

RESPONSIBLE INVESTMENT REPORT

Regulation (UE) 2019/2088

2024

Clessidra Capital Credit SGR

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RESPONSIBLE INVESTMENT REPORT

CLESSIDRA

A multi-asset platform
for businesses and investors

VISION

Clessidra aims to contribute, through the development of innovative asset management solutions, to a renewed synergistic relationship between financial capital, small and medium-sized Italian enterprises, society, and the environment, with the goal of supporting productive growth, creative excellence, and the competitiveness of businesses in domestic markets and in facing global challenges.

MISSION

The Clessidra Group is an independent platform focused on the Italian alternative investment market, offering Italian small and medium-sized enterprises financial resources, qualified expertise, full commitment, and experience in ESG integration, generating growing and sustainable value for its investors. Through a comprehensive range of solutions – Private Equity, Private Debt, and Factoring – the Clessidra Group responsibly supports entrepreneurs, promoting sustainable growth and meeting the strong demand for diversified investments. The excellence of its internal resources and their continuous development are at the core of the Group's growth strategy, supporting companies at all stages of their life cycle.



In 2024, Clessidra Capital Credit SGR further strengthened its leadership in integrating ESG criteria into investment strategies. Our commitment to a sustainable future continued to evolve, placing greater emphasis on creating value that goes beyond profit, incorporating environmental, social, and governance aspects into all our decisions.

Our concrete commitment to sustainability began with the launch of the Clessidra Private Debt fund in 2022, an Article 8 SFDR fund that represented a first but decisive step in integrating sustainability into investment decisions. This fund has had a positive impact, supporting the growth of companies committed to respecting and promoting environmental and social sustainability principles.

Throughout 2024, the management of the Clessidra Private Debt fund continued. The portfolio was further enriched with the introduction of four new companies. Thanks to the assignment of targeted ESG objectives, we were able to promote the growth of Italian SMEs, supporting them in sustainability projects that have led to tangible results in crucial sectors such as occupational health and safety, environmental impact reduction, corporate integrity, and supply chain management.

Building on this experience, we extended our approach to other business realities managed through our Clessidra Restructuring Fund and Clessidra Restructuring Parallel Fund (this last one being an Article 8 SFDR fund). For some of these companies, having the necessary leverage (thanks to our presence in the companies' capital), we actively supported their sustainable evolution, with the first year of operations already yielding significant ESG benefits.

Looking ahead, we will continue to intensify the integration of ESG criteria into our investment strategies, pursuing ambitious goals within our Group's sustainable vision. We are also considering the possibility of launching an Article 9 debt fund, with the aim of further driving sustainability and strengthening our commitment towards future generations.

With this second Responsible Investment Report, we reaffirm our devotion to transparency and accountability, providing our investors and stakeholders with a clear view of the progress made. We are proud of the results achieved and we look to the future with determination, ready to continue our journey in the world of sustainable investments. Thank you for your trust and support.

Mario Fera
CEO

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CLESSIDRA
CAPITAL
CREDIT
SGR

Clessidra Capital Credit SGR

Clessidra Capital Credit SGR, based in Milan, is an independent asset management company that manages closed-end alternative investment funds. Clessidra Capital Credit operates both in the distressed credit sector and in the performing credit sector, positioning itself as a financial partner for small and medium-sized Italian companies with strong industrial fundamentals, supporting their growth, consolidation, and turnaround projects. The company is controlled by Clessidra Holding S.p.A., which is 100% owned by Italmobiliare S.p.A.

Clessidra Capital Credit SGR's deep knowledge of the Italian industrial context enables it to ensure the identification and implementation of growth strategies aimed at enhancing the company and fostering long-term sustainable growth, or turnaround strategies focused on financial and asset restructuring in the long term. What makes Clessidra Capital Credit one of the most recognized managers in the sector in Italy is the technical expertise, combined with proven financial experience in credit and alternative investments, flexibility in structuring operations and intervention types and a dynamic management approach.

2003	Clessidra was founded in 2003 by Claudio Sposito with the goal of creating a highly professional asset management company operating in the Italian private equity sector, dedicated to the domestic upper-middle market segment, a relatively underpenetrated market but extremely appealing for opportunities and returns.
2010	In 2010, Clessidra was one of the first Italian signatories of the UN Principles for Responsible Investment .
2016	In 2016, following the sudden passing of Claudio Sposito, Clessidra was acquired by Italmobiliare S.p.A. , an investment holding controlled by the Pesenti Family. Listed on the Milan Stock Exchange since 1980, Italmobiliare S.p.A. has a market capitalization of approximately €1.2 billion
2019	In 2019, Clessidra launched a diversification strategy that progressively expanded the company's activities beyond its traditional private equity sector. Clessidra Holding is now an independent platform operating in alternative investments, asset management and factoring, capable of offering a wide range of products and services for institutional investors and the Italian mid-market. The Clessidra Group operates through three companies: Clessidra Private Equity SGR , Clessidra Capital Credit SGR , and Clessidra Factoring , each respectively specialized in private equity, private credit, and factoring activities. Each company has its own operational autonomy.
2020	Since 2020, aligning with Italmobiliare's renewed commitment to sustainability through its adherence to the UN Global Compact , all the companies in the Clessidra Group have progressively strengthened their ESG strategy, effectively contributing to the Sustainable Development Goals .
2022	Clessidra Capital Credit SGR launches the Clessidra Private Debt Fund , its first Article 8 SFDR fund. Clessidra Capital Credit SGR signs the UN Principles for Responsible Investment .
2023	Launch of the Clessidra Restructuring Parallel Fund , the second Article 8 SFDR fund. Completion of the acquisition of Value Italy, a manager of diversified NPL portfolios. The Clessidra Group joins the UN Global Compact , the world's largest corporate sustainability initiative.
2024	The Clessidra Group joins the Women's Empowerment Principles (WEPs) and Science Based Targets Initiative , obtaining validation for its CO2 reduction targets in line with the 1.5°C scenarios of the Paris Agreement.

Funds e portfolio companies

During 2024, Clessidra Capital Credit SGR continued managing its four funds. **Clessidra Restructuring Fund** completed its investment period; **Clessidra Restructuring Parallel Fund (CRPF)** increased the value of its assets through investment actions and capital appreciation, primarily with medium- and long-term duration. By December 31, 2024, **Clessidra Private Debt Fund (CPDF)** had completed 11 investments, 4 of which were made during the year. In December 2024, the merger by incorporation of the six funds managed by Value Italy SGR S.p.A. (acquired during 2023) into a new fund named **Clessidra Credit Recovery Fund** was completed.

This report outlines the approach to sustainability for the funds and their respective portfolio companies that fall under the category of products referred to in Article 8 of Regulation (EU) 2019/2088 (SFDR): **Clessidra Private Debt Fund and Clessidra Restructuring Parallel Fund**. These funds promote **environmental or social characteristics**, or a combination of such characteristics, ensuring that the companies in which investments are made adhere to **good governance** practices.

The reporting scope is clarified in the Reporting section.

Company	Investment date	Sector
Clessidra Restructuring Fund - Article 6 SFDR		
Launched in September 2019, Clessidra Restructuring Fund invests in the debts of Italian companies experiencing temporary financial distress but with solid industrial fundamentals. The fund also has financial resources raised from leading institutional investors to support turnaround processes.		
Sisma	March 2020	Personal. Home & Food Care
Italtel qualified minority	April 2022	Information & Communication Technologies
OMA qualified minority	October 2023	Automotive Components
ISCOM	June 2021	Manufacturing of coverings and cladding
Others		Various sectors
Clessidra Private Debt Fund - Article 8 SFDR		
Launched in April 2022, Clessidra Private Debt Fund finances entrepreneurs and managers in the growth industrial projects of performing companies. The fund offers a flexible and tailored range of financial products, promoting the sustainable evolution of business processes.		
Candy Factory financing + minority	November 2022	Food & Beverage
MGM/Rekord financing + minority	November 2022 Repayment in June 2024	Footwear
Trime financing	December 2022	Lighting
Gruppo Florence financing	December 2022 Repayment in October 2023	Fashion/Luxury
Groupack financing	August 2023	Mechatronics
Righi Elettroservizi financing + minority	December 2023	Industrial Automation
Bracchi financing + minority	December 2023	Transportations e Logistics
La Piadineria financing	May 2024	Food & Beverage
Alveo financing + minority	June 2024	Information Technologies

Società undisclosed financing	June 2024	Industrial chemical dosing solutions
Errevi financing	December 2024	Information Technologies
Clessidra Restructuring Parallel Fund - Article 8 SFDR Launched in February 2023, Clessidra Restructuring Parallel Fund is a "parallel" fund to the CRF Fund but does not provide additional credit to the companies in the CRF. The fund ensures full integration of ESG principles throughout the entire investment process.		
OMA	October 2023	Automotive components
ISCOM	June 2024	Manufacturing of coverings and cladding
Sisma	February 2024	Personal. Home & Food Care
Clessidra Credit Recovery Fund Launched in 2024, the Clessidra Credit Recovery Fund was created from the merger by incorporation of the 6 Value Italy funds, originated through the transfer of NPL (Non-Performing Loan) portfolios (including both Corporate and Retail exposures, secured and unsecured) from Italian banks in exchange for equity shares.		

