NO CONSIDERATION OF ADVERSE IMPACTS OF INVESTMENT DECISIONS ON SUSTAINABILITY FACTORS

by

Wise Equity SGR S.p.A.

This disclosure is based on the requirements set out in Regulation (EU) 2019/2088 of the European Parliament and of the Council on sustainability-related disclosures in the financial services sector, as supplemented by Commission Delegated Regulation (EU) 2022/1288 of 6 April 2022 with regard to regulatory technical standards specifying the details of the content and presentation of the information in relation to the principle of 'do no significant harm', specifying the content, methodologies and presentation of information in relation to sustainability indicators and adverse sustainability impacts, and the content and presentation of the information in relation to the promotion of environmental or social characteristics and sustainable investment objectives in precontractual documents, on websites and in periodic reports.

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10 March 2021	Creation
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Introduction

On 10 March 2021, Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector (hereinafter, the "**SFDR**" or the "**SFDR Regulation**") entered into force, as supplemented by Commission Delegated Regulation (EU) 2022/1288 of 6 April 2022 with regard to regulatory technical standards (hereinafter, the "RTS") specifying the details of the content and presentation of information disclosed under the SFDR. Both of these measures aim to provide harmonised rules at European level in order to enhance transparency regarding the risks and opportunities associated with sustainability-related investment decisions.

The purpose of this document is to explain how Wise Equity SGR S.p.A. (hereinafter, the "**Company**") intends to comply with the provisions on *web-based disclosure under* Article 4 of the SFDR, taking into account the provisions of the RTS. With regard to the provisions on *web-based disclosure under* Articles 3, 5 and 10, the Company has provided this information in other specific documents.

Article 4 of the SFDR – Reasons for not considering the adverse impacts of investment decisions on sustainability factors

With reference to Article 4(1)(b) of the SFDR, the Company does not currently consider at entity level any adverse impacts (so-called "PAIs") of investment decisions on sustainability factors, defined by the SFDR as *"environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters".*

This choice is motivated by *the* limited size of the Company (which does not exceed the threshold of 500 employees referred to in Article 4(3) *and* (4) of the SFDR), as well as by the fact that the Company assesses the impacts that its investment decisions may have on sustainability factors through an approach that differs from entity-level PAI consideration, namely through:

(i) the exclusion of certain investment sectors deemed controversial, as provided for in the management rules of the funds managed by the Company (reference is made, for details, to the offering documentation of each fund and, for funds that promote environmental and/or social characteristics pursuant to Article 8 of the SFDR, to the dedicated pre-contractual disclosure and the web-based disclosure under Article 10 of the SFDR);

(ii) the promotion, with regard to managed funds classified pursuant to Article 8 of the SFDR, of certain environmental and social characteristics.

The Company reserves the right to change its position regarding entity-level PAI consideration and to update this disclosure where necessary. In particular, the Company will assess the opportunity of adopting entity-level PAI consideration in light of the evolution of the applicable regulatory framework, taking into account also the ongoing revision of the SFDR and of Commission Delegated Regulation (EU) 2022/1288 at European level, as well as any development of the information sources and methodologies available for the collection and calculation of PAIs.