

KERVIS SGR S.P.A.

ESG POLICY

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1. OVERVIEW	3
2. OBJECTIVE	3
3. REGULATORY FRAMEWORK	3
4. SCOPE	3
5. POLICY OWNER	3
6. INTRODUCTION	3
7. ROLES AND RESPONSIBILITIES	4
8. POLICY REQUIREMENTS	4
9. POLICY PRINCIPLES	4
I. MANAGEMENT OF KERVIS SGR ENVIRONMENTAL IMPACT	5
II. KERVIS SGR COMMITMENT TO A SUSTAINABLE SOCIETY	6
III. KERVIS SGR COMMITMENT TO ITS EMPLOYEES	7
IV. ETHICS & GOVERNANCE	7
10. CONCLUSION	8
11. APPROVAL OF ESG POLICY AND PERIODIC REVIEW	8

1. OVERVIEW

The Kervis SGR S.p.A. (“Kervis SGR” or “Company”) Environmental, Social and Governance (“ESG”) Policy describes our commitment to sustainability, including mitigating environmental impacts, addressing relevant social issues and maintaining sound governance procedures.

2. OBJECTIVE

The objective of this policy is to affirm our commitment to achieving long term sustainable outcomes through our real estate assets, across our supply chain and in the communities in which we operate. The policy describes the overall intentions and direction of Kervis SGR related to environmental and social performance. It provides a framework for the setting of its ESG objectives and targets. It is further supported by our ethical principles of legality, integrity and non-discrimination.

3. REGULATORY FRAMEWORK

Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector

4. SCOPE

This policy covers:

- Kervis SGR corporate offices operations
- All investment vehicles (“funds”)

5. POLICY OWNER

ESG Representative, Kervis SGR

The ESG Representative will be supported by all Kervis SGR employees who are responsible for ensuring they follow Kervis SGR ESG policies and procedures and by the senior management who support the representative in implementation of senior decision-making processes.

6. INTRODUCTION

Kervis SGR has operated from 2019 and is a real estate AIFM entity dedicated to the management of funds reserved to international institutional investors of primary standing. Kervis SGR manages Alternative Investment Funds (AIFs) with specific focus on value add and core products.

ESG (or Sustainability¹) encompasses a broad range of issues that may of themselves, or in combination, have a material impact on the risk/return characteristics of our investments. Kervis SGR goal is to adopt a policy aimed at embedding a culture of sustainability in our entire investment process, accompanied by regular monitoring, ambitious targets and measurable results. In this regard, the ESG Policy defines the guidelines that Kervis SGR intends to achieve with respect to ESG factors; it specifies its application to every business process, also with the help of guidelines developed in compliance with current regulations (mainly the EU Regulation 2088/2019).

¹ To be sustainable, businesses must consider environmental, social and governance factors. To Kervis SGR, the terms ESG and Sustainability are interchangeable.

Kervis SGR is implementing a best practice approach to sustainability to drive investments along sustainable and responsible criteria in a way that either protects or, where possible, enhances asset value. When appropriate, the Company measures the sustainability performance of managed AIFs investments using external benchmarks. Where applicable and appropriate, Kervis SGR will also use third-party green building certification schemes for appropriate local property markets (such as LEED or BREEAM).

Reflecting the central importance of sustainability, our Board of Directors oversees and reviews the sustainability objectives, strategies and approach. The company strives for continual improvement across all managed AIFs real estate portfolios.

7. ROLES AND RESPONSIBILITIES

Kervis SGR pays close attention to ESG factors and their integration at all levels of management, administration and control. Specifically, the functions involved in sustainability governance are:

- the Board of Directors
 - defines and approves the ESG Policy and the guidelines for product classification according to SFDR and oversees their correct implementation
- Risk and Control functions
 - Monitor the implementation of the ESG Policy
- The ESG Representatives (selected within the investment team of AIF aligned with art. 8 and 9 of EU Regulation 2088/2019)
 - Represent the reference point on ESG issues at fund level
 - Monitor the ESG performance of investment funds and periodical reporting

8. POLICY REQUIREMENTS

This Policy applies to all of Kervis SGR operating business activities and all managed AIFs. It sets out the sustainability commitments and intents for all employees, and contractors operating with and under Kervis SGR.