Highlights: Clessidra Capital Credit SGR

ESG Commitment



UN PRINCIPLES FOR RESPONSIBLE INVESTMENT

Clessidra Capital Credit SGR has been a signatory of the UN Principles for Responsible Investment since 2022.

Rating: "Policy Governance and Strategy" ★★★★★ (91/100); "Direct - Fixed income - Corporate": ★★★★★ (52/100); "Direct - Fixed income - Private debt": ★★★★★ (94/100); "Confidence building measure" ★★★★★ (100/100).



UN GLOBAL COMPACT

By adhering to the **United Nations Global Compact**, the world's largest sustainability initiative, Clessidra reaffirms its formal and substantial commitment to promoting a healthy, inclusive, and sustainable global economy, one that respects human rights and labor, protects the environment, and is actively engaged in all aspects of business integrity.

To this end, Clessidra shares, supports, and applies the Ten Core Principles of the Global Compact within its sphere of influence.



COMMITMENT TO THE SDGs

With the support of the renewed Responsible Investment Policy, Clessidra Capital Credit SGR explicitly aims to contribute to the achievement of the **Sustainable Development Goals** (SDGs).



WOMEN'S EMPOWERMENT PRINCIPLES

By subscribing to the Women's Empowerment Principles, Clessidra aims to strengthen the inclusion of diversity, considering gender equality and women's empowerment as key factors for value creation.



SCIENCE BASED TARGETS initiative (SBTi)

Clessidra recognizes the need to limit the rise in temperature to 1.5°C as outlined in the Paris Agreement on climate. To achieve this goal, it has joined the SBTi and received validation for its CO2 emission reduction targets.



ESG NETWORK

Through active participation in **AIFI**, the Italian Association of Capital Credit, Venture Capital, and Private Debt, and **Invest Europe**, the corresponding European trade association, Clessidra supports numerous ESG initiatives and guidelines. Additionally, Clessidra is actively involved in the **Forum for Sustainable Finance** (ItaSIF), part of **EuroSif**, a non-profit organization that promotes the knowledge and practice of responsible and sustainable investments.

30%

AUM IN FONDI ESG

Clessidra Private Debt Fund and Clessidra CRF Parallel Fund are funds under **Article 8 of the SFDR**, meaning they integrate sustainability risks, consider the principal adverse impacts of investment decisions on sustainability, and promote environmental or social characteristics.



FINANZA SOSTENIBILE

Clessidra Capital Credit SGR does not have formal commitments to sustainable investment quotas in the managed funds. However, it systematically monitors the alignment and compatibility of its investment portfolio with the criteria established by the **European Taxonomy for Sustainable Finance**.



SUSTAINABLE GOVERNANCE

The set of documents includes:

- Code of Ethics
- Sustainability Policies
- Partnership Charter
- Investment Responsible Policy
- Model 231

ESG COMPETENCE AND LEADERSHIP

- Board of Directors
- Investment Committee
- ESG Committee supported by ESG Advisors (external)
- Investment Team
- ESG Team (ESG/Sustainability and Compliance functions)

Highlights: Clessidra Portfolio Companies CPDF

ENVIRONMENT

100%

portfolio companies

trace **GHG emissions**, including Scope 3

100%

portfolio companies

have implemented actions to reduce the carbon footprint

32%

renewable energy

percentage of **renewables** on the thermal and electric energy mix

566

emission intensity

Tons of CO2 equivalent per million Euro of revenues

530

carbon footprint

tons of CO2 equivalent per million Euro invested

336

energy intensity

GW/h (thermal & electric) per million Euro of revenues

SOCIAL

7.556

people

in the controlled portfolio companies

93%

people

with a **permanent contracts**

7,7

injuries

injuries per million hours worked

14,78

hours of training

per capita in portfolio companies

12%

women

in managerial positions, i.e. executives and middle managers

15%

gender pay gap

Unadjusted: calculated on the total number of people, without considering differences in tenure

GOVERNANCE

93%

portfolio companies

with a **Code of Ethics** including sustainability

54%

portfolio companies

implementation of **Sustainability Policies**, also supporting the **Paris Agreement** on Climate

80%

portfolio companies

adoption of **Model 231** as an integrated tool to prevent criminal offences

57%

portfolio companies

adopt a **Supplier Code**

0

ESG incidents

reported by portfolio companies

Highlights: Clessidra Portfolio Companies CRPF

ENVIRONMENT

100%

portfolio companies
trace **GHG emissions**, including Scope 3

100%

portfolio companies
have implemented **actions to reduce the carbon footprint**

3%

renewable energy
percentage of renewables on the thermal and electric **energy mix**

728

emission intensity
tons of CO2 equivalent per million Euro of revenues

559

carbon footprint
tons of CO2 equivalent per million Euro invested

216

energy intensity
GWh (thermal & electric) per million Euro of revenues

SOCIAL

348

people
in the controlled portfolio companies

99%

people
with a **permanent contracts**

5,1

injuries
injuries per million hours worked

14,92

hours of training
per capita in portfolio companies

15%

women
in managerial positions, i.e. executives and middle managers

12%

gender pay gap
Unadjusted: calculated on the total number of people, without considering differences in tenure

GOVERNANCE

100%

portfolio companies
with a **Code of Ethics** including sustainability

20%

portfolio companies
implementation of **Sustainability Policies**, also supporting the **Paris Agreement** on Climate

100%

portfolio companies
adoption of **Model 231** as an integrated tool to prevent criminal offences

0%

portfolio companies
adopt a **Supplier Code**

0

ESG incidents
reported by portfolio companies

Sustainable Strategy

With its responsible investment approach, Clessidra positions itself as a trusted partner, focused on creating long-term value by harnessing the significant potential growth of Italian companies. The strategy adopted is based on three key pillars:

1. **Operational Excellence:** Clessidra aims to identify and support companies that promote the health and safety of individuals, adopt principles and values of transparency and integrity, and encourage the inclusion of diversity, not just gender. The optimization of business processes is at the core of operations, ensuring financial resilience and economic solidity. This approach enables Clessidra to support the companies in which it invests, ensuring they operate efficiently and sustainably.
2. **Equitable Transition:** Clessidra invests in companies committed to tackling the challenge of transitioning to a low-carbon future, considering the social and environmental impacts. The ambition is to achieve carbon neutrality through energy efficiency and circular economy actions. Clessidra’s financing aims to ensure that this transition occurs while safeguarding jobs, promoting social inclusion, and creating fair and equal opportunities for all.
3. **Distinctive Leadership:** Clessidra seeks and supports companies that aim to create strong and distinctive leadership, strengthening the knowledge and skills of their people. Investments are directed towards enhancing transformation, innovation, and future-oriented aspects. Clessidra promotes the development of local supply chains and product quality, encouraging the aggregation of portfolio companies to create synergies and open new market opportunities.

Clessidra carefully selects the companies for its funds, focusing on those that demonstrate or have the potential to develop the key characteristics of these strategic drivers. The selection process includes a thorough assessment of business practices, organizational culture and performance in terms of sustainability and social responsibility.

For the Private Debt Fund, once selected, companies are assigned specific **ESG targets** that are formalized **in the financing agreements** and designed in line with Clessidra’s three strategic pillars.

The table shows the objectives of the Clessidra Group that inspire and guide the assignment of targets to the companies included in the Clessidra Private Debt Fund.

		Target	Target Year	2022	2023	2024
Governance and value chain						
Extension of ESG qualification to the entire value chain of the Clessidra Group						
Percentage of spending towards suppliers with prequalification, qualification, and ESG contractual clauses	%	75%	2027	na	na	na
Climate Strategy						
The commitment made with the Science Based Targets initiative outlines the decarbonization pathway						
Reduction of Scope 1 and Scope 2 emissions compared to 2023		-42%	2030			
Maintenance of the annual supply of renewable electricity from 2023		100%	2030		100%	100%
Eligible Net Asset Value represented by companies with validated Science Based Targets	%	50% NAV	2027	na	na	3%*
		100% NAV	2030			
Health, safety, and well-being						
Every workplace incident is unacceptable; therefore, the only acceptable goal is Zero Injuries. Only the creation of a safety culture, well beyond legal obligations, allows for progress						
Injury frequency rate	# / million hours worked	0	2025	0	0	0
Gender and human capital development						
The goal is to initiate a pathway aimed at the full development of human capital in general						
Training hours	hour / person	>40	2027	12	11	27

The **Clessidra Group** is a signatory of the **UN Global Compact**, supporting its **Ten Principles** and actively contributing to the **Sustainable Development Goals**.

Additionally, **Clessidra Capital Credit SGR** is a signatory of the **UN Principles for Responsible Investment (UNPRI)**, formally committing to follow its principles and guidelines.

The **SDG Action Manager** analysis tool enables effective self-assessment of progress. The chart on the side represents Clessidra’s contribution to the SDGs chosen as its strategic reference.

