



**PUBLIC TRANSPARENCY REPORT**

**2023**

**Ambienta SGR SpA**

Generated 15-12-2023

# About this report

PRI reporting is the largest global reporting project on responsible investment. It was developed with investors, for investors.

PRI signatories are required to report publicly on their responsible investment activities each year. In turn, they receive a number of outputs, including a public and private Transparency Report.

The public Transparency Reports, which are produced using signatories' reported information, provide accountability and support signatories to have internal discussions about their practices and to discuss these with their clients, beneficiaries, and other stakeholders.

This public Transparency Report is an export of the signatory's responses to the PRI Reporting Framework during the 2023 reporting period. It includes the signatory's responses to core indicators, as well as responses to plus indicators that the signatory has agreed to make public.

In response to signatory feedback, the PRI has not summarised signatories' responses – the information in this document is presented exactly as it was reported.

For each of the indicators in this document, all options selected by the signatory are presented, including links and qualitative responses. In some indicators, all applicable options are included for additional context.

## Disclaimers

### Responsible investment definitions

Within the PRI Reporting Framework Glossary, we provide definitions for key terms to guide reporting on responsible investment practices in the Reporting Framework. These definitions may differ from those used or proposed by other authorities and regulatory bodies due to evolving industry perspectives and changing legislative landscapes. Users of this report should be aware of these variations, as they may impact interpretations of the information provided.

### Data accuracy

This document presents information reported directly by signatories in the 2023 reporting cycle. This information has not been audited by the PRI or any other party acting on its behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented.

The PRI has taken reasonable action to ensure that data submitted by signatories in the reporting tool is reflected in their official PRI reports accurately. However, it is possible that small data inaccuracies and/or gaps remain, and the PRI shall not be responsible or liable for such inaccuracies and gaps.

# Table of Contents

Module	Page
SENIOR LEADERSHIP STATEMENT (SLS)	4
ORGANISATIONAL OVERVIEW (OO)	8
POLICY, GOVERNANCE AND STRATEGY (PGS)	21
LISTED EQUITY (LE)	62
PRIVATE EQUITY (PE)	71
HEDGE FUNDS (HF)	84
SUSTAINABILITY OUTCOMES (SO)	93
CONFIDENCE-BUILDING MEASURES (CBM)	98

# SENIOR LEADERSHIP STATEMENT (SLS)

## SENIOR LEADERSHIP STATEMENT

### SENIOR LEADERSHIP STATEMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SLS 1	CORE	N/A	N/A	PUBLIC	Senior Leadership Statement	GENERAL

#### Section 1. Our commitment

- Why does your organisation engage in responsible investment?
- What is your organisation's overall approach to responsible investment, and what major responsible investment commitment(s) have you made?

At Ambianta SGR we engage in responsible investment from both a strategy perspective and a responsible investment perspective. We are proud to say that we are one of Europe's leading and largest asset managers entirely focused on environmental sustainability. Ambianta started in 2007 with the sole purpose of investing in companies with a positive environmental impact. Ever since, our strongest belief continues to be that sustainability drives value. Indeed, throughout the years Ambianta has proven over and over again that companies which provide solutions to global environmental issues are not only good for the planet and its inhabitants, but are also going to enjoy growing long-term competitive advantages in their respective sectors.

As such, Ambianta invests exclusively in businesses whose products or services generate a Resource Efficiency or a Pollution Control impact. To assess such impact, which has to be uncontroverted, material and at the origin of growth, and demonstrate the environmental achievements of our portfolio, we developed our proprietary methodologies: the Environmental Impact Analysis ("EIA") for our private equity division, and the Ambianta Sustainability Index ("ASI") for our public markets division. The purpose of the Environmental Impact Analysis is to quantify the overall Environmental Impact of different businesses in terms of Resource Efficiency and Pollution Control, through a holistic approach that aims to capture the full impact of companies with different business models operating across a variety of sectors and at different stages of the value chain. To have a broad enough methodology to achieve our goal we have identified 11 Environmental Metrics which together can be used to evaluate any of the businesses we come across. We assess the environmental contribution of each business, before we make an investment in a prospective target acquisition and annually once the company joins our portfolio, using these metrics. The analysis is executed simultaneously with due diligence for a target company. As we expanded in Public Markets in 2019 we adapted our EIA methodology developing an analytical Environmental Sustainability Scoring (ESS) system to assess the contribution to environmental sustainability, at single holding and portfolio level, of our PM strategies. The Ambianta Sustainability Index (ASI) is the single holding level indicator which scores each division of a company on its environmental impact.

ASIs are then aggregated at fund level. This methodology allows us to assess if sustainability drives value in public companies, guiding our investment strategy similarly to how the EIA guides our private equity investments.

Our commitment to responsible investment goes beyond our environmentally focused investment strategy to encompass an activist ESG strategy, based on our public Responsible Investment Policy, that is Board approved, and that represents the foundation of our entire ESG approach at firm level and across asset classes. Among other topics it reaffirms the principles of active ownership and the link between value and sustainability and good ESG management. It commits to stakeholder reporting and to the incorporation of ESG in management practices at the GP- and portfolio-level.

Furthermore, it commits to carbon management. It also includes the foundation of Ambienta's Diversity, Equity and Inclusion Policy, which the Firm has developed at both GP and portfolio level in more detail. To this end the firm developed and continues to refine its proprietary programme, "ESG in Action", to systematically embed ESG management guidelines and practices at firm level and across asset classes. Over the years, the programme won a number of awards and has become widely known as a trendsetter in the industry for its comprehensiveness and pervasiveness. It is not a "box ticking" exercise but rather a way to create value by building strong, purpose driven organizations.

To support the above, Ambienta created its central in-house sustainability function, the Sustainability & Strategy team ("S&S").

The team is a core pillar of the firm's business model and has been instrumental in leading the push to be at the forefront of sustainable investing. It is fully dedicated to (i) analysing how environmental trends shape industries and create investment opportunities; (ii) assessing environmental impact and (iii) integrating ESG factors in the investment process. The team collaborates with the investment teams, across asset classes, to support the implementation of the aforementioned tools.

Among its main commitment Ambienta is a PRI signatory since 2012 and a certified B-Corp since 2019. It has also publicly committed to Net Zero by 2030 and, most recently in 2023, to the Science Based Target initiative. Finally, it is also a TCFD supported.

## Section 2. Annual overview

- Discuss your organisation's progress during the reporting year on the responsible investment issue you consider most relevant or material to your organisation or its assets.
- Reflect on your performance with respect to your organisation's responsible investment objectives and targets during the reporting year. Details might include, for example, outlining your single most important achievement or describing your general progress on topics such as the following (where applicable):
  - refinement of ESG analysis and incorporation
  - stewardship activities with investees and/or with policymakers
  - collaborative engagements
  - attainment of responsible investment certifications and/or awards

For 15 years, we never wavered in our belief that sustainability drives value and the year 2022 was just as successful on this front. We refined and upgraded our ESG in Action programme, our award-winning programme which provides the internal framework to explore, improve and engage our investees on ESG issues. This programme is embedded in the firm's culture since 2012 and has been further consolidated and structured both at firm level and across asset classes throughout 2022 to ensure more efficient and holistic due diligence and monitoring processes. The main upgrades have included:

- Decarbonization: Ambienta committed to Net Zero by 2030 back in 2019, and this year we worked to strengthen our decarbonization approach at asset-level.

We developed the first forward-looking carbon budget for Namirial, a portfolio company in Ambienta III, which was used to support the identification of a solid, science-based decarbonization approach thanks to an ambitious commitment supported by a concrete implementation plan and toolkit to guide real actions. To this end we committed to the Science-Based Targets initiative. In the coming months, Ambienta will set and validate targets at firm-level (percentage of emission reduction) and at asset class-level (percentage of invested capital with SBTi validated targets), in line with SBTi requirements. Joining the SBTi further accelerates our efforts in reducing greenhouse gas emissions and fostering a more sustainable future, confirming our position as a sustainability leader in the industry.

- Diversity Equity and Inclusion: following our 2020 Diversity and Recruitment Policy, in 2022 we established the Ambienta Diversity, Equity and Inclusion Committee, a firm-wide Committee with representation cross departments and geographies that concretely works towards an even more diverse and inclusive workplace. Achievements on this front include (i) reaching about 40% female representation at firm level, (ii) the set up of the Junior Analyst Programme and the Annual Internship Programme for women to sustain our diverse recruitment efforts, and (iii) the definition of a firm-level gender representation target for 2023.

At the asset class level, we committed to increase Board-level gender diversity in our Private Equity portfolio companies, starting from our new fund Ambienta IV.

- Engagement in the Public Market division: following the first cycle (2021) of ESG engagement, in 2022 we refined our approach and formalized a solid and comprehensive process composed of ESG due diligence and engagement activities.

Engagement is undertaken both based on ESG due diligence results and as part of our annual engagement activities comprising of an ESG questionnaire sent to all portfolio companies, analysis of results and definition of companies with which to do one on one engagement.

- SFDR integration: Ambienta's investment strategy is strategically aligned with Article 9, investment products aimed at achieving a sustainability goal, of the Sustainable Finance Disclosure Regulation (SFDR). To date, all our directly managed funds are classified as Article 9. Throughout 2022 the S&S function continued to focus on the sustainability-related disclosure obligations imposed by SFDR. Both the first- and second-level requirements, which have come in force in January 2023, have been met by Ambienta across all its asset classes, according to the deadlines set by the Regulation. In June 2023 Ambienta published its first Principal Adverse Impacts entity-level statement on its website, a voluntary disclosure as Ambienta was under the size thresholds for which this reporting is mandatory.

Regarding our proprietary environmental impact methodologies, on the Private Equity side, following our investment in Cap Vert at the end of 2021, we embarked on a project to quantify its impact on "biodiversity preserved", a metric that we included in our impact modelling since the beginning and we quantified for the first time in 2022, after 8 years of impact calculations.

Internally, we continued to grow the S&S team which is now comprised of 9 full-time employees and growing year on year (vs 6 individuals in 2021).

The team will continue to grow in 2023 with at least one more resource expected to join. The activities and services of the team provided across the firm were subject to a review on behalf of the CEO with the objective of revising and streamlining roles and responsibilities within the function in order to support Ambienta's purpose of being a pioneer in the sustainability space.

Furthermore, we continue to bring environmental sustainability to the world of investing with the launch of our third asset class: Ambienta Credit. The latter will bring our environmental knowledge, insights and proprietary methodologies to the world of Private Credit, by lending exclusively to environmental champions.

### Section 3. Next steps

- What specific steps has your organisation outlined to advance your commitment to responsible investment in the next two years?

Firm-level and across asset classes:

1. Decarbonization: as next steps in our decarbonization efforts, Ambienta will set and validate targets at firm-level (percentage of emission reduction) and at asset class-level (percentage of invested capital with SBTi validated targets) in line with the requirements of the Science Based Target initiative requirements. Part of such commitment includes defining a comprehensive decarbonization strategy to be applied across asset classes. In Private Equity, as a majority stakeholder in almost all its investments, Ambienta will support portfolio companies in calculating their baseline emissions and setting decarbonization strategies and actions.

To this end Ambienta is working towards the development of a decarbonization toolkit to support portfolio companies and guide real action. On the Public Market side, Ambienta plans on intensifying efforts on that front via engagement and proxy voting.

2. SFDR: SFDR requirements have been integrated in Ambienta's processes. The S&S team will continue to monitor the regulatory updates being shared with the industry to ensure its continued alignment with all legislative and market requirements.

3. Team: Finally, Ambienta, in the upcoming years, foresees an enlargement of its central Sustainability & Strategy team. The team will grow in line with the growth and expansion of the firm in order to sustain its ambitions and offer an even higher level of service to the investment teams and of support to our portfolio companies in their journey towards ESG integration and value creation.

Asset class specific:

1.

Performance assessment and ESG link: In 2022 it was defined to enhance the link between the annual performance assessment process and the link to ESG for investment professionals in Private Equity. To this end, on top of the "ESG Drive" KPI already part of the investment team's (in Private Equity as well as across the other asset classes) annual performance evaluation, it was decided, by top management, to introduce a material and incremental bonus, on top of performance ones, to best "ESG drive" members (3 selected per year) to further drive implementation effectiveness. This will be erogated for the first year at the end of 2023.

2. Reporting: as ESG data requests from a variety of stakeholders continue to increase and in order to ensure the continuous improvement of data quality Ambienta plans to automatize, for its Private Equity division, its data collection and analysis process. This will be done through the use of an IT tool that will further enhance the quality of the annual reporting process both towards investors and in general towards stakeholders.

#### Section 4. Endorsement

**'The Senior Leadership Statement has been prepared and/or reviewed by the undersigned and reflects our organisation-wide commitment and approach to responsible investment'.**

Name

Fabio Ranghino

Position

Partner and Head of Sustainability & Strategy Team

Organisation's Name

Ambienta SGR SpA

A

**'This endorsement applies only to the Senior Leadership Statement and should not be considered an endorsement of the information reported by the above-mentioned organisation in the various modules of the Reporting Framework. The Senior Leadership Statement serves as a general overview of the above-mentioned organisation's responsible investment approach. The Senior Leadership Statement does not constitute advice and should not be relied upon as such. Further, it is not a substitute for the skill, judgement and experience of any third parties, their management, employees, advisors and/or clients when making investment and other business decisions'.**

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# ORGANISATIONAL OVERVIEW (OO)

## ORGANISATIONAL INFORMATION

### REPORTING YEAR

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 1	CORE	N/A	N/A	PUBLIC	Reporting year	GENERAL

What is the year-end date of the 12-month period you have chosen to report for PRI reporting purposes?

	Date	Month	Year
Year-end date of the 12-month period for PRI reporting purposes:	31	12	2022

## SUBSIDIARY INFORMATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 2	CORE	N/A	OO 2.1	PUBLIC	Subsidiary information	GENERAL

Does your organisation have subsidiaries?

- (A) Yes
- (B) No

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 2.1	CORE	OO 2	OO 2.2	PUBLIC	Subsidiary information	GENERAL

Are any of your organisation's subsidiaries PRI signatories in their own right?

- (A) Yes
- (B) No



# ASSETS UNDER MANAGEMENT

## ALL ASSET CLASSES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 4	CORE	OO 3	N/A	PUBLIC	All asset classes	GENERAL

What are your total assets under management (AUM) at the end of the reporting year, as indicated in [OO 1]?

USD

(A) AUM of your organisation, including subsidiaries, and excluding the AUM subject to execution, advisory, custody, or research advisory only

US\$ 1,801,709,622.00

(B) AUM of subsidiaries that are PRI signatories in their own right and excluded from this submission, as indicated in [OO 2.2]

US\$ 0.00

(C) AUM subject to execution, advisory, custody, or research advisory only

US\$ 0.00

**Additional information on the exchange rate used: (Voluntary)**

Used Oanda Currency Converter <https://www.oanda.com/currency-converter/en/?from=EUR&to=USD&amount=1>

## ASSET BREAKDOWN

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5	CORE	OO 3	Multiple indicators	PUBLIC	Asset breakdown	GENERAL

Provide a percentage breakdown of your total AUM at the end of the reporting year as indicated in [OO 1].

	(1) Percentage of Internally managed AUM	(2) Percentage of Externally managed AUM
(A) Listed equity	13%	0%
(B) Fixed income	0%	0%
(C) Private equity	59%	0%
(D) Real estate	0%	0%
(E) Infrastructure	0%	0%
(F) Hedge funds	28%	0%
(G) Forestry	0%	0%
(H) Farmland	0%	0%
(I) Other	0%	0%
(J) Off-balance sheet	0%	0%

## ASSET BREAKDOWN: INTERNALLY MANAGED LISTED EQUITY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.3 LE	CORE	OO 5	Multiple	PUBLIC	Asset breakdown: Internally managed listed equity	GENERAL

**Provide a further breakdown of your internally managed listed equity AUM.**

(A) Passive equity 0%

(B) Active – quantitative 0%

(C) Active – fundamental 100%

(D) Other strategies 0%

## ASSET BREAKDOWN: INTERNALLY MANAGED PRIVATE EQUITY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.3 PE	CORE	OO 5	N/A	PUBLIC	Asset breakdown: Internally managed private equity	GENERAL

**Provide a further breakdown of your internally managed private equity AUM.**

(A) Venture capital 0%

(B) Growth capital 0%

(C) (Leveraged) buy-out 100%

(D) Distressed, turnaround or  
special situations 0%

(E) Secondaries 0%

(F) Other 0%

## ASSET BREAKDOWN: INTERNALLY MANAGED HEDGE FUND

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.3 HF	CORE	OO 5	OO 11	PUBLIC	Asset breakdown: Internally managed hedge fund	GENERAL

**Provide a further breakdown of your internally managed hedge fund assets.**

(A) Multi-strategy 0%

(B) Long/short equity 100%

(C) Long/short credit 0%

(D) Distressed, special situations  
and event-driven fundamental 0%

(E) Structured credit 0%

(F) Global macro 0%

(G) Commodity trading advisor 0%

(H) Other strategies 0%

## GEOGRAPHICAL BREAKDOWN

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 7	CORE	Multiple, see guidance	N/A	PUBLIC	Geographical breakdown	GENERAL

How much of your AUM in each asset class is invested in emerging markets and developing economies?

### AUM in Emerging Markets and Developing Economies

(A) Listed equity	(1) 0%
(F) Private equity	(1) 0%
(I) Hedge funds	(1) 0%

## STEWARDSHIP

### STEWARDSHIP

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 8	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Stewardship	GENERAL

Does your organisation conduct stewardship activities, excluding (proxy) voting, for any of your assets?

	(1) Listed equity - active	(5) Private equity	(8) Hedge funds
(A) Yes, through internal staff	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Yes, through service providers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

(C) Yes, through external managers	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(D) We do not conduct stewardship	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

## STEWARDSHIP: (PROXY) VOTING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 9 HF	CORE	OO 5	OO 9	PUBLIC	Stewardship: (Proxy) voting	GENERAL

Does your organisation have direct investments in listed equity across your hedge fund strategies?

- (A) Yes  
 (B) No

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 9	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Stewardship: (Proxy) voting	GENERAL

Does your organisation conduct (proxy) voting activities for any of your listed equity holdings?