9. POLICY PRINCIPLES

Kervis SGR is committed to achieving long term sustainable outcomes through managed AIFs real estate assets, across Kervis SGR supply chain and in the communities in which the Company operates and the managed AIFs invest. Kervis SGR sustainability framework addresses environmental, social and governance issues, in order to:

- Enhance value and minimise risk for our investors – through understanding of the risks associated with climate change
- Deliver exceptional real estate experiences for the investors and tenants
- Progress towards global sustainability best practice
- Develop our employees' and partners' sustainability knowledge so they can be advocates, and
- Foster a culture which embraces sustainability as a genuine core value.

The following principles guide the approach to sustainability of Kervis SGR:

- Integrating ESG considerations into the investment processes
- Implement sustainable practices, where feasible, through innovation and the sharing of best practices across managed AIFs portfolios.
- Act responsibly as a steward for the natural environment by addressing environmental impacts whilst also enhancing operational efficiency and values.
- Recognise social impact and have consideration for the local communities in which managed AIFs assets reside and the Company operates.

Kervis SGR believes that application of these principles increases the appeal of a property to both tenants and investors, and reduces operational costs and risks, resulting in improved risk-adjusted returns.

Long-term value of a property investment is strengthened by increasing climate change resilience and limiting the risk of regulatory non-compliance or the erosion of its competitive position in the market.

Therefore, ESG considerations are embedded in all phases of the investment process (from the acquisition to the disposal) as provided by the relevant internal procedure.

To ensure that the above principles are met, Kervis SGR has established a simple sustainability management system approach, based on principles defined within the international standard for environmental management – ISO 14001. In simple terms Kervis SGR reviews performance to define material issues, develops improvement objectives, implements and track progress then review. This framework will assist in the development and continual improvement of sustainability performance to the benefit of all the stakeholders.

The following are our principal commitments:

I. MANAGEMENT OF KERVIS SGR ENVIRONMENTAL IMPACT

Kervis SGR acknowledges that its operations have both a direct and indirect impact upon the environment. The Company is committed to pollution prevention, protection of the environment, compliance with all relevant legal obligations and integrating sustainability and climate risks into all processes and stages of the managed AIFs investment life cycle.

Energy Management

Kervis SGR understands and acknowledges the reality of human-induced climate change and is taking strong action to de-carbonise and adapt managed AIFs real estate portfolios. This involves working to design and develop highly energy-efficient buildings, taking into account the energy efficiency criteria for nZEB buildings (nearly Zero Energy Building).

Climate Change Mitigation

Kervis SGR aims at reducing its carbon footprint, in relation to direct and indirect greenhouse gas emissions associated with both the company's activities and those of the assets in its portfolio to be

developed or redeveloped. In this context, the Company supports initiatives to reduce environmental impacts of its offices and activities, promoting an environmental culture between its stakeholders.

Waste Management

Kervis SGR recognizes its role in reducing the waste generated during real estate developments and by managed AIFs building users. Kervis SGR will implement where possible, waste management infrastructure, work to reduce the volume of waste sent to landfill and increase the proportion that is recycled or composted. The Company aspires to support the creation of a 'circular economy' in the use of materials.

Water Efficiency

Kervis SGR will improve water efficiency by reducing wastage and harvesting or reusing water where practical. The Company, where possible, will track water use and, in future, report on performance.

Biodiversity & Habitat

Kervis SGR will use native and locally adapted plants in involved landscaping to create habitats that support and respect local biodiversity. Where feasible, simple biodiversity plans will be established for real estate developments and biodiversity factors will be taken into account in redevelopment projects. Finally, Kervis SGR is committed not to develop in protected natural areas.

II. KERVIS SGR COMMITMENT TO A SUSTAINABLE SOCIETY

Sustainability is a core part of Kervis SGR business culture and a central pillar of the Company business strategy. We will educate and enable our stakeholders about how we can work together to achieve our sustainability goals.

