NATAM MANAGEMENT COMPANY

NEW MILLENNIUM
SOCIÉTÉ D'INVESTISSEMENT À CAPITAL VARIABLE

Key Information Document

Purpose

This document provides you with key information about this investment product. It is not marketing material. The information is required by law to help you understand the nature, risks, costs, potential gains and losses of this product and to help you compare it with other products.

Product

PIR Azionario Mid-Small Cap Sistema Italia a sub-fund of New Millennium Sicav

Class I Capitalisation EUR
ISIN: LU1602468636

The SICAV is authorised in Luxembourg.
Management Company: Natam Management Company S. A. ("Natam"), belonging to Banca Finnat Group
Contact details: Tel +352 28 80 91 Websites: www.natam.lu and www.newmillenniumsicav.com
The Commission de Surveillance du Secteur Financier (CSSF) is responsible for supervising Natam in relation to this Key Information Document.
The Management Company is authorised in Luxembourg and supervised by the CSSF.

This document is accurate as at 1 October 2026

What is this product?

Type
The SICAV is a Luxembourg Investment company subject to the provisions of Part I of the Law of 17 December 2010, relating to undertakings for collective investment in transferable securities (UCITS).

Term
There is no maturity date. The SICAV has been established for an unlimited period of time. Natam may terminate the SICAV and the Sub-Funds early, following the procedures described in §23 and §24 of the Prospectus.

Objectives
Investment objective The aim of the Sub-Fund is to achieve medium/ long term capital appreciation through an exposure to equity markets, also taking into account the need to promote environmental social and governance characteristics on the investments (ESG factors), mitigating the relevant sustainability risk, and through a focus on the real economy and on the growth of the Italian entrepreneurial system.

Investment policies The Sub-Fund's units are included among eligible investments held in a "Piano Individuale di Risparmio a lungo termine" ("PIR") under the Italian 2017 Budget Law (Law No 232 of 11 December 2016) and subsequent amendments, including the Italian 2022 Budget Law (No 234 of 30 December 2021).
The Sub-Fund is an equity fund characterized by a broad diversification primarily in small and medium-sized capitalization stocks. Investment in Special Purpose Acquisition Companies ("SPACs") is allowed up to 5% of the net assets and only if they qualify as transferable securities.
The Sub -Fund invests at least 70% of the portfolio in financial instruments issued by companies resident in Italy, or in an EU or EEA Member State and have a permanent establishment in Italy. At least 25% of the qualified investments, (17,5% of the fund's total net assets), shall be issued by companies not listed in the FTSE MIB index or in any other equivalent indices. At least 5% of the qualified investments, (3,5% of the sub fund's total net assets), shall be issued by companies not listed in the FTSE MIB and on the FTSE Mid Cap index or in any other equivalent indices of regulated markets. Investments in financial instruments issued by medium-small size issuers is allowed up to 40% if the issuers capitalization is below 1 Bio EUR and up to 20% if their capitalization is under 300 Mio EUR. Up to 30% of the total net assets can be invested in: Governative and supranational money market instruments and bonds, issued mainly by EU or G8 countries; equity and debt financial instruments issued by not Italian Issuers, nor issuers with a permanent establishment in Italy; units of UCITS and/or UCIs with investment policies consistent with those of the sub-fund (no more than 10% of the assets).
Investment in convertible bonds cannot exceed 10% of the assets. The Sub-Fund may hold ancillary liquid assets, including cash and cash equivalents.
Derivatives, which are financial contracts whose value depends on the market price of a reference asset, can only be used for hedging purposes.

The "ESG features", according to art.8 of EU Regulation 2019/2088, are implemented through a two-level approach:

1. an average portfolio ESG rating, determined as described in the Paragraph Disclosure on "ESG integration" practices of the Prospectus, which will be equal or over the quarterly weighted average ESG rating of a specific synthetic index indicated in the Appendix of the Sub-Fund

2. a set of specific restrictions and investment limits identified to promote sustainable investments.