(1) Listed equity - active

(3) Hedge funds

(A) Yes, through internal staff	<input type="checkbox"/>	<input type="checkbox"/>
(B) Yes, through service providers	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(C) Yes, through external managers	<input type="checkbox"/>	<input type="checkbox"/>
(D) We do not conduct (proxy) voting	<input type="radio"/>	<input type="radio"/>

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 9.1	CORE	OO 9	PGS 10.1, PGS 31	PUBLIC	Stewardship: (Proxy) voting	GENERAL

For each asset class, on what percentage of your listed equity holdings do you have the discretion to vote?

Percentage of your listed equity holdings over which you have the discretion to vote

(A) Listed equity – active	(11) >90 to <100%
(C) Hedge funds	(5) >30 to 40%

## ESG INCORPORATION

### INTERNALLY MANAGED ASSETS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 11	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Internally managed assets	1

For each internally managed asset class, does your organisation incorporate ESG factors into your investment decisions?

	(1) Yes, we incorporate ESG factors into our investment decisions	(2) No, we do not incorporate ESG factors into our investment decisions
(C) Listed equity - active - fundamental	<input checked="" type="radio"/>	<input type="radio"/>
(I) Private equity	<input checked="" type="radio"/>	<input type="radio"/>
(M) Hedge funds - Long/short equity	<input checked="" type="radio"/>	<input type="radio"/>

# ESG STRATEGIES

## LISTED EQUITY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 17 LE	CORE	OO 11	OO 17.1 LE, LE 12	PUBLIC	Listed equity	1

**Which ESG incorporation approach and/or combination of approaches does your organisation apply to your internally managed active listed equity?**

**Percentage out of total internally managed active listed equity**

(A) Screening alone	0%
(B) Thematic alone	0%
(C) Integration alone	0%
(D) Screening and integration	0%
(E) Thematic and integration	0%
(F) Screening and thematic	0%
(G) All three approaches combined	100%
(H) None	0%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 17.1 LE	CORE	OO 17 LE	LE 9	PUBLIC	Listed equity	1

**What type of screening does your organisation use for your internally managed active listed equity assets where a screening approach is applied?**



**Percentage coverage out of your total listed equity assets where a screening approach is applied**

(A) Positive/best-in-class screening only	0%
(B) Negative screening only	0%
(C) A combination of screening approaches	100%

## ESG/SUSTAINABILITY FUNDS AND PRODUCTS

### LABELLING AND MARKETING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18	CORE	OO 11–14	OO 18.1	PUBLIC	Labelling and marketing	1

**Do you explicitly market any of your products and/or funds as ESG and/or sustainable?**

(A) Yes, we market products and/or funds as ESG and/or sustainable

Provide the percentage of AUM that your ESG and/or sustainability-marketed products or funds represent:

100%

- (B) No, we do not offer products or funds explicitly marketed as ESG and/or sustainable
- (C) Not applicable; we do not offer products or funds

**Additional information: (Voluntary)**

Ambienta exclusively invests across asset classes in businesses whose products or services generate a Resource Efficiency or a Pollution Control impact. Our proprietary methodologies in assessing impact are uncontroverted, measurable and material, and are at the origin of our investments strategies, setting us as leaders in generating top-tier financial performance through solid environmental impact. Additionally, across all our asset classes, we integrate sustainability and ESG management practices via our ESG in Action program. The latter aims at promoting sustainability-driven best practices into day-to-day operations within our firm, while engaging with industry stakeholders. Our methodologies and active ownership practices on this front are continuously reviewed and refined to ensure we remain at the forefront of sustainability trends and ESG integration. Furthermore, all our directly managed funds are classified as Article 9 products as per the SFDR Regulation.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18.1	CORE	OO 18	OO 18.2	PUBLIC	Labelling and marketing	1

**Do any of your ESG and/or sustainability-marketed products and/or funds hold formal ESG and/or RI certification(s) or label(s) awarded by a third party?**

**(A) Yes, our ESG and/or sustainability-marketed products and/or funds hold formal labels or certifications**

Provide the percentage of AUM that your labelled and/or certified products and/or funds represent:

100%

(B) No, our ESG and/or sustainability-marketed products and/or funds do not hold formal labels or certifications

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18.2	CORE	OO 18.1	N/A	PUBLIC	Labelling and marketing	1

**Which ESG/RI certifications or labels do you hold?**

- (A) Commodity type label (e.g. BCI)
- (B) GRESB
- (C) Austrian Ecolabel (UZ49)
- (D) B Corporation**
- (E) BREEAM
- (F) CBI Climate Bonds Standard
- (G) DDV-Nachhaltigkeitskodex-ESG-Strategie
- (H) DDV-Nachhaltigkeitskodex-ESG-Impact
- (I) EU Ecolabel
- (J) EU Green Bond Standard
- (K) Febelfin label (Belgium)
- (L) Finansol
- (M) FNG-Siegel Ecolabel (Germany, Austria and Switzerland)
- (N) Greenfin label (France)
- (O) Grüner Pfandbrief
- (P) ICMA Green Bond Principles
- (Q) ICMA Social Bonds Principles
- (R) ICMA Sustainability Bonds Principles
- (S) ICMA Sustainability-linked Bonds Principles
- (T) Kein Verstoß gegen Atomwaffensperrvertrag
- (U) Le label ISR (French government SRI label)
- (V) Luxflag Climate Finance
- (W) Luxflag Environment
- (X) Luxflag ESG
- (Y) Luxflag Green Bond
- (Z) Luxflag Microfinance
- (AA) Luxflag Sustainable Insurance Products
- (AB) National stewardship code
- (AC) Nordic Swan Ecolabel
- (AD) Other SRI label based on EUROSIF SRI Transparency Code (e.g. Novethic)

- (AE) People's Bank of China green bond guidelines
  - (AF) RIAA (Australia)
  - (AG) Towards Sustainability label (Belgium)
  - (AH) Other
- Specify:

Our products are products under the SFDR regulation; all our directly managed funds are Article 9 products.

## SUMMARY OF REPORTING REQUIREMENTS

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Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 21	CORE	Multiple indicators	Multiple indicators	PUBLIC	Summary of reporting requirements	GENERAL

The following table shows which modules are mandatory or voluntary to report on in the separate PRI asset class modules. Where a module is voluntary, indicate if you wish to report on it.

Applicable modules	(1) Mandatory to report (pre-filled based on previous responses)	(2.1) Voluntary to report. Yes, I want to opt-in to reporting on the module	(2.2) Voluntary to report. No, I want to opt-out of reporting on the module
Policy, Governance and Strategy	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Confidence Building Measures	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(C) Listed equity – active – fundamental	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(I) Private equity	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(M) Hedge funds – Long/short equity	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

## OTHER ASSET BREAKDOWNS

### PRIVATE EQUITY: SECTORS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 22	CORE	OO 21	N/A	PUBLIC	Private equity: Sectors	GENERAL

In which sector(s) are your internally managed private equity assets invested?

- (A) Energy
- (B) Materials
- (C) Industrials
- (D) Consumer discretionary
- (E) Consumer staples
- (F) Healthcare
- (G) Financials
- (H) Information technology
- (I) Communication services
- (J) Utilities
- (K) Real estate

### PRIVATE EQUITY: OWNERSHIP LEVEL

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 23	CORE	OO 21	N/A	PUBLIC	Private equity: Ownership level	GENERAL

What is the percentage breakdown of your internally managed private equity investments by the level of ownership?

- (A) A majority stake (more than 50%)
  - Select from the list:
    - (1) >0 to 10%
    - (2) >10 to 50%
    - (3) >50 to 75%
    - (4) >75%
- (B) A significant minority stake (between 10–50%)
  - Select from the list:
    - (1) >0 to 10%
    - (2) >10 to 50%
- (C) A limited minority stake (less than 10%)

## SUBMISSION INFORMATION

### REPORT DISCLOSURE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 32	CORE	OO 3, OO 31	N/A	PUBLIC	Report disclosure	GENERAL

How would you like to disclose the detailed percentage figures you reported throughout the Reporting Framework?

- (A) Publish as absolute numbers
- (B) Publish as ranges

## POLICY, GOVERNANCE AND STRATEGY (PGS)

### POLICY

#### RESPONSIBLE INVESTMENT POLICY ELEMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 1	CORE	OO 8, OO 9	Multiple indicators	PUBLIC	Responsible investment policy elements	1, 2

Which elements are covered in your formal responsible investment policy(ies)?

- (A) Overall approach to responsible investment
- (B) Guidelines on environmental factors
- (C) Guidelines on social factors
- (D) Guidelines on governance factors
- (E) Guidelines on sustainability outcomes
- (F) Guidelines tailored to the specific asset class(es) we hold
- (G) Guidelines on exclusions
- (H) Guidelines on managing conflicts of interest related to responsible investment
- (I) Stewardship: Guidelines on engagement with investees
- (J) Stewardship: Guidelines on overall political engagement
- (K) Stewardship: Guidelines on engagement with other key stakeholders
- (L) Stewardship: Guidelines on (proxy) voting
- (M) Other responsible investment elements not listed here
- (N) Our organisation does not have a formal responsible investment policy and/or our policy(ies) do not cover any responsible investment elements

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 2	CORE	PGS 1	Multiple, see guidance	PUBLIC	Responsible investment policy elements	1

**Does your formal responsible investment policy(ies) include specific guidelines on systematic sustainability issues?**

- (A) Specific guidelines on climate change (may be part of guidelines on environmental factors)
- (B) Specific guidelines on human rights (may be part of guidelines on social factors)
- (C) Specific guidelines on other systematic sustainability issues

Specify:

efficient use of resources; preservation of quality of air, land, water and biodiversity; mitigation of deforestation risks and impacts; business integrity; good corporate governance and management; occupational, user, and community health and safety; fair employment terms and labour standards; human capital development; welfare

- (D) Our formal responsible investment policy(ies) does not include guidelines on systematic sustainability issues

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 3	CORE	PGS 1, PGS 2	N/A	PUBLIC	Responsible investment policy elements	6

**Which elements of your formal responsible investment policy(ies) are publicly available?**

- (A) Overall approach to responsible investment

Add link:

<https://ambientasgr.com/wp-content/uploads/2023/04/Responsible-Investment-Policy-2023-update.pdf>

- (B) Guidelines on environmental factors

Add link:

<https://ambientasgr.com/wp-content/uploads/2023/07/Ambienta-Flyer-EIA-2022.pdf>

- (C) Guidelines on social factors

Add link:

<https://ambientasgr.com/wp-content/uploads/2023/04/Responsible-Investment-Policy-2023-update.pdf>

- (D) Guidelines on governance factors

Add link:

<https://ambientasgr.com/wp-content/uploads/2023/04/Responsible-Investment-Policy-2023-update.pdf>

- (E) Guidelines on sustainability outcomes

Add link:

<https://ambientasgr.com/wp-content/uploads/2023/07/Ambienta-Flyer-EIA-2022.pdf>

- (F) Specific guidelines on climate change (may be part of guidelines on environmental factors)

Add link:

<https://ambientasgr.com/wp-content/uploads/2021/04/Ambienta-Net-Zero-Policy.pdf>

**(G) Specific guidelines on human rights (may be part of guidelines on social factors)**

Add link:

<https://ambientasgr.com/wp-content/uploads/2023/04/Responsible-Investment-Policy-2023-update.pdf>

**(H) Specific guidelines on other systematic sustainability issues**

Add link:

<https://ambientasgr.com/wp-content/uploads/2023/04/Responsible-Investment-Policy-2023-update.pdf>

**(I) Guidelines tailored to the specific asset class(es) we hold**

Add link:

<https://ambientasgr.com/wp-content/uploads/2023/04/Responsible-Investment-Policy-2023-update.pdf>

**(J) Guidelines on exclusions**

Add link:

<https://ambientasgr.com/wp-content/uploads/2023/07/Ambienta-Flyer-EIA-2022.pdf>

**(L) Stewardship: Guidelines on engagement with investees**

Add link:

<https://ambientasgr.com/wp-content/uploads/2023/04/Responsible-Investment-Policy-2023-update.pdf>

**(M) Stewardship: Guidelines on overall political engagement**

Add link:

<https://ambientasgr.com/wp-content/uploads/2023/04/Responsible-Investment-Policy-2023-update.pdf>

**(N) Stewardship: Guidelines on engagement with other key stakeholders**

Add link:

<https://ambientasgr.com/wp-content/uploads/2023/04/Responsible-Investment-Policy-2023-update.pdf>

**(O) Stewardship: Guidelines on (proxy) voting**

Add link:

<https://ambientasgr.com/wp-content/uploads/2023/04/Responsible-Investment-Policy-2023-update.pdf>

(Q) No elements of our formal responsible investment policy(ies) are publicly available

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 4	PLUS	PGS 1	N/A	PUBLIC	Responsible investment policy elements	1 – 6

**Does your formal responsible investment policy(ies) identify a link between your responsible investment activities and your fiduciary duties or equivalent obligations?**

**(A) Yes**

Elaborate:

Responsible investment is at the very core of our activities, both in terms of investment strategy, as well as in terms of integration of ESG processes. Both these elements are highlighted in our Limited Partnership Agreements (LPAs) with our investors.

- (B) No

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 5	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy elements	2

**Which elements are covered in your organisation's policy(ies) or guidelines on stewardship?**

- (A) Overall stewardship objectives
- (B) Prioritisation of specific ESG factors to be advanced via stewardship activities
- (C) Criteria used by our organisation to prioritise the investees, policy makers, key stakeholders, or other entities on which to focus our stewardship efforts
- (D) How different stewardship tools and activities are used across the organisation
- (E) Approach to escalation in stewardship
- (F) Approach to collaboration in stewardship
- (G) Conflicts of interest related to stewardship
- (H) How stewardship efforts and results are communicated across the organisation to feed into investment decision-making and vice versa
- (I) Other
- (J) None of the above elements is captured in our policy(ies) or guidelines on stewardship

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 6	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy elements	2

**Does your policy on (proxy) voting include voting principles and/or guidelines on specific ESG factors?**

- (A) Yes, it includes voting principles and/or guidelines on specific environmental factors
- (B) Yes, it includes voting principles and/or guidelines on specific social factors
- (C) Yes, it includes voting principles and/or guidelines on specific governance factors
- (D) Our policy on (proxy) voting does not include voting principles or guidelines on specific ESG factors

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 7	CORE	OO 9	N/A	PUBLIC	Responsible investment policy elements	2



Does your organisation have a policy that states how (proxy) voting is addressed in your securities lending programme?

- (A) We have a publicly available policy to address (proxy) voting in our securities lending programme
- (B) We have a policy to address (proxy) voting in our securities lending programme, but it is not publicly available
- (C) We rely on the policy of our external service provider(s)
- (D) We do not have a policy to address (proxy) voting in our securities lending programme
- (E) Not applicable; we do not have a securities lending programme

## RESPONSIBLE INVESTMENT POLICY COVERAGE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 8	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy coverage	1

What percentage of your total AUM is covered by the below elements of your responsible investment policy(ies)?

### Combined AUM coverage of all policy elements

- (A) Overall approach to responsible investment
  - (B) Guidelines on environmental factors
  - (C) Guidelines on social factors
  - (D) Guidelines on governance factors
- (7) 100%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 9	CORE	PGS 2	N/A	PUBLIC	Responsible investment policy coverage	1

What proportion of your AUM is covered by your formal policies or guidelines on climate change, human rights, or other systematic sustainability issues?

## AUM coverage

(A) Specific guidelines on climate change (1) for all of our AUM

(B) Specific guidelines on human rights (1) for all of our AUM

(C) Specific guidelines on other systematic sustainability issues (1) for all of our AUM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 10	CORE	OO 8, OO 9, PGS 1	N/A	PUBLIC	Responsible investment policy coverage	2

Per asset class, what percentage of your AUM is covered by your policy(ies) or guidelines on stewardship with investees?

(A) Listed equity

(1) Percentage of AUM covered

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- (10) >90% to <100%

(11) 100%

(C) Private equity

(1) Percentage of AUM covered

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- (10) >90% to <100%

(11) 100%

(F) Hedge funds

(1) Percentage of AUM covered

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- (10) >90% to <100%
- (11) 100%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 10.1	CORE	OO 9.1, PGS 1	N/A	PUBLIC	Responsible investment policy coverage	2

**What percentage of your listed equity holdings is covered by your guidelines on (proxy) voting?**

**(A) Actively managed listed equity**

(1) Percentage of your listed equity holdings over which you have the discretion to vote

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- (10) >90% to <100%
- (11) 100%

(2) If your AUM coverage is below 100%, explain why: (Voluntary)

We have discretion to vote on all long cash equity positions however, we are not allowed to vote on swap positions. Currently long positions represent 92% of our total holdings

**(C) Direct listed equity holdings in hedge fund portfolios**

(1) Percentage of your listed equity holdings over which you have the discretion to vote

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- (10) >90% to <100%
- (11) 100%

(2) If your AUM coverage is below 100%, explain why: (Voluntary)

We have discretion to vote on all long cash equity positions however, we are not allowed to vote on our swap positions. Currently our long positions represent 35% of our holdings

## GOVERNANCE

### ROLES AND RESPONSIBILITIES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11	CORE	N/A	Multiple indicators	PUBLIC	Roles and responsibilities	1

Which senior level body(ies) or role(s) in your organisation have formal oversight over and accountability for responsible investment?

(A) Board members, trustees, or equivalent

(B) Senior executive-level staff, or equivalent

Specify:

CEO, CIOs, Head of Sustainability and Strategy

(C) Investment committee, or equivalent

Specify:

CEO, CIOs, Head of Sustainability and Strategy, investment team

(D) Head of department, or equivalent

Specify department:

Head of Sustainability and Strategy

(E) None of the above bodies and roles have oversight over and accountability for responsible investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11.1	CORE	PGS 1, PGS 2, PGS 11	N/A	PUBLIC	Roles and responsibilities	1, 2

Does your organisation's senior level body(ies) or role(s) have formal oversight over and accountability for the elements covered in your responsible investment policy(ies)?

