference period from 1 January to 31 December 2024.

Given the availability of the data, the Company reported on the following metrics for indicators applicable to investments in real estate assets: (i) exposure to fossil fuels through real estate assets; (ii) exposure to energy inefficient real estate assets; (iii) Energy intensity; (iv) waste generation during operations.

Despite the efforts made by the Company to submit ad hoc questionnaires for the retrieval of detailed data directly from the companies benefiting from the investments, it was not possible to find complete and reliable information useful for the calculation of the indicators. This circumstance reflects the characteristics of the credit investments of the two funds under management that provide for the indirect investment of the same funds through, mainly, the subscription of notes of securitization vehicles. In these cases, in fact, there is limited access to information on ESG issues and the management of the Borrower, as well as a lesser willingness of the Borrower to provide such information, unless the information is subject to an information obligation within the loan agreement. In order to make it possible to calculate and take into account the indicators also for this perimeter, the Company has defined a calculation framework through the collection of public information deriving from Non-financial Declarations, the use of private reports for the retrieval of detailed data and public databases for the retrieval of sectoral data to make reliable estimates. This framework allowed the calculation of all 14 mandatory PAIs and 2 additional indicators.

For the next reference period, the Company plans to resubmit the questionnaires again for the collection of detailed data and is committed to intensifying engagement with the companies benefiting from the investments also through the inclusion, where possible, within the new contractual agreements (renegotiations or new disbursements), of clauses that provide for the undertaking to provide information useful for the calculation of the applicable PAI metrics.

Description of the principal adverse impacts on sustainability factors

Indicators applicable to investments in investee companies

Adverse sustainability indicators	Metric	Effect year 2022	Effect year 2023	Effect year 2024	Explanation	Action undertaken, planned actions and targets set for the next reference period
CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS						
Greenhouse gas emissions	1. GHG emissions	Scope 1 GHG emissions	Not calculated	Not calculated	Not calculated	For GHG emissions, the detailed data broken down by Scope 1 could not be found. The aggregated data of total GHG emissions was then calculated and reported. ¹
		Scope 2 GHG emissions	Not calculated	Not calculated	Not calculated	For GHG emissions, the detailed data broken down by Scope 2 could not be found. The See note 1

¹Since 2023, the Company undertook to request, by questionnaire, data from the companies benefiting from the investments. Despite the efforts, the available data were not sufficient to perform an adequate calculation of the metric. In order to find useful data in the future, the Company has included in the new contractual agreements with the companies benefiting from the investments clauses that provide for the sending of such data. For the next reference period, the Company expects to submit the questionnaires for the collection of the data in question and undertakes to intensify engagement with the companies benefiting from the investments. In the event that this will not be profitable, the Company undertakes to use again the calculation framework of this report, sophisticating the methodology where possible and expanding the percentage of GBV taken into account.

						aggregated data of total GHG emissions was then calculated and reported.	
		Scope 3 GHG emissions	Not calculated	Not calculated	Not calculated	For GHG emissions, the detailed data broken down by Scope 3 could not be found. The aggregated data of total GHG emissions was then calculated and reported.	See note 1
		Total GHG emissions	Not calculated	3535.87 tons of CO2e	3147.09 tons of CO2e	The reported data refers to around 54% in GBV terms of the total asset portfolio under management. Of this portion, about 80% refer to data point derived from counterparties' non-financial statements, while the remaining share was estimated using a combination of data from private reports and the ISTAT public database.	See note 1
	2. Carbon footprint	Carbon footprint	Not calculated	11,35 tons/€mEV	10,99 tons/€mEV	The reported data refers to around 54% in GBV terms of the total asset portfolio under management. Of this portion, about 80% refer to data point derived from counterparties' non-financial statements, while the remaining share was estimated using a combination of data from private reports and the ISTAT public database.	See note 1
	3. GHG intensity of investee companies	GHG intensity of investee companies	Not calculated	2,26 tons/€mrev	2,29 tons/€mrev	The reported data refers to around 54% in GBV terms of the total asset portfolio under management. Of this portion, about 80% refer to data point derived from counterparties' non-	See note 1

