

Statement on due diligence policies regarding the consideration of the main negative effects of investment decisions on sustainability factors

Drive for performance

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This statement is elaborated in accordance with the provisions of art. 4 para (i), letter b) of EU Regulation no. 2088/2019 of the European Parliament and of the Council of 27.11.2019 on sustainability information in the financial services sector.

EVERGENT Investments does not always take into account the potential negative effects of investment decisions on sustainability factors, motivated by the following considerations:

- legislation on sustainability information in the financial services sector, although it
 has begun to take shape, is not yet finalized at EU level. Regulation (EU) 2019/2088
 was supplemented by Regulation (EU) 2020/852 on the establishment of a
 framework to facilitate sustainable investment, but this framework only covers
 environmental issues, not those related to social and labor issues, as well as those
 related to corporate governance. Moreover, the technical standards related to the
 regulations in force are, for most of the sustainability objectives, at project level at
 most.
- even if we had a complete legislation related to sustainability information in the
 financial services sector, there is still a limited and non-uniform availability of ESG
 data and information on issuers operating in the local financial market. Therefore,
 although we have a formalized policy and procedures on the integration of
 sustainability risks in the investment decision-making process, in the short and
 medium term it is not possible to identify and prioritize with the highest degree of
 certainty the main negative effects of investment decisions on sustainability factors
 and the calculation of some indicators in this regard.
- the complexity and novelty of the requirements formulated in the regulations already published and in the technical standards drafts require an adequate time for the additional professional training of the staff in order to understand and apply them correctly.

Concerned on the effects of its investment decisions on sustainability factors, EVERGENT Investments will consider the issues set out in the above-mentioned recitals and intends to analyze and decide on the negative effects of investment decisions on sustainability factors, notifying investors of any new concrete actions in this regard.

EVERGENT Investments believes in the importance of sustainable investing and incorporating ESG factors into investment decision-making. Also, active interaction with the companies we invest in is another key element for managing investment risk. As efforts to integrate ESG into our industry continue to evolve, EVERGENT Investments' approach will continue to develop. We seek to work closely with all our stakeholders to provide transparency in our approach and tailor it to their needs.

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