**(1) Board members, trustees, or equivalent**

**(2) Senior executive-level staff, investment committee, head of department, or equivalent**

(A) Overall approach to responsible investment	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Guidelines on environmental, social and/or governance factors	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(C) Guidelines on sustainability outcomes	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(D) Specific guidelines on climate change (may be part of guidelines on environmental factors)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(E) Specific guidelines on human rights (may be part of guidelines on social factors)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(F) Specific guidelines on other systematic sustainability issues	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(G) Guidelines tailored to the specific asset class(es) we hold	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(H) Guidelines on exclusions	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(J) Stewardship: Guidelines on engagement with investees	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(K) Stewardship: Guidelines on overall political engagement	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(L) Stewardship: Guidelines on engagement with other key stakeholders	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(M) Stewardship: Guidelines on (proxy) voting	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

(N) This role has no formal oversight over and accountability for any of the above elements covered in our responsible investment policy(ies)

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Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11.2	CORE	N/A	N/A	PUBLIC	Roles and responsibilities	1 – 6

**Does your organisation have governance processes or structures to ensure that your overall political engagement is aligned with your commitment to the principles of PRI, including any political engagement conducted by third parties on your behalf?**

(A) Yes

Describe how you do this:

Ambienta's Board-approved Responsible Investment Policy and Limited Partnership Agreements (LPAs) are built upon the PRI principles, form the basis of our governance and strategy approach, and guide all our external engagement processes ensuring consistency and alignment.

The Sustainability & Strategy team also provides training sessions dedicated to ESG integration and trends. A firm-wide training session is held at least once a year providing updates on the firm's ESG programme and main trends. Specific trainings on the programme are also provided to all new Private Equity portfolio companies and investment teams.

Such trainings always begin with an introduction to the PRI principles as they form the basis of our ESG programme. The latter further helps to ensure consistency between the PRI principles and the engagement activities that may be conducted by various members of the firm.

In general, the only political engagement that Ambienta may employ, happens through the Ambienta Foundation, a non profit organization endorsed by the Italian Ministry of Education. The Foundation was established to promote projects encouraging a culture of respect for the environment, energy saving, recycling and more generally, to promote all those behaviours capable of effectively reconciling industrial development and environmental sustainability in schools. The Foundation does not perform political engagement per se, but aims at increasing student awareness and education on environmental matters.

(B) No

(C) Not applicable, our organisation does not conduct any form of political engagement directly or through any third parties

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 12	CORE	N/A	N/A	PUBLIC	Roles and responsibilities	1

**In your organisation, which internal or external roles are responsible for implementing your approach to responsible investment?**

**(A) Internal role(s)**

Specify:

CEO, CIOs, Investment Team, Head of Sustainability & Strategy, Sustainability & Strategy Team

**(B) External investment managers, service providers, or other external partners or suppliers**

Specify:

Board member and ESG advisor (Stefano Bacci)

- (C) We do not have any internal or external roles with responsibility for implementing responsible investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 13	CORE	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

**Does your organisation use responsible investment KPIs to evaluate the performance of your board members, trustees, or equivalent?**

**(A) Yes, we use responsible investment KPIs to evaluate the performance of our board members, trustees, or equivalent**

Describe: (Voluntary)

Ambienta's annual performance evaluation system includes a dedicated ESG KPI, the "ESG drive", which ensures consistency in the assessment of responsible investment performance across the organisation. This is applied to all investment professionals, including executive Board members.

- (B) No, we do not use responsible investment KPIs to evaluate the performance of our board members, trustees, or equivalent

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 14	CORE	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

**Does your organisation use responsible investment KPIs to evaluate the performance of your senior executive-level staff (or equivalent), and are these KPIs linked to compensation?**

**(A) Yes, we use responsible investment KPIs to evaluate the performance of our senior executive-level staff (or equivalent)**

Indicate whether these responsible investment KPIs are linked to compensation

**(1) KPIs are linked to compensation**

- (2) KPIs are not linked to compensation as these roles do not have variable compensation
- (3) KPIs are not linked to compensation even though these roles have variable compensation

Describe: (Voluntary)

Ambienta's annual performance evaluation system includes a dedicated ESG KPI, the "ESG drive", which ensures consistency in the assessment of responsible investment performance across the organisation. This is applied to all investment professionals across asset classes (including senior executive-level staff). In 2022 we upgraded the system introducing, for Private Equity professionals, a material and incremental bonus, on top of performance ones, to best "ESG drive" members (3 selected per year) to further drive implementation effectiveness.

- (B) No, we do not use responsible investment KPIs to evaluate the performance of our senior executive-level staff (or equivalent)

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 15	PLUS	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

**What responsible investment competencies do you regularly include in the training of senior-level body(ies) or role(s) in your organisation?**

	(1) Board members, trustees or equivalent	(2) Senior executive-level staff, investment committee, head of department or equivalent
(A) Specific competence in climate change mitigation and adaptation	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(B) Specific competence in investors' responsibility to respect human rights	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(C) Specific competence in other systematic sustainability issues	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(D) The regular training of this senior leadership role does not include any of the above responsible investment competencies	<input type="checkbox"/>	<input type="checkbox"/>



## EXTERNAL REPORTING AND DISCLOSURES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 16	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

What elements are included in your regular reporting to clients and/or beneficiaries for the majority of your AUM?

- (A) Any changes in policies related to responsible investment
- (B) Any changes in governance or oversight related to responsible investment
- (C) Stewardship-related commitments
- (D) Progress towards stewardship-related commitments
- (E) Climate-related commitments
- (F) Progress towards climate-related commitments
- (G) Human rights-related commitments
- (H) Progress towards human rights-related commitments
- (I) Commitments to other systematic sustainability issues
- (J) Progress towards commitments on other systematic sustainability issues
- (K) We do not include any of these elements in our regular reporting to clients and/or beneficiaries for the majority of our AUM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 17	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

During the reporting year, did your organisation publicly disclose climate-related information in line with the Task Force on Climate-Related Financial Disclosures' (TCFD) recommendations?

- (A) Yes, including all governance-related recommended disclosures
- (B) Yes, including all strategy-related recommended disclosures
- (C) Yes, including all risk management-related recommended disclosures
- (D) Yes, including all applicable metrics and targets-related recommended disclosures
- (E) None of the above

Add link(s):

<https://ambientasgr.com/wp-content/uploads/2023/07/Ambienta-ESG-Report-2022.pdf>

<https://ambientasgr.com/net-zero-strategy/>

[https://ambientasgr.com/wp-content/uploads/2023/07/Ambienta-SGR\\_Annex-I\\_20230630\\_FINAL.pdf](https://ambientasgr.com/wp-content/uploads/2023/07/Ambienta-SGR_Annex-I_20230630_FINAL.pdf)

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 18	PLUS	N/A	N/A	PUBLIC	External reporting and disclosures	6

**During the reporting year, to which international responsible investment standards, frameworks, or regulations did your organisation report?**

**(A) Disclosures against the European Union's Sustainable Finance Disclosure Regulation (SFDR)**

Link to example of public disclosures

<https://ambientasgr.com/sustainability/sustainable-finance-disclosure-regulation-sfdr-related-disclosures/>

(B) Disclosures against the European Union's Taxonomy

(C) Disclosures against the CFA's ESG Disclosures Standard

**(D) Disclosures against other international standards, frameworks or regulations**

Specify:

Impact reporting for benefit corporations (Italian Law 208 of Dec 2015)

Link to example of public disclosures

[https://ambientasgr.com/wp-content/uploads/2022/07/2021-Impact-report-relazione\\_Final.pdf](https://ambientasgr.com/wp-content/uploads/2022/07/2021-Impact-report-relazione_Final.pdf)

(E) Disclosures against other international standards, frameworks or regulations

(F) Disclosures against other international standards, frameworks or regulations

(G) Disclosures against other international standards, frameworks or regulations

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 19	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

**During the reporting year, did your organisation publicly disclose its membership in and support for trade associations, think tanks or similar bodies that conduct any form of political engagement?**

**(A) Yes, we publicly disclosed our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement**

Add link(s):

<https://ambientasgr.com/wp-content/uploads/2023/07/Ambienta-ESG-Report-2022.pdf>

(B) No, we did not publicly disclose our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement

(C) Not applicable, we were not members in or supporters of any trade associations, think tanks, or similar bodies that conduct any form of political engagement during the reporting year

# STRATEGY

## CAPITAL ALLOCATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 20	CORE	N/A	N/A	PUBLIC	Capital allocation	1

### Which elements do your organisation-level exclusions cover?

- (A) Exclusions based on our organisation's values or beliefs regarding particular sectors, products or services
- (B) Exclusions based on our organisation's values or beliefs regarding particular regions or countries
- (C) Exclusions based on minimum standards of business practice aligned with international norms such as the OECD Guidelines for Multinational Enterprises, the International Bill of Human Rights, UN Security Council sanctions or the UN Global Compact
- (D) Exclusions based on our organisation's climate change commitments
- (E) Other elements  
Specify:

Ambienta's investment strategy exclusively focuses on companies whose products, services and/or operations have a positive impact in terms of Resource Efficiency and Pollution Control, as per Ambienta's proprietary methodologies.

- (F) Not applicable; our organisation does not have any organisation-level exclusions

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 21	CORE	N/A	N/A	PUBLIC	Capital allocation	1

### How does your responsible investment approach influence your strategic asset allocation process?

- (A) We incorporate ESG factors into our assessment of expected asset class risks and returns  
Select from dropdown list:
  - (1) for all of our AUM subject to strategic asset allocation
  - (2) for a majority of our AUM subject to strategic asset allocation
  - (3) for a minority of our AUM subject to strategic asset allocation
- (B) We incorporate climate change-related risks and opportunities into our assessment of expected asset class risks and returns  
Select from dropdown list:
  - (1) for all of our AUM subject to strategic asset allocation
  - (2) for a majority of our AUM subject to strategic asset allocation
  - (3) for a minority of our AUM subject to strategic asset allocation
- (C) We incorporate human rights-related risks and opportunities into our assessment of expected asset class risks and returns  
Select from dropdown list:
  - (1) for all of our AUM subject to strategic asset allocation
  - (2) for a majority of our AUM subject to strategic asset allocation
  - (3) for a minority of our AUM subject to strategic asset allocation

**(D) We incorporate risks and opportunities related to other systematic sustainability issues into our assessment of expected asset class risks and returns**

Select from dropdown list:

- (1) for all of our AUM subject to strategic asset allocation**
- (2) for a majority of our AUM subject to strategic asset allocation
- (3) for a minority of our AUM subject to strategic asset allocation

Specify: (Voluntary)

- (E) We do not incorporate ESG factors, climate change, human rights or other systematic sustainability issues into our assessment of expected asset class risks and returns
- (F) Not applicable; we do not have a strategic asset allocation process

## STEWARDSHIP: OVERALL STEWARDSHIP STRATEGY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 22	CORE	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

**For the majority of AUM within each asset class, which of the following best describes your primary stewardship objective?**

**(1) Listed equity**

**(3) Private equity**

**(6) Hedge funds**

(A) Maximise our portfolio-level risk-adjusted returns. In doing so, we seek to address any risks to overall portfolio performance caused by individual investees' contribution to systematic sustainability issues.



(B) Maximise our individual investments' risk-adjusted returns. In doing so, we do not seek to address any risks to overall portfolio performance caused by individual investees' contribution to systematic sustainability issues.



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 23	PLUS	OO 5, OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

**How does your organisation, or the external service providers or external managers acting on your behalf, prioritise the investees or other entities on which to focus its stewardship efforts?**

With regards to our Private Equity portfolio companies we apply our award-winning ESG in Action programme with no exception. The programme is deeply rooted in our culture and operates as a risk management and value creation tool for the benefit of all stakeholders. We use the findings of the ESG due diligence performed prior to investment, as well as other inputs, to support management in the identification of material ESG topics and the definition of an ESG Action Plan that is Board approved.

When it comes to our Public Markets division on the other hand, prioritization is based on the findings of the ESG due diligence carried out prior to investment as well as on the results of our annual engagement process. These findings allow us to identify and prioritize investees for our direct engagement efforts. The annual engagement process is comprised of an ESG questionnaire sent to all portfolio companies. The analysis of the answers provided, allows us to identify engagement priorities and to channel our efforts towards the most relevant companies.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 24	CORE	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

**Which of the following best describes your organisation's default position, or the position of the external service providers or external managers acting on your behalf, concerning collaborative stewardship efforts?**

- (A) We recognise the value of collective action, and as a result, we prioritise collaborative stewardship efforts wherever possible
- (B) We collaborate on a case-by-case basis
- (C) Other
- (D) We do not join collaborative stewardship efforts

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 24.1	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

**Elaborate on your organisation’s default position on collaborative stewardship, or the position of the external service providers or external investment managers acting on your behalf, including any other details on your overall approach to collaboration.**

Ambienta is open and willing to provide support and join collaborative stewardship initiatives that are aligned with our values and that help advancing our sustainability and ESG agenda. Currently, we are not involved in any collective stewardship activities but our internal team, the Sustainability & Strategy team, is evaluating a series of collective engagement initiatives. We have collaborated on a case-by-case basis through various associations / initiatives, the latest one being a representation of a variety of investors determined to maintain the leadership of a large Italian corporation who is an active player in the fight against climate change.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 25	PLUS	OO 5, OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

**Rank the channels that are most important for your organisation in achieving its stewardship objectives.**

- (A) Internal resources, e.g. stewardship team, investment team, ESG team, or staff

Select from the list:

- 1
- 3
- 4
- 5

- (B) External investment managers, third-party operators and/or external property managers, if applicable

- (C) External paid specialist stewardship services (e.g. engagement overlay services or, in private markets, sustainability consultants) excluding investment managers, real assets third-party operators, or external property managers

Select from the list:

- 2
- 3
- 4
- 5

- (D) Informal or unstructured collaborations with investors or other entities
- (E) Formal collaborative engagements, e.g. PRI-coordinated collaborative engagements, Climate Action 100+, or similar
- (F) We do not use any of these channels

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 26	PLUS	OO 8, OO 9, PGS 1	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

**How does your organisation ensure that its policy on stewardship is implemented by the external service providers to which you have delegated stewardship activities?**

**(A) Example(s) of measures taken when selecting external service providers:**

Aspects that we evaluated when choosing our external service provider include: its operational efficiency, the alignment of their voting policy with our Responsible Investment policy, and the fact that it is a market leader in the relevant space.

**(B) Example(s) of measures taken when designing engagement mandates and/or consultancy agreements for external service providers:**

**(C) Example(s) of measures taken when monitoring the stewardship activities of external service providers:**

Our internal team, the Sustainability & Strategy team, under the supervision of Ambienta's COO and of the Head of the Team, regularly reviews all the voting proposals sent weekly by our external service provider to ensure alignment with our ESG approach and process.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 27	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

**How are your organisation's stewardship activities linked to your investment decision making, and vice versa?**

Ambienta's investment strategy is focused on companies whose products, services and/or operations have a positive environmental impact in terms of Resource Efficiency and Pollution Control. Furthermore, we strive, through active ownership practices, to increase the ESG profile of our investees. This is part of our investment decision making and also influences our stewardship activities. This approach and mindset already ensures a base of alignment between our investment decision making and our stewardship activities across asset classes. Moreover, we work continuously with our portfolio companies to enhance their ESG profiles by identifying potential improvement areas from a sustainability point of view. The enforcement of such approach varies depending on the asset class: with regards to our private equity investments, since they represent the majority ownership of the company, we apply a programme which aims at integrating ESG in all of the company's operations, from governance to strategy, and through a materiality assessment we implement an action plan which is approved and monitored by the Board.

With regards to our public markets investments on the other hand, we ensure ESG is integrated in the companies via our engagement strategy and proxy voting.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 28	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

**If relevant, provide any further details on your organisation's overall stewardship strategy.**

Our stewardship strategy is enclosed in our ESG in Action programme that is applied at firm level and customized across all the asset classes we invest in. The programme is composed of phases embracing the entire investment lifecycle, starting from due diligence prior to investment (and engagement where relevant) and going into active ownership post-investment. In Private Equity active ownership essentially entails, as majority owners in almost all cases, work with the portfolio company to set the ESG governance, high-level principle based ESG policies and definition, based on a materiality assessment performed, of an ESG Action Plan that is Board approved. This is then monitored and reported on regularly to the Board and to Ambienta. The programme also includes carbon footprint analysis and definition of climate mitigation actions.

In Public Equity post-investment we regularly monitor the company through publicly available and third-party-based information. Our annual engagement cycles foresee sending an ESG questionnaire to companies and, based on results, identifying those with which to engage in meetings/video calls to push their ESG efforts and improvement of their ESG profile. We also undertake our active ownership practices through application of Proxy Voting.

## STEWARDSHIP: (PROXY) VOTING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 29	CORE	OO 9, PGS 1	N/A	PUBLIC	Stewardship: (Proxy) voting	2

**When you use external service providers to give recommendations, how do you ensure those recommendations are consistent with your organisation's (proxy) voting policy?**

**(A) Before voting is executed, we review external service providers' voting recommendations for controversial and high-profile votes**

Select from the below list:

- (1) in all cases**
- (2) in a majority of cases
- (3) in a minority of cases

**(B) Before voting is executed, we review external service providers' voting recommendations where the application of our voting policy is unclear**

Select from the below list:

- (1) in all cases**
- (2) in a majority of cases
- (3) in a minority of cases
- (D) We do not review external service providers' voting recommendations
- (E) Not applicable; we do not use external service providers to give voting recommendations

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 30	CORE	OO 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

**How is voting addressed in your securities lending programme?**

- (A) We recall all securities for voting on all ballot items



- (B) When a vote is deemed important according to pre-established criteria (e.g. high stake in the company), we recall all our securities for voting
- (C) Other
- (D) We do not recall our securities for voting purposes
- (E) Not applicable; we do not have a securities lending programme

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 31	CORE	OO 9.1	N/A	PUBLIC	Stewardship: (Proxy) voting	2

For the majority of votes cast over which you have discretion to vote, which of the following best describes your decision making approach regarding shareholder resolutions (or that of your external service provider(s) if decision making is delegated to them)?

- (A) We vote in favour of resolutions expected to advance progress on our stewardship priorities, including affirming a company's good practice or prior commitment
- (B) We vote in favour of resolutions expected to advance progress on our stewardship priorities, but only if the investee company has not already publicly committed to the action(s) requested in the proposal
- (C) We vote in favour of shareholder resolutions only as an escalation measure
- (D) We vote in favour of the investee company management's recommendations by default
- (E) Not applicable; we do not vote on shareholder resolutions

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 32	CORE	OO 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

During the reporting year, how did your organisation, or your external service provider(s), pre-declare voting intentions prior to voting in annual general meetings (AGMs) or extraordinary general meetings (EGMs)?

- (A) We pre-declared our voting intentions publicly through the PRI's vote declaration system on the Resolution Database
- (B) We pre-declared our voting intentions publicly by other means, e.g. through our website
- (C) We privately communicated our voting decision to investee companies prior to the AGM/EGM
- (D) We did not privately or publicly communicate our voting intentions prior to the AGM/EGM
- (E) Not applicable; we did not cast any (proxy) votes during the reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 33	CORE	OO 9	PGS 33.1	PUBLIC	Stewardship: (Proxy) voting	2

After voting has taken place, do you publicly disclose your (proxy) voting decisions or those made on your behalf by your external service provider(s), company by company and in a central source?