Stakeholder Engagement

The Company promotes a meaningful engagement with Kervis SGR stakeholders on key issues, to help build an inclusive, sustainable society. Kervis SGR considers its stakeholders (internal and external) as key players in achievement of sustainability goals.

Health & Wellbeing

Kervis SGR will work to identify and effectively manage safety, physical and mental health to protect all involved communities, employees, contractors, tenants and investors, and continually improve the Company processes. Kervis SGR will strive to provide the best indoor environmental conditions for managed AIFs tenants to support their wellbeing, including indoor air quality. Where practical, Kervis SGR will track indoor air quality data and, in future, report on performance.

Culture & Community Development

Kervis SGR success rests on the strength of the communities in which the Company operates, aiming

to partner with community organisations to deliver positive social outcomes.

Transport & Mobility

Kervis SGR will implement best practice standards of accessibility. The Company encourage walking, running or cycling to and from managed AIFs assets, and, where appropriate, ensure people can find out how to get there using public transport. Kervis SGR will support the transition to non-polluting transport by providing, for example, charging points for electric vehicles.

III. KERVIS SGR COMMITMENT TO ITS EMPLOYEES

Kervis SGR values its employees highly and fully recognizes that maintaining a driven and contented workforce is essential in delivering continued success. To support this, the Company is committed to:

Diversity & Equal Opportunities

Kervis SGR encourages a respectful, inclusive culture where different perspectives are heard and supported, and its employees feel comfortable expressing all aspects of their identity at work.

ESG Training & Awareness

Kervis SGR will educate and enable its employees to adhere to and support the company sustainability strategy.

Employee Remuneration

Kervis SGR employs a remuneration program that is competitive and fair. Performance objectives are set out within the Kervis SGR employee performance and development review appraisal process and reviewed annually to consider performance of all staff members. Over time Kervis SGR commits to ensuring that ESG objectives are clearly set in the remuneration programme

Performance against all objectives is reviewed annually through a performance and development review appraisal process.

IV. ETHICS & GOVERNANCE

Kervis SGR employs clear rules to encourage exemplary day-to-day behaviour and to enable innovation while managing risk in a stringent regulatory environment. Kervis SGR has adopted both the “Modello Organizzativo 231” and the “Codice Etico”. The former, addresses a number of issues and among the others: Health and Safety, Data Protection, Cyber Crime, Fraud, Corruption, Environmental Protection, Fiscal Fraud etc.

In addition, Kervis SGR will implement the following approaches to ensure sustainability factors are covered.

Processes

Kervis SGR will maintain processes to identify and manage its governance, social and environmental risks during the acquisition, development and operation of managed AIFs real estate assets. Where possible, the Company will use wording in lease agreements with tenants to help us collectively achieve sustainability goals. Specifically, Kervis SGR acknowledges the key role of tenants in implementing the ESG strategy, both as building users and as data collection holders necessary to improve the asset's ESG performance. To this end and according to real estate sector ESG best practices, the Company supports the “green lease” clauses as a useful tool for improving the environmental performance of buildings.

Supply Chain

Kervis SGR will implement processes to minimize ESG-related risks in its supply chain, and strive for best practice in its procurement with the aim of making all managed AIFs assets free of, or safe from, hazardous materials and identifying and addressing the risk of human rights abuses including modern slavery, child labour and working conditions.

10. CONCLUSION

This Policy acts as a foundation upon which Kervis SGR can achieve measurable ESG impacts across its business and managed AIFs assets. By adopting a disciplined approach, the Company aims to achieve more resilient, sustainable property portfolios which will ultimately enhance value and deliver better performance for the investors.

Kervis SGR focus is on embedding sustainable investing across every aspect of its activities, and across the entire life cycle of every property. The Company is committed to setting ambitious but practical targets to continually improve its performance and ensure independent measurement of its progress.

This Policy is communicated to all employees and is maintained as publicly available on the Kervis SGR website.

11. APPROVAL OF ESG POLICY AND PERIODIC REVIEW

The ESG strategies adopted by the Company are subject to annual review by the Board of Directors, in order to ensure coherence with any new guideline taking into account additional internal experiences on the topic. Kervis SGR is committed to maintain stakeholders informed and updated on Policy reviews and updates.