Sustainability-related disclosures in accordance with Art. 10 of the Disclosure Regulation (SFDR)

Disclosure of product information for financial products aimed at sustainable investments

SIERA Impact Growth Fund

A sub-fund of the SIERA Impact Fund

Summary

The SIERA Impact Growth Fund („Fund") is a financial product classified as an Article 9 Fund under 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 (SFDR). The Fund is designed to make sustainable investments that actively contribute to climate change mitigation, climate change adaptation, and other EU Taxonomy environmental objectives.

The Fund strategically focuses on environmental engineering, with an emphasis on ETP (Engineers, Technology and Projects), targeting companies that drive Europe's sustainable transformation. These companies develop innovative solutions, implement pioneering projects, and provide specialized consulting services, playing a crucial role in supporting the European Green Deal, the energy transition, and the UN Sustainable Development Goals (SDGs). Their activities contribute significantly to economic and infrastructure renewal, the development of resource-efficient structures, and technological innovation, all of which facilitate the transition to a climate-neutral future.

The investment strategy ensures that 80% of the Fund's assets are allocated to sustainable investments. The Fund applies strict ESG screening, exclusion policies, and continuous monitoring to ensure compliance with sustainability objectives. Investments undergo thorough due diligence, integrating Principal Adverse Impact (PAI) indicators to assess risks related to carbon emissions, biodiversity impact, resource use, and governance practices.

The Fund follows an active engagement policy, which includes:

- Ongoing ESG monitoring and impact tracking through site visits, stakeholder engagement, and real-time data collection.
- Time-bound corrective action plans (12–36 months) for investments with ESG improvement potential.

- Proactive governance oversight, ensuring compliance with OECD Guidelines and UN Guiding Principles on Business and Human Rights.

The Fund does not rely on an external benchmark but instead uses the proprietary iESG framework, as its primary tool for evaluating and aligning investments with sustainability goals.

This framework integrates:

- ESG criteria aligned with EU regulations, including the Corporate Sustainability Reporting Directive (CSRD) and the European ESG Template (EET).
- Impact-specific themes linked to the UN Sustainable Development Goals (SDGs) and the EU Taxonomy environmental objectives.

By integrating a structured, data-driven approach, the SIERA Impact Growth Fund ensures full transparency, sustainable impact, and long-term financial resilience, making it a leading investment vehicle for driving Europe's transition to a greener economy.

For this Fund, no benchmark has been designated.

No Significant Harm to the Sustainable Investment Objective

The SIERA Impact Growth Fund ensures that its investments do not cause significant harm by strictly adhering to the Do No Significant Harm (DNSH) principle under the EU Taxonomy Regulation. To achieve this, the AIFM integrates sustainability risks into the investment process through comprehensive pre-investment selection, rigorous post-investment screening, and continuous monitoring.

As part of the pre-investment selection, the AIFM finances only environmental engineering companies operating within the ETP framework (Engineers, Technology and Projects), ensuring that portfolio companies actively contribute to sustainable solutions. Investments are subject to strict environmental criteria, excluding any companies involved in deforestation, excessive resource depletion, or pollution-intensive activities.

To further ensure sustainability compliance, all investments undergo detailed ESG screening using the iESG framework. This assessment evaluates key factors such as biodiversity protection, resource efficiency, and pollution control. The AIFM continuously monitors the portfolio to identify and mitigate potential risks, ensuring that investments remain aligned with high environmental and social standards.

Additionally, the AIFM follows a strict exclusion policy, refraining from investments in companies that cause irreversible environmental damage or engage in human rights violations. The ongoing monitoring process includes regular impact assessments, tracking key indicators such as carbon emissions, biodiversity impact, and resource efficiency. Through proactive engagement, the Fund works closely with portfolio companies to address sustainability risks and implement necessary improvements.

The SIERA Impact Growth Fund aligns its sustainability approach with internationally recognized frameworks, including the EU Taxonomy environmental objectives, the OECD Guidelines for Multinational Enterprises, and the UN Guiding Principles on Business and Human Rights. To ensure transparency and accountability, the Fund regularly publishes reports documenting measures taken to prevent significant harm and detailing the sustainability performance of the portfolio.

Through these measures, the SIERA Impact Growth Fund actively prevents significant harm to environmental and social objectives while maintaining the highest ethical and sustainability standards in its investment strategy.

