

**CORPORATE SOCIAL
RESPONSIBILITY PROTOCOL**

1. INTRODUCTION

NATAM MANAGEMENT COMPANY S.A. (hereinafter “the Company”), as part of Banca Finnat Euramerica Group S.p.A., emphasis, together with its parent company, the importance to conduct its business with particular focus to the social and environmental aspects to become an example of good, corporate social responsibility.

In this sense, the Company, in carrying out its activities, calibrates and manages their impact in environmental, social and governance (ESG) terms, enhances good environmental and social practices and contributes to disseminating strong motivations so that they can be followed and adopted by the largest number of people and entity.

As consequence, the Company has released this *Corporate Social Responsibility Protocol* (CRS Protocol) to outline how the Company is implementing its commitment to incorporate ESG criteria, within its own internal organization and in the framework of its investment strategy and how intends to provide disclosures, according to the EU Regulation 2019/2088 (SFDR Regulation).

2. AT CORPORATE LEVEL

2.1 Ethical Codes and Professional Standards

At NATAM managers and employees are held to respect the highest ethical and professional standards, being bound by:

- the Banca Finnat Ethical Code (“Codice Interno di Comportamento”),
- the NATAM Internal Policies & Procedures (“NATAM IPM”) and
- the ALFI Code of Conduct (release 2013).

In particular, the above set of internal ethical rules outlines and details the following items:

- principles and rules of conduct
- activities incompatible with working duties
- conflicts of Interest with Customers
- personal transactions
- behavior in the workplace and outside, discrimination and sexual harassment
- treatment of personal data and information
- protections of privileged and confidential information
- gifts
- duties of external suppliers and sub-contractors
- relations with third parties (Supervisory Authority, Public Admin., Customers, Press)
- use of Company assets

2.2 Working Environment

2.2.1 Workplace behaviour

According to the adopted internal codes of conduct, employees and managers are bound to respect, both in the workplace and outside, high standards of correctness, refraining from conducting behaviors that are not compatible with the tasks performed or that could compromise the reputation and image of the Company. In this sense, the staff must adopt behaviors based on correctness and on the respect for the dignity, also in private life, refraining from carrying out activities not lawful, ethically incorrect or may prejudice their morality and financial situation (i.e. gambling, betting).

In addition, at the Company, any form of discrimination is also prohibited as well as any harassment, unwanted behaviors with a sexual connotation expressed in verbal or non-verbal physical form that violate the dignity of the person or create an intimidating, hostile or humiliating climate.

2.2.2 Health and Safety Protocol

The health and safety of the employees is the number one priority of the Company. Accordingly, the Company provides and maintains a safe and healthy working environment for employees with adequate facilities and arrangements for their welfare, aimed, in particular, to limit the risk of accidents (starting from its set up the Company doesn't record any accident). With these purposes, the Company has laid down its internal *Healthy and Safety Protocol*.

2.2.3 Equal Treatment and promotion of diversity

The Company is committed to offering equal opportunities to all and to foster an employment environment free from all aspects of discrimination, remaining unequivocally committed to grant equal access and equal opportunity in employment practices.

In this sense the Company and its Parent Company, have in place a hiring process that does not discriminate on the basis of race, religion, gender, national origin, age, disability genetic information, sexual orientation.

2.2.4 Prevention and management of waste

The Company fully respects the Luxembourg prescriptions on the management of waste, which requires to manage household and similar waste (including organic waste and other recoverable waste fractions) and to implement measures to reduce waste.

In accordance with the relevant regulations, the Company seeks to organize waste management so as to limit energy use and the impact on the environment. It does so by carrying out actions in the following order of priority:

- Prevention
- Recycling
- other forms of recovery, in particular energy recovery

2.2.5 Environmental Initiatives

The Company, in carrying out its day to day activity:

- limits to the minimum necessary the use of air travel, raw materials and supplies;
- put in place Video Conferencing facilities to be used to reduce the requirement for unnecessary journeys;
- asks key suppliers to provide copies of their environmental policies.
- invites staff to reduce unnecessary paper usage – where appropriate including double-sided printing, and photo-reduction energy usage
- minimizes the use of electricity, by ensuring appliances are turned off when not in use.

2.2.6 Data Protection

The Company is committed to complying with the data protection principles established by the EU Directive on Data Protection, as implemented by the Luxembourg laws, from time to time in force. All employees and those carrying out activities on behalf of the Company are responsible for ensuring compliance with the Corporate Data Protection Policy.

2.2.7 Remuneration

The Company has adopted, for its staff, certain remuneration principles, in line with the business strategy, objectives and values that are consistent with and promote sound and effective risk management and do not encourage risk-taking (including sustainability risks), which is inconsistent with the risk profiles, rules or instruments of incorporation of the managed funds.

3. AT THE BUSINESS LEVEL

3.1 The Business activity

The Company considers as virtuous behavior incorporating ESG criteria within the investment processes. In this regard – although the specific business model carried out by the Company (the outsourcing model as *Third party Management company*) consists in establish several investment strategies, according to the criteria and skills of its “partners”, which often also act as Investment Manager -- NATAM encourages its business partners to keep themselves constantly updated on developments in the matter, also in order to promptly assess the opportunity to undertake initiatives consistent with these purposes.

In particular, the Company, while allows and does not preclude different strategies, invites and encourages its partners - Investment manager and/or fund’s promoter - to promote environmental or social characteristics as far as having sustainable investment objective, providing any support to fully comply with regulations and best practices in the phase of the setup of the projects and their ongoing activity.

In addition the Company keeps itself duly updated to maintain an adequate know-how to provide sound processes and technical methodologies to manage sustainability risk and objectives in favor of the business partners, customers, investment managers and/ or investors.

In this framework the Company has long been committed to offering its employee the opportunity to achieve a corporate culture also on social and environmental aspects also participating to conferences and sharing technical documentation.

The Company is also committed to integrating assessments, metrics and controls relating to sustainability objectives (and related risks) into the processes and activities that are not delegated (primarily risk management). It integrates its own Risk management process.

3.2 ESG Integration and Consideration in the Investment Process

Art. 2 (22) of the SFDR defines “sustainability risk” as every environmental, social or governance (“ESG”) event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of the investment; given that risk may have a negative impact on returns, the aim of Natam is to identify specific indicators in order quantify and mitigate the ESG risks, and therefore, in cooperation with the delegated investment managers, taking them into account in the investment process.



Natam integrated the ESG risk into the risk profiles of those sub funds which integrate sustainability risks into their investment decision-making processes (art.8 SFDR) but also keeps an internal control, through an in house model based on third party data, on the sub funds which do not adopt ESG criteria in the investment policy in order to monitor the sustainability risk in any case.

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As of today (10 March 2021) one of the four sub-managers has formally integrated the ESG factors into its management process while the other three are evaluating this opportunity. For 8 out of the 19 sub funds that have designated Natam as Manco, changes to the investment policies have been proposed to the CSSF in order to make them compliant with the provisions of E.U. 2019/2088 art. 8 (funds that promote sustainability) while the remaining 11 fall, for the moment, under art.6.

As soon as the new versions of the Prospectus enter into force, the relevant documentation will be made available and the ex art 8 sub-funds will be listed.