

**GENESTA NORDIC REAL ESTATE Fund III, FCP-RAIF****Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector, also referred to as the Sustainable Finance Disclosure Regulation ("SFDR")**

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Genesta Nordic Capital Fund Management S.à r.l. ("**Genesta**"), a Luxembourg alternative investment fund manager, makes the following disclosures in accordance with Article 10 of the SFDR.

**SUSTANABILITY-RELATED DISCLOSURES – SFDR ARTICLE 10**

According to Article 10 of the SFDR, financial market participants shall publish and maintain information for each financial product on their websites.

**Summary**

Genesta Nordic Real Estate Fund III, FCP-RAIF (the "**Fund**") qualifies as a financial product as referred to in Article 8 of the SFDR given that it promotes environmental and social characteristics.

**No sustainable investment objective**

The Fund promotes environmental or social characteristics, but does not have as its objective sustainable investment.

**Environmental or social characteristics of the financial product**

The environmental characteristics promoted by the Fund for the underlying real estate assets are addressed through the following topics: alignment with Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation EUR 2019/2088 ("**EU Taxonomy**"), net-zero carbon targets, active property renovation strategies to increase energy efficiency and to mitigate climate risks and circular economy. The social characteristics promoted by the Fund for the underlying real estate assets are addressed through community, supplier and tenant engagement efforts.

**Investment strategy**

The Fund promotes environmental and social characteristics, and a reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the Fund. The characteristics promoted by the Fund will be measured according to the sustainability indicators in the tables below for (i) environmental targets, (ii) social engagement targets and (iii) governance targets. Such indicators will be measured for real estate assets except for such real estate assets pertaining to the residential sector and, hence, where reference is made to real estate assets in the tables below such reference is to be understood accordingly. The Fund may in its discretion implement measures indicated in the tables below for real estate assets pertaining to the residential sector where such implementation is considered feasible.

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(i) Environmental targets

Topic	Description	Target at Disposal of Real Estate Asset (unless other timeline is stated)	Measurement
EU Taxonomy	<p>The EU Taxonomy is a classification system for sustainable economic activities. Buying real estate and exercising ownership of that real estate is an EU Taxonomy eligible activity. In order to substantially contribute to the mitigation of climate change, real estate owners have to fulfill the technical screening criteria outlined in the Climate Delegated Act Annex 1 – Mitigation, 7.7 and as part of the “do no significant harm” test screen the activity for potential physical climate risks to define mitigation plans for possible identified risks.</p>	<p>100% of real estate assets (based on market value) will undergo a gap analysis and an alignment action plan will be established to define measures in the real estate assets’ business plans to address any gaps to achieve alignment with the EU Taxonomy. For new acquisitions, this will be established within 4 months after acquisition.</p>	<p>Percentage of real estate assets (based on market value) for which a long-term action plan to align with the EU Taxonomy has been established.</p>
Net-zero carbon	<p>Genesta will apply the concepts of the Science-Based Target initiative (“<b>SBTi</b>”) as a target setting method with a view to the Fund’s portfolio. The SBTi targets are Paris aligned and represent a leading and highly credible standard for carbon reduction ambitions guiding the way to net-zero</p> <p>Onsite energy production shall be a priority for all real estate assets.</p> <p>When onsite renewable energy production is not feasible to eliminate residual emissions, the investment into offsite wind and solar power under the principle of additionality (additional wind and solar power generation and produced in Northern Europe) shall be implemented when regulatorily possible into the Fund’s portfolio (requires change to Fund documentation).</p>	<ol style="list-style-type: none"> <li>1) For 100% of real estate assets (based on market value) (and for new real estate assets within 4 months of ownership) a Carbon Risk Real Estate Monitor (“<b>CRREM</b>”) pathway will be established.</li> <li>2) For 100% of real estate assets (based on market value) (and for new real estate assets within 4 months of ownership) feasibility studies for renewable energy installation will be undertaken and measures derived from such feasibility studies will be defined within such real estate assets’ business plans.</li> <li>3) Removal of 100% of fuel combustion boilers and furnaces from Real Estate Assets where feasible within 3 years of ownership to eliminate scope 1 emissions.</li> </ol>	<ol style="list-style-type: none"> <li>1) Percentage of real estate assets (based on market value) for which CRREM pathways are established.</li> <li>2) Percentage of real estate assets (based on market value) with feasibility studies for renewable energy installation undertaken and definition of measures derived from such feasibility studies within real estate assets’ business plans.</li> <li>3) Percentage of real estate assets (based on market value) which undergo assessments to identify (i) any fuel combustion boilers or furnaces and (ii) feasible measure for their removal.</li> </ol>
Active property renovation strategy to increase energy efficiency and to mitigate climate risks	<p>In recognition that renovation of the building stock is much more sustainable than new construction, the Fund shall actively renovate buildings within its CapEx and risk parameters.</p> <p>The Fund’s carbon management hierarchy prioritizes building efficiency with onsite and</p>	<p>For 100% of real estate assets (based on market value) energy audits will be completed to identify energy reduction plans and the relevant measure derived from such energy audits will be included in the real estate assets’ business plans where feasible.</p>	<p>Percentage of real estate assets (based on market value) with energy audits completed to identify energy reduction plans and the relevant measures derived from such energy audits included in the real estate assets’ business plan where feasible.</p>