Sustainable Investment Objective of the Financial Product

The SIERA Impact Growth Fund pursues a sustainable investment objective by financing companies that actively contribute to the green transition and long-term environmental sustainability. The Fund focuses on environmental engineering solutions that drive positive change in key areas such as climate change mitigation, climate change adaptation, resource efficiency, and sustainable infrastructure.

To achieve its investment goal, the Fund invests primarily in companies operating within the ETP framework (Engineers, Technology and Projects), which develop innovative technologies, services, and projects with measurable environmental impact. These companies contribute to achieving the EU Taxonomy environmental objectives, including climate change mitigation, adaptation, and pollution prevention.

By integrating strict ESG criteria, the Fund ensures that its investments generate measurable environmental benefits while maintaining high ethical and sustainability standards. The AIFM selects investments that align with the Sustainable Development Goals (SDGs) and the European Green Deal, ensuring a positive, lasting impact on both the environment and society.

Through this targeted investment approach, the SIERA Impact Growth Fund actively supports the global transition to a more sustainable economy, contributing to long-term environmental resilience and responsible growth.

Investment Strategy

The SIERA Impact Growth Fund follows a structured and impact-driven investment strategy, ensuring that all investments actively contribute to climate change mitigation, climate change adaptation, and environmental sustainability. The AIFM employs a rigorous selection process to identify companies that align with the Fund's sustainability objectives while maintaining financial resilience and growth potential.

The Fund invests exclusively in companies within the ETP framework (Engineers, Technology, and Projects) that contribute to environmental sustainability through innovative environmental technologies and pioneering infrastructure solutions. These investments support the EU Taxonomy environmental objectives, particularly in areas such as renewable energy, circular economy practices, pollution prevention, and biodiversity conservation.

To ensure that the investment portfolio meets high ESG standards, the Fund integrates:

- **Strict Exclusion Criteria** – Avoiding investments in industries that pose environmental or social risks, including fossil fuel extraction, deforestation, and unsustainable resource use.
- **ESG Integration** – Embedding environmental, social, and governance (ESG) factors into all investment decisions, ensuring alignment with international sustainability frameworks.
- **Impact Measurement & Continuous Monitoring** – Utilizing proprietary and third-party ESG assessment tools to track environmental and social impact, ensuring that investments continue to meet the Fund's sustainability criteria.
- **Active Engagement** – Collaborating with portfolio companies to improve ESG performance and drive long-term sustainable growth.

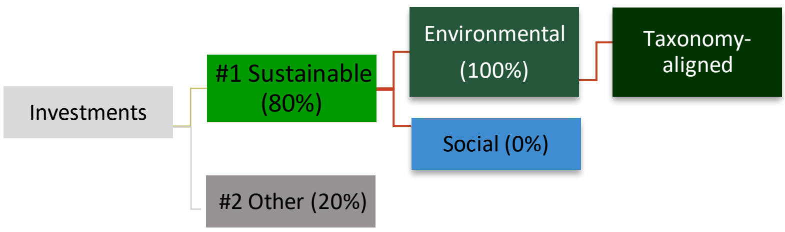
Through this systematic and impact-oriented approach, the SIERA Impact Growth Fund not only achieves strong environmental and social outcomes but also ensures long-term value creation for investors.

Allocation of Investments

The SIERA Impact Growth Fund ensures that the majority of its investments are allocated to projects and companies that actively contribute to climate change mitigation, climate change adaptation, and environmental sustainability. The Fund is committed to aligning its investment strategy with the EU Taxonomy environmental objectives and focuses on high-impact sectors that drive measurable positive change.

The Fund's portfolio consists of:

- **#1 Sustainable Investments** –80% of the portfolio is allocated to companies and projects that meet strict environmental and social sustainability criteria. These investments primarily support environmental engineering solutions, sustainable infrastructure, and innovative technologies within the ETP framework (Engineers, Technology and Projects).
- **#2 Other Investments** – 20% of the portfolio may consist of liquidity instruments or financial instruments necessary for risk management and operational flexibility. These investments do not have a direct sustainable investment objective but must comply with minimum environmental and social safeguards to ensure they do not undermine the Fund's sustainability goals.



