GREEN ARROW
CAPITAL

Sustainability disclosure pursuant to art. 10 of Regulation (EU) 2019/2088 (SFDR) and art. da 37 a 49 36 of Delegated Regulation (EU) 2022/1288 on the Fund
Green Arrow Infrastructure of the Future Fund
That has as sustainable objective ex art. 9 SFDR

Green Arrow Capital AIFM SARL	codice LEI: 636700S8DFQA41ASEZ75
Green Arrow Infrastructure of the Future Fund	
	Classe A ISIN LU2183129183
	Classe B ISIN LU2183129340
	Classe C ISIN LU2183129779

A) Summary

Green Arrow Infrastructure of the Future Fund (the "Fund" or "GAIF"), managed by Green Arrow Capital AIFM SARL (the "SARL"), which has delegated portfolio management activities to Green Arrow Capital SGR (the "SGR"), promotes environmental and/or social characteristics pursuant to Article 9 of the SFDR.

The Fund aims to build a diversified infrastructure portfolio with a particular focus on green energy generation and related services such as energy storage and distribution. The investable universe also includes activities related to waste-to-energy solutions and telecommunications infrastructure.

- Do No Significant Harm to the sustainable investment objective: The Fund verifies, during the pre-investment phase, that target investments do not significantly harm sustainable objectives by assessing their alignment with the UN Global Compact, UN Guiding Principles on Business and Human Rights, ILO standards, and OECD Guidelines for Multinational Enterprises. Principal Adverse Impact (PAI) indicators are considered throughout both the pre-investment and ownership phases through dedicated ESG assessment tools, ensuring consistency with the Fund's Policy and appropriate monitoring of relevant ESG KPIs.
- Sustainable investment objective of the financial product: The sustainable characteristics promoted by the Fund are identified based on the specific features and activities of each investee company or infrastructure asset.
- Investment strategy: The Fund invests in renewable energy projects, advanced-stage greenfield developments, energy storage systems, electric vehicle infrastructure, and digital infrastructure, primarily in Italy, Spain, Portugal, and France. Its objectives include:
    - Renewable energy generation and distribution;
    - Promotion of the circular economy;
    - Support for the digital transition.

  All investments are subject to an assessment of eligibility and alignment with the EU Taxonomy, using specific indicators tailored to each asset class. No reference benchmark has been designated.
- Proportion of investments: One hundred percent (100%) of sustainable investments pursue an environmental or social objective and are focused on renewable energy, energy storage, and telecommunications infrastructure (including 5G networks), as well as biogas-related activities. The

portfolio is primarily composed of transitional activities, with a residual portion consisting of enabling activities. All investments are expected to:

- Make a substantial contribution to climate change mitigation;
- Do no significant harm to any environmental or social objective;
- Comply with applicable technical screening criteria;
- Adhere to minimum safeguards.

Cash is held only on an ancillary basis.

- Monitoring of the sustainable investment objective: The Fund monitors ESG data through a dedicated ESG management system, the results of which are reviewed by the ESG Manager and the ESG Committee. The monitoring framework consolidates information from both the ESG monitoring tool and the technical control room that oversees the infrastructure assets, ensuring accurate data collection for disclosure purposes and impact measurement.
- Methodologies: The investable universe has been designed to accelerate the energy and digital transitions. Performance indicators are selected to reflect the technological differences among infrastructure assets, with support from external ESG consultants. The sustainable investment objective is considered achieved when all infrastructure assets are operational and their positive impact can be measured and demonstrated.
- Data sources and processing: Data are sourced directly from the Fund's control room, which collects operational information from all infrastructure assets. The Fund's direct control over the underlying assets ensures the quality, reliability, and availability of the required data.
- Limitations of methodologies and data: No material limitations have been identified. Full control over each asset ensures complete availability of the data necessary to assess performance against sustainable investment objectives.
- Due diligence: For each investment, the Fund assesses:
  - Compliance with the GAC Policy;
  - The asset's ability to contribute to a sustainable investment objective;
  - Exogenous risks (such as location-specific risks);
  - Good governance practices, where applicable given the nature of the investments.

External specialists may be engaged to perform technical due diligence. The findings are shared with the ESG Manager and the ESG Committee, which are responsible for oversight and final approval.

- Engagement policies: Engagement is not considered a material element of the investment strategy, given the nature of the Fund's investments and its direct control over the underlying infrastructure assets. Nevertheless, the Fund seeks to promote and share its sustainability principles with suppliers, contractors, and business partners.
- Designated reference benchmark: No index has been designated as a reference benchmark for the purpose of attaining the Fund's sustainable investment objectives.

