

Annex 1

ANIMA GLOBAL EQUITY VALUE

Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

ANIMA Global Equity Value

LEI: 21380077NJPWJCMRZ997

Environmental and/or social characteristics

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Does this financial product have a sustainable investment objective?**

Yes   No

<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective: ___%</b> <input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	<input checked="" type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 21% of sustainable investments: <input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy <input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy <input checked="" type="checkbox"/> with a social objective
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: ___%</b>	<input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>



**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

## **What environmental and/or social characteristics are promoted by this financial product?**

*This financial product promotes both the preservation of the environment and natural resources, and fair work conditions, democracy and human and social rights on the social side, as pursued by government issuers. From a corporate point of view, this financial product promotes also the following environmental and social characteristics:*

- *the fight against climate change;*
- *the respect of human rights;*
- *the protection of human health;*
- *the protection of human well-being.*

*The promotion of the above environmental and social characteristics are evaluated by the Manager based on the analysis carried out by specialised third party ESG data providers.*

*Further elements of the financial product's ESG strategy are described in the "Asset Allocation" sections below.*

## ● **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

*The sustainability indicators used by this financial product are:*

- *the exclusion of corporate issuers involved in the production of thermal coal which accounts for more than 30% of their revenues, for the fight against climate change;*
- *the exclusion of:*
  - *corporate issuers involved in the production of controversial weapons, which include anti-personnel land mines, cluster munitions, biological, chemical, blinding weapons, white phosphorus, nuclear armaments and which have mostly been banned by UN treaties;*
  - *countries sanctioned at the central government level by the UN for systematic violations of human rights;*

*for the respect of human rights;*

- *the exclusion of issuers involved in the production of tobacco, for the protection of human health;*

- the exclusion of corporate issuers involved in the gambling sector, for the protection of human well-being.

● **What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?**

As mentioned above, although the financial product does not have a sustainable objective, it will invest a minimum of 21% of its NAV in issuers defined as “SFDR” sustainable according to an internal algorithm of the Manager. This algorithm provides that issuers are considered sustainable if they:

- comply with the exclusion criteria mentioned in the “Investment Strategy” section further below;
- pass the DNSH test, described in the following section;
- pass a Good Governance test, which is set at the level of 25 out 100 for their G score;
- pass a general E and S test, which is set at the level of 25 out 100 for their E and S scores;
- contribute positively to at least one of the following three areas: Climate Transition, Environment or Society. Positive contribution is measured on the basis of issuers’ involvement in certain initiatives or on the basis of best-in-class criteria related to specific environmental and/or social factors.”

● **How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?**

The assessment that issuers considered to be sustainable do not cause significant harm to other sustainable investment objectives is carried out on the basis of the Do No Significant Harm test (DNSH, developed internally by the Manager), which, in line with regulatory recommendations, is based on the mandatory Principal Indicators of Adverse Impact (PAI, see the RTS to the SFDR). In particular, investments are considered to cause significant harm when they involve issuers that:

- do not publish data on Carbon Footprint, Carbon Intensity and Board Gender Diversity;
- are involved in the fossil fuels sector or the controversial weapons sector;

- *are involved in very severe controversies related to compliance with the UN Global Compact and OECD requirements for multinational companies;*
- *exceed strict threshold values (specifically identified by the Manager based on a diversified sample of issuers worldwide) for any of the following PAI indicators: 2\*, 3\*, 5, 6\*, 8, 9, 12 and 13;*
- *exceed critical thresholds (specifically identified by the Manager based on a diversified sample of issuers worldwide) for at least 4 of the following PAI indicators: 2\*, 3\*, 5, 6\*, 7, 8, 9, 10, 11, 12 and 13.*

*Note \*: it should be noted that, for the purposes of the DNSH test, absolute GHG emissions levels (PAI 1) are used to calculate PAIs 2 and 3; also, Carbon Footprint and GHG Intensity are calculated taking into account only Scope 1 and 2 emissions. It should also be noted that PAI 6 currently takes into account the sectoral classification provided by the provider Refinitiv as a proxy for the NACE classification required by the regulations.*

● ***How have the indicators for adverse impacts on sustainability factors been taken into account?***

*Please refer to the preceding section.*

● ***How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?***

*The alignment of sustainable investments with the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights is pursued through several investment selection and management criteria, explained above and consistent with the aforementioned guidelines. In particular:*

- *exclusions relating to controversial weapons, which apply to all investments;*
- *exclusions based on the DNSH principle, applied through the definition of threshold levels on PAI indicators;*
- *inclusions based on the identification of positive contributions to climate, social or environmental objectives;*
- *exclusions of environmental or social ratings that fall into the worst quartile of the rankings based on the data provided by specialized third party providers;*
- *application to equity investments of the voting rights policy, based on the third party provider (ISS) model, which takes into account specific ESG factors and refers*

to guidelines consistent with sustainable business practices on the environment, fair treatment of labour, non-discriminatory policies and protection of human rights, framed in initiatives such as those of the United Nations Environment Programme Finance Initiative (UNEP FI), United Nations Principles for Responsible Investment (UNPRI), United Nations Global Compact, Global Reporting Initiative (GRI), Carbon Principles, International Labour Organisation Conventions (ILO), CERES Principles, Global Sullivan Principles, MacBride Principles and the European Union Directives on social and environmental issues.

