SFDR Compliance

Article 4 - Statement on Principal Adverse Impacts of investment decisions on sustainable factors

Revaia considers principal adverse impacts (PAI) of its investment decisions on sustainability factors.

This document represents our response to Article 4 of the Disclosure Regulation and sets out how the principal adverse sustainability impacts are identified, prioritised and considered in Revaia's investments.

The scope of this document includes all funds managed by Revaia.

A. Summary

As part of its responsible investment policy, Revaia has identified several negative impacts related to our activities on sustainability factors.

This list is in line with the mandatory sustainability indicators published by the European authorities under the SFDR. The following description of negative impacts covers the 14 mandatory indicators and includes two additional indicators.

Among the negative impacts addressed in this document, two main themes stand out:

- Negative impacts related to environmental and climate challenges.
- Negative impacts related to social issues, such as human resources practices, respect for human rights and diversity.

The data presented in this report has been collected from Revaia's investee companies.

B. Revaia's consolidated report on Principal Adverse Impacts

Adverse sustainability indicator		Metric	Unit	Value 2024	Value 2023	Scope Answered (%)	Scope Answered Weighted (%)	Actions Items
CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS								
Greenhouse gas emissions	1. GHG emissions	Scope 1 GHG emissions	tCO2e	9,17	64,74	47.06	46.11	Conduct annual carbon footprint assessments for all portfolio companies. Implement carbon reduction roadmaps with short- and long-term targets aligned with the Paris Agreement. Promote the use of renewable energy and energy efficiency programs.
		Scope 2 GHG emissions	tCO2e	2139,89	47,57	41.18	41.96	
		From 1 January 2023, Scope 3 GHG emissions	tCO2e	139292,27	3223,29	41.18	38.3	
		Total GHG emissions	tCO2e	141441,32	3335,6	52.94	54.02	
	2. Carbon footprint	Carbon footprint	tCO2e/M€	602,14	11,66	52.94	54.02	Require portfolio companies to track and publicly disclose their carbon footprint. Develop a sustainability training program for executives and employees. Encourage the adoption of low-carbon technologies and processes.
	3. GHG intensity of investee companies	GHG intensity of investee companies	tCO2e/M€	5345,65	164,44	47.06	53.52	Set clear GHG intensity reduction targets for each company. Support companies in developing internal carbon pricing mechanisms. Introduce green incentives such as linking executive compensation to emissions reduction.
	4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	%	0	0	5.88	10.68	Maintain our exclusion policy to avoid investments in companies heavily involved in fossil fuels.
Energy	5. Share of non-renewable energy consumption and production	Share of non-renewable energy consumption and non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources,	%	74,57	86,36	23.53	17.23	Support portfolio companies to transition to 100% renewable energy targets. Provide expertise for transitioning to renewable energy. Introduce mandatory energy audits for high-energy-consuming companies.

		expressed as share of total energy intensity						
		Share of non-renewable energy consumption of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage	%	74,57	86,36	23.53	17.23	
		Share of non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage	%		100			
	6. Energy consumption intensity per high impact climate sector	Energy consumption in MWh per million EUR of revenue of investee companies, per high impact climate sector	GWh/€M	0	0	17.65	16.72	
		A - Agriculture, forestry and fishing	GWh/€M	0		82.35	90.23	
		B - Mining and quarrying	GWh/€M	0		82.35	90.23	
		C - Manufacturing	GWh/€M	0		82.35	90.23	
		D - Electricity, gas, steam and air conditioning supply	GWh/€M	0		82.35	90.23	
		E - Water supply; sewerage; waste management and remediation activities	GWh/€M	0		82.35	90.23	
		F - Construction	GWh/€M	0		82.35	90.23	
		G - Wholesale and retail trade; repair of motor vehicles and motorcycles	GWh/€M	0		82.35	90.23	
		H - Transporting and storage	GWh/€M	0		88.24	93.99	
		L - Real estate activities	GWh/€M	0		82.35	90.23	
Biodiversity	7. Activities negatively affecting biodiversity-sensitive areas	Share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas	%	0	0			Conduct biodiversity impact assessments before investment. Ensure investees have policies to minimize land use impact and deforestation.
Water	8. Emissions to water	Tonnes of emissions to water generated by investee companies	ton/€M	0	0			Ensure companies have policies to implement water efficiency strategies and pollution control measures.

		per million EUR invested, expressed as a weighted average						
Waste	9. Hazardous waste ratio	Tonnes of hazardous waste generated by investee companies per million EUR invested, expressed as a weighted average	ton/€M	0	0			Encourage waste reduction, recycling, and safe disposal practices.

SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS								
Social and employee matters	10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	%	0	0	100	100	Implement a due diligence framework for compliance monitoring. Require annual sustainability reporting from all portfolio companies. Ensure companies establish whistleblower mechanisms and ethics training programs.
	11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance /complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	%	88,74	0	94.12	93.56	Ensure that all companies implement compliance mechanisms such as grievance channels. Provide ESG training and resources to help companies meet international guidelines. Regularly audit compliance efforts and enforce corrective actions.
	12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	%	9.4	8,73	82.35	84.06	Require companies to conduct annual gender pay gap audits. Set gender pay equity targets and corrective action plans. Promote equal career advancement opportunities and parental leave policies.
	13. Board gender diversity	Average ratio of female to male board members in investee companies	%	29	79,19	76.47	84.25	Set a target of at least 40% female representation on boards. Provide mentorship programs to promote female leadership. Require diversity and inclusion policies for all investees.
	14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	Share of investments in investee companies involved in the manufacture or selling of controversial weapons	%	0	0			Maintain strict exclusion policies for investments in companies producing controversial weapons.

ADDITIONAL INDICATORS								
Emissions	4. Investments in companies without carbon emission reduction initiatives	Share of investments in investee companies without carbon reduction emission initiatives aimed at aligning with the Paris Agreement.	%	100		100	100	Require carbon reduction plans aligned with paris Agreement Targets for all companies without existing initiatives. Provide financial and technical support for companies to set and achieve carbon reduction goals.
Social and employee matters	4. Lack of a supplier code of conduct	Share of investments in investee companies without any supplier code of conduct (against unsafe working conditions, precarious work, child labour and forced labour).	%	43		100	100	Ensure all investees have a supplier code of conduct that includes human rights and environmental criteria. Encourage responsible procurement practices and sustainable sourcing.