Topic	Description	Target at Disposal of Real Estate Asset (unless other timeline is stated)	Measurement
	<p>offsite energy generation as a second priority.</p> <p>The renovations (e.g. window replacements and/or wall and roof insulations) will also address and mitigate climate risks.</p>		
Circular economy	<p>Construction materials have a big negative impact on the environment throughout their whole life cycle (from production to demolition) and should therefore be reduced.</p> <p>Waste from building operation should be reduced to the minimum according to the 4-R principle: refuse, reduce, reuse, recycle.</p>	<ol style="list-style-type: none"> <li>1) Standardized life cycle impact assessment ("LCA") analysis and implementation of new LCA guideline across 75 % of major renovations and new construction projects.</li> <li>2) Implementation of standardized waste management process that increases recycling rates for 100% of the real estate assets (based on market value).</li> </ol>	<ol style="list-style-type: none"> <li>1) Percentage of renovation and new construction projects following the LCA standardized process.</li> <li>2) Percentage of real estate assets (based on market value) with implemented standardized waste management process.</li> </ol>

(ii) Social engagement targets

Topic	Description	Target until disposal	Measurement
Community engagement	The Fund's real estate assets should be managed while supporting and enhancing the local community.	<ol style="list-style-type: none"> <li>1) For 100% of real estate assets (based on market value) an analysis will be conducted to identify local needs (e.g. walkability and liveability).</li> <li>2) Comprehensive community engagement program (as set out under "measurement") for 100% of real estate assets (based on market value) in the residential and retail sectors.</li> </ol>	<ol style="list-style-type: none"> <li>1) Percentage of real estate assets (based on market value) for which an analysis was conducted to determine local needs (e.g. walkability and liveability).</li> <li>2) Promotion of community engagement by the implementation of an individual community engagement program for a real estate asset requiring the implementation of at least one activity annually for one of the following topics depending on local needs and feasibility. Topics: <ul style="list-style-type: none"> <li>- Health &amp; well-being in the neighbourhood.</li> <li>- Biodiversity preservation &amp; recreational space.</li> <li>- Sponsoring of or partnerships with local charities and/or NGO's and/or hosting of ESG related events.</li> </ul> </li> </ol>
Supplier engagement	<p>The suppliers of the Fund must comply to minimum human rights standards: OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights ("<b>UNGPs</b>"), including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work ("<b>ILO Declaration</b>").</p> <p>Due diligences on human rights ("<b>HR DD</b>") based on the OECD Guidelines for Multinational Enterprises, the UNGPs (including (i) the principles and rights set out in the eight fundamental conventions</p>	<ol style="list-style-type: none"> <li>1) HRIAs will be conducted over 100 % of suppliers/service providers (incl. engagement mechanism for non-compliant suppliers).</li> <li>2) 100 % of supplier/service providers of the Fund will be subject to HR DD and Genesta will consider appropriate and feasible measures for 100% of non-compliant suppliers/service providers.</li> <li>3) For 100 % of the real estate assets (based on market value) a grievance mechanism aligned with the criteria of the UNGPs will be</li> </ol>	<ol style="list-style-type: none"> <li>1) Percentage of suppliers/service providers over which HRIAs have been conducted (incl. engagement mechanism for non-compliant suppliers).</li> <li>2) Percentage of supplier/service providers of the Fund will be subject to HR DD and Genesta will consider appropriate and feasible measures for 100% of non-compliant suppliers/service providers.</li> <li>3) Percentage of real estate assets (based on market value) for which a grievance mechanism is in place at the level of Genesta and</li> </ol>