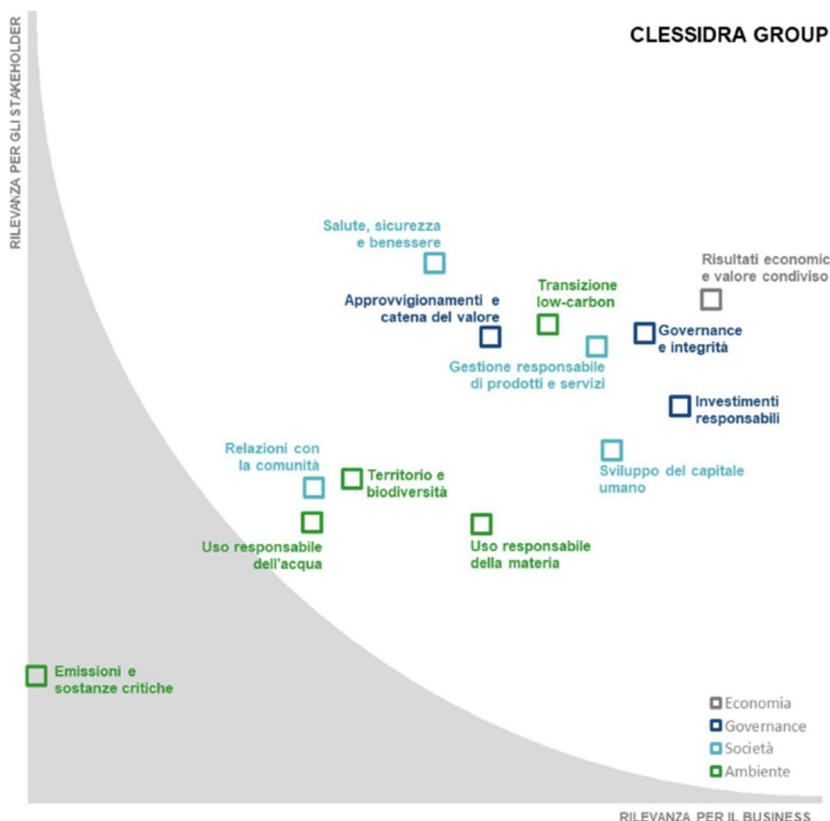
Materiality

The materiality analysis is a useful tool for identifying, through the assessment of impacts, risks and opportunities, the ESG elements on which to confirm or refine the business model and the resulting strategy. The results of the analysis are approved by the Board of Directors and are made operational by the management through specific actions, depending on the type of fund considered. Specifically, for the Private Debt Fund, the materiality analysis guides the due diligence processes carried out during the pre-investment phase as well as the assignment of ESG targets.

The analysis involves identifying the macro areas of ESG interest by cross-referencing their **relevance for the business** with their **relevance for stakeholders**. The evaluation weighs the positions expressed by the first line of management, all managers with responsibilities, and the majority shareholder through targeted questionnaires. The analysis is periodically updated or repeated to properly account for the evolution of both the strategy and performance, as well as the sensitivity and perception of stakeholders.

The data collected is appropriately weighted and graphically represented. In this structure, the materiality analysis not only serves as a tool for identifying topics for potential reporting but also as a strategic support for exploring all the success drivers of the business through the interdependent evaluation of risks incurred, effects generated, and opportunities for value creation.

SDGs and materiality serve as the reference for the ESG objectives and action plans promoted within the portfolio companies, coordinated and monitored by the Investment Team with the support of the ESG & Sustainability Manager, discussed at the Board of Directors of both Clessidra and the portfolio companies, and integrated into the management's variable compensation.



Contribution to SDGs

Through its investments, Clessidra Capital Credit actively contributes to the achievement of the **Sustainable Development Goals**, implementing a sustainable strategy aimed at achieving the following six priority objectives, focused on creating shared value.

ENVIRONMENT



Ensure sustainable models of production and consumption, through the responsible use of resources, the implementation of regenerative production cycles, product stewardship, and the promotion of lifestyles and consumption habits focused on conservation.



Adopt urgent measures to combat climate change and its impacts, promoting the low-carbon transition and implementing monitoring, mitigation, and adaptation activities for resilient value chains.

SOCIETY



Achieve gender equality and empower all women and girls, for operational efficiency and social inclusiveness, by actively promoting the implementation of the Women Empowerment Principles.



Promote sustained, inclusive, and sustainable economic growth, full and productive employment, and decent work for all, through diversification, innovation, safe and protected work environments, and social and professional growth.

GOVERNANCE

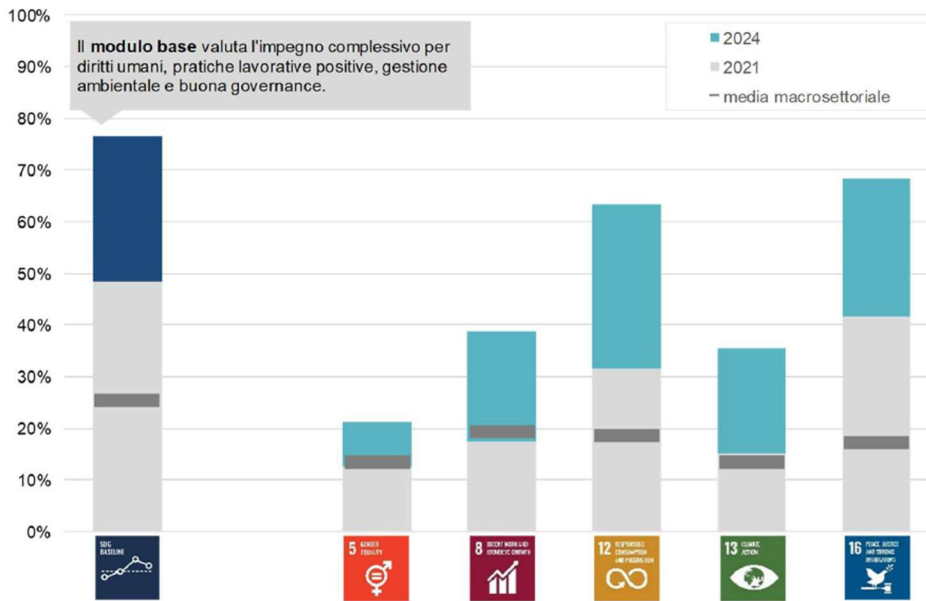








Promote peaceful and more inclusive societies for sustainable development; provide access to justice for all and create effective, accountable, and inclusive institutions at all levels, promoting sustainable governance and business integrity.



Strengthen the means of implementation and revitalize the global partnership for sustainable development, through responsible investments aimed at creating shared value and bringing global challenges to the agenda of economic organizations.

The SDG Action Manager integrates the B Impact Assessment from B Lab, the Ten Principles of the UN Global Compact, and the SDGs, enabling effective self-assessment of progress achieved. The following chart illustrates the improvement from the first year the assessment was conducted. The same tool also provides the average performance of all companies in the macro-sector that have completed the assessment.



		2024 vs 2021
	<p>The core module assesses impact across key areas, including:</p> <ul style="list-style-type: none"> Governance: Evaluates transparency and accountability in corporate management. Workers: Reviews company policies on employee well-being, safety, and job satisfaction. Community: Examines the company's impact on local communities, including diversity and inclusion efforts. Environment: Measures environmental practices, such as waste management and resource use. Customers: Assesses how the company's products or services create a positive impact for 	28%
	<ul style="list-style-type: none"> Evaluates company policies and practices aimed at promoting gender equality. Reviews women's representation in leadership roles and pay equity. Examines initiatives to prevent discrimination and gender-based violence 	9%
	<ul style="list-style-type: none"> Assesses the quality of working conditions, including fair wages and workplace safety. Evaluates training and professional development opportunities for employees. Examines the company's impact on sustainable and inclusive economic growth. 	21%
	<ul style="list-style-type: none"> Reviews waste management practices and resource efficiency. Evaluates the company's commitment to minimizing the environmental impact of its products and services. Examines initiatives to encourage responsible consumption among customers. 	32%
	<ul style="list-style-type: none"> Measures greenhouse gas emissions and the company's strategies for reducing them. Evaluates efforts to adapt to climate change. Examines initiatives to raise climate awareness among employees and the community. 	20%
	<ul style="list-style-type: none"> Assesses corporate practices that promote transparency and accountability. Reviews the company's commitment to fighting corruption and advancing justice. Examines initiatives that support strong and inclusive institutions. 	27%

Governance and Integrity

Board of Directors

- 7 members
- 1 female member
- 3 independent members

Board of Statutory Auditors

- 3 members
- 1 female member
- All independent members

Supervisory and Control Body

- 3 members
- 1 female member
- 2 independent members

Rating PRI 2024

Policy Governance and Strategy
★★★★★ (91/100)

Direct - Fixed income - Corporate
★★★★☆ (52/100)

Direct - Fixed income - Private debt
★★★★★ (94/100)
Confidence building measures
★★★★★ (100/100)

The composition and management of the governance bodies, starting from the **Board of Directors**, ensure representativeness, expertise, and the absence of conflicts of interest, aiming for maximum operational efficiency and integrity.

