



Disclosure pursuant to Regulation (EU) 2019/2088 of the European Parliament relating to the information on the sustainability in the financial services sector ("SFDR")

Article 10

Fund: Claris Biotech II

The present document sets out the information required by EU Regulation 2088/2019 ("SFDR") pursuant to Article 10, related to the transparency of the promotion of environmental or social characteristics and of sustainable investments on websites for the Claris Biotech II fund (hereinafter "the Fund"). The Fund is managed by Claris Ventures SGR S.p.A. (hereinafter also "Claris" or "AIFM") and is classified as an Article 8-aligned financial product under the same regulation. Specifically, an Article 8 Fund under SFDR is defined by the European Regulation as "a financial product that promotes, among other characteristics, environmental or social characteristics, or a combination of those characteristics, provided that the companies in which the investments are made follow good governance practices".

The following paragraphs present information on the responsible investment activity pursued by the fund, specifically:

- Description of the environmental and social (E/S) characteristics identified.
- Information on how the E/S characteristics are achieved, including the methodologies used to assess, measure, and monitor their achievement.
- Investment strategy pursued by the Fund.

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input type="checkbox"/> Yes	<input type="radio"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> No
<input type="checkbox"/> It will make a minimum of sustainable investments with an environmental objective: ___% <input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> It will make a minimum of sustainable investments with a social objective: ___%	<input type="checkbox"/> It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of ___% of sustainable investments <input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> with a social objective <input type="checkbox"/> It promotes E/S characteristics, but will not make any sustainable investments

a) Summary

Claris Biotech II Fund is classified under Article 8 of the EU Sustainable Finance Disclosure Regulation 2088/2019 ("SFDR") as a "financial product that promotes environmental or social characteristics, or a combination of those characteristics," without pursuing a sustainable investment objective". In line with its classification, the Fund has identified environmental and social (E/S) characteristics to be promoted through investments activity. Specifically, the Fund has adopted specific processes and tools aimed at identifying, monitoring, and promoting E/S characteristics at all stages of the investment process, from the initial stage of evaluating investment opportunities, to the final stage of divestment, in accordance with the requirements of the SFDR Regulations and international best practices.

b) No sustainable investment objective

Claris Biotech II Fund promotes environmental and social characteristics (E/S), but it does not pursue a sustainable investment objective.

c) Environmental or social characteristics of the financial product

In line with its alignment with article 8 of the Regulation 2019/2088 (SFDR), Claris Biotech II Fund has identified the environmental and social characteristics it intends to promote through its investment activity. The table below reports the E/S characteristics promoted and quantitative indicators that are monitored on a periodic basis in order to measure the contribution of the invested companies to the promotion of the above-mentioned characteristics.

Table 1. Environmental and social characteristics promoted by Claris Biotech II



ESG	Obiettivo	KPI
E	Sustainable Practices	% di portfolio companies che promuovono pratiche sostenibili / certificate
		% di fornitori che promuovono pratiche sostenibili / certificate
S	Addressing Unmet Medical Needs	% di portfolio companies dedicate allo sviluppo di trattamenti volti a interessare <i>highly unmet medical needs</i> numero di pazienti potenzialmente beneficiari delle terapie sviluppate dalle <i>portfolio companies</i>
	Partnerships with Research Institutes and Universities	% di portfolio companies con collaborazioni attive con istituti di ricerca / università numero di collaborazioni attive tra le <i>portfolio companies</i> e università / istituti di ricerca
	IP & Innovation	% di <i>portfolio companies</i> con brevetti registrati numero di brevetti registrati
	Employment and Talent Management	% di crescita FTE per le <i>portfolio companies</i> (diretti e indiretti) Net Turnover % di dipendenti coinvolti in eventi di sviluppo professionale
	Health and Safety	<i>Incidence Index</i> <i>Severity Index</i>
	Diversity and Inclusion	<i>Female to Male ratio</i> nei CdA e in posizioni dirigenziali numero di episodi di discriminazione riportati attraverso <i>whistleblowing</i>
G	Ethical Codes	% di <i>portfolio companies</i> che adottano codice etico
	Ethical Codes for Clinical Trials	% di <i>portfolio companies</i> che adottano codice etico per la sperimentazione clinica
	Anti-Bribery and Corruption	% di <i>portfolio companies</i> che adottano una policy anticorruzione e antiriciclaggio
	DURC & DURF Compliance	% di <i>portfolio companies</i> che dispongono di DURC e DURF regolari
	Gender Equality	% di <i>portfolio companies</i> che adottano una <i>gender equality</i> policy

In addition, the Fund will encourage good governance practices within the portfolio throughout its investment, such as through the adoption by investee companies of ethical and transparent corporate governance policies.

