



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

Last update: November 18<sup>th</sup>, 2024

### **Art. 3 - Regulation on Sustainability Related Disclosures in the Financial Sector (“SFDR”), Transparency of sustainability risk policies**

Claris Ventures SGR S.p.A. (hereinafter also “Claris” or “AIFM”) has embodied sustainability risks within its investment activity through the implementation of processes aimed at their identification and monitoring. Sustainability risks are defined as environmental, social or governance (ESG) events or conditions that, if they occur, could cause a negative material impact on the value of the investments.

Claris has established a structured approach to manage sustainability risks and opportunities related to investments. The approach adopted by Claris throughout all stages of the investment process is described in the ESG Policy and it can be summed up as follows:

- **Screening phase:** In the process of selecting and evaluating investment opportunities, the exclusion list is applied, allowing for the identification of a set of sectors where Claris precludes itself from investing.
- **Pre-investment phase:** during the pre-investment phase, Claris conducts an in-depth analysis of the ESG risks and opportunities of the potential investment by performing an ESG Due Diligence through a questionnaire. The ESG assessment allows for the mapping of ESG risks and opportunities related to the investment, on which to base the preliminary identification of ESG improvement actions.
- **Ownership and monitoring phase:** Based on the results of the ESG Due Diligence, a list of KPI is developed with the goal of improving the performance of the invested companies in terms of the sustainability issues deemed material, through the implementation of improvement actions that allow for ESG risk minimization and ESG opportunity enablement. Throughout the holding period, ESG performance of portfolio companies is monitored. This involves regular tracking of such ESG Key Performance Indicators (KPIs).
- **Comprehensive information** about how the investment process considers sustainability risks and opportunities is reported in the ESG Policy, publicly available on the website of the Asset Manager.

#### **Art. 4 - Regulation on Sustainability Related Disclosures in the Financial Sector (“SFDR”), Transparency of adverse sustainability impacts at entity level**

Claris considers the adverse effects of its investment decisions on sustainability factors as part of its efforts to foster a responsible investment process.

As formalized in the ESG policy, Claris has defined a <sup>1</sup>structured approach for the identification and assessment of KPIs through the conduction of a ESG Due Diligence in the pre-investment phase and through a monitoring process that enables to monitor such set of ESG KPIs.

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<sup>1</sup> Please note that the approach adopted by Claris for the identification and assessment of the KPIs refers to the investment activity of the Private Equity Fund “Claris Biotech II”, aligned with Article 8 of the European Regulation 2019/2088 (SFDR). The Fund will be subject to the first data collection once the first investment is finalized; following the first data collection, values for the indicators identified in the latest Reporting Technical Standards (“RTS”) by the European Supervisory Authorities (“ESA”) will be available.