- (A) Yes, for all (proxy) votes
  - (B) Yes, for the majority of (proxy) votes
  - (C) Yes, for a minority of (proxy) votes
  - (D) No, we do not publicly report our (proxy) voting decisions company-by-company and in a central source
- Explain why:

We are currently working on improving transparency in disclosing our proxy voting results

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 34	CORE	OO 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

After voting has taken place, did your organisation, and/or the external service provider(s) acting on your behalf, communicate the rationale for your voting decisions during the reporting year?

(1) In cases where we abstained or voted against management recommendations

(2) In cases where we voted against an ESG-related shareholder resolution

(A) Yes, we publicly disclosed the rationale

(B) Yes, we privately communicated the rationale to the company

(C) We did not publicly or privately communicate the rationale, or we did not track this information

(D) Not applicable; we did not abstain or vote against management recommendations or ESG-related shareholder resolutions during the reporting year

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Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 35	PLUS	OO 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

**How does your organisation ensure vote confirmation, i.e. that your votes have been cast and counted correctly?**

Our external provider offers us with confirmation of receipt, recording and counting of votes cast for all securities impacted by SRD II. For securities not subject to SRD II, issuers are not required by regulation to provide vote confirmation to shareholders, however our external provider can request confirmation through the issuers and their agents are not obliged to provide confirmation.

**STEWARDSHIP: ESCALATION**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 36	CORE	OO 8, OO 9	N/A	PUBLIC	Stewardship: Escalation	2

**For your listed equity holdings, what escalation measures did your organisation, or the external investment managers or service providers acting on your behalf, use in the past three years?**

**(1) Listed equity**

**(2) Direct listed equity holdings in hedge fund portfolios**

(A) Joining or broadening an existing collaborative engagement or creating a new one

(B) Filing, co-filing, and/or submitting a shareholder resolution or proposal

(C) Publicly engaging the entity, e.g. signing an open letter	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(D) Voting against the re-election of one or more board directors	<input type="checkbox"/>	<input type="checkbox"/>
(E) Voting against the chair of the board of directors, or equivalent, e.g. lead independent director	<input type="checkbox"/>	<input type="checkbox"/>
(F) Divesting	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(G) Litigation	<input type="checkbox"/>	<input type="checkbox"/>
(H) Other	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
(I) In the past three years, we did not use any of the above escalation measures for our listed equity holdings	<input type="radio"/>	<input type="radio"/>

**(H) Other - (1) Listed equity - Specify:**

Privately engaging with the entity based on ESG due diligence and engagement findings.

**(H) Other - (2) Direct listed equity holdings in hedge funds portfolios - Specify:**

Privately engaging with the entity based on ESG due diligence and engagement findings.

## STEWARDSHIP: ENGAGEMENT WITH POLICY MAKERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39	CORE	OO 8, OO 9	PGS 39.1, PGS 39.2	PUBLIC	Stewardship: Engagement with policy makers	2

**Did your organisation, or the external investment managers or service providers acting on your behalf, engage with policy makers as part of your responsible investment approach during the reporting year?**

- (A) Yes, we engaged with policy makers directly
- (B) Yes, we engaged with policy makers through the leadership of or active participation in working groups or collaborative initiatives, including via the PRI

(C) Yes, we were members of, supported, or were in another way affiliated with third party organisations, including trade associations and non-profit organisations, that engage with policy makers, excluding the PRI

(D) We did not engage with policy makers directly or indirectly during the reporting year beyond our membership in the PRI

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39.1	CORE	PGS 39	N/A	PUBLIC	Stewardship: Engagement with policy makers	2

During the reporting year, what methods did you, or the external investment managers or service providers acting on your behalf, use to engage with policy makers as part of your responsible investment approach?

(A) We participated in 'sign-on' letters

(B) We responded to policy consultations

(C) We provided technical input via government- or regulator-backed working groups

Describe:

The Head of the Sustainability & Strategy team regularly collaborates with associations, media, press and stakeholders within the industry to discuss regulatory ESG trends

(D) We engaged policy makers on our own initiative

(E) Other methods

Describe:

We participated to round tables and discussions on sustainability and ESG topics

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39.2	CORE	PGS 39	N/A	PUBLIC	Stewardship: Engagement with policy makers	2

During the reporting year, did your organisation publicly disclose details of your engagement with policy makers conducted as part of your responsible investment approach, including through external investment managers or service providers?

(A) We publicly disclosed all our policy positions

(B) We publicly disclosed details of our engagements with policy makers

(C) No, we did not publicly disclose details of our engagement with policy makers conducted as part of our responsible investment approach during the reporting year

Explain why:

We participated at roundtables and consultations on sustainability upon request of policy makers and/or other entities; to date we have not undertaken disclosure on this although as our engagement grows we will consider a proper reporting of outcomes.

## STEWARDSHIP: EXAMPLES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 40	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Examples	2

**Provide examples of stewardship activities that you conducted individually or collaboratively during the reporting year that contributed to desired changes in the investees, policy makers or other entities with which you interacted.**

(A) Example 1:

Title of stewardship activity:

Upgrade of human capital management practices and ESG integration in supplier management

(1) Led by

- (1) Internally led
- (2) External service provider led
- (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

- (1) Environmental factors
- (2) Social factors
- (3) Governance factors

(3) Asset class(es)

- (1) Listed equity
- (2) Fixed income
- (3) Private equity
- (4) Real estate
- (5) Infrastructure
- (6) Hedge funds
- (7) Forestry
- (8) Farmland
- (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

Our ESG in Action programme demonstrated its effectiveness on several occasions throughout 2022. One of them being a portfolio company in our Private Equity Fund III, acquired at the beginning of 2021, which designs led luminaries. Among the key priorities identified by Ambienta together with management was the upgrade of human capital management practices. This was found fundamental in supporting the company in its growth and internationalization path and in creating a common culture and sense of belonging to the company. Among the activities identified on which the company is continuing implementation are: definition of employee communication initiatives, structured training programmes, development of a performance management system and employee annual engagement surveys.

Additionally, having a business model with a production entirely outsourced in Asia, relevant risks and opportunities were identified from a review of supply chain management practices, and ESG integration. The ESG Action Plan defined together with the company included actions to address this relevant issue such as a programme to audit suppliers and manage results and improvements. Since acquisition the % of suppliers covered by the programme has gone from 0% to 100% (significant suppliers, about 85% of total, are part of the SEDEX programme while remaining suppliers are subjected to a “lighter” but still third party managed audit). This has allowed the company to (i) manage its supply chain sustainability risk and (ii) has also led to significant commercial opportunities with some clients entering contracts with the company due to these additional layers of ESG control over the supply chain.

(B) Example 2:

Title of stewardship activity:

Engagement on climate related topics

(1) Led by

- (1) Internally led
- (2) External service provider led
- (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

- (1) Environmental factors
- (2) Social factors
- (3) Governance factors

(3) Asset class(es)

- (1) Listed equity
- (2) Fixed income
- (3) Private equity
- (4) Real estate
- (5) Infrastructure
- (6) Hedge funds
- (7) Forestry
- (8) Farmland
- (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

Actively exercising our influence to drive positive change in ESG practices is fundamental for Ambienta. For one of the portfolio companies, part of our Public Market funds, we identified, based on an analysis of its answers to our annual engagement questionnaire, improvement areas regarding climate change mitigation, specifically on the presence of ambitious decarbonization strategy and emission reduction targets. Ambienta first investigated the issue engaging directly with company management, then gained comfort that a plan was being implemented to increase the ambition of the company's decarbonization efforts, and finally monitored the evolution. Specifically, Ambienta checked throughout 2022 that the company had defined a decarbonization plan, set an ambitious emission reduction target and integrated climate related KPIs within the remuneration process of its leadership.

(C) Example 3:

Title of stewardship activity:

Decarbonization Pilot

(1) Led by

- (1) Internally led
- (2) External service provider led
- (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

- (1) Environmental factors
- (2) Social factors
- (3) Governance factors

(3) Asset class(es)

- (1) Listed equity
- (2) Fixed income
- (3) Private equity
- (4) Real estate
- (5) Infrastructure
- (6) Hedge funds
- (7) Forestry
- (8) Farmland
- (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

We worked with one of our portfolio companies on a decarbonization pilot in order to help the identification of carbon reduction solutions, with the aim of defining a Private Equity Fund-wide decarbonization programme. Specifically, the pilot started by setting the baseline, which included data gathering on the company's emissions and the calculation of its Scope 1 and Scope 2 GHG emissions.

Subsequently, we identified emission reduction actions such as the purchases of renewable energy and decarbonization of the car fleet.

Finally, we set roles and responsibilities for starting the implementation and monitoring its results.

The comprehensive decarbonization plan identified, sets the basis for future activities and helps the company in its green transition. In the first year of implementation, the company has already registered terrific results having reduced its Scope 1 and 2 footprint by 40% compared to 2021. We are now extending our analysis with the calculation of Scope 3 emissions, and subsequent identification of emission reduction activities.

The results of this pilot supported the definition of Ambienta's approach to decarbonization as concerning our investments.

Following this work Ambienta committed to the Science Based Target initiative. In the coming months Ambienta will set and validate targets at firm-level (percentage of emission reduction) and at asset class-level (percentage of invested capital with SBTi validated targets), in line with SBTi requirements.

(D) Example 4:

Title of stewardship activity:

(1) Led by

- (1) Internally led
- (2) External service provider led
- (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

- (1) Environmental factors
- (2) Social factors
- (3) Governance factors

(3) Asset class(es)

- (1) Listed equity
- (2) Fixed income
- (3) Private equity
- (4) Real estate
- (5) Infrastructure
- (6) Hedge funds
- (7) Forestry
- (8) Farmland
- (9) Other



(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

(E) Example 5:

Title of stewardship activity:

(1) Led by

- o (1) Internally led
- o (2) External service provider led
- o (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

- (1) Environmental factors
- (2) Social factors
- (3) Governance factors

(3) Asset class(es)

- (1) Listed equity
- (2) Fixed income
- (3) Private equity
- (4) Real estate
- (5) Infrastructure
- (6) Hedge funds
- (7) Forestry
- (8) Farmland
- (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

## CLIMATE CHANGE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 41	CORE	N/A	PGS 41.1	PUBLIC	Climate change	General

### Has your organisation identified climate-related risks and opportunities affecting your investments?

(A) Yes, within our standard planning horizon

Specify the risks and opportunities identified and your relevant standard planning horizon:

In Ambianta's investment strategies and practices, climate risk analysis is integrated in two main ways. Firstly, the investment strategy focuses on companies that have a positive impact in terms of Resource Efficiency and Pollution Control, emphasizing the analysis and understanding of how environmental trends, including those related to climate change and climate transition risk, influence industries and businesses. Climate-related risks which can affect operations or assets are also included in the scope of the ESG due diligence conducted before investment.

Our internal and cross-functional Sustainability & Strategy team conducts systematic scenario analysis and sensitivity assessments through monthly internal research analysis of environmental trends known as the "Book of Sectors." This analysis is also performed during the environmental impact assessment of target companies.

The Book of Sectors compiles environmental trends related to various sectors that influence the economy.

These reports are based on environmental risks and climate issues, which are addressed through scenario analysis and sensitivities when applicable. By analyzing and studying potential solutions to these problems, Ambianta identifies high conviction investment opportunities. To date, Ambianta has produced 59 reports dedicated to these issues.

In addition, for each investment, Ambianta has developed its own methodology to measure and analyse Environmental Impact: the Environmental Impact Analysis ("EIA"). The EIA encompasses a comprehensive evaluation of environmental impact, including considerations of climate change and climate risk. The S&S team takes into account climate risks, where relevant, and their influence on sectors and businesses.

- (B) Yes, beyond our standard planning horizon
- (C) No, we have not identified climate-related risks and/or opportunities affecting our investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 41.1	CORE	PGS 41	N/A	PUBLIC	Climate change	General

**Does your organisation integrate climate-related risks and opportunities affecting your investments in its overall investment strategy, financial planning and (if relevant) products?**

(A) Yes, our overall investment strategy, financial planning and (if relevant) products integrate climate-related risks and opportunities

Describe how climate-related risks and opportunities have affected or are expected to affect your investment strategy, financial planning and (if relevant) products:

Climate related risks are constantly assessed across asset classes by our internal team, the Sustainability & Strategy team, which carries out materiality assessments and analyzes industry trends. This ensures that Ambianta stays ahead of the curve in terms of market movements. Such analyses are deeply integrated in our culture and a core approach for our investment strategy, as Ambianta only invests in companies that engage in resource efficiency and pollution control. We have a solid internal company structure (dedicated department, commitment of Board, proprietary methodologies...) that allows us to react promptly to changes in regulation and, as climate-related modelling and Greenhouse Gas accounting evolve, to integrate such industry advancement in our analyses and investment approach. All our directly managed products are categorized as Article 9 indicating that they all have a sustainability objective at their core, as per the SFDR Regulation.

- (B) No, our organisation has not yet integrated climate-related risks and opportunities into its investment strategy, financial planning and (if relevant) products

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 42	PLUS	N/A	N/A	PUBLIC	Climate change	General

**Which sectors are covered by your organisation's strategy addressing high-emitting sectors?**

(A) Coal

Describe your strategy:

So far, none of our portfolio companies is part of this sector, however if such companies were to pass our environmental impact analysis and ESG due diligence, we would apply the same strategy as the one referenced in sectors in which we have invested in. That is, engagement, proxy voting or ESG in Action plan, depending on whether the company is publicly traded or not.

(B) Gas

Describe your strategy:

So far, none of our portfolio companies is part of this sector, however if such companies were to pass our environmental impact analysis and ESG due diligence, we would apply the same strategy as the one referenced in sectors in which we have invested in. That is, engagement, proxy voting or ESG in Action plan, depending on whether the company is publicly traded or not.

**(C) Oil**

Describe your strategy:

So far, none of our portfolio companies is part of this sector, however if such companies were to pass our environmental impact analysis and ESG due diligence, we would apply the same strategy as the one referenced in sectors in which we have invested in. That is, engagement, proxy voting or ESG in Action plan, depending on whether the company is publicly traded or not.

**(D) Utilities**

Describe your strategy:

Ambienta's investment strategy is to invest in companies that show a potential upside in enhancing their commitment to ESG topics and trends. With regards to public markets, we implement our sustainability-driven approach via public engagement and proxy voting, while with our private equity portfolio we apply our ESG in Action program, where we work with companies to identify crucial areas to improve, define a plan and monitoring process, and help the company enhance their operations, through the lens of ESG topics

**(E) Cement**

Describe your strategy:

Investments in this sector are short positions

**(F) Steel**

Describe your strategy:

Investments in this sector are short positions

**(G) Aviation**

Describe your strategy:

Investments in this sector are short positions

**(H) Heavy duty road**

Describe your strategy:

So far, none of our portfolio companies is part of this sector, however if such companies were to pass our environmental impact analysis and ESG due diligence, we would apply the same strategy as the one referenced in sectors in which we have invested in. That is, engagement, proxy voting or ESG in Action plan, depending on whether the company is publicly traded or not.

**(I) Light duty road**

Describe your strategy:

So far, none of our portfolio companies is part of this sector, however if such companies were to pass our environmental impact analysis and ESG due diligence, we would apply the same strategy as the one referenced in sectors in which we have invested in. That is, engagement, proxy voting or ESG in Action plan, depending on whether the company is publicly traded or not.

**(J) Shipping**

Describe your strategy:

Investments in this sector are short positions

**(K) Aluminium**

## Describe your strategy

So far, none of our portfolio companies is part of this sector, however if such companies were to pass our environmental impact analysis and ESG due diligence, we would apply the same strategy as the one referenced in sectors in which we have invested in. That is, engagement, proxy voting or ESG in Action plan, depending on whether the company is publicly traded or not.

### (L) Agriculture, forestry, fishery

#### Describe your strategy:

So far, none of our portfolio companies is part of this sector, however if such companies were to pass our environmental impact analysis and ESG due diligence, we would apply the same strategy as the one referenced in sectors in which we have invested in. That is, engagement, proxy voting or ESG in Action plan, depending on whether the company is publicly traded or not.

### (M) Chemicals

#### Describe your strategy:

Ambienta's investment strategy is to invest in companies that show a potential upside in enhancing their commitment to ESG topics and trends. With regards to public markets, we implement our sustainability-driven approach via public engagement and proxy voting, while with our private equity portfolio we apply our ESG in Action program, where we work with companies to identify crucial areas to improve, define a plan and monitoring process, and help the company enhance their operations, through the lens of ESG topics

### (N) Construction and buildings

#### Describe your strategy:

Ambienta's investment strategy is to invest in companies that show a potential upside in enhancing their commitment to ESG topics and trends. With regards to public markets, we implement our sustainability-driven approach via public engagement and proxy voting, while with our private equity portfolio we apply our ESG in Action program, where we work with companies to identify crucial areas to improve, define a plan and monitoring process, and help the company enhance their operations, through the lens of ESG topics

### (O) Textile and leather

#### Describe your strategy:

Investments in this sector are short positions as well as part of our Private Equity portfolio. With regards to the latter, Ambienta's investment strategy is to invest in companies that show a potential upside in enhancing their commitment to ESG topics and trends. With regards to public markets, we implement our sustainability-driven approach via public engagement and proxy voting, while with our private equity portfolio we apply our ESG in Action program, where we work with companies to identify crucial areas to improve, define a plan and monitoring process, and help the company enhance their operations, through the lens of ESG topics

### (P) Water

#### Describe your strategy:

Ambienta's investment strategy is to invest in companies that show a potential upside in enhancing their commitment to ESG topics and trends. With regards to public markets, we implement our sustainability-driven approach via public engagement and proxy voting, while with our private equity portfolio we apply our ESG in Action program, where we work with companies to identify crucial areas to improve, define a plan and monitoring process, and help the company enhance their operations, through the lens of ESG topics

### (Q) Other

- (R) We do not have a strategy addressing high-emitting sectors

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 43	CORE	N/A	N/A	PUBLIC	Climate change	General

**Has your organisation assessed the resilience of its investment strategy in different climate scenarios, including one in which the average temperature rise is held to below 2 degrees Celsius (preferably to 1.5 degrees Celsius) above pre-industrial levels?**

- (A) Yes, using the Inevitable Policy Response Forecast Policy Scenario (FPS) or Required Policy Scenario (RPS)
- (B) Yes, using the One Earth Climate Model scenario
- (C) Yes, using the International Energy Agency (IEA) Net Zero scenario
- (D) Yes, using other scenarios**

Specify:

Ambienta's investment strategy is centered on companies whose products, services and/or operations have a positive environmental impact. Environmental impact is studied at 360 degrees and includes climate change / climate risk considerations. The Sustainability and Strategy team considers, where applicable, climate risks and how these influence and shape sectors and businesses. Climate risk is also integrated in the ESG due diligence performed pre-deal. To date however, the above listed scenario analyses and sensitivities are not applied to the analysis performed.