						financial statements, while the remaining share was estimated using a combination of data from private reports and the ISTAT public database.	
4.	Exposure companies active in fossil fuel sector	Share of investments in companies active in the fossil fuel sector	Not calculated	0%	0%	The reported data refers to around 54% in GBV terms of the total asset portfolio under management. The data was calculated using the ATECO Code found by private reports.	See note 1
5.	Share of non-renewable energy consumption and production	Share of non-renewable energy consumption and non-renewable energy production of enterprises benefiting from investments from non-renewable energy sources in comparison with renewable energy sources, expressed as a percentage of total energy sources	Not calculated	95%	91,24%	The reported data refers to around 54% in GBV terms of the total asset portfolio under management. Of this portion, about 80% refer to data point derived from counterparties' non-financial statements, while the remaining share was estimated using a combination of data from private reports and the Eurostat public database.	See note 1
6.	Energy consumption intensity for high impact climate sector	Energy consumption in GWh per EUR million of revenue of investee companies, by NACE A	Not calculated	0,000 GhW/€m rev	0,000 GhW/€m rev	The reported data refers to around 54% in GBV terms of the total asset portfolio under management. Of this portion, about 80% refer to data point from counterparties' non-financial statements, while the remaining share was estimated using a combination of data from private reports and ISTAT and Eurostat public databases.	See note 1
		Energy consumption in GWh per EUR million of revenue of investee companies, by NACE B	Not calculated	0,000 GhW/€m rev	0,000 GhW/€m rev		See note 1
		Energy consumption in GWh per EUR million of revenue of investee companies, by NACE C	Not calculated	5,527 GhW/€m rev	5,514 GhW/€m rev		See note 1
		Energy consumption in GWh per EUR million of revenue of investee companies, by NACE D	Not calculated	0,000 GhW/€m rev	0,000 GhW/€m rev		See note 1

		Energy consumption in GWh per EUR million of revenue of investee companies, by NACE E	Not calculated	0,000 GhW/€m rev	0,000 GhW/€m rev		See note 1
		Energy consumption in GWh per EUR million of revenue of investee companies, by NACE F	Not calculated	0,012 GhW/€m rev	0,030 GhW/€m rev		See note 1
		Energy consumption in GWh per EUR million of revenue of investee companies, by NACE G	Not calculated	0,016 GhW/€m rev	0,000 GhW/€m rev		See note 1
		Energy consumption in GWh per EUR million of revenue of investee companies, by NACE H	Not calculated	0,000 GhW/€m rev	0,096 GhW/€m rev		See note 1
		Energy consumption in GWh per EUR million of revenue of investee companies, by NACE L	Not calculated	0,017 GhW/€m rev	0,013 GhW/€m rev		See note 1
Biodiversity	7. Activities negatively affecting biodiversity - sensitive areas	Share of investments in enterprises benefiting from investments that have sites or conduct operations in biodiversity sensitive areas, or adjacent areas, where the activities of such enterprises adversely affect those areas	Not calculated	Not calculated	0%	The reported data refers to around 54% in GBV terms of the total asset portfolio under management. The reported data refers to the number of counterparties with operational offices located near biodiversity-sensitive areas, as verifiable through three public databases.	See note 1
Water	8. Emissions to water	Tonnes of water emissions generated by the beneficiary companies per million EUR invested (weighted average value)	Not calculated	Not calculated	0,000009	The reported data refers to around 54% in GBV terms of the total asset portfolio under management. The reported data refers on information on emissions into water provided by the ISPRA database - "PRTR Registry: Emissions into Water". Through this register, it was possible to associate the NACE/Ateco codes with the sectors for	See note 1