B) Do No Significant Harm to the Sustainable Investment Objective

During the pre-investment phase, the Fund ensures that any prospective investment does not cause significant harm to any sustainable investment objective. In addition, where applicable, prospective investments are assessed for alignment with the principles of the United Nations Global Compact, the

United Nations Guiding Principles on Business and Human Rights, the International Labour Organization (ILO) Declaration, and the OECD Guidelines for Multinational Enterprises.

Furthermore, the Fund takes Principal Adverse Impact (PAI) indicators into consideration throughout the entire investment process. The Fund employs ESG assessment tools both during the pre-investment phase and throughout the ownership period to ensure that: (i) each investment project is aligned with the Policy and the investment objectives of GAIF; and (ii) relevant PAI indicators and other ESG KPIs are appropriately monitored.

Finally, the implementation of the Policy ensures alignment with high standards and principles, including, among others, the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights.

C) Sustainable Investment Objective of the Financial Product

The Fund will invest in renewable energy facilities, advanced-stage greenfield projects, energy storage solutions, energy infrastructure, particularly infrastructure supporting the electric vehicle market (including, where relevant, parking facilities), and digital infrastructure, primarily in Italy, Spain, Portugal, and France (the Primary Markets). Accordingly, the Fund’s objectives are to:

- Generate and distribute renewable energy;
- Implement circular economy solutions for energy production;
- Accelerate the digital transition through innovative telecommunications systems.

As a result, the Fund’s portfolio is expected to be primarily aligned with the following United Nations Sustainable Development Goals (SDGs):

- SDG 7 – Affordable and Clean Energy;
- SDG 9 – Industry, Innovation and Infrastructure;
- SDG 11 – Sustainable Cities and Communities;
- SDG 12 – Responsible Consumption and Production;
- SDG 13 – Climate Action.

The Fund is committed to conducting an assessment of both EU Taxonomy eligibility and alignment for all of its assets.

Given the diversity of asset types contemplated by the investment strategy and the range of targeted UN SDGs, the Fund considers the most effective approach to be the identification of the most appropriate indicator for each asset category. The following list includes examples of indicators that may be selected to measure the achievement of the Fund’s sustainable investment objectives:

- Renewable energy generated and the corresponding greenhouse gas (GHG) emissions avoided;
- Installed renewable energy capacity;
- Tonnes of biofuel produced by biogas facilities;
- Volume of data transmitted through 5G networks.

Additional and more specific indicators will be identified and selected with the support of external technical experts.

No index has been designated as a benchmark for this Fund.

D) Investment Strategy

The Fund's objective is to align the positive impact of sustainable investments with financial returns by building a diversified portfolio of renewable energy-related assets that extends beyond energy generation alone. The investable universe also includes energy storage and distribution infrastructure, particularly assets supporting sustainable mobility (potentially including parking facilities). The range of renewable energy technologies targeted by the Fund includes solar and wind farms, hydroelectric facilities, and biogas plants. In addition, a residual portion of the portfolio will be allocated to 5G infrastructure.

During the pre-investment phase, the Exclusion List set out in GAC's ESG Responsible Investment Policy remains fully applicable, and the investable universe is structured to ensure that potential investment projects are aligned with the Fund's sustainable investment objectives. Furthermore, the Fund conducts a preliminary sustainability risk assessment, taking into account PAI indicators and asset-specific checklists developed with the support of ESG advisors. The suitability of each investment is also assessed against the principle of "do no significant harm" (DNSH). Where relevant, the Fund verifies the adoption of good governance practices by target companies.

The asset management phase is primarily characterized by:

- Assessment of the eligibility and alignment of assets with the EU Taxonomy, conducted in line with the evolution of the Fund's portfolio;
- Monitoring of PAI indicators and other metrics used to measure the achievement of sustainable investment objectives;
- Reporting to investors.

Upon divestment, the Fund will include information relating to sustainability performance within the relevant asset documentation.

In many cases, investment projects are multi-year initiatives involving several assets and may therefore not be operational during the early stages of the Fund's lifecycle. As a result, material ESG data (including PAI indicators, performance indicators, and EU Taxonomy metrics) will become available once the investment projects are fully operational. The collection of data and information relating to these metrics will, in many cases, be immediate, as the Fund will hold a majority stake or exercise full control over each asset.

E) Proportion of Investments

The Fund's entire asset allocation will consist of sustainable investments pursuing either environmental objectives aligned with the EU Taxonomy or a social objective.