Topic	Description	Target until disposal	Measurement
	<p>identified in ILO Declaration, (ii) the International Bill of Human Rights and (iii) the Human Rights Impact Assessment (“<b>HRIA</b>”) and grievance mechanism) will be implemented, in which suppliers will be considered.</p>	<p>available at the level of Genesta and accessible on Genesta’s website.</p>	<p>accessible on Genesta’s website.</p>
<p>Tenant engagement</p>	<p>A key element to the Fund’s social plan is the promotion of health &amp; well-being to tenants.</p>	<ol style="list-style-type: none"> <li>1) Targeted and individual tenant engagement program (as set out under “measurement”) for 100% of real estate assets (based on market value) in place.</li> <li>2) Genesta will undertake reasonable best efforts (with a view to data protection and other applicable laws, regulations and rules) to include in any new lease contract provisions relating to tenant space screens which provide information on present energy and wellbeing.</li> <li>3) For 100% of the real estate assets (based on market value) a grievance mechanism aligned with the criteria of the UNGPs will be available at the level of Genesta and accessible on Genesta’s website.</li> <li>4) Supply of healthy indoor air quality and healthy ambient noise meters according to Genesta’s metering policy (as amended from time to time), which applies to all assets managed by Genesta (including real estate assets of the Fund) and which sets out Genesta’s processes and requirements for the installation of meters in buildings and the collection of data via such meters with the aim to display such data to tenants (“<b>Genesta Metering Policy</b>”) in 50% of the real estate assets (based on market value).</li> </ol>	<ol style="list-style-type: none"> <li>1) Promotion of tenant engagement by implementation of an individual tenant engagement program for a real estate asset requiring the implementation of at least one activity annually for each of the following topics depending on local needs. Topics: <ul style="list-style-type: none"> <li>- Health &amp; well-being and/or recreational spaces (e.g. showers/locker rooms)</li> <li>- Commuting (e.g. bicycle parking)</li> </ul> </li> <li>2) Inclusion of provisions relating to tenant space screens in new lease contracts.</li> <li>3) Percentage of real estate assets (based on market value) for which a grievance mechanism is in place at the level of Genesta and accessible on Genesta’s website.</li> <li>4) Percentage of real estate assets (based on market value) with air quality and ambient noise measurement.</li> <li>5) Percentage of tenants provided with annual surveys on tenant satisfaction.</li> </ol>

Topic	Description	Target until disposal	Measurement
		5) 100% of tenants will be provided with annual survey on tenant satisfaction.	

(iii) Governance targets

Topic	Description	Target before Disposal of Real Estate Asset (unless other timeline is stated)	Measurement
Data management	For good decision-making high-quality data is needed. Smart buildings will help to facilitate (investment) decisions and lower resource consumption on building level.	<ol style="list-style-type: none"> <li>1) 100% of real estate assets (based on market value) connected to an intelligent environmental management platform which collects real-time building level energy data from Building Management Systems ("BMS") and Energy Management Systems ("EMS")</li> <li>2) 50% of real estate assets (based on market value) include meters according to Genesta Metering Policy (e.g. to measure air quality and ambient noise).</li> <li>3) Limited assurance of annual reported ESG data.</li> </ol>	<ol style="list-style-type: none"> <li>1) Percentage of real estate assets (based on market value) connected to the intelligent environmental management platform.</li> <li>2) Percentage of real estate assets (based on market value) in which meters are installed according to Genesta Metering Policy.</li> <li>3) Existence of a limited assurance report for the ESG data by a third-party service provider and provision of such limited assurance report to investors.</li> </ol>
ESG risk management	As risk mitigation measures can only be taken for identified risks, a solid ESG risk management shall be implemented into all Fund Management activities	<ol style="list-style-type: none"> <li>1) Conduct an ESG materiality assessment across all Fund related activities including the identification, likelihood and impact of risks.</li> <li>2) Implementation of a climate related risk management according to TCFD framework and implementation of ESG risk management in alignment with ISO 31000 and TCFD.</li> </ol>	<ol style="list-style-type: none"> <li>1) Existence of an ESG materiality assessment across all Fund related activities including the identification, likelihood and impact of risks.</li> <li>2) Implementation of two risk management streams (TCFD &amp; ISO).</li> </ol>
Transparency and communication	Reporting and certifications are the main components of a reliable and transparent ESG communication to investors, government authorities and other stakeholders. Independent third parties like certifiers and/or auditors shall provide additional credibility.	<ol style="list-style-type: none"> <li>1) Annual GRESB submissions, obtaining a 4-Star rating</li> <li>2) Publication of the annual ESG Report and UN PRI report including third party assured data, including the percentage of reduction in total and specific energy consumption and CO2 emissions, as well as the produced amount and ratio of renewable energy and information on TCFD.</li> <li>3) Providing ESG integrated quarterly reporting to investors.</li> <li>4) 70% of real estate assets (based on market value) shall be at least certified as "very good" by BREEAM.</li> </ol>	<ol style="list-style-type: none"> <li>1) GRESB &amp; UN PRI Score</li> <li>2) UN PRI &amp; annual ESG report &amp; TCFD report including data assurance and auditing.</li> <li>3) ESG integrated quarterly report.</li> <li>4) Percentage of real estate assets (based on market value) with a BREEAM certification of at least very good.</li> </ol>