						which data on water emissions are available.	
Waste	9. Relationship between hazardous and radioactive waste	Tonnes of hazardous and radioactive waste generated by the beneficiary enterprises per EUR million invested (value expressed as a weighted average)	Not calculated	0.000015 tons/€m EV	0.000021 tons/€m EV	The reported data refers to around 54% in GBV terms of the total asset portfolio under management. Of this portion, about 80% refer to data point from counterparties' non-financial statements, while the remaining share was estimated using a combination of data from private reports and ISTAT and ISPRA public databases.	See note 1
INDICATORS ON SOCIAL AND PERSONNEL ISSUES, RESPECT FOR HUMAN RIGHTS AND ISSUES RELATING TO THE FIGHT AGAINST ACTIVE AND PASSIVE CORRUPTION							
Indicators on social and personnel issues	10. Violations of the principles of the United Nations Global Compact and the Organisation for Economic Cooperation and Development (OECD) guidelines for multinational enterprises	Share of investments in enterprises benefiting from investments that have been involved in violations of the principles of the UN Global Compact or the OECD guidelines for multinational enterprises	Not calculated	0%	0%	The reported data refers to around 54% in GBV terms of the total asset portfolio under management. The data comes from various web searches and public and private databases.	See note 1

	11. Lack of procedures and compliance mechanism s to monitor compliance with UN Global Compact Principles and OECD Guidelines for Multinational Enterprises	Share of investments in enterprises benefiting from investments that do not have policies to monitor compliance with UN Global Compact principles or OECD guidelines for multinational enterprises, or mechanisms for dealing with complaints/complaints about violations of the principles of the UN Global Compact or the OECD Guidelines for Multinational Enterprises.	Not calculated	0%	0%	The reported data refers to around 54% in GBV terms of the total asset portfolio under management. Of this portion, about 80% refer to data point from counterparties' non-financial statements, while the remaining share was estimated considering that counterparties are most likely not equipped with such internal procedures due to the limited size that does not provide for similar documentation in any case.	See note 1
	12. Gender pay-gap not corrected	AVERAGE of the gender pay gap not corrected in the enterprises benefiting from the investments	Not calculated	-3,63%	-3,56%	The reported data refers to around 54% in GBV terms of the total asset portfolio under management. Of this portion, about 80% refer to data point derived from counterparties' non-financial statements, while the remaining share was estimated using a combination of data from private reports and the ISTAT public database.	See note 1
	13. Gender diversity in the board	Average ratio of women/men among the members of the Investment Beneficiary Business Council, expressed as a percentage of all Board members	Not calculated	30,43%	29,55%	The reported data refers to around 54% in GBV terms of the total asset portfolio under management. Of this portion, about 80% refer to data point from counterparties' websites, while the remaining share was calculated using point data from private reports.	See note 1
	14. Exposure to controversies	Share of investments in companies benefiting	Not calculated	0%	0%	The reported data refers to around 54% in GBV	See note 1

	al weapons (landmines, cluster munitions, chemical weapons and biological weapons)	from investments involved in the manufacture or sale of controversial weapons				terms of the total asset portfolio under management. The data was calculated using the ATECO Code found by private reports.	
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Indicators applicable to investments in real estate assets

Fossil fuels	17. Exposure to fossil fuels through real estate assets	Share of investments in real estate assets involved in the extraction, storage, transport and production of fossil fuels	0%	0%	0%	For calculating the indicator, the use of the individual properties under management on the Corporate IT Platform (PAN) has been considered.	Within its <i>Responsible Investment Policy</i> , the Company operates on the basis of an exclusion list ("Negative Screening") that provides for the exclusion of the possibility of building new buildings for extraction, the storage, transport or production of fossil fuels. For this reason, the Company expects that this indicator will remain constant / will have minimal impacts even for subsequent periods.
Energy efficiency	18. Exposure to energy inefficient real estate assets	Share of investments in energy-inefficient real estate assets	85,57%	80,55%	79,14%	To take the indicator into account, the Energy Performance Certificates of the buildings under management have been collected to derive their energy class. The following formula has been used for the calculation, as required by current legislation: $(\text{Value of real estate assets constructed before 31/12/2020 with an EPC of C or less}) + (\text{Value of real estate assets constructed after 31/12/2020 with an EPC of less than NZEB according to Directive 2010/31/EU}) / \text{Value of real estate assets required to comply with EPC and NZEB}$.	The Company is currently committed to improving the energy efficiency of buildings under management. In particular, it provides for the different funds, the construction and energy efficiency of many buildings under management by providing for the transition to better energy classes and, where possible, subjecting the buildings under management to voluntary certifications such as LEED (<i>Leadership in Energy and Environmental Design</i>) or BREEAM (<i>Building Research Establishment Environmental Assessment Method</i>) and other platforms. This approach can encourage sustainable building design and management, helping to reduce GHG emissions and improving their overall efficiency. Where the strategies for the development of real estate do not include significant construction/redevelopment and are intended for sale in a short time, However, the possibility of minor interventions during any maintenance will be evaluated. Downstream of the finalization of the different yards/redevelopment interventions, the Company foresees a progressive improvement of the PAI indicator for the subsequent periods.

