

# Failure to take into account the negative effects of investment decisions on Sustainability Factors

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The SGR, in compliance with Article 4 of the SFDR, does not currently take into consideration the possible negative effects of its investment decisions on the Sustainability Factors.

The SGR, on the other hand, has started, internally, the analyses deemed appropriate in order to: (i) assess the main negative effects of investment decisions on the Sustainability Factors; and (ii) define precise due diligence policies, which will take into account, among other things, the evolution of the applicable regulatory framework.

The SGR while carrying out autonomous evaluations on the potential impacts of its investment decisions on the AIFs portfolio, considering the lack of structured data and established market practice in assessing the aforementioned negative effects on sustainability factors, has opted, for the time being, not to declare itself compliant in accordance with Article 4(1)(b) of the SFDR.

It will be the responsibility of the SGR to provide timely updates on these aspects and, in particular, on how the aforementioned negative effects, if any, will be taken into account.