- (E) No, we have not assessed the resilience of our investment strategy in different climate scenarios, including one that holds temperature rise to below 2 degrees

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 44	CORE	N/A	N/A	PUBLIC	Climate change	General

**Does your organisation have a process to identify, assess, and manage the climate-related risks (potentially) affecting your investments?**

- (A) Yes, we have a process to identify and assess climate-related risks**

(1) Describe your process

Thanks to its intrinsic culture and investment strategy, as well as its management of ESG topics, which is systematically applied to all investments, Ambienta monitors and handles climate and environmental risks by only targeting companies that, through their products and services, mitigate such risks. An impact analysis is carried out at pre-investment phase, and reviewed annually thereafter, which allows to integrate climate risk from the very beginning of the investment process. Moreover, through its award-winning ESG in Action programme, Ambienta monitors and handles further climate risks that may arise during the due diligence phase

(2) Describe how this process is integrated into your overall risk management

To update the risk profile of investment portfolios across asset classes, that is, Private Equity and Public Markets, Ambienta's risk evaluation policy has been further integrated with the creation of a new ESG category, which is in turn divided into three main pillars: Environmental, Social and Governance. Relevant KPIs for each pillar have been defined with specific indicators which allow to assess the risk level of the company. Such indicators are integrated as part of Ambienta's overall risk management policy via two defined processes: In the Private space, as mentioned above, a systematic due diligence process is carried out at pre-investment phase, while in the Public space, Ambienta's proprietary indicator, Ambienta Sustainability Index (ASI), is monitored on a monthly basis for each investment position.

**(B) Yes, we have a process to manage climate-related risks**

(1) Describe your process

Our ESG in Action programme identifies areas of improvement related to ESG topics and trends, including an assessment of the company's climate risk exposure. Such assessment is integrated in our investment process from the very beginning in our due diligence, where we require from the investment company to calculate and provide an evaluation of their environmental impact. Such evaluation is analyzed by our internal Sustainability & Strategy team, comprised of industry experts, and integrated with a materiality assessment. Finally, an ESG Action Plan is elaborated to help the company prepare for the transition to a green economy, and therefore, decrease its climate risk exposure. With regards to our Public Markets portfolio, we integrate climate risk in our public engagement processes and proxy voting.

(2) Describe how this process is integrated into your overall risk management

Risk management practices at Ambienta are integrated in our culture as we invest only in companies that engage in Resource Efficiency and Pollution Control. During the Due Diligence phase and through our Materiality assessment, we identify attention points to focus on, which will lead us towards elaborating a specific plan to address them. Climate risk is part of the evaluation and, if deemed necessary, specific areas are detailed for the company to work on and improve. This is then monitored and reviewed on a regular basis by our industry experts within the Sustainability & Strategy team, as well as at Board level.

- (C) No, we do not have any processes to identify, assess, or manage the climate-related risks affecting our investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 45	CORE	N/A	N/A	PUBLIC	Climate change	General

**During the reporting year, which of the following climate risk metrics or variables affecting your investments did your organisation use and disclose?**

- (A) Exposure to physical risk

**(B) Exposure to transition risk**

(1) Indicate whether this metric or variable was used and disclosed, including the methodology

**(1) Metric or variable used**

- (2) Metric or variable used and disclosed
- (3) Metric or variable used and disclosed, including methodology

- (C) Internal carbon price

**(D) Total carbon emissions**

(1) Indicate whether this metric or variable was used and disclosed, including the methodology

- (1) Metric or variable used
- (2) Metric or variable used and disclosed**
- (3) Metric or variable used and disclosed, including methodology

(2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

[https://ambientasgr.com/wp-content/uploads/2023/07/Ambienta-SGR\\_Annex-I\\_20230630\\_FINAL.pdf](https://ambientasgr.com/wp-content/uploads/2023/07/Ambienta-SGR_Annex-I_20230630_FINAL.pdf)

**(E) Weighted average carbon intensity**

- (1) Indicate whether this metric or variable was used and disclosed, including the methodology
- (1) Metric or variable used**
  - (2) Metric or variable used and disclosed
  - (3) Metric or variable used and disclosed, including methodology

**(F) Avoided emissions**

- (1) Indicate whether this metric or variable was used and disclosed, including the methodology
- (1) Metric or variable used
  - (2) Metric or variable used and disclosed
  - (3) Metric or variable used and disclosed, including methodology**
- (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

<https://ambientasgr.com/wp-content/uploads/2023/07/Ambienta-Flyer-EIA-2022.pdf>

(G) Implied Temperature Rise (ITR)

(H) Non-ITR measure of portfolio alignment with UNFCCC Paris Agreement goals

(I) Proportion of assets or other business activities aligned with climate-related opportunities

**(J) Other metrics or variables**

Specify:

Share of non-renewable energy consumption and production

- (1) Indicate whether this metric or variable was used and disclosed, including the methodology
- (1) Metric or variable used
  - (2) Metric or variable used and disclosed**
  - (3) Metric or variable used and disclosed, including methodology
- (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

[https://ambientasgr.com/wp-content/uploads/2023/07/Ambienta-SGR\\_Annex-I\\_20230630\\_FINAL.pdf](https://ambientasgr.com/wp-content/uploads/2023/07/Ambienta-SGR_Annex-I_20230630_FINAL.pdf)

- (K) Our organisation did not use or disclose any climate risk metrics or variables affecting our investments during the reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 46	CORE	N/A	N/A	PUBLIC	Climate change	General

**During the reporting year, did your organisation disclose its Scope 1, Scope 2, and/or Scope 3 greenhouse gas emissions?**

**(A) Scope 1 emissions**

- (1) Indicate whether this metric was disclosed, including the methodology
- (1) Metric disclosed
  - (2) Metric and methodology disclosed**
- (2) Provide links to the disclosed metric and methodology, as applicable

<https://ambientasgr.com/net-zero-strategy/>

**(B) Scope 2 emissions**

- (1) Indicate whether this metric was disclosed, including the methodology
- (1) Metric disclosed
  - (2) Metric and methodology disclosed**

(2) Provide links to the disclosed metric and methodology, as applicable

<https://ambientasgr.com/net-zero-strategy/>

**(C) Scope 3 emissions (including financed emissions)**

(1) Indicate whether this metric was disclosed, including the methodology

o (1) Metric disclosed

**(2) Metric and methodology disclosed**

(2) Provide links to the disclosed metric and methodology, as applicable

<https://ambientasgr.com/net-zero-strategy/>

o (D) Our organisation did not disclose its Scope 1, Scope 2, or Scope 3 greenhouse gas emissions during the reporting year

## SUSTAINABILITY OUTCOMES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47	CORE	N/A	Multiple indicators	PUBLIC	Sustainability outcomes	1, 2

**Has your organisation identified the intended and unintended sustainability outcomes connected to its investment activities?**

**(A) Yes, we have identified one or more specific sustainability outcomes connected to our investment activities**

o (B) No, we have not yet identified the sustainability outcomes connected to any of our investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47.1	CORE	PGS 47	N/A	PUBLIC	Sustainability outcomes	1, 2

**Which widely recognised frameworks has your organisation used to identify the intended and unintended sustainability outcomes connected to its investment activities?**

**(A) The UN Sustainable Development Goals (SDGs) and targets**

**(B) The UNFCCC Paris Agreement**

**(C) The UN Guiding Principles on Business and Human Rights (UNGPs)**

**(D) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors**

**(E) The EU Taxonomy**

(F) Other relevant taxonomies

**(G) The International Bill of Human Rights**

**(H) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions**

(I) The Convention on Biological Diversity

**(J) Other international framework(s)**



Specify:

UN Global Compact

- (K) Other regional framework(s)
- (L) Other sectoral/issue-specific framework(s)
- (M) Our organisation did not use any widely recognised frameworks to identify the intended and unintended sustainability outcomes connected to its investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47.2	CORE	PGS 47	PGS 48	PUBLIC	Sustainability outcomes	1, 2

**What are the primary methods that your organisation has used to determine the most important intended and unintended sustainability outcomes connected to its investment activities?**

- (A) Identify sustainability outcomes that are closely linked to our core investment activities
- (B) Consult with key clients and/or beneficiaries to align with their priorities
- (C) Assess which actual or potential negative outcomes for people are most severe based on their scale, scope, and irremediable character
- (D) Identify sustainability outcomes that are closely linked to systematic sustainability issues
- (E) Analyse the input from different stakeholders (e.g. affected communities, civil society, trade unions or similar)
- (F) Understand the geographical relevance of specific sustainability outcome objectives
- (G) Other method
- (H) We have not yet determined the most important sustainability outcomes connected to our investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 48	CORE	PGS 47.2	PGS 48.1, SO 1	PUBLIC	Sustainability outcomes	1, 2

**Has your organisation taken action on any specific sustainability outcomes connected to its investment activities, including to prevent and mitigate actual and potential negative outcomes?**

- (A) Yes, we have taken action on some of the specific sustainability outcomes connected to our investment activities
- (B) No, we have not yet taken action on any specific sustainability outcomes connected to our investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 48.1	PLUS	PGS 48	N/A	PUBLIC	Sustainability outcomes	1, 2

**Why has your organisation taken action on specific sustainability outcomes connected to its investment activities?**

- (A) We believe that taking action on sustainability outcomes is relevant to our financial risks and returns over both short- and long-term horizons
- (B) We believe that taking action on sustainability outcomes, although not yet relevant to our financial risks and returns, will become so over a long-time horizon
- (C) We have been requested to do so by our clients and/or beneficiaries
- (D) We want to prepare for and respond to legal and regulatory developments that are increasingly addressing sustainability outcomes
- (E) We want to protect our reputation, particularly in the event of negative sustainability outcomes connected to investments
- (F) We want to enhance our social licence-to-operate (i.e. the trust of beneficiaries, clients, and other stakeholders)
- (G) We believe that taking action on sustainability outcomes in parallel to financial return goals has merit in its own right
- (H) Other

**HUMAN RIGHTS**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 49	PLUS	PGS 47	PGS 49.1	PUBLIC	Human rights	1, 2

**During the reporting year, what steps did your organisation take to identify and take action on the actual and potentially negative outcomes for people connected to your investment activities?**

- (A) We assessed the human rights context of our potential and/or existing investments and projected how this could connect our organisation to negative human rights outcomes

Explain how these activities were conducted:

Human rights are at the core of Ambienta's culture and beliefs. We ensure these are fully honoured via multiple steps in our investment process:

1. we carry out an online research of the company's background and its implications (Business & Human Rights Resource Center website, OECD website, etc.);
2. we look at our third party provider's data universe to investigate whether the company carries out controversial activities;
3. we carry out due diligence activities both internally (in case of our Public Equity portfolio and Hedge Funds) and externally via third party experts (in case of our Private Equity portfolio);
4. we develop a plan to carry out company engagement

- (B) We assessed whether individuals at risk or already affected might be at heightened risk of harm
- (C) We consulted with individuals and groups who were at risk or already affected, their representatives and/or other relevant stakeholders such as human rights experts

Explain how these activities were conducted:

Based on our due diligence analysis, if findings require it, we engage with representatives of organizations involved in order to obtain further information on relevant matters. Throughout the reporting year we engaged with the Global Trade Union and various NGOs to get more information with regards to findings of our internal due diligence process.

- (D) We took other steps to assess and manage the actual and potentially negative outcomes for people connected to our investment activities

- (E) We did not identify and take action on the actual and potentially negative outcomes for people connected to any of our investment activities during the reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 49.1	PLUS	PGS 49	N/A	PUBLIC	Human rights	1, 2

**During the reporting year, which stakeholder groups did your organisation include when identifying and taking action on the actual and potentially negative outcomes for people connected to your investment activities?**

**(A) Workers**

Sector(s) for which each stakeholder group was included

- (1) Energy
- (2) Materials**
- (3) Industrials**
- (4) Consumer discretionary**
- (5) Consumer staples
- (6) Healthcare
- (7) Finance
- (8) Information technology**
- (9) Communication services
- (10) Utilities**
- (11) Real estate

**(B) Communities**

Sector(s) for which each stakeholder group was included

- (1) Energy
- (2) Materials**
- (3) Industrials**
- (4) Consumer discretionary**
- (5) Consumer staples
- (6) Healthcare
- (7) Finance
- (8) Information technology**
- (9) Communication services
- (10) Utilities**
- (11) Real estate

**(C) Customers and end-users**

Sector(s) for which each stakeholder group was included

- (1) Energy
- (2) Materials**
- (3) Industrials**
- (4) Consumer discretionary**
- (5) Consumer staples
- (6) Healthcare
- (7) Finance
- (8) Information technology**
- (9) Communication services
- (10) Utilities**
- (11) Real estate

**(D) Other stakeholder groups**

Specify:

Global trade union, NGOs

Sector(s) for which each stakeholder group was included

- (1) Energy
- (2) **Materials**
- (3) **Industrials**
- (4) **Consumer discretionary**
- (5) Consumer staples
- (6) Healthcare
- (7) Finance
- (8) **Information technology**
- (9) Communication services
- (10) **Utilities**
- (11) Real estate

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 49.2	PLUS	PGS 47	N/A	PUBLIC	Human rights	1, 2

**During the reporting year, what information sources did your organisation use to identify the actual and potentially negative outcomes for people connected to its investment activities?**

**(A) Corporate disclosures**

Provide further detail on how your organisation used these information sources:

Since the pre-investment phase, ESG topics are integrated and evaluated. A thorough due diligence is carried out at company level to ensure that the company is fully aligned with Ambienta's culture and values. On the Private Equity side, the due diligence process is further enhanced by a third party assessment of the company on ESG topics, and compared to peers within the same sector. On the Public Markets side, the due diligence is carried out by our specialized team, the Strategy and Sustainability team. On both markets, our materiality assessment during the due diligence phase is integrated by an analysis of corporate disclosure

**(B) Media reports**

Provide further detail on how your organisation used these information sources:

In case concerns of misalignment between Ambienta's culture and the investment company arise, further researches are conducted, which include the analysis of media reports.

**(C) Reports and other information from NGOs and human rights institutions**

Provide further detail on how your organisation used these information sources:

When a company is evaluated for potential investments, and some concerns arise during the due diligence phase, we reach out to NGOs to have a better understanding of the matter and decide whether it is a dealbreak for us or if there is the possibility of working with the company to improve on that front.

**(D) Country reports, for example, by multilateral institutions, e.g. OECD, World Bank**

Provide further detail on how your organisation used these information sources:

During our due diligence phase we research the company's background, specifically using the OECD Responsible Business Conduct website as well as the Business and Human Rights Resource Centre website

**(E) Data provider scores or benchmarks**

Provide further detail on how your organisation used these information sources:

We use Bloomberg to conduct researches on the company and peer analysis identifying similar companies in the same sector.

**(F) Human rights violation alerts**

Provide further detail on how your organisation used these information sources:

As mentioned above, the background search of the company includes websites that highlight whether the company is aligned with the set of guidelines that prevent, address and remedy human rights abuses committed in business operations

- (G) Sell-side research
- (H) Investor networks or other investors
- (I) Information provided directly by affected stakeholders or their representatives
- (J) Social media analysis**

Specify:

Twitter

Provide further detail on how your organisation used these information sources:

News, press releases and statements published on social media platform become part of our background check and due diligence of the investment company

(K) Other

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 50	PLUS	PGS 47	N/A	PUBLIC	Human rights	1, 2

**During the reporting year, did your organisation, directly or through influence over investees, enable access to remedy for people affected by negative human rights outcomes connected to your investment activities?**

- (A) Yes, we enabled access to remedy directly for people affected by negative human rights outcomes we caused or contributed to through our investment activities
- (B) Yes, we used our influence to ensure that our investees provided access to remedies for people affected by negative human rights outcomes we were linked to through our investment activities**

Describe:

In Public Markets (Listed Equity & Hedge Funds) we put pressure through engagement activities. Where applicable, we engage with NGOs and other organizations, such as the Global Trade Union, to get more information on findings that arose during our due diligence process. This helps shape our engagement activities with our investees and to formulate our requirements from them. On the Private Equity side, as majority owners, we work with management to improve their ESG profile and ensure good practices.

- (C) No, we did not enable access to remedy directly, or through the use of influence over investees, for people affected by negative human rights outcomes connected to our investment activities during the reporting year

# LISTED EQUITY (LE)

## OVERALL APPROACH

### MATERIALITY ANALYSIS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 1	CORE	OO 21	N/A	PUBLIC	Materiality analysis	1

Does your organisation have a formal investment process to identify and incorporate material ESG factors across your listed equity strategies?

(3) Active - fundamental

(A) Yes, our investment process incorporates material governance factors

(1) for all of our AUM

(B) Yes, our investment process incorporates material environmental and social factors

(1) for all of our AUM

(C) Yes, our investment process incorporates material ESG factors beyond our organisation's average investment holding period

(1) for all of our AUM

(D) No, we do not have a formal process. Our investment professionals identify material ESG factors at their discretion

o

(E) No, we do not have a formal or informal process to identify and incorporate material ESG factors

o

## MONITORING ESG TRENDS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 2	CORE	OO 21	N/A	PUBLIC	Monitoring ESG trends	1

**Does your organisation have a formal process for monitoring and reviewing the implications of changing ESG trends across your listed equity strategies?**

**(3) Active - fundamental**

(A) Yes, we have a formal process that includes scenario analyses

(2) for a majority of our AUM

(B) Yes, we have a formal process, but it does not include scenario analyses

(3) for a minority of our AUM

(C) We do not have a formal process for our listed equity strategies; our investment professionals monitor how ESG trends vary over time at their discretion

o

(D) We do not monitor and review the implications of changing ESG trends on our listed equity strategies

o

**(A) Yes, we have a formal process that includes scenario analysis - Specify: (Voluntary)**

Our Sustainability & Strategy Team is a centralized team fully dedicated to the understanding of how environmental trends shape sectors and businesses. Its role is to continuously map and research compelling environmental risks to identify sustainability hot topics and investment opportunities. These analyses are turned into reports, where climate issues are addressed through scenario analysis and sensitivities when applicable. Having a function entirely committed to evaluate ESG trends allows Ambianta to always move ahead of the curve. This approach has been at the core of Ambianta's investment strategy since the very beginning.