Clessidra's regulatory system for managing responsible investments is structured to ensure that business practices align with the continuously evolving ESG (Environmental, Social, and Governance) objectives and current regulations. To this end, Clessidra updates every three years its regulations, as outlined in its responsible investment policy. Updates are made based on contextual changes or corporate strategy. A benchmark analysis or review of best practices is conducted to identify potential areas for improvement. Relevant regulatory aspects and international reference standards, as well as strategic business decisions, including the intention to launch new products with more challenging characteristics, are also considered.

The regulatory system includes the **Ethical Code**, **Sustainability Policies**, the **Partnership Charter**, and the **Responsible Investment Policy**. These documents are inspired by international references and explicitly reference the Ten Principles of the **UN Global Compact**, to which Clessidra adheres, the **Women's Empowerment Principles (WEPs)**, and the **Science Based Target Initiative**. Clessidra also acknowledges the link between investment returns and environmental, social, and governance (ESG) issues. In line with this, Clessidra Capital Credit SGR has signed the **UN Principles for Responsible Investment (UN PRI)**, which are explicitly referenced in its **Responsible Investment Policy**.

Through a sustainable approach aimed at creating shared value for society and the environment, Clessidra Capital Credit SGR encourages portfolio companies to explore additional success levers to increase revenue and profit margins, mitigate business risk, attract capital and investors, motivate their people, and strengthen the brand.

Through active participation in **AIFI**, the Italian Association of Capital Credit, Venture Capital, and Private Debt, and Invest Europe, the corresponding European industry association, Clessidra supports numerous ESG initiatives and guidelines. Additionally, Clessidra actively participates in the **Forum for Sustainable Finance**, a non-profit organization that promotes knowledge and the practice of responsible and sustainable investment.

The companies of the Clessidra Group adopt an **Organizational, Management, and Control Model**, required by law but not mandatory, aimed at preventing the risk of committing specific relevant crimes. The control activities are entrusted to the Supervisory Bodies, appointed based on criteria of autonomy and independence. In addition to specific periodic training, the adopted approach includes a whistleblowing procedure for reporting illegal behaviour, providing employees and third parties with confidential channels to raise concerns or violations of the procedure itself, without fear of retaliation, discrimination, or disciplinary action.

In its investment activities, Clessidra Capital Credit SGR promotes compliance with applicable regulations and the highest ethical standards among its portfolio companies. Specifically, it collaborates with portfolio companies to adopt or update their Organizational, Management, and Control Models, which include ethical principles, codes of conduct, control tools, procedures, and training activities. At the operational level, portfolio companies are encouraged to adopt management systems, considered essential assets to ensure activities are fully aligned with the business strategy, in a continuous improvement logic.

The Board of Directors plays a crucial role in overseeing ESG matters: It approves the sustainability regulations, their respective updates, and ensures their implementation; it approves the annual sustainability action plan, periodically monitoring progress at both the SGR (Asset Management Company) level and for the individual companies within the funds; it reviews, evaluates, and approves

the annual responsible investment report in accordance with the **SFDR** (Sustainable Finance Disclosure Regulation), along with the financial statements.

The **Risk Management function** holds an independent position relative to operational structures and reports directly to the Board of Directors. It evaluates, manages, and monitors all financial and operational risks related to the assets under management, as well as the strategic, operational, and reputational risks of the asset management company (SGR). In particular, the Risk Management function:

- implements effective policies and procedures to continuously identify and monitor risks related to the investment strategy outlined in each fund's regulations, and to which each fund is or may potentially be exposed.
- monitors compliance with the risk limits set forth in each fund's regulations and ensures the alignment of the communicated risk profile with what is disclosed to investors during the commercialization phase.
- provides updates to the Board of Directors at least semi-annually regarding the adequacy and effectiveness of the risk management process, as well as any actual or foreseeable breaches of the established risk limits, allowing for prompt corrective actions to be taken.
- reviews the policies and procedures adopted for evaluating portfolio assets, ensuring consistency between the outcomes of the evaluation process and the measurement of the associated risks.

Since 2021, climate risk assessment follows the guidelines of the Task Force on Climate-related Financial Disclosures (TCFD). Since 2022, a climate risk exposure assessment is conducted for all investment opportunities at the presentation of the "concept memo" to the Board of Directors. The climate risk assessment is also performed for all companies already within the portfolios of the managed funds.

Negative and positive screening, due diligence, and the integration of ESG factors into Clessidra Capital Credit SGR's management processes are effective safeguards for risk mitigation.

Main risks mitigated through ESG integration

Description	Mitigation adopted and opportunities
GOVERNANCE	
ESG integration into business strategy and implementation of action plans	Adherence to the UN Global Compact Adherence to the UN PRI Code of Ethics, Sustainability Policies, and Responsible Investment Policies Negative screening (exclusions) for investments Positive screening (value creation) for investments ESG Due Diligence for investments ESG plans / ESG objectives for investments
SOCIETY	
Organizational structure, internal processes, and competencies	Ongoing training for the Board of Directors, Investment Team, and staff in general.
Health and safety at work	Active promotion of health and safety at Clessidra Capital Credit SGR and the Portfolio Companies.
Products and services aligned with the expectations of the Group, investors, and clients	New funds at least Article 8 SFDR Transparency on ESG performance well beyond the applicable legal requirements.
ENVIRONMENT	
Climate risks	Exclusion of carbon-intensive sectors from investments Systematic evaluation of climate risks for Clessidra Capital Credit SGR and Portfolio Companies Validation of CO2 reduction targets by SBTi Validation of CO2 reduction targets from SBTi
Evolution of the regulatory framework (elements not included in climate risks)	Regulatory follow-up and anticipation of associated risks for Clessidra Capital Credit SGR and Portfolio Companies

The **Compliance function** prevents the risk of non-compliance with legal and regulatory requirements and manages aspects related to anti-money laundering, KYC and conflicts of interest.

A **dedicated ESG Team** is responsible for implementing the strategy. Its primary responsibility is to ensure that ESG considerations are fully integrated into the investment process. It supports the management company and portfolio companies in defining ESG strategies to achieve their assigned goals. Among other tasks, it monitors emerging ESG regulations and best practices, advises investment teams on ESG-related risks and opportunities, and ensures compliance with reporting standards and frameworks (SDG, UN PRI).

TCFD

Established in 2015 by the Financial Stability Board – the body that promotes and monitors the stability of the global financial system – it provides recommendations on reporting climate-related risks.

The Team's ESG Commitment

- Clear framework established by Codes and Policies.
- Internal procedures, processes, and data/information flows.
- Motivation, including through incentive schemes.
- Continuous training and coaching.
- Openness and proactive listening to trends, emerging challenges, and regulations in the field.

In addition, Clessidra Capital Credit has a team with complementary experience and expertise in ordinary and extraordinary finance, business management, and corporate restructuring.

ESG integration is based on the leadership, commitment, and established expertise of the Board of Directors, the Investment Committee, and the investment team, all appropriately supported by an ESG team.

All staff receive ongoing training with periodic update sessions, aimed at raising awareness of ESG macro-trends and challenges, explaining Clessidra's approach to responsible investing, and covering the key steps for the most effective integration of ESG into the investment process.

Responsible investments

Clessidra guides its investments towards companies that adopt and share its sustainable approach. To achieve this objective, ESG (Environmental, Social, and Governance) factors are integrated throughout all stages of the investment process, from the initial selection of companies to include in the funds to the exit phase. The well-structured and robust approach is outlined below.

During the pre-investment phase, both negative and positive screenings are conducted. The negative screening involves the exclusion of companies operating in sectors that do not meet specific ethical, environmental, or social criteria. The list of exclusions is included in the Responsible Investment Policy available on the website. On the other hand, the positive screening assesses companies against the relevant themes described in the sustainability policy, focusing on identifying and selecting companies that can contribute to generating benefits in priority areas. The materiality analysis conducted in this phase is inspired by the double materiality approach set out in the European CSRD reporting regulations. Both the potential impacts the target company has on the internal and external context, as well as the influence the external context has on the company, are evaluated.

The process is followed by due diligence, in some cases entrusted to external experts, aimed at:

- Understanding if there are potential sustainability risks or opportunities that could affect the target company's business, its growth assumptions, or its projected cash flows.
- Identifying and commenting on potential regulatory requirements that are either currently applicable or reasonably expected to be applicable soon, specific to the business.
- Highlighting the need for further detailed assessments of any identified risks or opportunities. Qualifying the environmental, social, and ethical commitment of the target through its governance, programs, and stakeholder relations.
- Proposing recommendations for corrective actions or improvements to address the identified risks or to enhance the target's sustainable approach.

The analyses carried out involve the following phases:

Context Analysis

- A review of external factors is conducted through an ESG search of publicly available information to gather data on the company's sustainability performance, emerging issues raised by external stakeholders, and any best practices.
- Benchmark Analysis: peer companies of the target company are identified, and through research of publicly available information, the company's performance is compared, thereby identifying areas for improvement.

The **Responsible Investment Policy** outlines all stages of the investment process: sector criteria, pre-investment, active management, and divestment. The contribution to the SDGs is a key metric for assessing the sustainable success of the managed funds and the SGR.

Negative screening

Exclusions are described in the "Sector Criteria" section. They can be further defined in the fund regulations and by any specific requests from investors.