Topic	Description	Target before Disposal of Real Estate Asset (unless other timeline is stated)	Measurement
Join relevant Network Initiatives.	Shaping the public policies, development the investment practices and support the corporate action required to address the long-term financial risks associated with climate change.	Minimum of one activity per year within any network initiative suitable to exchange best practices and to form thought leadership.	Number of activities per year within any network initiative suitable to exchange best practices and to form thought leadership.

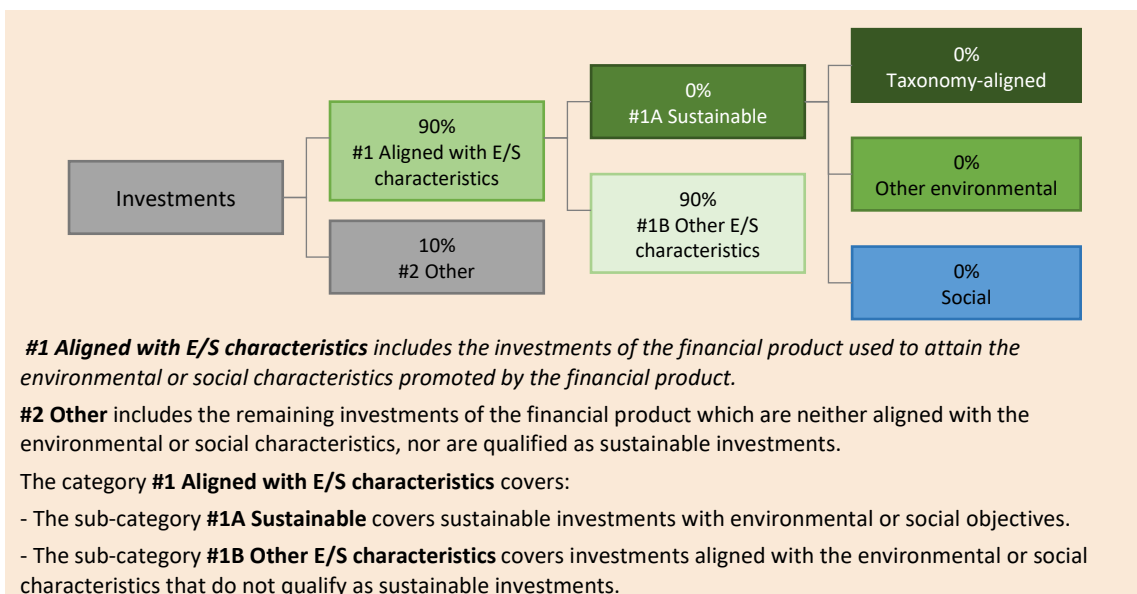
In accordance with its investment strategy, the Fund invests in real estate assets either directly or indirectly via real estate companies. In case of an indirect investment via a real estate company, given that such real estate companies do not have employees or substance, good governance checks are limited to annual audit of accounts, timely submission of income tax and VAT return, transfer pricing study and funding documentation.