Other indicators of principal adverse impacts on sustainability factors

Other indicators related to climate

Adverse sustainability indicators	Adverse impact on sustainability factors	Metric	Effect year 2022	Effect year 2023	Effect year 2024	Explanation	Action undertaken, planned actions and targets set for the next reference period
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	(qualitative or quantitative)						
Indicators applicable to investments in investee companies							
CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS							
Water, waste and material emissions	9. Investments in chemical manufacturing companies	Share of investments in enterprises benefiting from investments whose activities fall under Annex I, Division 20.2, of Regulation (EC) No 1893/2006.	Not calculated	0%	0%	The reported data refers to around 54% in GBV terms of the total asset portfolio under management. The data was calculated using the ATECO Code found by private reports.	See note 1
Indicators applicable to investments in real estate assets							
Energy consumption	19. Intensity of energy consumption	Energy consumption in GWh of real estate assets held per square meter	0.000066917 GWh/m ²	0.00009374 GWh/m ²	0.00006505 GWh/m ²	To take the indicator into account, the Company obtained from the EPC the related energy consumption from the buildings under management. A weighting system based on square metres and market values was used for the calculation.	In parallel with the expected energy efficiency through the construction of new buildings / significant redevelopment of existing buildings, with the consequent decrease in the intensity of energy consumption, the Company considers interventions aimed at reducing the energy needs of buildings under management also in the context of maintenance. Further initiatives under assessment include the implementation of monitoring systems to measure and analyse energy consumption, GHG emissions and plant efficiency. This data can be used to identify areas for improvement and set specific emission reduction targets. Policies to raise awareness and involve drivers are also underway to encourage more responsible behaviour and a greater commitment to sustainability.
Waste	20. Waste production during operations	Share of real estate assets not equipped with waste sorting facilities and not subject to a waste recovery or recycling contract	45,30%	42,34%	41,66%	To consider the indicator has been obtained data on the share of waste sorting on the basis of the municipalities in which the buildings are located from the ISPRA database. For the calculation of the metric, complements to one of the collected data were obtained and these data were then weighted using Market Values.	For subsequent periods, the Company plans to refine the methodology for calculating the indicator, including by making use of timely information on whether there are areas/ rooms used for sorting waste.

Adverse sustainability indicators	Adverse impact on sustainability factors (qualitative or quantitative)	Metric	Effect year 2022	Effect year 2023	Effect year 2024	Explanation	Action undertaken, planned actions and targets set for the next reference period
Indicators applicable to investments in investee companies							
Indicators on social and personnel issues	17. Number of convictions and amount of fines imposed for violations of active and passive corruption laws	Number of convictions and amount of fines imposed for violations of the laws against active and passive corruption committed by the companies benefiting from the investments.	Not calculated	0	0	The reported data refers to around 54% in GBV terms of the total asset portfolio under management. The data comes from various web searches and public and private databases.	See note 1

Description of policies to identify and prioritise principal adverse impact on sustainability factors

The Board of Directors (Board) of Prelios SGR S.p.A. approved the policies relating to identify and prioritize principal adverse impact on sustainability factors as of 28 March 2023.

These policies provide for the involvement of the relevant corporate bodies and structures, in accordance with the following.

The *Asset & Development Management* structure is responsible for the collection of relevant data for the purposes of the PAI indicators for real estate assets (Real estate AIFs), while the *Fund Management* structure is responsible for the collection of the same for the movable assets (credit and private equity AIFs).

The *Fund Management* structure, in coordination with the *Risk Management* (RM) function and the possible support of the Head of Sustainability, measures the PAI indicators. In particular, the RM function verifies the completeness of the data useful for calculating the PAI and monitors their values over time, reporting any abnormal or particularly high/ critical values according to the company strategy.