Positive Screening

- Companies in sectors with the potential to contribute to one or more SDGs or to create social or environmental benefits through their processes, products, or services.
- Companies with positive ESG performance relative to sector competitors.
- Companies with a positive impact, such as those in transition, renewable/clean technologies, or social enterprises or initiatives.

Due diligence

All investment opportunities are subject to a due diligence process that includes the evaluation of ESG practices and related performance.

Active engagement

Based on the specific ESG clauses included in the individual credit agreements, Clessidra Capital Credit SGR manages the integration of ESG strategies and policies within the Portfolio Companies. In all cases, the Investment Team, in collaboration with the Sustainability & ESG Manager, provides full support to the Portfolio Companies in managing ESG-related risks and opportunities, monitoring the implementation of good practices and ESG performance.

www.clessidracapitalcredit.it/it/sost-enibilita/

Interviews are conducted with key business functions, and relevant documentation is reviewed to preliminarily assess the company's maturity in monitoring and reporting GHG emissions (Scope 1, 2, and 3), emissions reduction targets, related action plans, and key EHS issues that may have material impacts.

Interviews are conducted with key business functions to assess the sustainability performance of the target, review business processes, and identify potential current and historical areas of concern. The interviews cover key areas such as Procurement, HR, Sustainability, and EHS to address potential regulatory issues and industry trends. A site visit is conducted to assess production practices.

If critical issues are identified during the assessment, they are duly considered in the investment decisions.

If no red flags are identified, a final report will describe the key issues identified, outlining:

- A summary of the EHS and ESG risks and opportunities for the company.
- Results from the review of external factors and the benchmarking analysis.
- Identification of the company's maturity in addressing EHS and ESG risks and opportunities.

For the companies in which financing proceeds, specific improvement goals are defined to be achieved before the final repayment to benefit from a discount rate.

This comprehensive approach ensures that the investment process not only aligns with the defined sustainability objectives but also addresses and mitigates potential risks through detailed assessments and continuous improvement.

SFDR Regulation

Clessidra Restructuring Fund
is an "article 6" SFDR fund

Clessidra Private Debt Fund
is an "article 8" SFDR fund

Clessidra Restructuring Parallel Fund
is an "article 8" SFDR fund

www.clessidraprivateequity.it/it/sostenibilita/

Responsible Investment Policy: key elements

<i>Pre - investment</i>	Screening	<ul style="list-style-type: none"> • Sectoral Criteria and Positive Contribution to Clessidra's Objectives • Fund Regulations
	Due Diligence	<ul style="list-style-type: none"> • Pre-materiality Assessment "Outside-in" and Proprietary ESG Checklist • ESG Incorporated into Final Recommendations to the Investment Committee, Including Identification of Potential ESG Objectives to Be Included in the Contract
<i>Active Engagement</i>	ESG Objectives	<ul style="list-style-type: none"> • Contractual clauses with specific ESG objectives to be achieved
	Support	<ul style="list-style-type: none"> • Full support provided for managing ESG risks and opportunities
	Monitoring & Reporting	<ul style="list-style-type: none"> • Follow-up at both portfolio company and Clessidra Capital Credit SGR levels • Timely and extensive disclosure to LPs • From the 2023 fiscal year reporting, full alignment with SFDR requirements, Article 8
<i>Disinvestment</i>	Exit Memo	<ul style="list-style-type: none"> • Comprehensive disclosure on the achieved ESG performance

As a responsible investor, Clessidra Capital Credit SGR promotes the evolution towards sustainable business models across all companies in the Funds under Article 8 portfolio, offering transformative capabilities, specific expertise, and full support in managing ESG-related risks and opportunities. In 2023, significant ESG interactions took place with all portfolio companies.

Clessidra Private Debt Fund - Key ESG Activities in 2024

Candy Factory	Support for ESG Integration
MGM/Rekord	
Trime	ESG Metrics and Data Collection, in accordance with SFDR requirements
Groupack Holding	
Righi Elettroservizi	
Bracchi	
La Piadineria	Actions aimed at achieving the contractual ESG targets
Alveo	
<i>Undisclosed Company</i>	
Errevi	ESG Due Diligence and Definition of Contractual ESG Targets

Clessidra Restructuring Parallel Fund - Key ESG Activities in 2024

OMA	Support for ESG Integration
ISCOM	
SISMA	ESG Metrics and Data Collection, in accordance with SFDR

Furthermore, regarding the level of detail and transparency required by the SFDR Regulation, Clessidra Capital Credit SGR adopts differentiated approaches for each asset class of financial product, especially considering the investment timeline of the funds currently under management, as extensively outlined in the SFDR Disclosure published on the website.

The **Clessidra Restructuring Fund (CRF)** falls under the category of products referred to in Article 6 of the SFDR Regulation. Therefore, the CRF Fund does not promote environmental or social characteristics, or a combination of such characteristics, and does not aim for "sustainable investments." In any case, the CRF Fund integrates sustainability risks into the investment decision-making process, both during the investment selection phase and on an ongoing basis for the management of portfolio investments. In the pre-investment process, the asset manager adopts specific sector exclusions, in line with those outlined in the "Sector Criteria" section of the Responsible Investment Policy and detailed in the CRF Fund Regulation.

In the management of the **Clessidra Private Debt Fund (CPDF)** and the **Clessidra Restructuring Parallel Fund (CRPF)**, Clessidra Capital Credit SGR considering the negative effects of investment decisions on sustainability factors. As confirmation, the funds fall under the category of products referred to in Article 8 of the SFDR Regulation, integrating sustainability risks and promoting environmental or social characteristics, or a combination of such characteristics, while ensuring that the companies in which investments are made adhere to good governance practices, but not having the objective of 'sustainable investments'.

Clessidra Capital Credit SGR adopts a management approach aimed at ensuring the integration of ESG objectives into the strategies and policies of Portfolio Companies. In fact, the Investment Team, in collaboration with the Sustainability & ESG Manager, directly supports the Portfolio Companies in managing ESG risks and opportunities, monitoring the implementation of best practices and ESG performance.

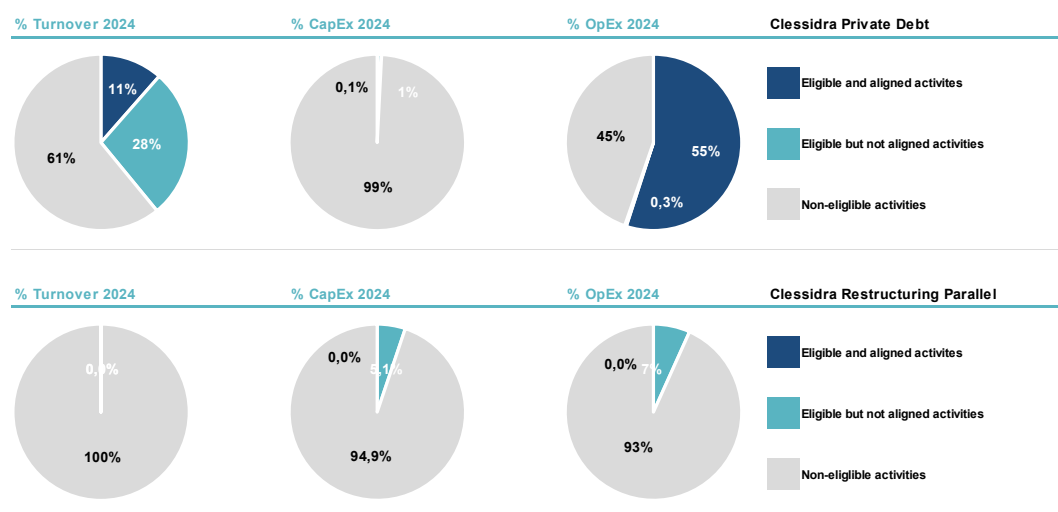
Among **environmental issues**, the Funds specifically promote those identified in Article 9 of Regulation (EU) 2020/852, related to the establishment of a framework that facilitates sustainable investments (the so-called 'EU Taxonomy'), which are also reflected in the Clessidra Group's sustainable strategy through the definition of specific detailed objectives.

ENVIRONMENT: Key Areas of Intervention	Specific Objectives (Examples)
i Mitigation of climate change	<ul style="list-style-type: none"> Adoption of low-carbon fuels Increase in electricity supply from renewable sources
ii Adaptation to climate change	<ul style="list-style-type: none"> Interventions aimed at safeguarding assets from extreme weather events (e.g., planting, reinforcement of embankments, etc.)
iii Sustainable use and protection of water and marine resources	<ul style="list-style-type: none"> Reduction in plastic consumption
iv Transition to a circular economy	<ul style="list-style-type: none"> Promotion of the use of renewable or recycled materials Promotion of electric mobility, both directly and in the value chain
v Prevention and reduction of pollution	<ul style="list-style-type: none"> Adoption of environmental criteria for the procurement of goods and services
vi Protection and restoration of biodiversity and ecosystems	<ul style="list-style-type: none"> Adoption of measures for the sustenance and protection of areas of environmental interest for biodiversity

Among the **social aspects**, the Funds promote topics that are particularly central to the sustainable strategy of the Clessidra Group, through the definition of specific detailed objectives.