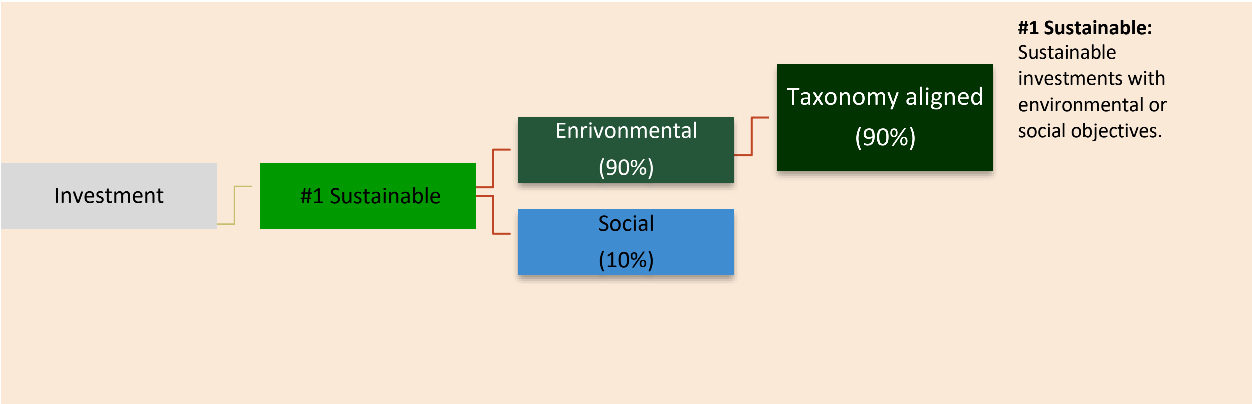
The Fund will invest directly in assets focused exclusively on the generation, distribution, and storage of renewable energy, as well as telecommunications solutions (such as 5G network infrastructure). Among the various green energy technologies considered, the Fund may also invest in assets that generate energy from biogas and other circular economy solutions.

For the majority of investments, the underlying activities can be classified as transitional activities (renewable energy), while a smaller residual portion relates to enabling activities (telecommunications). Accordingly, these investments:

- Make a substantial contribution to climate change mitigation;
- Do not significantly harm any of the environmental objectives set out in Article 9 of the EU Taxonomy Regulation;
- Comply with the applicable technical screening criteria.

In addition, compliance with the minimum safeguards requirements is assessed during both the pre-investment and asset management phases to verify their effective implementation by the investee activities.

However, due to the Fund's investment strategy and the nature of its investment operations, cash and cash-equivalent instruments may be held on an ancillary basis for liquidity management and hedging purposes. Such holdings are not intended to contribute to the achievement of the Fund's sustainable investment objectives.



F) Monitoring of the Sustainable Investment Objective

As described in section "D) Investment Strategy", the Fund monitors ESG data relevant to its performance indicators through a dedicated ESG tool, the results of which are shared with the Fund Manager for review by the ESG Manager and the ESG Committee. The data management system aggregates information from both the ESG monitoring tool and the dedicated technical office (the "control room") responsible for overseeing all infrastructure assets, ensuring that data is collected effectively and appropriately for disclosure purposes and for measuring the Fund's contribution to its sustainable investment objectives.

G) Methodologies

The investable universe is structured so that investment projects contribute to accelerating the energy and digital transitions. The selection of performance indicators used to measure the achievement of the sustainable investment objective takes into account the differences among technologies and the nature of the positive impact generated. External ESG consultants support the Fund in this process and in the implementation of ESG tools and methodologies.

The overall sustainable investment objective may be considered achieved when all portfolio infrastructure assets are fully operational and their positive impact can be effectively measured.

H) Data Sources and Processing

The information and data relating to performance indicators are sourced directly from the Fund's control room, which collects data from all portfolio infrastructure assets. Internal control and management systems ensure the availability and quality of the data used by the ESG monitoring tool.

The Fund's full control over each asset ensures data availability and minimizes the need for estimations.

I) Limitations of Methodologies and Data

The Fund exercises complete control over each asset in its portfolio. As a result, data availability is ensured and no material limitations to the methodology are anticipated.

J) Due Diligence

For each investment project, the Fund assesses the relevant ESG aspects in order to evaluate:

- Compliance with the Green Arrow Capital SGR S.p.A. Policy;
- Suitability with respect to the Fund's sustainable investment objective;

- Potential risks arising from external factors (e.g., geographic location);
- The adoption of sound governance practices (where applicable).

External experts may be appointed to perform technical due diligence activities. The results of the preliminary assessment are shared with the ESG Manager and the Manager's ESG Committee, which are responsible for overseeing the entire due diligence process and approving the investment project.

K) Engagement Policies

The Fund does not consider engagement activities to be a material component of its investment strategy, given the nature of the strategy and the direct control exercised by the Fund over each portfolio investment.

Nevertheless, the Fund's general approach towards external suppliers, business partners, and contractors includes the promotion and sharing of the Fund's sustainability principles and objectives.

L) Attainment of the Sustainable Investment Objective

This section is not applicable because:

- No specific index has been designated as a reference benchmark for the attainment of the sustainable investment objective; and
- The Fund does not pursue a carbon emissions reduction objective.

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