**(B) Yes, we have a formal process but it does not include scenario analysis - Specify: (Voluntary)**

Our Sustainability & Strategy Team is a centralized team fully dedicated to the understanding of how environmental trends shape sectors and businesses. Its role is to continuously map and research compelling environmental risks to identify sustainability hot topics and investment opportunities. These analyses are turned into reports, where climate issues are addressed through scenario analysis and sensitivities when applicable. Having a function entirely committed to evaluate ESG trends allows Ambienta to always move ahead of the curve. This approach has been at the core of Ambienta's investment strategy since the very beginning.

## PRE-INVESTMENT

### ESG INCORPORATION IN RESEARCH

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 3	CORE	OO 21	N/A	PUBLIC	ESG incorporation in research	1

**How does your financial analysis and equity valuation or security rating process incorporate material ESG risks?**

#### (2) Active - fundamental

(A) We incorporate material governance-related risks into our financial analysis and equity valuation or security rating process

(1) in all cases

(B) We incorporate material environmental and social risks into our financial analysis and equity valuation or security rating process

(1) in all cases

(C) We incorporate material environmental and social risks related to companies' supply chains into our financial analysis and equity valuation or security rating process

(1) in all cases

(D) We do not incorporate material ESG risks into our financial analysis, equity valuation or security rating processes

o



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 4	CORE	OO 21	N/A	PUBLIC	ESG incorporation in research	1

**What information do you incorporate when you assess the ESG performance of companies in your financial analysis, benchmark selection and/or portfolio construction process?**

**(3) Active - fundamental**

(A) We incorporate qualitative and/or quantitative information on current performance across a range of material ESG factors

(1) in all cases

(B) We incorporate qualitative and/or quantitative information on historical performance across a range of material ESG factors

(3) in a minority of cases

(C) We incorporate qualitative and/or quantitative information on material ESG factors that may impact or influence future corporate revenues and/or profitability

(1) in all cases

(D) We incorporate qualitative and/or quantitative information enabling current, historical and/or future performance comparison within a selected peer group across a range of material ESG factors

(1) in all cases

(E) We do not incorporate qualitative or quantitative information on material ESG factors when assessing the ESG performance of companies in our financial analysis, equity investment or portfolio construction process

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## ESG INCORPORATION IN PORTFOLIO CONSTRUCTION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 5	PLUS	OO 21	N/A	PUBLIC	ESG incorporation in portfolio construction	1

**Provide an example of how you incorporated ESG factors into your equity selection and research process during the reporting year.**

Ambienta only invests in companies with Resource Efficiency and Pollution Control positive impact. This is measured through our proprietary methodology, which in the Public Market division is the Ambianta Sustainability Index (ASI). Fundamental for equity selection is research and knowledge building related to environmental sustainability. The Sustainability & Strategy team analyses, monthly, an environmental issue identifying causes, sources and possible solutions (including a universe of potentially relevant targets). This knowledge is shared in meetings with the investment team, giving them the tools to perform the necessary origination activities / analysis of potential targets.

Beyond the analysis done on the business and financials of a target, an understanding of their environmental impact and application of our internal environmental impact methodology is also key prior to investment. This analysis is jointly performed by the S&S and investment teams.

Moreover, ESG factors are integrated from the very beginning of the investment process as part of our due diligence. This includes a review of company impact and performances on a wide range of ESG factors and is based on review of public sources, information from third party providers and direct company engagement, where needed.

An engagement strategy is also applied on an annual basis. The latter is defined by answers to an ESG questionnaire sent by Ambianta to the portfolio companies. Such questionnaire allows us to have further insights on companies' approach towards ESG topics, and therefore, to identify the ones we want to engage with. Once companies have been selected, we define an action plan and initiate the engagement process, which, throughout the year, is further enhanced by our proxy voting practices.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 6	CORE	OO 21	N/A	PUBLIC	ESG incorporation in portfolio construction	1

**How do material ESG factors contribute to your stock selection, portfolio construction and/or benchmark selection process?**

### (3) Active - fundamental

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(A) Material ESG factors contribute to the selection of individual assets and/or sector weightings within our portfolio construction and/or benchmark selection process

(1) for all of our AUM

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(B) Material ESG factors contribute to the portfolio weighting of individual assets within our portfolio construction and/or benchmark selection process

(1) for all of our AUM

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(C) Material ESG factors contribute to the country or region weighting of assets within our portfolio construction and/or benchmark selection process

(D) Other ways material ESG factors contribute to your portfolio construction and/or benchmark selection process

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(E) Our stock selection, portfolio construction or benchmark selection process does not include the incorporation of material ESG factors

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## POST-INVESTMENT

### ESG RISK MANAGEMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 9	CORE	OO 17.1 LE, OO 21	N/A	PUBLIC	ESG risk management	1

**What compliance processes do you have in place to ensure that your listed equity assets subject to negative exclusionary screens meet the screening criteria?**

- (A) We have internal compliance procedures that ensure all funds or portfolios that are subject to negative exclusionary screening have pre-trade checks
- (B) We have an external committee that oversees the screening implementation process for all funds or portfolios that are subject to negative exclusionary screening
- (C) We have an independent internal committee that oversees the screening implementation process for all funds or portfolios that are subject to negative exclusionary screening
- (D) We do not have compliance processes in place to ensure that we meet our stated negative exclusionary screens

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 10	CORE	OO 21	N/A	PUBLIC	ESG risk management	1

**For the majority of your listed equity assets, do you have a formal process to identify and incorporate material ESG risks and ESG incidents into your risk management process?**

(2) Active - fundamental

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(A) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for individual listed equity holdings

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(B) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for other listed equity holdings exposed to similar risks and/or incidents

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(C) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for our stewardship activities

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(D) Yes, our formal process includes ad hoc reviews of quantitative and/or qualitative information on severe ESG incidents

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(E) We do not have a formal process to identify and incorporate material ESG risks and ESG incidents into our risk management process; our investment professionals identify and incorporate material ESG risks and ESG incidents at their discretion

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(F) We do not have a formal process to identify and incorporate material ESG risks and ESG incidents into our risk management process

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## PERFORMANCE MONITORING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 11	PLUS	OO 21	N/A	PUBLIC	Performance monitoring	1

**Provide an example of how the incorporation of ESG factors in your listed equity valuation or portfolio construction affected the realised returns of those assets.**

Throughout 2022 our listed equity portfolio did not perform as expected, in a period of significant market turbulence. It might be easy to lose perspective on key trends which emerge each time we face issues negatively impacting our economic growth and individual well-being. Governments continue, however, to press the sustainable investment agenda – a good example being the Inflation Reduction Act in the US - not only for the greater good, but because it is becoming increasingly apparent to leading nations that the next battleground will be access to technologies and resources to support our fight to make growth more environmentally sustainable. It is also worth mentioning that sustainability-driven investments not always show their positive returns in the short term, as it is a slow process which requires changes in core aspect of the economy. Therefore, we maintain our optimism and moreover, we stand behind our strongest belief that sustainability drives value.

## DISCLOSURE OF ESG SCREENS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
LE 12	CORE	OO 17 LE, OO 21	N/A	PUBLIC	Disclosure of ESG screens	6

**For all your listed equity assets subject to ESG screens, how do you ensure that clients understand ESG screens and their implications?**

- (A) We share a list of ESG screens
- (B) We share any changes in ESG screens
- (C) We explain any implications of ESG screens, such as their deviation from a benchmark or impact on sector weightings
- (D) We do not share the above information for all our listed equity assets subject to ESG screens

# PRIVATE EQUITY (PE)

## POLICY

### INVESTMENT GUIDELINES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 1	CORE	OO 21	N/A	PUBLIC	Investment guidelines	1 to 6

What private equity-specific ESG guidelines are currently covered in your organisation's responsible investment policy(ies)?

- (A) Guidelines on our ESG approach tailored to the sector(s) and geography(ies) where we invest
- (B) Guidelines on our ESG approach tailored to the strategy(ies) and company stage(s) where we invest, e.g. venture capital, buy-out and distressed
- (C) Guidelines on pre-investment screening
- (D) Guidelines on minimum ESG due diligence requirements
- (E) Guidelines on our approach to ESG integration into short-term or 100-day plans (or equivalent)
- (F) Guidelines on our approach to ESG integration into long-term value-creation efforts
- (G) Guidelines on our approach to monitoring ESG risks, ESG opportunities and ESG incidents
- (H) Guidelines on our approach to ESG reporting
- (I) Our responsible investment policy(ies) does not cover private equity-specific ESG guidelines

## FUNDRAISING

### COMMITMENTS TO INVESTORS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 2	CORE	OO 21	N/A	PUBLIC	Commitments to investors	1, 4

For all of the funds that you closed during the reporting year, what type of formal responsible investment commitments did you make in Limited Partnership Agreements (LPAs), side letters or other constitutive fund documents?

- (A) We incorporated responsible investment commitments in LPAs (or equivalent) as a standard default procedure
- (B) We added responsible investment commitments in LPAs (or equivalent) upon clients' request
- (C) We added responsible investment commitments in side letters upon clients' request
- (D) We did not make any formal responsible investment commitments for the relevant reporting year
- (E) Not applicable; we have not raised funds in the last five years

## PRE-INVESTMENT

### MATERIALITY ANALYSIS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 3	CORE	OO 21	PE 3.1	PUBLIC	Materiality analysis	1

During the reporting year, how did you conduct ESG materiality analysis for your potential private equity investments?

- (A) We assessed ESG materiality at the portfolio company level, as each case is unique
  - Select from dropdown list
    - (1) for all of our potential private equity investments
      - (2) for the majority of our potential private equity investments
      - (3) for a minority of our potential private equity investments
    - (B) We performed a mix of industry-level and portfolio company-level ESG materiality analyses
    - (C) We assessed ESG materiality at the industry level only
    - (D) We did not conduct ESG materiality analyses for our potential private equity investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 3.1	CORE	PE 3	N/A	PUBLIC	Materiality analysis	1

During the reporting year, what tools, standards and data did you use in your ESG materiality analysis of potential private equity investments?

- (A) We used GRI standards to inform our private equity ESG materiality analysis
- (B) We used SASB standards to inform our private equity ESG materiality analysis
- (C) We used the UN Sustainable Development Goals (SDGs) to inform our private equity ESG materiality analysis
- (D) We used environmental and social factors detailed in the IFC Performance Standards (or other similar standards used by development-focused financial institutions) in our private equity ESG materiality analysis
- (E) We used climate disclosures, such as the TCFD recommendations or other climate risk and/or exposure analysis tools, to inform our private equity ESG materiality analysis
- (F) We used the UN Guiding Principles on Business and Human Rights (UNGPs) to inform our private equity ESG materiality analysis
- (G) We used geopolitical and macro-economic considerations in our private equity ESG materiality analysis
- (H) We engaged with the prospective portfolio company to inform our private equity ESG materiality analysis
- (I) Other



## DUE DILIGENCE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 4	CORE	OO 21	N/A	PUBLIC	Due diligence	1

During the reporting year, how did material ESG factors influence the selection of your private equity investments?

**(A) Material ESG factors were used to identify risks**

Select from dropdown list

- (1) for all of our potential private equity investments**
- (2) for the majority of our potential private equity investments
- (3) for a minority of our potential private equity investments

**(B) Material ESG factors were discussed by the investment committee (or equivalent)**

Select from dropdown list

- (1) for all of our potential private equity investments**
- (2) for the majority of our potential private equity investments
- (3) for a minority of our potential private equity investments

**(C) Material ESG factors were used to identify remedial actions for our 100-day plans (or equivalent)**

Select from dropdown list

- (1) for all of our potential private equity investments**
- (2) for the majority of our potential private equity investments
- (3) for a minority of our potential private equity investments

**(D) Material ESG factors were used to identify opportunities for value creation**

Select from dropdown list

- (1) for all of our potential private equity investments**
- (2) for the majority of our potential private equity investments
- (3) for a minority of our potential private equity investments

**(E) Material ESG factors informed our decision to abandon potential investments in the due diligence phase in cases where ESG risks were considered too high to mitigate**

Select from dropdown list

- (1) for all of our potential private equity investments**
- (2) for the majority of our potential private equity investments
- (3) for a minority of our potential private equity investments

**(F) Material ESG factors impacted investments in terms of the price offered and/or paid**

Select from dropdown list

- (1) for all of our potential private equity investments**
- (2) for the majority of our potential private equity investments
- (3) for a minority of our potential private equity investments

**(G) Material ESG factors did not influence the selection of our private equity investments**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 5	CORE	OO 21	N/A	PUBLIC	Due diligence	1

Once material ESG factors have been identified, what processes do you use to conduct due diligence on these factors for potential private equity investments?

- (A) We do a high-level or desktop review using an ESG checklist for initial red flags**  
Select from dropdown list
  - (1) for all of our potential private equity investments**
  - (2) for a majority of our potential private equity investments
  - (3) for a minority of our potential private equity investments
- (B) We send detailed ESG questionnaires to target companies**  
Select from dropdown list
  - (1) for all of our potential private equity investments**
  - (2) for a majority of our potential private equity investments
  - (3) for a minority of our potential private equity investments
- (C) We hire third-party consultants to do technical due diligence on specific material ESG factors**  
Select from dropdown list
  - (1) for all of our potential private equity investments**
  - (2) for a majority of our potential private equity investments
  - (3) for a minority of our potential private equity investments
- (D) We conduct site visits**  
Select from dropdown list
  - (1) for all of our potential private equity investments**
  - (2) for a majority of our potential private equity investments
  - (3) for a minority of our potential private equity investments
- (E) We conduct in-depth interviews with management and/or personnel**  
Select from dropdown list
  - (1) for all of our potential private equity investments**
  - (2) for a majority of our potential private equity investments
  - (3) for a minority of our potential private equity investments
- (F) We conduct detailed external stakeholder analyses and/or engagement
- (G) We incorporate ESG due diligence findings in all of our relevant investment process documentation in the same manner as other key due diligence, e.g. commercial, accounting and legal**  
Select from dropdown list
  - (1) for all of our potential private equity investments**
  - (2) for a majority of our potential private equity investments
  - (3) for a minority of our potential private equity investments
- (H) Our investment committee (or an equivalent decision-making body) is ultimately responsible for ensuring all ESG due diligence is completed in the same manner as for other key due diligence, e.g. commercial, accounting, and legal**  
Select from dropdown list
  - (1) for all of our potential private equity investments**
  - (2) for a majority of our potential private equity investments
  - (3) for a minority of our potential private equity investments
- (I) Other
- (J) We do not conduct due diligence on material ESG factors for potential private equity investments

# POST-INVESTMENT

## MONITORING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 6	CORE	OO 21	PE 6.1	PUBLIC	Monitoring	1

During the reporting year, did you track one or more KPIs on material ESG factors across your private equity investments?

(A) Yes, we tracked KPIs on environmental factors

Percentage of portfolio companies this applies to:

- (1) >0 to 10%
- (2) >10 to 50%
- (3) >50 to 75%
- (4) >75 to 95%

(5) >95%

(B) Yes, we tracked KPIs on social factors

Percentage of portfolio companies this applies to:

- (1) >0 to 10%
- (2) >10 to 50%
- (3) >50 to 75%
- (4) >75 to 95%

(5) >95%

(C) Yes, we tracked KPIs on governance factors

Percentage of portfolio companies this applies to:

- (1) >0 to 10%
- (2) >10 to 50%
- (3) >50 to 75%
- (4) >75 to 95%

(5) >95%

(D) We did not track KPIs on material ESG factors across our private equity investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 6.1	PLUS	PE 6	N/A	PUBLIC	Monitoring	1

Provide examples of KPIs on material ESG factors you tracked across your private equity investments during the reporting year.

(A) ESG KPI #1

Energy consumption

(B) ESG KPI #2

Water consumption

- (C) ESG KPI #3  
Environmental/ESG Capex expenditure
- (D) ESG KPI #4  
Training expenditure per employee
- (E) ESG KPI #5  
Job creation (number of employees)
- (F) ESG KPI #6  
Number of employees by country
- (G) ESG KPI #7  
Number of women employees
- (H) ESG KPI #8  
Independent members within Board of Directors
- (I) ESG KPI #9  
Women representation in Board of Directors
- (J) ESG KPI #10

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 7	CORE	OO 21	PE 7.1	PUBLIC	Monitoring	1, 2

**What processes do you have in place to support meeting your targets on material ESG factors for your private equity investments?**

(A) We use operational-level benchmarks to assess and analyse the performance of portfolio companies against sector performance

Select from dropdown list

- (1) for all of our private equity investments
- (2) for a majority of our private equity investments
- (3) for a minority of our private equity investments

(B) We implement international best practice standards, such as the IFC Performance Standards, to guide ongoing assessments and analyses

(C) We implement certified environmental and social management systems across our portfolio

Select from dropdown list

- (1) for all of our private equity investments
- (2) for a majority of our private equity investments
- (3) for a minority of our private equity investments

(D) We make sufficient budget available to ensure that the systems and procedures needed are established

Select from dropdown list

- (1) for all of our private equity investments
- (2) for a majority of our private equity investments
- (3) for a minority of our private equity investments

(E) We hire external verification services to audit performance, systems, and procedures

Select from dropdown list

- (1) for all of our private equity investments
- (2) for a majority of our private equity investments
- (3) for a minority of our private equity investments

(F) We conduct ongoing engagement with all key stakeholders at the portfolio company level, e.g. local communities, NGOs, governments, and end-users

Select from dropdown list

- (1) for all of our private equity investments
- (2) for a majority of our private equity investments
- (3) for a minority of our private equity investments

(G) We implement 100-day plans, ESG roadmaps and similar processes

Select from dropdown list

- (1) for all of our private equity investments
- (2) for a majority of our private equity investments
- (3) for a minority of our private equity investments

(H) Other

(I) We do not have processes in place to help meet our targets on material ESG factors for our private equity investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 7.1	PLUS	PE 7	N/A	PUBLIC	Monitoring	1, 2

**Describe up to two processes you have put in place during the reporting year to help meet your targets on material ESG factors.**

(A) Process one

In the last months Ambienta has internally assessed the feasibility of an ambitious, science-based commitment towards decarbonization and has taken the decision to publicly commit to the Science-Based Target initiative (SBTi), a global organization, that helps companies establish emission reduction targets based on what the latest climate science says is necessary to meet the goals of the Paris Agreement. The commitment is publicly visible on the SBTi website. Joining the SBTi further accelerates Ambienta's efforts in reducing greenhouse gas emissions and fostering a more sustainable future, confirming its position as a sustainability leader in the industry. In the coming months, Ambienta will set and validate targets at firm-level (percentage of emission reduction) and at asset class-level (percentage of invested capital with SBTi validated targets), in line with SBTi requirements.