SOCIAL: Key Areas of Intervention	Specific Objectives (Examples)
i Gender Equality	<ul style="list-style-type: none"> Increase in female representation in managerial positions and among the general workforces
ii Health and Safety at Work	<ul style="list-style-type: none"> Reduction of injuries and accidents Achieving ISO 45001 or SA8000 certification
iii Inclusivity and Welfare	<ul style="list-style-type: none"> Implementation of initiatives to promote work-life balance (e.g., on-site childcare facilities)
iv Social Initiatives	<ul style="list-style-type: none"> Allocation of predefined revenue shares to interventions supporting the local community and territory

In the active management of the Funds and Portfolio Companies, the strategic and operational references of the **European Taxonomy** for Sustainable Finance are considered. Below is a graphical representation of eligibility and alignment in relation to revenue, CapEx, and OpEx, for the Clessidra Private Debt Fund and the Clessidra Restructuring Parallel Fund.



Taxonomy Regulation

Designed as a tool to guide the choices of investors and businesses, Regulation (EU) 2020/852 introduces a classification of economic activities based on six environmental objectives: climate change mitigation, climate change adaptation, water resources, circular economy, pollution prevention, and biodiversity.

An activity is considered aligned when:

- It positively contributes to at least one of the six environmental objectives;
- It does not produce negative impacts on any other objective;
- It is carried out in compliance with minimum social safeguards;
- It meets the identified technical criteria.

Performance ESG: “Share of investment” 2024

		CPDF
Companies in portfolio		9
Companies added to portfolio in 2024		6
CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS (mandatory, unless not material)		
Greenhouse gas emissions		
4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	0%
Biodiversity		
7. Activities negatively affecting biodiversity-sensitive areas	Share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas	0%
CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS (at least 1 additional, material)		
Emissions		
4. Investments in companies without carbon emission reduction initiatives	Share of investments in investee companies without carbon emission reduction initiatives aimed at aligning with the Paris Agreement	0%
Water, waste and material emissions		
7. Investments in companies without water management policies	Share of investments in investee companies without water management policies	0%
8. Exposure to areas of high water stress	Share of investments in investee companies with sites located in areas of high-water stress without a water management policy	0%
9. Investments in companies producing chemicals	Share of investments in investee companies the activities of which fall under Division 20.2 of Annex I to Regulation (EC) No 1893/2006	0%
10. Land degradation, desertification, soil sealing	Share of investments in investee companies the activities of which cause land degradation, desertification or soil sealing	0%
11. Investments in companies without sustainable land/agriculture practices	Share of investments in investee companies without sustainable land/agriculture practices or policies	0%
12. Investments in companies without sustainable oceans/seas practices	Share of investments in investee companies without sustainable oceans/seas practices or policies	n/a
14. Natural species and protected areas	1. Share of investments in investee companies whose operations affect threatened species 2. Share of investments in investee companies without a biodiversity protection policy covering operational sites owned, leased, managed in, or adjacent to, a protected area or an area of high biodiversity value outside protected areas*	n/a
15. Deforestation	Share of investments in companies without a policy to address deforestation	n/a
Green securities		
16. Share of securities not certified as green under a future EU legal act setting up an EU Green Bond Standard	Share of securities in investments not certified as green	n/a
SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS (mandatory, unless not material)		
Social and employee matters		
10. Violations of UNGC principles and OECD Guidelines for Multinational Enterprises	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	0%
11. Lack of processes and compliance mechanisms to monitor compliance with UNGC principles and OECD Guidelines for Multinational Enterprises	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance /complaints handling mechanisms to address violations of the UNGC principles or OECD	29%
14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	Share of investments in investee companies involved in the manufacture or selling of controversial weapons	0%
1. Investments in companies lacking workplace accident prevention policies.	Share of investment in subsidiary companies lacking workplace accident insurance policies.	0%
4. Lack of a code of conduct for suppliers.	Share of investments in subsidiary companies lacking a supplier code of conduct (against unsafe working conditions, precarious employment, child labor, and forced labor).	7%
5. Lack of a mechanism for managing employee-related complaints or grievances.	Share of investments in subsidiary companies with no mechanism for managing complaints or grievances related to employee issues.	20%
6. Insufficient protection for whistleblowers.	Share of investments in entities lacking policies for the protection of whistleblowers	20%
Human rights		
9. Lack of a human rights policy	Share of investments in entities without a human rights policy	20%
10. Lack of due diligence	Share of investments in entities without a due diligence process to identify, prevent, mitigate and address adverse human rights impacts	20%
Anticorruption		
15. Lack of anti-corruption policies and measures	Share of investment in entities without anti-corruption policies and measures aligned with the United Nations Convention against Corruption	20%
16. Cases of insufficient action taken to address violations of anti-corruption regulations and measures.	Share of Investment in subsidiary companies with identified shortcomings in actions taken to address violations of anti-corruption procedures and standards	20%

Performance ESG: CPDF

Details on the scope of consolidation can be found in the 'Reporting' section.

			2023	2024	Notes
Companies in portfolio			3	9	
Governance					
Governance and integrity	Code of Ethics	% implementation of Code of Ethics	80%	93%	weighted on invested capital
	Sustainability Policies	% implementation of Sustainability Policies	46%	54%	
	Board gender diversity	% of women in Board of Directors	10%	15%	
	Model 231	% implementation of Model 231	80%	80%	
	Supplier Code of Conduct	% implementation of Supplier Code of Conduct	46%	57%	
	Incidents of non-compliance	Ethics, HSE, societal, market, and others	0	0	count
Society					
People, contracts and turnover	Employees		1.088	7.556	sum of companies with majority control
	Women	#	596	4.028	
	Men		492	3.528	
	Contract	% of permanent contracts	89,8%	92,9%	
	New hires rate	% new hires on total employees	20,3%	18,4%	
	Leavers rate	% leavers on total employees	20,3%	15,6%	
Gender	Women	% of total employees	43,9%	36,0%	weighted on invested capital
	in managerial positions	% of total managers and middle managers	14,5%	12,4%	
	Gender pay gap		10,9%	15,4%	
	Managers		0,0%	11,3%	
	Middle mManagers	%	5,7%	14,0%	
	White Collars		7,3%	9,2%	
Health and safety	Blue Collars		5,1%	11,4%	
	Frequency rate	# of work injuries per million hours worked	3,4	7,7	
	Lost days	# of workdays lost to injuries	43,0	229,4	
Human capital development	Severity rate	# of lost day per thousand hours worked	1,35	0,39	
	Training	Average training hours per employee	3,61	14,78	
	Performance review	% of employees with formal performance review	5,1%	22,0%	
Environment					
GHG emissions and energy	GHG emissions		20.091,58	61.941,47	weighted on ratio: invested capital / enterprise value
	Scope 1	tons of CO ₂ equivalent	279,51	2.661,49	
	Scope 2		232,07	1.365,55	
	Scope 3		19.580,00	57.914,43	
	Carbon footprint	tons of CO ₂ equivalent per million € invested	496,09	530,32	weighted on invested capital
	GHG Intensity	tons of CO ₂ equivalent per million € revenues	752,26	565,55	
	Energy consumption	GJ (thermal and electric)	68.015,63	288.822,85	
	of which renewable	% of renewable energy	34,14%	32,07%	
Water	Energy intensity	GWh (thermal & electric) per million € revenues	330	336	weighted on invested capital
	Emissions to water	tons of priority hazardous substances per million € invested	-	-	
Waste	Hazardous waste	tons of hazardous waste	164,19	160,79	weighted on invested capital
	Hazardous waste	tons of hazardous waste per million € invested	1,41	1,03	

Obiettivi ESG*: CPDF

Details on the scope of consolidation can be found in the 'Reporting' section.