When entering into contracts with third parties (e. g. tenants and third-party service providers), the Fund’s due diligence process includes an assessment of good governance practices, such as management structures, employee relations, staff remuneration, and tax compliance. Specifically, the Genesta Property Nordic AB (“**Investment Advisor**”) and Genesta have a due diligence process which provides guidance on the types of due diligence to be undertaken when acquiring a real estate asset and real estate company. For example, legal, tax, technical, ESG, health and safety due diligence etc. The Investment Advisor and Genesta conduct a fully risk, compliance, and conflict of interest assessment on the real estate companies as well.

### Proportion of investments

The Fund plans to allocate a minimum proportion of 90% of the investments to meet the environmental and social characteristics promoted by the Fund in accordance with the binding elements of the investment strategy (#1 in the illustration below). 0% of the investments will qualify as sustainable investments within the meaning of Article 2(17) of the SFDR (#1A in the illustration below).

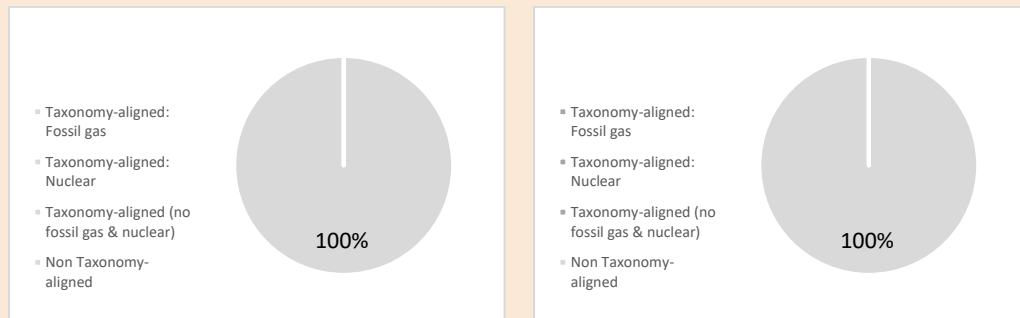
It is the intention of the Fund, that 90% of the investments are classified under #1B (investments aligned with the environmental or social characteristics that do not qualify as sustainable investments). The remaining proportion of the investments is expected to be 10% and would qualify as “#2 Other”.





- Promotion of the environmental or social characteristics through use of derivatives: Use of derivatives is limited only for hedging purposes, linked to the acquisition, disposal and the financing of real estate assets.
- Minimum extent of sustainable investments with an environmental objective aligned with the EU Taxonomy: The Fund has a minimum proportion of 0% of sustainable investments with an environmental objective aligned with the EU Taxonomy (Taxonomy-aligned in the pie chart below), i.e., investments within the meaning of “environmentally sustainable economic activities” as defined in Article 3 of the EU Taxonomy.
- Investments of the Fund in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy: The Fund does not invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy.

*The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.*



*\*For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures*

- Minimum share of investments in transitional and enabling activities: 0%
- Minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy: The Fund does not hold sustainable investments.
- Minimum share of socially sustainable investments: The Fund’s ESG policy contains social engagement targets but the Fund does not hold socially sustainable investments.
- Purpose and minimum environmental or social safeguards of investments that are not aligned with environmental or social characteristics (see “#2 Other” in the overview above): Investment included under “#2 Other” include cash and derivatives. Furthermore also certain real estate assets in the residential sector may be included under “#2 Other” unless a real estate assets pertaining to the residential sector is aligned with the environmental and social characteristics promoted by the Fund in which case such real estate asset pertaining to the residential sector would be included under “#1 Aligned with E/S characteristics”.

### Monitoring of environmental or social characteristics

Throughout the lifecycle of the Fund, the promoted environmental and social characteristics of the investments are monitored using the sustainability indicators set out in the tables above. According to Genesta’s responsible investment policy, the environmental and social characteristics are monitored during the acquisition phase through the due diligence processes, as well as the development and ownership phase, where risks are mitigated and an active monitoring of environmental key performance indicators (“KPIs”) are ensured.

Thus, the environmental and social characteristics are assessed on an on-going basis.

After the due diligence process with a view to ESG, Genesta's ESG managers, i.e. senior personnel responsible for overseeing Genesta's ESG targets, develop an ESG business plan for each of the new acquisitions which is in line with the Fund targets. The ESG business plan ensures that the assets are renovated and maintained in line with the environmental and social characteristics of the Fund.