The *Head of Sustainability*, in agreement with the *Fund Management* and *Asset & Development Management* structure, identifies and prioritizes the PAI and proposes to the *Sustainable Finance Committee* (CSF) any measures to be planned to mitigate its negative effects. In addition, the *Head of Sustainability* monitors, on the basis of available data and information, the reporting of indicators on the principal adverse impact on sustainability related to the assets managed by the Company and submit this statement to the CSF on the principal adverse impact of investment decisions on sustainability.

The CSF is entrusted with advisory and proposal-making functions towards the Board of Directors and the Chief Executive Officer (CEO) and in particular, express opinions and/ or recommendations on the proposals made by the Head of Sustainability on any measures to be planned to mitigate the principal adverse impact on sustainability identified and on this statement on the principal adverse impact of investment decisions on sustainability.

The Board, therefore, is responsible for the approval of the two previous aspects on the proposal of the CSF.

The implementation of the policies described above is the responsibility of the CEO.

Several factors were taken into account in the selection of the different indicators, including the availability of data at IT level within the systems and/ or available from external databases and the materiality of the indicator itself. For the evaluation of the PAI relating to the real estate AIFs, which constitute the largest share in terms of managed AUM, the Company has committed itself to collecting the Energy Performance Certificates (EPC) properties under management and their loading into the Corporate IT Platform (PAN). In addition to the use of other information regarding the properties under management on PAN, the Company, for the evaluation of indicators PAI has used the ISPRA database (Higher Institute for Environmental Protection and Research) and the "Portal opendata of the City of Madrid".

For the purpose of calculating the PAI indicators for real estate AIFs, given the unavailability of all EPC, the Company provided for the construction of an internal benchmark for the estimation of missing information. For this reason, the identified value may deviate from the actual value of the indicator.

With a view to continuous improvement, the Company has prepared a questionnaire for Tenants, in which granular information is required for the purposes of calculating PAI, in order to achieve an approach as timely as possible.

Finally, it should be noted that to date numerous investments are excluded from the calculation where construction work is underway / redevelopment that will lead to green certifications (such as: LEED and/ or BREEAM) for an estimated equivalent value of about Euro 3 billion. The conclusion of such interventions may have significant impacts on the improvement of the PAI. Without prejudice to the Company's effort to find the information to monitor also the indicators relating to credit AIFs in compliance with the pro tempore regulations in force, given the characteristics of the borrowers of the managed credit funds, the monitoring of these indicators is subject to the completion by the beneficiary companies of an investment questionnaire that the Company submits in order to collect the relevant data. Questionnaires were submitted during 2023, but the data collected were not sufficient to perform an adequate calculation of the metrics. To find useful data, the Company enters into new contractual agreements (new payments or renegotiations) with the companies benefiting from the investments of the clauses to make up for this lack. For the next reference period, the Company expects to submit the questionnaires for the collection of the data in question again and undertakes to continue with the engagement towards the companies benefiting from the investments. With a view to continuous improvement, in order to make it possible to calculate and take into account indicators also for this perimeter, the Company has defined a framework for calculation through the collection of public information deriving from Non-financial Declarations, the use of private reports for the retrieval of detailed data and public databases for the retrieval of sectoral data to make reliable estimates.

This framework allowed the calculation of all 14 mandatory indicators and 2 additional indicators.

Engagement policies

The Company actively promotes both internally and externally engagement policies aimed at raising stakeholders' awareness of sustainability issues, in order to positively influence behaviour and increase the degree of transparency of its reference context.

With regard to the commitment within the organization, the Company prepares and implements a training plan on ESG issues, intended for both SGR employees and members of decision-making and governance bodies, with the twofold objective of increasing awareness on ESG issues as well as the dissemination of specific expertise in the organisation. With regard to its external commitment, the Company, aware of its position as a "prime contractor", takes action to encourage suppliers, conductors and other counterparties of AIFs, to adopt an ESG approach.