		2023	2024	Notes
Clessidra Private Debt Fund		75%	63%	Weighted on the invested capital
Casa del Dolce / Liking	Nov 2022	58%	71%	
	100% electricity from renewable sources	23%	52%	
Environment	50% of purchases of paper, cardboard, and similar products certified FSC or FSC MIX	✓	✓	*86% recycled, objective achieved
	75% of purchases of paper, cardboard, and similar products certified FSC or FSC MIX			
Governance	Ethical Code, Sustainability Policies, Model 231, Supplier Charter	50%	66%	
MGM / Rekord	Nov 2022	100%	100%	
Environment	100% electricity from renewable sources	✓	✓	
	Improvement in the provision of work clothing and PPE, uniforms for all production sites	✓	✓	
Society	Enhancement of housekeeping, with clearly defined tracking of storage and material placement areas, pedestrian passage zones, and internal vehicle transit areas	✓	✓	ESG objectives achieved
	Improvement of external traffic routes for vehicles and pedestrians, with identification of safe pedestrian paths and access/stationing areas for vehicles	✓	✓	
Governance	Ethical Code, Sustainability Policies, Model 231, Supplier Charter	✓	✓	
Trime	Dic 2022	77%	100%	
Environment	100% electricity from renewable sources	55%	✓	
	Improvement in the provision of work clothing and PPE, uniforms for all production sites	✓	✓	
Society	Improvement in internal traffic management, electronic limitation of forklift speed	✓	✓	ESG objectives achieved
	Improvement in internal traffic management, installation of 'blue spot' devices on forklifts	✓	✓	
Governance	Ethical Code, Sustainability Policies, Model 231, Supplier Charter	75%	✓	
Gruppo Florence	Dic 2022	75%	75%	
Environment	100% electricity from renewable sources	25%	25%	The evaluation does not consider the parameterization related to the advance of repayment times
Society	75% of suppliers of goods and services qualified according to ESG criteria	✓	✓	
Governance	Ethical Code, Sustainability Policies, Model 231, Supplier Charter	✓	✓	
Groupack Holding	Aug 2023		5%	
Environment	100% energia elettrica da fonti rinnovabili	--	10%	
Society	75% of suppliers of goods and services qualified according to ESG criteria	--	0	
Governance	Ethical Code, Sustainability Policies, Model 231, Supplier Charter	--	10%	
Righi Elettroservizi	Dic 2023		44%	
Environment	100% electricity from renewable sources	--	51%	
	Improvement in the provision of work clothing and PPE, uniforms	--	40%	
Society	Improvement in the management of forklifts and pallet trucks, whether owned or third-party, with electronic speed limitation to a maximum of 10 km/h, installation of 'blue spot' devices or equivalent market-available solutions on forklifts, and identification of outdoor or well-ventilated charging areas.	--	30%	
	Enhancement of internal and external organization, with the definition and marking of workstations, material storage areas, safe paths for people, and reserved routes and parking areas for owned or third-party vehicles.	--	40%	
Governance	Ethical Code, Sustainability Policies, Model 231, Supplier Charter	--	40%	
Bracchi	Dic 2023		60%	
Environment	80% electricity from renewable sources	--	100%	
Society	60% of logistics service providers qualified according to ESG criteria	--	29%	
Governance	Ethical Code, Sustainability Policies, Model 231, Supplier Charter	--	50%	
Alveo	Jun 2024	--	98%	
Environment	100% electricity from renewable sources for European sites	--	95%	
Society	100% of non-managerial staff covered by extra-contractual welfare	--	100%	
Governance	Ethical Code, Sustainability Policies, Model 231, Supplier Charter	--	50%	
Seko	Jun 2024		33%	
Environment	100% electricity from renewable sources for European sites	--	0	
Society	75% (spending) of prequalified suppliers according to ESG criteria	--	0	
Governance	Ethical Code, Sustainability Policies, Model 231, Supplier Charter	--	100%	

*The table does not include: La Piadineria, whose target assignment provides a grace period of 18 months; Errevi, which entered the fund in December 2024 and is not within the reporting scope.

Performance ESG: “Share of investment” 2024

		CRPF
Companies in portfolio		3
Companies added to portfolio in 2024		3
CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS (mandatory, unless not material)		
Greenhouse gas emissions		
4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	0%
Biodiversity		
7. Activities negatively affecting biodiversity-sensitive areas	Share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas	0%
Emissions		
4. Investments in companies without carbon emission reduction initiatives	Share of investments in investee companies without carbon emission reduction initiatives aimed at aligning with the Paris Agreement	0%
Water, waste and material emissions		
7. Investments in companies without water management policies	Share of investments in investee companies without water management policies	0%
8. Exposure to areas of high water stress	Share of investments in investee companies with sites located in areas of high-water stress without a water management policy	0%
9. Investments in companies producing chemicals	Share of investments in investee companies the activities of which fall under Division 20.2 of Annex I to Regulation (EC) No 1893/2006	0%
10. Land degradation, desertification, soil sealing	Share of investments in investee companies the activities of which cause land degradation, desertification or soil sealing	0%
11. Investments in companies without sustainable land/agriculture practices	Share of investments in investee companies without sustainable land/agriculture practices or policies	0%
12. Investments in companies without sustainable oceans/seas practices	Share of investments in investee companies without sustainable oceans/seas practices or policies	n/a
14. Natural species and protected areas	1. Share of investments in investee companies whose operations affect threatened species 2. Share of investments in investee companies without a biodiversity protection policy covering operational sites owned, leased, managed in, or adjacent to, a protected area or an area of high biodiversity value outside protected areas"	n/a
15. Deforestation	Share of investments in companies without a policy to address deforestation	n/a
Green securities		
16. Share of securities not certified as green under a future EU legal act setting up an EU Green Bond Standard	Share of securities in investments not certified as green	n/a
SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS (mandatory, unless not material)		
Social and employee matters		
10. Violations of UNGC principles and OECD Guidelines for Multinational Enterprises	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	0%
11. Lack of processes and compliance mechanisms to monitor compliance with UNGC principles and OECD Guidelines for Multinational Enterprises	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance /complaints handling mechanisms to address violations of the UNGC principles or OECD	0%
14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	Share of investments in investee companies involved in the manufacture or selling of controversial weapons	0%
1. Investments in companies lacking workplace accident prevention policies.	Share of investment in subsidiary companies lacking workplace accident insurance policies.	0%
4. Lack of a code of conduct for suppliers.	Share of investments in subsidiary companies lacking a supplier code of conduct (against unsafe working conditions, precarious employment, child labor, and forced labor).	0%
5. Lack of a mechanism for managing employee-related complaints or grievances.	Share of investments in subsidiary companies with no mechanism for managing complaints or grievances related to employee issues.	0%
6. Insufficient protection for whistleblowers.	Share of investments in entities lacking policies for the protection of whistleblowers	0%
Human rights		
9. Lack of a human rights policy	Share of investments in entities without a human rights policy	28%
10. Lack of due diligence	Share of investments in entities without a due diligence process to identify, prevent, mitigate and address adverse human rights impacts	28%
Anticorruption		
15. Lack of anti-corruption policies and measures	Share of investment in entities without anti-corruption policies and measures aligned with the United Nations Convention against Corruption	0%
16. Cases of insufficient action taken to address violations of anti-corruption regulations and measures.	Share of Investment in subsidiary companies with identified shortcomings in actions taken to address violations of anti-corruption procedures and standards	0%

Performance ESG: CRPF

Details on the scope of consolidation can be found in the 'Reporting' section.

			2024	Notes
Companies in portfolio			3	
Governance				
	Code of Ethics	% implementation of Code of Ethics	100%	
	Sustainability Policies	% implementation of Sustainability Policies	20%	
Governance and integrity	Board gender diversity	% of women in Board of Directors	0%	weighted on invested capital
	Model 231	% implementation of Model 231	100%	
	Supplier Code of Conduct	% implementation of Supplier Code of Conduct	0%	
	Incidents of non-compliance	Ethics, HSE, societal, market, and others	0	count
Society			0	
People, contracts and turnover	Employees		348	sum of companies with majority control
	Women	#	91	
	Men		257	
	Contract	% of permanent contracts	98,6%	
	New hires rate	% new hires on total employees	9,9%	
	Leavers rate	% leavers on total employees	10,4%	
Gender	Women	% of total employees	25,8%	weighted on invested capital
	in managerial positions	% of total managers and middle managers	15,4%	
	Gender pay gap		11,6%	
	Managers		5,5%	
	Middle mManagers	%	-2,4%	
	White Collars		20,2%	
	Blue Collars		9,5%	
Health and safety	Frequency rate	# of work injuries per million hours worked	5,1	
	Lost days	# of workdays lost to injuries	61,3	
	Severity rate	# of lost day per thousand hours worked	0,23	
Human capital development	Training	Average training hours per employee	14,92	
	Performance review	% of employees with formal performance review	0,0%	
Environment			0	
GHG emissions and energy	GHG emissions		4.381,06	weighted on ratio: invested capital / enterprise value
	Scope 1	tons of CO ₂ equivalent	47,10	
	Scope 2		105,08	
	Scope 3		4.228,88	
	Carbon footprint	tons of CO ₂ equivalent per million € invested	558,79	
	GHG Intensity	tons of CO ₂ equivalent per million € revenues	727,98	weighted on invested capital
	Energy consumption	GJ (thermal and electric)	31.570,30	sum of companies with majority control
	of which renewable	% of renewable energy	2,85%	
	Energy intensity	GWh (thermal & electric) per million € revenues	216	
Water	Emissions to water	tons of priority hazardous substances per million € invested	-	weighted on invested capital
Waste	Hazardous waste	tons of hazardous waste	1,90	
	Hazardous waste	tons of hazardous waste per million € invested	0,24	

REPORTING

Scope and Methodology

The Responsible Investment Report gathers services, data, and information on GEFIA, Clessidra Capital Credit SGR, and all the companies in the portfolio of the Article 8 SFDR funds at the end of the year.

In the event of changes in the consolidation area during the year, such as investments or divestitures of companies or significant changes in the percentage of control, the data and information related to these companies will be included or excluded according to the following cases:

- for companies that joined the scope during the first 6 months of the reporting year, the inclusion of data and information for the entire year is typically considered.
- for companies that joined the scope during the last 6 months of the reporting year, the inclusion of data and information is typically considered starting from the following year.
- for companies excluded from the scope during the reporting year, the data and information are typically excluded for the entire period.

The following table summarizes the evolution of the reporting scope over the years, for each individual Fund.

