



FARO FASHION, LUXURY AND DESIGN

Sustainability-Related Disclosure

Date of publication: 19/03/2024

Summary

[FARO Fashion, Luxury and Design] (the “Sub-fund”) promotes environmental and social characteristics without having sustainable investments as objective.

The investment strategy considers sustainability risks throughout the whole investment process: screening, pre-investment, investment period and divestment. During the screening process, target companies must not operate in any sector that the Sub-fund considers controversial or having a negative impact on environmental and social issues. The pre-investments phase is intended to assess potential principal adverse impacts, the adoption of good governance practices and room for improvement to be further investigated for the development of an ESG Improvement Plan. During the investment period, the Sub-fund will support portfolio companies in managing sustainability risks and in improving their ESG performance, working towards their ESG Improvement Plan goals.

The ESG Improvement Plan for each portfolio company will be monitored on an ongoing basis to track ESG indicators’ movements and it must be updated annually in cooperation with the management of the portfolio company.

At the end of the investment period, the final asset allocation will consist of at least 80% of investments that promote environmental and/or social characteristics, while the residual 20% will refer to cash, cash equivalents and other financial instruments held for liquidity and hedging purposes, and/or investments that do not promote any environmental or social characteristics.

No sustainable investment objective

The financial product promotes environmental and/or social characteristics but does not have as its objective sustainable investment.

Environmental or social characteristics of the financial product

The Sub-fund aims to invest in companies that promote environmental and/or social characteristics, alternatively in companies that have the potential to improve their ESG performance by implementing an ESG Improvement Plan, as furtherly described in the “Investment Strategy”. In accordance with the Sub-fund investment objective and the current sustainability challenges, the following environmental and social characteristics are promoted:

<i>Environmental</i>	<i>Social</i>
Reduction of GHG emission	Employee wellbeing and development
Responsible supply chain	Gender equality
Transition to a circular economy	Customer privacy and data security
Waste management system	
Water management resources	
Product Sustainability	

The promotion of such characteristics aligns with the achievement of 9 out of 17 UN Sustainable Development Goals:

4. Quality Education	10. Reduced Inequalities
5. Gender Equality	11. Sustainable Cities and Communities
7. Affordable and Clean Energy	12. Responsible Consumption and Production
8. Decent Work and Economic Growth	13. Climate Action
9. Industry, Innovation and Infrastructure	

Investment strategy

The investment strategy considers sustainability risks throughout the investment process:

- I. **Screening:** target companies must not operate in any of the excluded sector or be involved in controversial/unethical practices:
 - Production and distribution of tobacco and related products
 - Production and distribution of controversial weapons having a disproportionate impact on civilian population such as chemical, biological, depleted uranium, and nuclear weapons, anti-personnel landmines and cluster bombs, other weapons and ammunition banned by international conventions
 - Genetic engineering and human cloning for the solely reproduction purpose
 - Casino, gambling, and betting services
 - Animal testing for non-clinical purposes
 - Adult entertainment
 - Research and development of solutions aimed at to support the above activities
 - Illegal or unethical business practices, including money-laundering, corruption and bribery
 - Activities entailing violation of human and labour rights

- II. **Pre-investment:** the due diligence process ensures that Principal Adverse Impacts (PAIs) and the adoption of good governance practices by target companies are evaluated. In addition, sustainability risks and performance are assessed to inform the ESG Improvement Plan: a roadmap defined by the Sub-fund in accordance with the companies to support them in enhancing their ESG performance and promotion of environmental and social characteristics. Each portfolio company must agree on an ESG Improvement Plan.

- III. **Investment period:** the Sub-fund regularly engages with portfolio companies to:
 - Ensure ongoing adherence of investments to the responsible investment strategy of the Sub-fund, and absence of relevant PAIs
 - Support portfolio companies in achieving their ESG Improvement Plan goals
 - Improve and report on ESG performance of the Sub-fund

- IV. **Divestment:** the ESG progress and performance of the portfolio companies is summarized in the exit memorandum to capitalize Sub-fund's and portfolio company's effort in the context of sustainability.

The Sub-Fund is supported by ESG advisors in carrying out all the activities mentioned above.

Proportion of investments

The expected asset allocation of the Sub-fund at the end of the investment period is:

- 80% of investments promote environmental and/or social characteristics
- 20% will refer to cash, cash equivalents and other financial instruments held for liquidity and hedging purposes, and/or investments that do not promote any environmental or social characteristics

Monitoring of environmental and/or social characteristics

The Sub-fund engages with portfolio companies on a regular basis to monitor the execution of the ESG Improvement Plans by collecting ESG data at least once a year.

Methodologies of environmental or social characteristics

The exclusion of sectors and the identification of unethical or controversial practices are informed by UN Global Compact Principles, OECD Guidelines, ILO conventions and other relevant frameworks, where applicable and meaningful.

Industry-specific materiality, PAIs and the targets of the UN SDGs are considered in the assessment of sustainability risks and performance during the due diligence phase. The ESG Improvement Plan is consequently developed in accordance with the results of this assessment. The progress is monitored and reported by means of indicators that properly represent the characteristics promoted in the ESG Improvement Plan.

Data sources and processing

Portfolio companies are required to report data referring to their ESG Improvement Plan at least once a year and the Sub-fund supports them in the generation and monitoring of ESG data. Third parties may be appointed if additional technical expertise is needed (e.g. calculation of GHG emissions).

The Sub-fund stores the data and tracks the changes in the indicators of the ESG Improvement Plan to inform the periodic disclosure to stakeholders.

Limitations to methodologies and data

The only limitation may be the lack of ESG data for some portfolio companies. The Sub-fund aims to increase ESG data availability and maximize portfolio coverage with engagement activities and the definition of an ESG Improvement Plan.

Due diligence

Detailed due diligence activities are performed on specific topics such as management reputation and reliability, tax, legal and alignment with the Sub-fund's policy. Moreover, additional due diligence can be carried out based on industry materiality and the characteristics of the company. Specialized third parties are appointed to conduct such activities entirely or in part.

Engagement policies

The Sub-fund engages with portfolio companies once a week to:

- receive updates on the ESG Improvement Plan's activities and to discuss further actions needed
- support the achievement of the ESG targets of the ESG Improvement Plan

Designated reference benchmark

The Sub-fund has not selected any index as a reference benchmark to measure the attainment of environmental and/or social characteristics promoted by the Sub-fund.