The Fund does not invest in activities that conflict with sustainability principles, such as fossil fuel-based industries, deforestation, or companies with poor ESG practices.

Through this allocation, the SIERA Impact Growth Fund maintains a strong focus on sustainability, ensuring that its capital is deployed in high-impact investments that contribute to a greener and more resilient economy.

Monitoring of the Sustainable Investment Objective

To ensure that the SIERA Impact Growth Fund continuously meets its sustainable investment objective, the AIFM has implemented a comprehensive monitoring framework. This includes ongoing data collection, impact measurement, and ESG performance assessments to track the Fund's contribution to climate change mitigation, climate change adaptation, and other environmental goals.

The AIFM regularly evaluates the Fund's investments using key sustainability indicators, including:

- Greenhouse gas (GHG) emissions reduction and energy efficiency improvements in portfolio companies.
- Biodiversity impact and resource efficiency to ensure investments align with EU Taxonomy environmental objectives.
- Compliance with international standards, including the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

To facilitate accurate tracking and reporting, the AIFM utilizes internal ESG assessment tools and third-party sustainability data providers. Regular impact reports and performance reviews ensure that all investments remain aligned with the Fund's sustainability commitments.

Additionally, the Fund engages directly with portfolio companies to encourage continuous improvement in ESG performance. If an investment fails to meet sustainability criteria, corrective actions are initiated, or divestment is considered.

Through this robust monitoring system, the SIERA Impact Growth Fund ensures full transparency and accountability, reinforcing its commitment to long-term environmental and social impact.

Methodologies

The AIFM of the SIERA Impact Growth Fund applies a structured methodology to assess, measure, and monitor the Fund's sustainable investment objective. This ensures that all investments align with climate change mitigation, climate change adaptation, and other EU Taxonomy environmental objectives, while maintaining transparency and accountability.

Key Methodological Approaches:

- iESG Assessment System: The Fund utilizes the I-ESG evaluation framework, which integrates multiple sustainability dimensions into the investment process. The I-ESG framework combines:
    - ESG criteria aligned with EU regulations, such as the Corporate Sustainability Reporting Directive (CSRD) and the European ESG Template (EET).
    - Impact-focused themes, linked to the UN Sustainable Development Goals (SDGs) and the EU Taxonomy environmental objectives to ensure measurable sustainability contributions.
- Sustainability Indicators: Investments are evaluated based on carbon intensity, biodiversity impact, energy efficiency, and pollution reduction, ensuring a measurable contribution to sustainability goals.
- EU Taxonomy Alignment: All sustainable investments are assessed for compliance with EU Taxonomy criteria, confirming their contribution to environmental objectives.
- Principal Adverse Impact (PAI) Consideration: The AIFM systematically assesses and monitors the 14 Principal Adverse Impact (PAI) indicators to identify and mitigate negative sustainability effects. These include:
    - Climate & Environmental Risks: Greenhouse gas (GHG) emissions (Scope 1, 2, and 3), energy efficiency, and biodiversity impact.
    - Resource Management: Water consumption, hazardous waste generation, and pollution control.
    - Social & Governance Factors: Human rights adherence, labor standards, gender diversity, and exposure to controversial industries.
    - Sectoral Exclusions: Investments in fossil fuels, deforestation-linked industries, or businesses with poor governance structures are systematically avoided.
- ESG Scoring & Risk Assessment: Investments undergo a multi-factor ESG analysis, leveraging both internal assessment tools and third-party data providers to ensure compliance with strict sustainability criteria.

To maintain data accuracy and consistency, the AIFM employs standardized ESG reporting frameworks and continuous monitoring mechanisms. If discrepancies or gaps are identified, corrective measures are implemented to ensure the Fund remains fully aligned with its sustainability commitments.

Through this rigorous methodological framework, the SIERA Impact Growth Fund guarantees measurable, verifiable, and transparent environmental and social impact across its entire portfolio.

Data Sources and Processing

The SIERA Impact Growth Fund relies on a combination of company-reported data that he collects itself, third-party ESG ratings, regulatory disclosures, and independent sustainability assessments to evaluate and monitor investments. Data is sourced from own investigations. corporate ESG reports, public databases, external data providers, and industry benchmarks to ensure accuracy and compliance with EU Taxonomy, CSRD, and the European ESG Template (EET).