Fund	SFDR	Portfolio	Investment data	2023	2024
Clessidra Private Debt Fund	Article 8	Candy Factory	November 2022	✓	✓
		MGM/Rekord	November 2022	✓	✓
		Trime	Dicember 2022	✓	✓
		Gruppo Florence	Dicember 2022-October 2023	ESG objectives only	
		Groupack Holding	August 2023	Qualitative information	✓
		Righi Elettroservizi	December 2023	Qualitative information	✓
		Bracchi	December 2023	Qualitative information	✓
		La Piadineria	May 2024		✓
		Alveo Group	June 2024		✓
		Seko	June 2024		✓
		Errevi	December 2024		Qualitative information
Clessidra Resstructuring Fund	Article 6			Qualitative information	Qualitative information
Fondi "Value Italy"				Qualitative information	Qualitative information
Clessidra Restructuring Parallel Fund	Article 8	OMA	October 2023	Qualitative information	✓
		Iscom	June 2024		✓
		Sisma	February 2024		✓

In order to provide a correct representation of performances and to guarantee the reliability of data, the use of estimates has been minimized as much as possible. Where estimates have been used, they are based on the best available methodologies and properly indicated.

The 2024 Responsible Investment Report has been prepared in accordance with the level of detail and transparency required by the SFDR Regulation and the Delegated Regulation (EU) 2022/1288. The individual performance indicators, where applicable, are also in line with the relevant 'Reporting Standards' defined by the Global Reporting Initiative (GRI).

This document is available at the address <https://clessidracapitalcredit.it/it/sostenibilita>. For further information or clarifications, you can contact Clessidra Capital Credit SGR at the email address investor.relations@clessidragroup.it

SFDR Requirements

		CPDF
CLIMATE AND OTHER ENVIRONMENTAL INDICATORS (mandatory, unless non-material)		
Greenhouse Gas (GHG) Emissions		
1. GHG emissions	Scope 1 - GHG Emissions	✓
	Scope 2 - GHG Emissions	✓
	Scope 3 - GHG Emissions (mandatory from January 1 st , 2023)	✓
	Total GHG Emissions	✓
2. Carbon footprint	Carbon footprint	✓
3. GHG Intensity of portfolio companies	GHG Intensity of portfolio companies	✓
4. Exposure to companies active in the fossil fuel sector	Investment share in companies active in the fossil fuel sector	✓
5. Non-renewable energy consumption and production	Non-renewable energy consumption and non-renewable energy production of portfolio companies from non-renewable energy sources compared to renewable sources, expressed as a percentage	✓
6. Energy consumption intensity for high-impact climate sectors	Energy consumption in GWh per million euros of revenue of portfolio companies, by high-impact climate sector	✓
Biodiversity		
7. Activities that negatively impact biodiversity-sensitive areas	Investment share in portfolio companies with sites/operations located in or near biodiversity-sensitive areas where the activities of such companies negatively impact these areas	✓
Water		
8. Water discharges	Tons of water emissions generated by portfolio companies per million euros invested, expressed as a weighted average	✓
Waste		
9. Ratio of hazardous waste to radioactive waste	Tons of hazardous waste and radioactive waste generated by investee companies per million euros invested (value expressed as a weighted average)	✓
CLIMATE AND OTHER ENVIRONMENTAL INDICATORS (at least 1 additional material indicator)		
Emissions		
1. Inorganic pollutant emissions	Tons of equivalent inorganic pollutants per million euros invested, expressed as a weighted average	Non-material
2. Air pollutant emissions	Tons of equivalent air pollutants per million euros invested, expressed as a weighted average	Non-material
3. Emissions of ozone-depleting substances	Tons of equivalent ozone-depleting substances per million euros invested, expressed as a weighted average	Non-material
4. Investments in companies without CO ₂ emission reduction initiatives	Investment share in portfolio companies without carbon emission reduction initiatives aimed at aligning with the Paris Agreement	✓
Energetic performance		
5. Breakdown of energy consumption by type of non-renewable energy sources	Share of energy from non-renewable sources used by portfolio companies, broken down by each non-renewable energy source	✓
Water, waste and material release		
6. Water use and recycling	1. Average amount of water consumed and recovered by portfolio companies (in cubic meters) per million euros of revenue of portfolio companies 2. Weighted average percentage of water recycled and reused by portfolio companies	-
7. Investments in companies without water management policies	Investment share in portfolio companies without water management policies	✓
8. Exposure to water-stressed areas	Investment share in portfolio companies with sites located in water-stressed areas without a water management policy	✓
9. Investments in chemical manufacturing companies	Investment share in portfolio companies whose activities fall under division 20.2 of Annex I of Regulation (EC) No. 1893/2006	✓
10. Soil degradation, desertification, and soil sealing	Investment share in portfolio companies whose activities cause soil degradation, desertification, or soil sealing	✓
11. Investments in companies without sustainable land and agriculture practices	Investment share in portfolio companies without sustainable land/agriculture practices or policies	✓

		CPDF
12. Investments in companies without sustainable ocean and marine practices	Investment share in portfolio companies without sustainable ocean/marine practices or policies	✓
13. Non-recycled waste	Tons of non-recycled waste generated by portfolio companies per million euros invested, expressed as a weighted average	-
14. Endangered species and protected areas	1. Investment share in portfolio companies whose activities impact threatened species 2. Share of investments in portfolio companies without a biodiversity protection policy covering operational sites that are owned, leased, managed, or adjacent to a protected area or an area of high biodiversity value outside protected areas	✓
15. Deforestation	Investment share in companies without a policy to address deforestation	✓
Green titles		
16. Share of non-certified green bonds according to a future EU legal act establishing a Green Bond Standard	Share of non-certified green investment securities	Non-material
SOCIETY AND WORK, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION (mandatory, unless non-material)		
Work and society		
10. Violations of the UNGC Principles and the OECD Guidelines for Multinational Enterprises	Percentage of investment in subsidiaries involved in violations of the UNGC Principles or the OECD Guidelines for Multinational Enterprises	✓
11. Lack of processes and mechanisms for monitoring compliance with the UNGC principles and the OECD Guidelines for Multinational Enterprises	Investment share in affiliated companies without policies to monitor compliance with the UNGC principles or the OECD Guidelines for Multinational Enterprises, or complaint/grievance management mechanisms to address violations of the UNGC principles or OECD Guidelines	✓
12. Gender pay gap 'not corrected'	Average gender pay gap 'not corrected' in affiliated companies	✓
13. Gender diversity on the board of directors	Average ratio of men to women on the boards of directors of affiliated companies	✓
14. Exposure to controversial weapons (landmines, cluster munitions, chemical weapons, and biological weapons)	Share of investments in recipient companies involved in the manufacturing or sale of controversial weapons	✓
COMPANIES AND LABOR, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION (at least 1 additional material indicator)		
Work and society		
1. Investments in companies without occupational health and safety policies	Share of investment in affiliated companies without occupational accident insurance	✓
2. Incident rate	Accident rate in affiliated companies expressed as a weighted average	✓
3. Days lost due to injury, accident, death or illness	Number of workdays lost due to injury, accident, death or illness in subsidiaries, expressed as a weighted average	✓
4. Lack of a code of conduct for suppliers	Share of investment in subsidiaries without a supplier code of conduct (against unsafe working conditions, precarious work, child labor, and forced labor)	✓
5. Lack of a grievance/complaint management mechanism related to employee issues	Share of investment in subsidiaries without any grievance/complaint management mechanism related to employee issues	✓
6. Insufficient protection of whistleblowers	Share of investment in entities without whistleblower protection policies	✓
7. Discrimination cases	1. Number of reported discrimination incidents in subsidiaries, expressed as a weighted average 2. Number of discrimination incidents leading to sanctions in subsidiaries, expressed as a weighted average	✓
8. Excessive CEO pay ratio	Average ratio within subsidiaries between the total annual compensation for the highest-paid person and the average annual compensation for all employees (excluding the highest-paid person)	-
Human rights		
9. Lack of a policy	Share of investment in entities without a human rights policy	✓
10. Lack of due diligence	Share of investment in entities without a due diligence process to identify, prevent, mitigate, and address negative impacts on human rights	✓

		CPDF
11. Lack of processes and measures to prevent human trafficking	Share of investment in subsidiaries without policies against human trafficking	Non-material
12. Operations and suppliers at significant risk of child labour incidents	Share of investment in subsidiaries exposed to operations and suppliers at significant risk of child labour incidents involving hazardous work, in terms of geographical areas or types of activities	Non-material
13. Operations and suppliers at significant risk of forced or compulsory labour incidents	Share of investment in subsidiaries exposed to operations and suppliers at significant risk of forced or compulsory labour incidents, in terms of geographical areas and/or types of operations	Non-material
14. Number of identified cases of serious human rights issues and incidents	Number of cases of serious human rights issues and incidents related to subsidiaries, on a weighted average basis	✓
Anti-corruption		
15. Lack of anti-corruption policies	Share of investment in entities without anti-corruption policies consistent with the United Nations Convention against Corruption	✓
16. Cases of insufficient action taken to address violations of anti-corruption laws and regulations	Share of investment in subsidiaries with identified shortcomings in actions taken to address violations of anti-corruption procedures and standards	✓
17. Number of convictions and amount of fines for violations of anti-corruption laws and regulations	Number of convictions and amount of fines for violations of anti-corruption laws and regulations by subsidiaries	✓

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