The monitoring activities are conducted using internal and external control mechanisms. The internal control mechanisms include reports to Genesta and Genesta's ESG steering committee. Specifically, the ESG managers are responsible to review the business plan and report progress to Genesta and Genesta's ESG steering committee once a year. The external control mechanisms include an independent assurance program provided by a third-party ESG specialist. Specifically, environmental and social KPIs are reported in the quarterly and annual sustainability reports and assured by the independent assurance program.

### **Methodologies for environmental or social characteristics**

The Fund uses the sustainability indicators and measurements set out in the tables above to measure how the promoted social and environmental characteristics of the Fund are met.

### **Data sources and processing**

The data sources used to attain each of the environmental or social characteristics promoted by the financial product include, but are not limited to, the following:

- Energy Bills;
- Waste hauler bills and statistics;
- Water bills;
- Meter readings (preferred automated readings; if not available, manual readings);
- On-site inspections; and
- Market and location-based emission factors.

To ensure data quality plausibility checks are run regularly within the quarterly data collection process. Plausibility checks are being performed for all data points, discrepancies are being discussed with the data owner and corrected. Outliers are marked and explained with e.g. a footnote in reports and other publications, if applicable. The data are collected by the property managers and processed by an external ESG consultant.

The data for 2022 will be partially estimated given that such data is in the process of being collected, e.g. from tenants.

### **Limitations to methodologies and data**

Information obtained from third parties is accepted at face value; Genesta believes this information to be reliable but does not guarantee its accuracy.

#### Limitations to environmental KPIs:

- Effects on energy efficiency are when available calculated on absolute consumption. Where absolute data is not available, the calculations represent theoretical models based on the EPC calculations and the information available from the valid EPCs.
- To use absolute data, data has to be made available by the previous owner or energy provider and/or by tenants.
- Limited tenant data: tenant data might not be available as tenant's contracts and meters are handled separately.

Limitations to social data: Information obtained from suppliers and subcontractors has been

accepted at face value; Genesta believes this information to be reliable but does not guarantee its accuracy.

As stated above, the data is only partially available to date and, hence, will partially be estimated. However, given that such estimation is used to assess KPIs, the Fund should nevertheless be able to use such data when assessing its environmental or social objectives.

### **Due diligence**

The due diligence carried out on the underlying assets of the Fund is staggered into three distinct stages:

1. pre-due diligence (pre-DD), when initial ESG screening is considered,
2. due diligence (including due diligence on ESG factors),
3. post-due diligence (final approval) when due diligence results and any post-acquisition measures/underwriting are considered.

During the investment selection process, the findings of the due diligence screening and analysis are considered. After the investment selection process, the Fund's approach is to complete the following activities:

- Definition of technical & environmental status and impacts;
- Identify and review relevant climate stress factors and their economic impacts;
- Identifying key areas for development and value creation; and
- Develop a business plan for the whole owning period.

Control mechanisms are incorporated throughout the due diligence process. The internal controls are outlined more fully above. The external controls include reviews performed by third-party ESG specialists.

### **Engagement policies**

The Fund employs engagement policies as set forth above in the section outlining environmental and social characteristics of the financial product.

### **Designated reference benchmark**

The Fund does not designate a reference benchmark in the meaning of SFDR but relies on the GRESB as a benchmark. GRESB has been designated for the purpose of attaining the environmental or social characteristics promoted by the Fund. GRESB is aligned with the characteristics promoted by the Fund, as GRESB takes multiple ESG dimensions into account, while cross references to standards like the UN SDG's or TCFD ensure a holistic approach.

Insight into the GRESB process can be found here: <https://www.gresb.com/nl-en/real-estate-assessment/>.

Detailed information on how data is validated and scored can be found here: [https://documents.gresb.com/generated\\_files/real\\_estate/2022/real\\_estate/scoring\\_document/complete.html](https://documents.gresb.com/generated_files/real_estate/2022/real_estate/scoring_document/complete.html).

**REVIEW OF DISCLOSURES – SFDR ARTICLE 12**

According to Article 12 of the SFDR, the website disclosure in Article 10 of the SFDR shall be kept up to date and a clear explanation of any amendments shall be published.

<b>Date of review</b>	<b>Version no.</b>	<b>Description of amendment</b>
December 2022	1	Original version of the Fund's SFDR disclosure
April 2023	2	Additional comment that the designated reference benchmark is not a reference benchmark in the meaning of the SFDR

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