To maintain data quality and reliability, the Fund applies cross-validation mechanisms, comparing self-reported company data with independent ESG ratings. The iESG framework ensures that all data is structured and aligned with sustainability indicators such as carbon intensity, biodiversity impact, and energy efficiency.

While the Fund prioritizes verified data, some estimates may be used where disclosures are incomplete. In such cases, the AIFM follows strict validation processes and continuously works to improve data accuracy. Regular monitoring and reporting ensure transparency, compliance, and effective measurement of the Fund's sustainability impact.

Limitations of Methodologies and Data

The AIFM of the SIERA Impact Growth Fund acknowledges that certain limitations in data availability and methodology can affect the assessment of sustainability performance. While the Fund relies on company-reported ESG data, third-party assessments, and regulatory disclosures, gaps may arise due to inconsistent reporting standards, varying data quality, or delays in sustainability disclosures.

To address these challenges, the AIFM applies cross-validation mechanisms, ensuring that self-reported data is compared with external ESG ratings and industry benchmarks. In cases where complete and verified data is not available, estimates may be used, but they are clearly identified and subject to regular review and updates.

Despite these limitations, the Fund ensures high transparency and methodological rigor, continuously refining its iESG framework and impact measurement processes to improve data accuracy and reliability over time.

Due Diligence

The AIFM of the SIERA Impact Growth Fund applies a comprehensive due diligence process to ensure that all investments align with the Fund's sustainability objectives and comply with EU Taxonomy, SFDR, and ESG best practices. Each investment undergoes a multi-stage assessment, integrating environmental, social, and governance (ESG) criteria, as well as potential Principal Adverse Impacts (PAI).

Before an investment is made, the iESG framework is used to evaluate climate impact, resource efficiency, biodiversity protection, and governance structures. External ESG data providers, regulatory disclosures, and company reports are reviewed to ensure compliance with sustainability standards. If risks or misalignments are identified, corrective action plans or exclusions are considered.

Post-investment, the AIFM conducts ongoing monitoring, ensuring that portfolio companies maintain strong ESG performance. Regular ESG reviews, risk assessments, and engagement strategies help address sustainability risks and drive continuous improvement.

Through this structured due diligence approach, the SIERA Impact Growth Fund ensures that investments actively contribute to sustainability goals while maintaining financial and ethical integrity.

Engagement Policy

The SIERA Impact Growth Fund follows an active engagement strategy, ensuring that portfolio companies continuously improve their ESG performance and align with sustainability benchmarks. Engagement goes beyond passive tracking, requiring regular monitoring, targeted improvement plans, and measurable impact assessments.

Active Engagement and ESG Risk Management

The Fund works directly with portfolio companies to enhance sustainability practices, optimize governance structures, and address social issues. If ESG performance deteriorates or agreedupon improvement targets are not met, the Fund takes corrective action, which may include restructuring strategies or, in extreme cases, divestment.

For companies with compliance or performance gaps in relation to the high standards of the Fund, the Fund implements time-bound corrective action plans (typically 12–36 months) to ensure measurable progress toward sustainability goals. Continuous engagement ensures that emerging risks are proactively addressed and that companies remain aligned with OECD Guidelines and UN Guiding Principles.

Ongoing Monitoring and Post-Investment Engagement

Following an investment, the Fund continuously tracks indicators of adverse impacts through:

- Site visits, stakeholder engagement, and real-time data collection.
- Regular assessments of emissions, biodiversity impacts, and compliance with ESG targets.
- Audits of governance practices, labor rights, and environmental performance.

Proactive monitoring and mitigation ensure that any sustainability risks are identified early. If deficiencies are observed, the Fund engages with companies in order to take corrective measures and strengthen compliance mechanisms.

Continuous Evaluation and Governance Oversight

The Fund also conducts ongoing governance evaluations, including:

- Regular reporting on board diversity, regulatory compliance, and ethical standards.
- Periodic engagement with management to ensure adherence to ESG commitments.

By implementing this structured engagement approach, the SIERA Impact Growth Fund drives continuous ESG improvements, mitigates sustainability risks, and ensures that investments contribute to long-term environmental and social impact.

Attainment of the Sustainable Investment Objective

For this Fund, there is no designated reference benchmark.