Benchmark 95% Bloomberg Italy Small Cap Net Return Index (ITSCNL) + 5% Compounded €STR Index (ESTCINDX Index)

Benchmark uses Discretion is allowed with respect to the benchmark. The Investment manager may invest in financial instruments not included in the benchmark, in order to take advantage of specific investment opportunities. This active management approach may involve a deviation from the benchmark that can be significant.
The Sub-Fund is not intended to track the benchmark.

Redemption and Dealing Investors may redeem their shares on any business day for Luxembourg banks. They can also switch some or all their shares in those of another Sub-Fund and/or Class (with the exception of Class "L") within the SICAV without paying any extra fee.

Distribution Policy All income is, normally, reinvested.

Intended retail investor
This share class is intended for Institutional investors only, with a long-term investment horizon and having preference for products complying with the ESG factors.

Practical information
Depositary The SICAV depositary is State Street Bank International GmbH, Luxembourg branch.

Further information A copy of the Prospectus, the latest annual and semiannual financial report of New Millennium are available free of charge in English and Italian on the websites www.natam.lu, www.newmillenniumsicav.com and at the registered office of the Fund (17, Boulevard de Kockelscheuer, L-1821 Luxembourg). Also the latest Net Asset Value per share are published on www.natam.lu and www.newmillenniumsicav.com
The information contained in this document is specific to PIR Azionario Mid-Small Cap Sistema Italia. However, the Prospectus, annual and half-yearly reports are prepared for the SICAV as a whole.
The SICAV consists of separate Sub-Funds with segregated liabilities. This means that the assets of a Sub-Fund will not be available to meet the claims of a creditor made against another Sub-Fund.

What are the risks and what could I get in return?

Risks



The risk indicator assumes you keep the product for 5 years.

The summary risk indicator is a guide to the level of risk of this product compared to other products. It shows how likely it is that the product will lose money because of movements in the markets or because we are not able to pay you.

We have classified this product as 4 out of 7, which is a medium risk class.

This means that potential losses due to the future performance of the product are rated a medium level and that adverse market conditions could affect the sub-fund's ability to return the initial capital.

This product does not include any protection from future market performance so you could lose part or all your investment. The significant risks not detected by the synthetic indicator, are detailed in the "Main risk factors" section of the relevant Sub-Fund Appendix of the Prospectus.

Performance scenarios

The figures shown include all the costs of the product itself, but may not include all the costs that you pay to your advisor or distributor. The figures do not take into account your personal tax situation, which may also affect how much you get back.

What you will get from this product depends on future market performance. Market developments in the future are uncertain and cannot be accurately predicted.

The unfavourable, moderate, and favourable scenarios shown are illustrations using the worst, average, and best performance of the product over the last 10 years. Markets could develop very differently in the future.

The stress scenario shows what you might get back in extreme market circumstances.

Unfavourable: this type of scenario occurred for an investment based on the performance of the reference benchmark: 95% Bloomberg Italy Small Cap Net Return Index (ITSCNL) + 5% Compounded €STR Index (ESTCINDX Index) backfilled with EONIA between September 2017 and September 2022.

Moderate: this type of scenario occurred for an investment based on the performance of the reference benchmark: 95% Bloomberg Italy Small Cap Net Return Index (ITSCNL) + 5% Compounded €STR Index (ESTCINDX Index) backfilled with EONIA between December 2018 and December 2023.

Favourable: this type of scenario occurred for an investment based on the performance of the reference benchmark: 95% Bloomberg Italy Small Cap Net Return Index (ITSCNL) + 5% Compounded €STR Index (ESTCINDX Index) backfilled with EONIA between October 2020 and October 2025.

Recommended holding period		**5 years**	
Example Investment		**10,000 EUR**	
Scenarios		**if you exit after 1 year**	**if you exit after 5 years** (recommended holding period)
Minimum	**There is no minimum guaranteed return. You could lose some or all of your investment.**		
Stress	**What you might get back after costs** Average return each year	**3,640 EUR** -63.6%	**3,070 EUR** -21.1%
Unfavourable	**What you might get back after costs** Average return each year	**7,520 EUR** -24.8%	**9,370 EUR** -1.3%
Moderate	**What you might get back after costs** Average return each year	**12,000 EUR** 20.0%	**17,200 EUR** 11.5%
Favourable	**What you might get back after costs** Average return each year	**15,910 EUR** 59.1%	**28,910 EUR** 23.7%

What happens if NATAM Management Company S.A. is unable to pay out?