Fundamental to our commitment is the decarbonization of our portfolio companies. This is why, starting from 2022, we began setting the basis and defining guidelines and tools to support companies towards an ambitious decarbonization (i.e. structured process for carbon footprint calculation, set of minimum carbon reduction actions and tools to support companies in implementation including, for example, carbon policy, pre-selected suppliers / providers...). By providing our portfoglio companies with the tools and support needed we aim to support the decarbonization effort and ensure effectiveness in implementation.

(B) Process two

Ambienta, as it recognizes the value of ESG integration in day-to-day operations, has already linked ESG elements to its annual evaluation process, which applies to the investment team as well. Throughout 2022 we have strengthened and structured this evaluation process in order to further associate / link ESG topics to performance. A dedicated ESG KPI, the "ESG drive", is included in Ambienta's annual performance evaluation system, which ensures consistency in the assessment of responsible investment performance across the organisation. This is applied to all investment professionals assessing their level of drive and commitment to the implementation of ESG in portfolio companies. At the end of 2022 we upgraded the system introducing a material and incremental bonus, on top of the "ESG drive", to the best performing, in terms of ESG integration, investment team members (3 selected per year). This addition was done to further drive implementation effectiveness and ensure alignment of interests.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 8	PLUS	OO 21	N/A	PUBLIC	Monitoring	1, 2

**Describe material ESG risks and ESG opportunities that you integrate into your 100-day plans, including those accountable for their successful completion and how the process is monitored.**

100-day plans: We do not have 100 day plans per se as we fundamentally believe in an ESG integration approach that is based on methodical steps geared toward long-term value creation. Our proprietary methodology, the ESG in Action programme, stretches over the entire holding period and beyond, and not just the first 100 days, as prescribed by the goal setting ESG policies which we require each portfolio company to Board approve and adopt. These policies act as the first step of our post-investment ESG integration process. They provide companies with specific guidelines and requirements with respect to the management of ESG risks and opportunities. Once these are Board-approved we engage with companies' top executives to perform a Materiality Analysis.

Here, we review all evidences of the initial ESG assessment and due diligence, brainstorm on relevant topics and solutions and review a benchmark analysis of peer ESG commitments. Based on this we define a set of actions for each material topic identified (mix of preventative (international ISO certifications), remedial (ad hoc) and monitoring actions). All such actions feed into ESG Action Plans which we require each portfolio company to Board approve. The Action Plan is composed of objectives, actions, implementation timeline, owner and monitoring KPIs. It features as a roadmap that enables our companies to set a course of action, implement the required measures and report progress and achievements to their respective Boards.

At the same time, they allow Ambienta to monitor progress for each portfolio company to ensure all identified risks and opportunities are managed to the highest possible standards.

Accountability: to ensure ESG integration does not come second to other managerial goals, we appoint the most senior resource, usually a Partner of Ambienta, as what we call the "ESG Node". He/She has oversight/accountability and implementation responsibilities of our ESG in Action programme at portfolio company level and is a Board Member of the portfolio companies. Other members of the investment team (Principals, Managers, Associates, Analysts) working with the company have implementation responsibilities as well. The investment team is supported by the Sustainability & Strategy (S&S) team, composed of 9 full-time employees (vs.

6 as at end of 2021). All people involved in the investment process are formally accountable and responsible for process implementation. Their annual bonuses take into account ESG integration besides all other standard factors (see answer to question PE 7). At portfolio company level, we appoint the CEO as what we call the "ESG Officer" and, as such, he/she is responsible for overseeing all ESG aspects and activities within the company.

Monitoring: portfolio companies' respective ESG Nodes are ultimately responsible for monitoring the execution of actions defined for each company and, as such, they engage with companies' ESG Officers on progress against their respective ESG Action Plans on a regular basis.

We require each company to report on ESG to its Board at least twice a year. The report covers the status of the monitored ESG KPIs and the progress against the ESG Action Plan. Quarterly, through update meetings / calls the ESG team conducts an internal audit of progress against the ESG in Action programme implementation across all portfolio companies. Findings are integrated in the investment team's quarterly update presentation which is discussed in front of the whole investment team during our Quarterly Portfolio Review meetings. Our internal support/audit function is engaged on a deal-by-deal basis to ensure all actions are completed in a timely manner.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 9	CORE	OO 21	N/A	PUBLIC	Monitoring	1, 2

**Post-investment, how do you manage material ESG risks and ESG opportunities to create value during the holding period of your investments?**

**(A) We develop company-specific ESG action plans based on pre-investment research, due diligence and materiality findings**

Select from dropdown list

- (1) for all of our private equity investments**
- (2) for a majority of our private equity investments
- (3) for a minority of our private equity investments

(B) We adjust our ESG action plans based on performance monitoring findings at least yearly

**(C) We, or the external advisors that we hire, support our private equity investments with specific ESG value-creation opportunities**

Select from dropdown list

- (1) for all of our private equity investments**
- (2) for a majority of our private equity investments
- (3) for a minority of our private equity investments

**(D) We engage with the board to manage ESG risks and ESG opportunities post-investment**

Select from dropdown list

- (1) for all of our private equity investments**
- (2) for a majority of our private equity investments
- (3) for a minority of our private equity investments

(E) Other

(F) We do not manage material ESG risks and opportunities post-investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 10	PLUS	OO 21	N/A	PUBLIC	Monitoring	1, 2

**Describe how you ensure that material ESG risks are adequately addressed in the private equity investments in which you hold a minority stake.**

Our strategy is generally focused on acquiring majority stakes. We have only one private equity investment in our portfolio in which we hold a minority stake. It is a company in which Ambienta invested a majority stake in 2018. Following investment we applied, as usual, our ESG in Action programme which systematically embeds ESG management guidelines and practices into the company's day-to-day operations. In 2022 we exited the company retaining a minority stake. Mindful of the importance of continuing with the ESG in Action programme implementation, Ambienta negotiated with the new shareholders the continuation of all ESG planned activities and nailed this down in the new Shareholder Agreement. We have then engaged with management and new owners on progress. The objective is to use our influence to drive action on key ESG topics for the company.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 11	PLUS	OO 21	N/A	PUBLIC	Monitoring	2

**Describe how your ESG action plans are currently defined, implemented and monitored throughout the investment period.**

Our proprietary ESG in Action programme is applied from the very beginning of the investment process as during the due diligence phase an extensive research about the company's background and activities is carried out, which allows us to already have a general perception of attention points towards which direct our focus at later stages. The due diligence phase also represents the base of the future ESG Action Plan since, in case concerns arise with regards to a misalignment between the company and Ambienta's sustainability values, it may act as a dealbreaker.

After the due diligence, we require the Board to approve ESG policies which act as the first step of our post-investment ESG integration process.

Afterwards, with companies' top executives, we perform a Materiality Analysis. Here, we review all evidences of the initial ESG assessment and due diligence, brainstorm on relevant topics and solutions and review a benchmark analysis of peer ESG commitments. Based on this we define a set of actions for each material topic identified (mix of preventative (international ISO certifications), remedial (ad hoc) and monitoring actions). All such actions feed into ESG Action Plans which we require each portfolio company to Board approve. The Action Plan is composed of objectives, actions, implementation timeline, owner and monitoring KPIs.

It features as a roadmap that enables our companies to set a course of action, implement the required measures and report progress and achievements to their respective Boards. At the same time, they allow Ambienta to monitor progress for each portfolio company to ensure all identified risks and opportunities are managed to the highest possible standards.

Implementation: to ensure ESG integration does not come second to other managerial goals, we appoint the most senior resource, usually a Partner of Ambienta, as what we call the "ESG Node". He/She has oversight/accountability and implementation responsibilities of our ESG in Action programme at portfolio company level and is a Board Member of the portfolio companies.

Other members of the investment team (Principals, Managers, Associates, Analysts) working with the company have implementation responsibilities as well. The investment team is supported by the Sustainability & Strategy (S&S) team, composed of 9 full-time employees (vs. 6 as at end of 2021). All people involved in the investment process are formally accountable and responsible for process implementation. Their annual bonuses take into account ESG integration besides all other standard factors. The implementation is also guided by detailed KPIs defined at earlier stages of the process.

At portfolio company level, we appoint the CEO as what we call the "ESG Officer" and, as such, he/she is responsible for overseeing all ESG aspects and activities within the company.

Monitoring: portfolio companies' respective ESG Nodes are ultimately responsible for monitoring the execution of actions defined for each company and, as such, they engage with companies' ESG Officers on progress against their respective ESG Action Plans on a regular basis.

We require each company to report on ESG to its Board at least twice a year. The report covers the status of the monitored ESG KPIs and the progress against the ESG Action Plan. Quarterly, through update meetings / calls the ESG team conducts an internal audit of progress against the ESG in Action programme implementation across all portfolio companies. Findings are integrated in the investment team's quarterly update presentation which is discussed in front of the whole investment team during our Quarterly Portfolio Review meetings. Our internal support/audit function is engaged on a deal-by-deal basis to ensure all actions are completed in a timely manner.



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 12	CORE	OO 21	PE 12.1	PUBLIC	Monitoring	1, 2

**How do you ensure that adequate ESG-related competence exists at the portfolio company level?**

**(A) We assign the board responsibility for ESG matters**

Select from dropdown list

- (1) for all of our private equity investments**
- (2) for a majority of our private equity investments
- (3) for a minority of our private equity investments

**(B) We ensure that material ESG matters are discussed by the board at least yearly**

Select from dropdown list

- (1) for all of our private equity investments**
- (2) for a majority of our private equity investments
- (3) for a minority of our private equity investments

**(C) We provide training on ESG aspects and management best practices relevant to the portfolio company to C-suite executives only**

Select from dropdown list

- (1) for all of our private equity investments**
- (2) for a majority of our private equity investments
- (3) for a minority of our private equity investments

**(D) We provide training on ESG aspects and management best practices relevant to the portfolio company to employees (excl. C-suite executives)**

Select from dropdown list

- (1) for all of our private equity investments**
- (2) for a majority of our private equity investments
- (3) for a minority of our private equity investments

**(E) We support the portfolio company in developing and implementing its ESG strategy**

Select from dropdown list

- (1) for all of our private equity investments**
- (2) for a majority of our private equity investments
- (3) for a minority of our private equity investments

**(F) We support portfolio companies by finding external ESG expertise, e.g. consultants or auditors**

Select from dropdown list

- (1) for all of our private equity investments**
- (2) for a majority of our private equity investments
- (3) for a minority of our private equity investments

**(G) We share best practices across portfolio companies, e.g. educational sessions or the implementation of environmental and social management systems**

Select from dropdown list

- (1) for all of our private equity investments**
- (2) for a majority of our private equity investments
- (3) for a minority of our private equity investments

(H) We include penalties or incentives to improve ESG performance in management remuneration schemes

(I) Other

(J) We do not ensure that adequate ESG-related competence exists at the portfolio company level

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 12.1	PLUS	PE 12	N/A	PUBLIC	Monitoring	1, 2

**Describe up to two initiatives taken as part of your ESG competence-building efforts at the portfolio company level during the reporting year.**

(A) Initiative 1

Every year we review our award-winning ESG in Action programme to ensure we continue to lead on ESG integration. The programme revolves around a series of steps which each portfolio company is required to complete within a specific timeframe. These include, prior to investment, conducting third-party ESG due diligence, while, post-investment, Board approving a series of ESG policies, completing a Materiality Analysis, defining an ESG Action Plan (including decarbonization efforts), and continuous monitoring to ensure ESG Action Plans are implemented and reviewed by the accountable managers and Boards of each portfolio company.

In 2022 we further strengthened our Materiality Analysis process.

This has been transformed from relatively informal meetings with management in real workshops between Ambienta's deal team, S&S team and the company's management. Starting from ESG due diligence results and peer benchmark the workshops have the aim to engage and brainstorm with management on relevant ESG risks and opportunities. Beyond increasing the effectiveness of the ESG Action Plans defined and pushing more on the "value creation" side of ESG, discussion with management on ESG trends, benefits as well as the peer benchmark have supported in raising awareness and increasing management buy-in, which is fundamental for ESG integration effectiveness.

As foreseen by our programme, responsibility over ESG in Action implementation is with the ESG Officer (generally the CEO).

(B) Initiative 2

Our ESG in Action programme is deeply rooted in our culture and operation and is has been integral to the investment process and approach to value creation. Over the years, we have formalized various procedures to ensure our commitment to ESG integration does not come second to other managerial goals. For instance, our rigorous monitoring and reporting process, which we apply consistently across all our funds, requires our companies to report ESG matters to their respective Board of Directors at least twice a year (occasionally even more often).

ESG progress update also features as a key element in our Quarterly Portfolio Reviews.

ESG members of the S&S team, following quarterly meetings / calls with management, integrate updates on ESG progress in the investment team's quarterly update presentation which is discussed in front of the whole investment team during our Quarterly Portfolio Review meetings. We have also introduced, in the last year, presentations of ESG best practices and case studies both during some Quarterly Portfolio Review meetings and during the ESG training sessions we have with portfolio company management post investment. This have proven to be an effective way to increase the influence of ESG on investment plans and value creation strategies, ultimately enabling greater integration of ESG into the investment process. Furthermore, this level of knowledge sharing supports the strenghtening of the firm's ESG culture.

## EXIT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 13	CORE	OO 21	N/A	PUBLIC	Exit	4, 6

**During the reporting year, what responsible investment information was shared with potential buyers of private equity investments?**

- (A) Our firm's high-level commitment to responsible investment, e.g. that we are a PRI signatory**
  - Select from dropdown list
    - (1) for all of our private equity investments**
    - (2) for a majority of our private equity investments
    - (3) for a minority of our private equity investments
- (B) A description of what industry and asset class standards our firm aligns with, e.g. TCFD**
  - Select from dropdown list
    - (1) for all of our private equity investments**
    - (2) for a majority of our private equity investments
    - (3) for a minority of our private equity investments
- (C) Our firm's responsible investment policy (at minimum, a summary of key aspects and firm-specific approach)**
  - Select from dropdown list
    - (1) for all of our private equity investments**
    - (2) for a majority of our private equity investments
    - (3) for a minority of our private equity investments
- (D) Our firm's ESG risk assessment methodology (topics covered in-house and/or with external support)**
  - Select from dropdown list
    - (1) for all of our private equity investments**
    - (2) for a majority of our private equity investments
    - (3) for a minority of our private equity investments
- (E) The outcome of our latest ESG risk assessment on the asset or portfolio company**
  - Select from dropdown list
    - (1) for all of our private equity investments**
    - (2) for a majority of our private equity investments
    - (3) for a minority of our private equity investments
- (F) Key ESG performance data on the asset or portfolio company being sold**
  - Select from dropdown list
    - (1) for all of our private equity investments**
    - (2) for a majority of our private equity investments
    - (3) for a minority of our private equity investments
- (G) Other
- (H) No responsible investment information was shared with potential buyers of private equity investments during the reporting year
- (I) Not applicable; we had no sales process (or control over the sales process) during the reporting year

## DISCLOSURE OF ESG PORTFOLIO INFORMATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PE 14	CORE	OO 21	N/A	PUBLIC	Disclosure of ESG portfolio information	6

During the reporting year, how did you report your targets on material ESG factors and related data to your investors?

- (A) We used a publicly disclosed sustainability report
- (B) We reported in aggregate through formal reporting to investors
- (C) We reported at the portfolio company level through formal reporting to investors
- (D) We reported through a limited partners advisory committee (or equivalent)
- (E) We reported back at digital or physical events or meetings with investors
- (F) We had a process in place to ensure that reporting on serious ESG incidents occurred
- (G) Other
- (H) We did not report our targets on material ESG factors and related data to our investors during the reporting year

## HEDGE FUNDS (HF)

### POLICY

#### INVESTMENT GUIDELINES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
HF 1	CORE	OO 21	N/A	PUBLIC	Investment guidelines	1, 4, 6

What activities, practices and/or relationships are covered by your organisation's responsible investment policy(ies) for the majority of your hedge fund assets?

- (A) Our ESG requirements of prime brokers
- (B) Our ESG requirements for administrators and custodians
- (C) Our ESG requirements regarding (proxy) voting service providers (or other third-party providers), where applicable
- (D) How breaches in our responsible investment policy are communicated to clients
- (E) How ESG is incorporated into our long and/or short exposures
- (F) Whether sectors, issuers, equities and/or asset types are excluded from the portfolio due to ESG factors
- (G) How we engage with underlying investees, issuers or real assets
- (H) Our responsible investment policy(ies) does not specifically cover activities, practices and/or relationships for our hedge fund assets

# OVERALL APPROACH

## MATERIALITY ANALYSIS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
HF 2	CORE	OO 21	N/A	PUBLIC	Materiality analysis	1

**Does your organisation have a formal investment process to identify and incorporate material ESG factors across your hedge fund strategies?**

### (2) Long/short equity

(A) Yes, our investment process incorporates material governance factors

(1) for all of our AUM

(B) Yes, our investment process incorporates material environmental and social factors

(1) for all of our AUM

(C) Yes, our investment process incorporates material ESG factors into risk assessment and the risk profile of the underlying exposures

(1) for all of our AUM

(D) No, we do not have a formal process; our investment professionals identify material ESG factors at their discretion

o

(E) No, we do not have a formal or informal process to identify and incorporate material ESG factors

o

## MONITORING ESG TRENDS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
HF 3	CORE	OO 21	N/A	PUBLIC	Monitoring ESG trends	1

**Does your organisation have a formal process for monitoring and reviewing the implications of changing ESG trends across your hedge fund strategies?**

### (2) Long/short equity

(A) Yes, we have a formal process that includes scenario analyses

(2) for a majority of our AUM

(B) Yes, we have a formal process but it does not include scenario analyses

(3) for a minority of our AUM

(C) We do not have a formal process for our hedge fund strategies; our investment professionals monitor and review the implications of changing ESG trends at their discretion

o

(D) We do not monitor and review the implications of changing ESG trends on our hedge fund strategies

o

### (A) Yes, we have a formal process that includes scenario analyses - Specify: (Voluntary)

Our Sustainability & Strategy Team is a centralized team fully dedicated to the understanding of how environmental trends shape sectors and businesses. Its role is to continuously map and research compelling environmental risks to identify sustainability hot topics and investment opportunities. These analyses are turned into reports, where climate issues are addressed through scenario analysis and sensitivities when applicable. Having a function entirely committed to evaluate ESG trends allows Ambienta to always move ahead of the curve. This approach has been at the core of Ambienta's investment strategy since the very beginning.