d) Investment strategy

Claris Biotech II Fund has defined a responsible investment strategy that integrates ESG criteria within the investment activity and allows for the promotion of the above-mentioned characteristics through all stages of the investment process. In more detail, the strategy is structured as follows:

- **Screening phase:** During the screening phase, Claris ensures compliance with the exclusion criteria defined in the Fund Regulations, reporting a list of sectors where it prevents itself from investing.
- **Pre-investment phase:** Following the identification of a potential investment opportunity, Claris undertakes in-depth analysis of the ESG risks and opportunities of the potential investment could be performed by conducting an ESG Due Diligence through the support of a questionnaire. During the ESG Due Diligence, a dedicated analysis is performed to assess potential target companies' contribution to the environmental and social characteristics promoted by the Fund considering its alignment with art. 8 of the of European Regulation 2019/2088 (SFDR), adopting a materiality approach.

- **Ownership and monitoring phase:** during the ownership and monitoring phase, the Fund supports to the Portfolio Companies in the process of improving their ESG KPIs, planning concrete actions to be implemented for the promotion of the defined environmental and social characteristics. Specifically, through the use of the questionnaire, Portfolio Companies are required to report a set of selected ESG KPIs, including those related to the environmental and social characteristics promoted by the Fund.
- **Exit phase:** During the exit phase, the Fund discloses relevant ESG information concerning the portfolio companies' performances to the potential buyer, highlighting the improvement of the Portfolio Company's ESG profile and the analysis related to the investee's contribution in promoting the Environmental and Social characteristics.

e) Proportion of investments

The Fund responsible investment strategy is applied to 20% of the Fund investments, with the aim of aligning them to the environmental and social characteristics promoted, adopting a materiality approach.

f) Monitoring of environmental or social characteristics

With the aim of monitoring the performance of each investee company with reference to the contribution to the environmental and social characteristics promoted by the Fund, a periodic collection of specific quantitative environmental and social indicators will be prepared and implemented by the Fund through the compilation by the investee companies. The indicators identified by Claris to measure the promotion of the environmental and social characteristics are listed in Table 1 under point c) "Environmental and social characteristics promoted by the Fund".

g) Methodologies

The Fund promotes the establishment of an appropriate monitoring system, based on the use of a questionnaire that enables the collection of ESG data for all indicators related to E/S characteristics applicable to investee companies. The tool makes it possible to monitor, on an annual basis, the contribution in promoting the environmental and social characteristics identified by the Fund.

h) Data sources and processing

ESG data and information are provided by the portfolio companies during the ownership and monitoring phase. Claris processes and aggregates the ESG data provided by the investee companies in order to assess overall ESG performance of the portfolio. Qualitative and quantitative information on its performance concerning the promotion of environmental and social characteristics is disclosed within the Fund's annual report.

i) Limitations to methodologies and data

At present, no limitations to methodologies and data have been identified. Should any limitation arise, this will be promptly notified.

j) Due Diligence

During the pre-investment phase, Claris performs an ESG Due Diligence to gain insight into the ESG risks and opportunities related to the potential investments. During the conduction of the ESG Due Diligence, a dedicated analysis is performed to assess potential Target companies' alignment to the Fund' investment strategy and their level of contribution to the environmental and social characteristics promoted considering its alignment with art. 8 of the European Regulation 2019/2088 (SFDR), adopting a materiality approach. The ESG Due-Diligence outcomes provide an insight into the ESG performance of the target company, allowing for the mapping of ESG risks and opportunities related to the investment, on which to base the preliminary identification of ESG improvement actions.

k) Engagement policies

The Fund promotes an active engagement with the investees with the aim of supporting them in improving their ESG performance, by encouraging the integration of ESG factors into their strategies and providing support in the process of enhancing their ability to contribute to the promotion of the environmental and social characteristics defined by the Fund.

To this end, the Fund promotes the definition of ESG roles and responsibilities at investee level, through the appointment of a ESG Key Person, in charge of carrying out all ESG engagement activities.

Throughout the ownership period, ESG performance of portfolio companies is monitored by promoting their active involvement in the performance monitoring process, through the use of the KPIs that enable the Fund to monitor the ESG performance of the individual investee company and its contribution to the environmental and social characteristics promoted by the Fund is also monitored.

Designated reference benchmark

No reference benchmark has been identified to compare investments' performance with respect to their contribution to the environmental and social characteristics. Activities to monitor and evaluate the performance of investee companies with regard to the promotion of environmental and social characteristics are carried out through the periodic collection of quantitative ESG indicators, which make it possible to analyze the performance of the individual investee and compare the performance of previous years.