In the event of Natam's insolvency, the assets of the SICAV will not be affected. The assets of the SICAV are held in safekeeping by the Depositary, that is required by law to segregate its own assets from the assets of the Sicav.

If the fund is not able to pay you out what is due, you may lose your entire investment. Losses are not covered by an investor's compensation or guaranteed scheme.

What are the costs?

The person advising on or selling you this product may charge you other costs. If so, this person will provide you with information about these costs and how they affect your investment.

Costs over time

The tables show the amounts that are taken from your investment to cover different types of costs. These amounts depend on how much you invest, how long you hold the product. The amounts shown here are illustrations based on an example investment amount and different possible investment periods.

We have assumed:

- in the first year you would get back the amount that you invested (0% annual return). For the other holding periods we have assumed the product performs as shown in the moderate scenario,
- 10,000 EUR is invested.

Example Investment 10,000 EUR	if you exit after 1 year	if you exit after 5 years (recommended holding period)
Total Costs	**375 EUR**	**1,876 EUR**
Annual cost impact*	**3.9%**	**4.3% each year**

(*) This illustrates how costs reduce your return each year over the holding period. For example it shows that if you exit at the recommended holding period your average return per year is projected to be 15.8% before costs and 11.5% after costs.

Composition of costs

One-off costs upon entry or exit		Annual cost impact if you exit after 1 year
Entry costs	**0.00%**, we do not charge an entry fee.	**0 EUR**
Exit costs	**0.00%**, we do not charge an exit fee for this product, but the person selling you the product may do so.	**0 EUR**
Ongoing costs taken each year		**Annual cost impact if you exit after 1 year**
Management fees and other administrative or operating costs	**2.36%** This is an estimate based on actual costs borne by the Sub-Fund over the last year. It does not include performance fees.	**236 EUR**
Transaction costs	**1.32%** This is an estimate of the costs incurred when we buy and sell the underlying investments for the product.	**132 EUR**
Incidental costs taken under specific conditions		**Annual cost impact if you exit after 1 year**
Performance fees	**0.07%** The performance fee rate is 20% of the positive returns the Sub-Fund achieves, if above HWM, over the benchmark in the calendar year. The aggregated cost estimation above includes the average over the last 5 years	**7 EUR**

How long should I hold it and can I take money out early?

Recommended holding period: 5 years

The Recommended holding period (RHP) is 5 years but investors can request the redemption of their shares on any business day for Luxembourg banks without paying any redemption fee. The RHP has been selected on the basis of a quantitative and qualitive analysis considering the strategy, fees, risk profile of the product and fiscal reasons.

Please note that the expected return is, anyway, not guaranteed.

How can I complain?

If you have a complaint about the Sub-Fund, you can contact Natam Management Company S.A., 11 rue Béatrix de Bourbon – L-1225 Luxembourg, Fax +352 28 80 91 91 or write an e-mail to info@natam.lu
You can find more details about how to complain in the "Complaints Handling Policy" in the "Documents" section of the website www.natam.lu
If you have a complaint about the person who advised you about this product, or who sold it to you, they will tell you where to complain.

Other relevant information

The delegated Investment Manager of the Sub-Fund is Banca Finnat Euramerica S.p.A.
The representative and paying agent in Switzerland is State Street Bank International GmbH, Munich, Zurich Branch, Kalanderplatz 5, Postfach, 8027 Zürich.

You can receive additional information about this product, including but not limited to the investor disclosure document, the latest annual report and any subsequent half yearly report, the latest price of the shares from NATAM Management Company S.A., 11 rue Béatrix de Bourbon – L-1225 Luxembourg, e-mail address: info@natam.lu They are available free of charge in English and Italian. You can find the latest version on the website www.newmillenniumsicav.com and www.natam.lu

Performance scenarios Monthly performance scenarios are available on the website www.newmillenniumsicav.com in the "Doc. Legali, Marketing, ESG" section.

Past performance Past performance of the last 10 years (if available for 10 years), can be downloaded from the website www.newmillenniumsicav.com in the "Doc. Legali, Marketing, ESG" beside each single KID.