### (B) Yes, we have a formal process but it does not include scenario analyses - Specify: (Voluntary)

Our Sustainability & Strategy Team is a centralized team fully dedicated to the understanding of how environmental trends shape sectors and businesses. Its role is to continuously map and research compelling environmental risks to identify sustainability hot topics and investment opportunities. These analyses are turned into reports, where climate issues are addressed through scenario analysis and sensitivities when applicable. Having a function entirely committed to evaluate ESG trends allows Ambienta to always move ahead of the curve. This approach has been at the core of Ambienta's investment strategy since the very beginning.

## PRE-INVESTMENT

### ESG INCORPORATION IN RESEARCH

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
HF 4	CORE	OO 21	N/A	PUBLIC	ESG incorporation in research	1

**How does your investment research incorporate material ESG risks and opportunities into the selection of listed companies or issuers of corporate debt?**

#### (2) Long/short equity

(A) We incorporate material governance-related risks and opportunities that may affect the products and services delivered by listed companies or issuers of corporate debt

(1) in all cases

(B) We incorporate material environmental and social risks and opportunities that may affect the products and services delivered by listed companies or issuers of corporate debt

(1) in all cases

(C) We incorporate material environmental and social risks and opportunities that may arise from how listed companies or issuers of corporate debt undertake their operations

(1) in all cases

(D) We incorporate material environmental and social risks and opportunities linked to a listed company or issuer or corporate debt supply chain

(1) in all cases

(E) Other

(F) Our investment research does not incorporate material ESG risks and opportunities into the selection of listed companies or issuers of corporate debt

o

(G) Not applicable, our strategy does not invest directly in listed companies or issuers of corporate debt

o

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
HF 5	PLUS	OO 21	N/A	PUBLIC	ESG incorporation in research	1

**Where you invest in commodities or other asset classes, either directly or through other financial instruments, provide an example of how you incorporate material ESG factors into your research, investment strategy, engagement or portfolio construction.**

Ambienta only invests in companies with Resource Efficiency and Pollution Control positive impact. This is measured through our proprietary methodology, which in the Public Market division is the Ambianta Sustainability Index (ASI). Fundamental for equity selection is research and knowledge building related to environmental sustainability. The Sustainability & Strategy team analyses, monthly, an environmental issue identifying causes, sources and possible solutions (including a universe of potentially relevant targets). This knowledge is shared in meetings with the investment team giving them the tools to perform the necessary origination activities / analysis of potential targets.

Beyond the analysis done on the business and financials of a target, an understanding of their environmental impact and application of our internal environmental impact methodology is also key prior to investment. This analysis is jointly performed by the S&S and investment teams.

Moreover, ESG factors are integrated from the very beginning of the investment process as part of our due diligence. This includes a review of company impact and performances on a wide range of ESG factors and is based on review of public sources, information from third-party providers and direct company engagement, where needed.

An engagement strategy is also applied on an annual basis. The latter is defined by answers to an ESG questionnaire sent by Ambianta to the portfolio companies. Such questionnaire allows us to have further insights on companies approach towards ESG topics, and therefore, to identify the ones we want to engage with. Once the companies have been selected, we define an action plan and initiate the engagement process, which, throughout the year, is further enhanced by our proxy voting practices.



## ESG INCORPORATION IN PORTFOLIO CONSTRUCTION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
HF 6	CORE	OO 21	N/A	PUBLIC	ESG incorporation in portfolio construction	1

**How do material ESG factors contribute to your stock selection, portfolio construction and/or benchmark selection process?**

### (2) Long/short equity

(A) Material ESG factors contribute to the selection of individual assets and financial instruments within our portfolio construction and/or benchmark selection process

(1) for all of our AUM

(B) Material ESG factors contribute to the portfolio weighting of individual assets and financial instruments within our portfolio construction and/or benchmark selection process

(1) for all of our AUM

(C) Material ESG factors contribute to the sector, country or regional weighting of assets and financial instruments within our portfolio construction and/or benchmark selection process

(D) Material ESG factors contribute to determining the construction of short positions

(1) for all of our AUM

(E) Other ways material ESG factors contribute to your portfolio construction and/or benchmark selection process

(F) Our stock selection, portfolio construction or benchmark selection process does not include the incorporation of material ESG factors

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Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
HF 7	PLUS	OO 21	N/A	PUBLIC	ESG incorporation in portfolio construction	1

**Describe how information or data on material ESG factors influenced weightings and portfolio construction in each of your main hedge fund strategies during the reporting year.**

**Internally managed hedge fund strategies**

**Example**

(B) Long/short equity

In the construction of our hedge fund portfolio, as an investment strategy, Ambienta is keen on rewarding, and therefore investing more, in companies that have a positive environmental impact. Our core belief that sustainability drives value, inevitably brings us to allocate higher amount of capital to companies that demonstrate financial growth while remaining sustainable. In the same manner, our strategy for choosing companies to short will include an analysis of how well-prepared companies are in sustaining the transition to a greener economy and whether they engage in activities or practices that are in contrast with Ambienta's view of future market trends. Such structural company analyses are integrated with assessments of their financial status and valuations. All of these aspects play a crucial role in the construction of our hedge fund portfolio.

## POST-INVESTMENT

## ESG RISK MANAGEMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
HF 8	CORE	OO 21	N/A	PUBLIC	ESG risk management	1

**What compliance processes do you have in place to ensure that your hedge fund assets subject to negative exclusionary screens meet the screening criteria?**

- (A) We have internal compliance procedures that ensure all funds or portfolios that are subject to negative exclusionary screening have pre-trade checks
- (B) We have an external committee that oversees the screening implementation process for all funds or portfolios that are subject to negative exclusionary screening
- (C) We have an independent internal committee that oversees the screening implementation process for all funds or portfolios that are subject to negative exclusionary screening
  - (D) We do not have compliance processes in place to ensure that we meet our stated negative exclusionary screens
  - (E) Not applicable; we do not conduct negative exclusionary screening on our hedge fund assets

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
HF 9	CORE	OO 21	N/A	PUBLIC	ESG risk management	1

**For the majority of your hedge funds, do you have a formal process to identify and incorporate material ESG risks and ESG incidents into your risk management process?**

## (2) Long/short equity

---

(A) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for individual securities, issuers and financial instruments

(B) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for other securities, issuers and financial instruments exposed to similar risks and/or incidents

(C) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for our stewardship activities

(D) Yes, our formal process includes ad hoc reviews of quantitative and/or qualitative information on severe ESG incidents

(E) We do not have a formal process to identify and incorporate material ESG risks and ESG incidents into our risk management process; our investment professionals identify and incorporate material ESG risks and ESG incidents at their own discretion

(F) We do not have a formal process to identify and incorporate material ESG risks and ESG incidents into our risk management process

o

# SUSTAINABILITY OUTCOMES (SO)

## SETTING TARGETS AND TRACKING PROGRESS

### SETTING TARGETS ON SUSTAINABILITY OUTCOMES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 1	PLUS	PGS 48	SO 2, SO 2.1, SO 3	PUBLIC	Setting targets on sustainability outcomes	1, 2

What specific sustainability outcomes connected to its investment activities has your organisation taken action on?

(A) Sustainability outcome #1

(1) Widely recognised frameworks used to guide action on this sustainability outcome

- (1) The UN Sustainable Development Goals (SDGs) and targets
- (2) The UNFCCC Paris Agreement
- (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
- (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
- (5) The EU Taxonomy
- (6) Other relevant taxonomies
- (7) The International Bill of Human Rights
- (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- (9) The Convention on Biological Diversity
- (10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

- (1) Environmental
- (2) Social
- (3) Governance-related
- (4) Other

(3) Sustainability outcome name

Material saved: amount of material consumption avoided/reduced

(4) Number of targets set for this outcome

- (1) No target
- (2) One target
- (3) Two or more targets

(B) Sustainability outcome #2

(1) Widely recognised frameworks used to guide action on this sustainability outcome

- (1) **The UN Sustainable Development Goals (SDGs) and targets**
- (2) The UNFCCC Paris Agreement
- (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
- (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
- (5) The EU Taxonomy
- (6) Other relevant taxonomies
- (7) The International Bill of Human Rights
- (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- (9) The Convention on Biological Diversity
- (10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

- (1) **Environmental**
- (2) Social
- (3) Governance-related
- (4) Other

(3) Sustainability outcome name

Energy saved: amount of energy consumption avoided/reduced

(4) Number of targets set for this outcome

- (1) **No target**
- (2) One target
- (3) Two or more targets

**(C) Sustainability outcome #3**

(1) Widely recognised frameworks used to guide action on this sustainability outcome

- (1) **The UN Sustainable Development Goals (SDGs) and targets**
- (2) The UNFCCC Paris Agreement
- (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
- (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
- (5) The EU Taxonomy
- (6) Other relevant taxonomies
- (7) The International Bill of Human Rights
- (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- (9) The Convention on Biological Diversity
- (10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

- (1) **Environmental**
- (2) Social
- (3) Governance-related
- (4) Other

(3) Sustainability outcome name

Water saved: amount of water consumption avoided/reduced

(4) Number of targets set for this outcome

- (1) **No target**
- (2) One target
- (3) Two or more targets

**(D) Sustainability outcome #4**

- (1) Widely recognised frameworks used to guide action on this sustainability outcome
  - (1) **The UN Sustainable Development Goals (SDGs) and targets**
  - (2) The UNFCCC Paris Agreement
  - (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
  - (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
  - (5) The EU Taxonomy
  - (6) Other relevant taxonomies
  - (7) The International Bill of Human Rights
  - (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
  - (9) The Convention on Biological Diversity
  - (10) Other international, regional, sector-based or issue-specific framework(s)
- (2) Classification of sustainability outcome
  - (1) **Environmental**
  - (2) Social
  - (3) Governance-related
  - (4) Other
- (3) Sustainability outcome name

Landfill saved: amount of space left untouched and not used for human purposes

- (4) Number of targets set for this outcome
  - (1) **No target**
  - (2) One target
  - (3) Two or more targets

**(E) Sustainability outcome #5**

- (1) Widely recognised frameworks used to guide action on this sustainability outcome
  - (1) **The UN Sustainable Development Goals (SDGs) and targets**
  - (2) The UNFCCC Paris Agreement
  - (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
  - (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
  - (5) The EU Taxonomy
  - (6) Other relevant taxonomies
  - (7) The International Bill of Human Rights
  - (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
  - (9) The Convention on Biological Diversity
  - (10) Other international, regional, sector-based or issue-specific framework(s)
- (2) Classification of sustainability outcome
  - (1) **Environmental**
  - (2) Social
  - (3) Governance-related
  - (4) Other
- (3) Sustainability outcome name

Food saved: amount of food no longer wasted or additionally produced

- (4) Number of targets set for this outcome
  - (1) **No target**
  - (2) One target
  - (3) Two or more targets

**(F) Sustainability outcome #6**

(1) Widely recognised frameworks used to guide action on this sustainability outcome

- (1) **The UN Sustainable Development Goals (SDGs) and targets**
- (2) The UNFCCC Paris Agreement
- (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
- (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
- (5) The EU Taxonomy
- (6) Other relevant taxonomies
- (7) The International Bill of Human Rights
- (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- (9) The Convention on Biological Diversity
- (10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

- (1) **Environmental**
- (2) Social
- (3) Governance-related
- (4) Other

(3) Sustainability outcome name

CO2 Emissions Reduced: amount of CO2 emissions reduced

(4) Number of targets set for this outcome

- (1) **No target**
- (2) One target
- (3) Two or more targets

(G) **Sustainability outcome #7**

(1) Widely recognised frameworks used to guide action on this sustainability outcome

- (1) **The UN Sustainable Development Goals (SDGs) and targets**
- (2) The UNFCCC Paris Agreement
- (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
- (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
- (5) The EU Taxonomy
- (6) Other relevant taxonomies
- (7) The International Bill of Human Rights
- (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- (9) The Convention on Biological Diversity
- (10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

- (1) **Environmental**
- (2) Social
- (3) Governance-related
- (4) Other

(3) Sustainability outcome name

Air Cleaned: volume of air cleaned

(4) Number of targets set for this outcome

- (1) **No target**
- (2) One target
- (3) Two or more targets

(H) **Sustainability outcome #8**



- (1) Widely recognised frameworks used to guide action on this sustainability outcome
  - (1) **The UN Sustainable Development Goals (SDGs) and targets**
  - (2) The UNFCCC Paris Agreement
  - (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
  - (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
  - (5) The EU Taxonomy
  - (6) Other relevant taxonomies
  - (7) The International Bill of Human Rights
  - (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
  - (9) The Convention on Biological Diversity
  - (10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

- (1) **Environmental**
- (2) Social
- (3) Governance-related
- (4) Other

(3) Sustainability outcome name

Pollutants Avoided: amount of pollutants reduced or not discharged

(4) Number of targets set for this outcome

- (1) **No target**
- (2) One target
- (3) Two or more targets

(I) **Sustainability outcome #9**

- (1) Widely recognised frameworks used to guide action on this sustainability outcome
  - (1) **The UN Sustainable Development Goals (SDGs) and targets**
  - (2) The UNFCCC Paris Agreement
  - (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
  - (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
  - (5) The EU Taxonomy
  - (6) Other relevant taxonomies
  - (7) The International Bill of Human Rights
  - (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
  - (9) The Convention on Biological Diversity
  - (10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

- (1) **Environmental**
- (2) Social
- (3) Governance-related
- (4) Other

(3) Sustainability outcome name

Water Cleaned: amount of water cleaned

(4) Number of targets set for this outcome

- (1) **No target**
- (2) One target
- (3) Two or more targets

(J) **Sustainability outcome #10**

- (1) Widely recognised frameworks used to guide action on this sustainability outcome
- (1) **The UN Sustainable Development Goals (SDGs) and targets**
  - (2) The UNFCCC Paris Agreement
  - (3) The UN Guiding Principles on Business and Human Rights (UNGPs)
  - (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
  - (5) The EU Taxonomy
  - (6) Other relevant taxonomies
  - (7) The International Bill of Human Rights
  - (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
  - (9) The Convention on Biological Diversity
  - (10) Other international, regional, sector-based or issue-specific framework(s)
- (2) Classification of sustainability outcome
- (1) **Environmental**
  - (2) Social
  - (3) Governance-related
  - (4) Other
- (3) Sustainability outcome name
- Materials Recycled: amount of materials reused at end of life  
&  
Biodiversity Preserved: amount of species or space protected
- (4) Number of targets set for this outcome
- (1) **No target**
  - (2) One target
  - (3) Two or more targets

## CONFIDENCE-BUILDING MEASURES (CBM)

### CONFIDENCE-BUILDING MEASURES

#### APPROACH TO CONFIDENCE-BUILDING MEASURES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 1	CORE	N/A	Multiple indicators	PUBLIC	Approach to confidence-building measures	6

#### How did your organisation verify the information submitted in your PRI report this reporting year?

- (A) We conducted independent third-party assurance of selected processes and/or data related to the responsible investment processes reported in our PRI report, which resulted in a formal assurance conclusion
- (B) We conducted a third-party readiness review and are making changes to our internal controls or governance processes to be able to conduct independent third-party assurance next year
- (C) **We conducted an internal audit of selected processes and/or data related to the responsible investment processes reported in our PRI report**

- (D) Our board, trustees (or equivalent), senior executive-level staff (or equivalent), and/or investment committee (or equivalent) signed off on our PRI report
- (E) We conducted an external ESG audit of our holdings to verify that our funds comply with our responsible investment policy
- (F) We conducted an external ESG audit of our holdings as part of risk management, engagement identification or investment decision-making
- (G) Our responses in selected sections and/or the entirety of our PRI report were internally reviewed before submission to the PRI
- (H) We did not verify the information submitted in our PRI report this reporting year

## INTERNAL AUDIT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 4	CORE	OO 21, CBM 1	N/A	PUBLIC	Internal audit	6

What responsible investment processes and/or data were audited through your internal audit function?

- (A) Policy, governance and strategy
  - Select from dropdown list:
    - (1) Data internally audited
    - (2) Processes internally audited
    - (3) Processes and data internally audited
- (C) Listed equity
  - Select from dropdown list:
    - (1) Data internally audited
    - (2) Processes internally audited
    - (3) Processes and data internally audited
- (E) Private equity
  - Select from dropdown list:
    - (1) Data internally audited
    - (2) Processes internally audited
    - (3) Processes and data internally audited
- (H) Hedge funds
  - Select from dropdown list:
    - (1) Data internally audited
    - (2) Processes internally audited
    - (3) Processes and data internally audited

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 5	PLUS	CBM 1	N/A	PUBLIC	Internal audit	6

Provide details of the internal audit process regarding the information submitted in your PRI report.

Various levels of auditing within the organisation have been established to review and sign off answers to this PRI report. The Sustainability & Strategy team, being the cross-functional team in charge of supervising, analysing and implementing ESG factors in Ambienta's investment strategy across asset classes, took care of gathering information and details from various teams within the organization in order to ensure the most accurate, up-to-date and reliable answer to the report's questions. Relevant teams have worked alongside the S&S team and have provided their time and support to validate responses backed up by data and the appropriate documentation. Answers to this report were then thoroughly reviewed and approved by the Head of the S&S team.

## INTERNAL REVIEW

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 6	CORE	CBM 1	N/A	PUBLIC	Internal review	6

### Who in your organisation reviewed the responses submitted in your PRI report this year?

- (A) Board, trustees, or equivalent
- (B) Senior executive-level staff, investment committee, head of department, or equivalent
  - Sections of PRI report reviewed
    - (1) the entire report
    - (2) selected sections of the report
  - (C) None of the above internal roles reviewed selected sections or the entirety of the responses submitted in our PRI report this year