Within real estate AIFs, the Company promotes the introduction of sustainable practices also through the use of specific contractual frameworks, such as CDs. "green leases", which contain a set of forecasts aimed at promoting the sustainable use of leased assets.

References to international standards

The Company operates in compliance with the principles of professional ethics and transparency, through the adoption and compliance with Model 231 and the Code of Ethics, ensuring proper management of conflicts of interest and risks related to corruption, money laundering, terrorism and international sanctions. In its relations with business partners, SGR requires the explicit acceptance of its Code of Ethics and the inclusion of the CSR Clause in the relevant contractual documentation. The Code of Ethics and the CSR Clause include, inter alia, aspects consistent with the main international standards, such as "OECD Guidelines for Multinational Enterprises", "UN Principles on Business and Human Rights", "principles enshrined in the EU Charter of Fundamental Rights", etc.

The Company is committed to supporting the main "Sustainable Development Goals", promoted by the UN and adheres to the principles and guidelines defined for responsible investments by the United Nations - Principles for Responsible Investments (PRI) that aim to encourage the integration of ESG factors in investment choices, encouraging the engagement of the actors involved and monitoring their progress.

In 2020, the Company joined the GRESB for some managed funds while during the last years sustainability practices were consolidated within the governance and processes, with the introduction of ESG due diligence, not only for real estate AIFs but also for credit AIFs. With regard to real estate, this due diligence was strengthened during 2023 with the aim of introducing a quantitative approach to the assessment of social elements.

To date, the Company does not consider *forward-looking climate scenarios* for currently reported PAI indicators. For subsequent periods, the Company may evaluate a framework dedicated to the assessment of the use of *forward-looking climate scenarios*, subject to the retrieval of data regarding also the PAI indicators applicable to the companies benefiting from the investments.

Historical comparison

Credit AIFs

In the course of 2024, it was possible to calculate the entire set of PAI indicators required by the legislation, including 14 mandatory and 2 optional indicators. For comparison, in 2023, 12 out of 14 mandatory indicators and 2 optional indicators had been calculated. This result is the result of a significant effort by the Company, aimed at taking into consideration the Main negative effects on sustainability factors also for this perimeter as it considers of fundamental importance both participation in the transition to a more sustainable economy and the importance of integrating sustainability factors throughout the investment process in order to avoid uninformed choices and reduce risks of the Funds.

The performance of the PAI indicators between FY 2023 and FY 2024 remained substantially stable, without showing significant changes in the indicators considered. Finally, it should be noted that the estimated percentage share of data is approximately 42%.

Real Estate AIFs

The "Fossil Fuels" indicator remains unchanged at 0% in 2024, reflecting Prelios' commitment to strictly comply with a "Negative Screening" policy. This policy, in fact, provides for the categorical exclusion of the possibility of constructing new buildings intended for the extraction, storage, transport or production of fossil fuels.

The "Energy efficiency" indicator has recorded a steady reduction, from 85.57% in 2022 to 80.55% in 2023 and finally to 79.14% in 2024. This result is attributable to the significant efforts undertaken by the Company to improve the energy efficiency of the properties under management. In particular, these efforts have been intensified with the start of operations of SFDR Article 8 compliant funds, which have played an important role in promoting and implementing more sustainable and energy-efficient practices.

The indicator "Energy consumption" recorded an increase from 0.000066917 GWh/m² in 2022 to 0.00009374 GWh/m² in 2023 and a subsequent decrease to 0.00006505 GWh/m² in 2024. The decrease is attributable, on the one hand, to the inclusion in the portfolio of assets with below-average energy consumption; on the other hand, to the exit of positions that in 2023 had negatively affected the indicator, which are currently undergoing renovation and energy efficiency improvements.

The "Waste" indicator recorded a continuous decrease, from 45.30% in 2022 to 42.34% in 2023 and 41.66% in 2024. This reduction is mainly due to the calculation methodology used, in fact, it depends on the progressive increase in separate waste collection in all municipalities as evidenced by ISPRA data.

Finally, it should be noted that the estimated percentage share of data is around 42%, compared to 38% in the previous year. The result obtained is attributable to the exit from the portfolio of assets under management for which timely data were available, together with the temporary unavailability of the census of new properties entering the internal management systems.