*The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.*

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

*Any other sustainable investments must also not significantly harm any environmental or social objectives.*

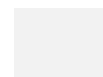
**Does this financial product consider principal adverse impacts on sustainability factors?**



**YES**

**X**

**NO**



**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

*Yes, the financial product considers the principal adverse impacts on sustainability factors.*

*In general, the consideration of PAIs is based on the contribution of certain mitigating factors, such as:*

- 1. value exclusions,*
- 2. exclusions/limitations resulting from investing in sustainable issuers according to the SFDR,*
- 3. the setting up of objectives for specific adverse impact indicators, chosen among those belonging to the Mandatory list in the RTS to the SFDR.*

*In particular:*

- 1) *from a value perspective, issuers involved in controversial weapons (connection to PAI 14), nuclear weapons, tobacco, gambling and thermal coal mining which accounts for more than 30% of revenues (connection to PAI 4) are excluded;*
- 2) *investment in at least 21% of the financial product's NAV in sustainable issuers ensures that these issuers, by construction, pass the Good Governance and general E and S tests (detailed in the "sustainable investment" sections above) and the DNSH test (which takes into consideration all the 14 mandatory PAI, detailed in the "sustainable investment" sections above) while contributing positively to climate, environmental and social topics;*
- 3) *objectives for specific mandatory adverse impact indicators:*
  - a. *PAI 4 (fossil fuels exposure): the adverse impact is mitigated through the limitation of the exposure to the fossil fuels sector, due to the exclusion of issuers with more than 30% of revenues from thermal coal mining.*
  - b. *PAI 14 (controversial weapons): the adverse impact is eliminated through the exclusion of issuers involved in controversial weapons.*
  - c. *PAI 16 (human rights violations): the adverse impact is mitigated through the exclusion of issuers sanctioned by the UN for human rights violations (see the "Strategy" sections below).*

*The consideration of PAIs is reported in the annual financial product report, as required by Art. 11(2) of the SFDR.*



### **What investment strategy does this financial product follow?**

*The financial product's ESG strategy is based on two pillars:*

1. *the promotion of certain environmental and social characteristics;*
2. *the limitation of investments in issuers with low ESG quality.*

*More specifically:*

1. *This financial product promotes in particular:*

- *the fight against climate change through the exclusion of corporate issuers involved in the production of thermal coal which accounts for more than 30% of their revenues;*
- *the respect of human rights, through the exclusion of:*
  - *corporate issuers involved in the production of controversial weapons, which include anti-personnel land mines, cluster munitions, biological, chemical,*

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.

*blinding weapons, white phosphorus, nuclear armaments and which have mostly been banned by UN treaties;*

➤ *countries sanctioned at the central government level by the UN for systematic violations of human rights;*

- *the protection of human health, through the exclusion of issuers involved in the production of tobacco;*

- *the protection of human well-being, through the exclusion of corporate issuers involved in the gambling sector.*

*The above exclusions are determined by the Manager based on the analysis carried out by specialized third party index and ESG data providers, in particular:*

- *Urgewald for thermal coal;*

- *Vigeo for controversial weapons;*

- *Sustainalytics for countries sanctioned by UN for systematic violations of human rights;*

- *MSCI, ICE-BofA indices for identifying issuers involved in tobacco and gambling.*

2. *The ESG quality of the financial product's portfolio is monitored by the Manager in order to avoid a high concentration of ESG lowly rated issuers in the financial product, where the concentration is taken into consideration in absolute terms (i.e. with reference to the net assets of the financial product) and not relative to the financial product's benchmark (i.e. not in relation to its composition in terms of ESG scores). In particular, issuers are selected by the Manager so that less than 10% of the financial product's net assets are invested in corporate or government issuers without an ESG Combined Score or with an ESG Combined Score below 25, on a scale from 0 to 100 (best).*

*Regarding the application of ESG scores for corporate or government issuers, the Manager uses scoring data of third party ESG data providers. In particular:*

- *Refinitiv provides ESG scores and ratings for corporates;*

- *Sustainalytics provides ESG scores, ratings and analyses for countries;*

*The overall ESG quality of the portfolio is monitored by the Manager on a continuous basis and issuers with an ESG Combined Score lower than 25 are evaluated at each quarterly meeting of the ESG Committee of the Manager.*

*The above exclusions and limitations do not apply to positions derived from investments in other collective investment schemes or in index derivatives.*

- **What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?**

The binding elements of the investment strategy in order to achieve the environmental and social characteristics promoted by this financial product are those described under the preceding Investment Strategy section.

- **What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?**

Not Applicable

- **What is the policy to assess good governance practices of the investee companies?**

When considering good governance practices, the Manager follows an internal process in order to monitor the governance (G) scores provided by a third party ESG data provider as far as directly owned issuers are concerned. Those G scores are calculated on the basis of 56 sub-indicators that relate to Management Quality (35), Attention to Shareholders (12) and CSR Strategy (9), which take into account specific factors such as: management structures, employee relations, remuneration of staff and tax compliance.

**Asset allocation** describes the share of investment in specific assets.

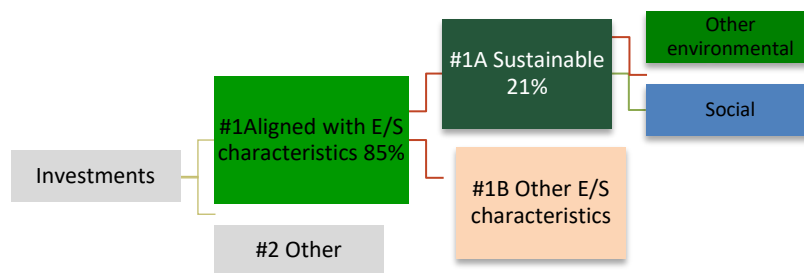
Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.



### What is the asset allocation planned for this financial product?

The financial product's strategic asset allocation is defined by its risk-return profile and implemented through the active investment in variable proportions.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.



*A minimum proportion of 85% of the financial product net assets are invested in issuers which promote the environmental and social characteristics, in accordance with the binding elements of the investment strategy, and which have an ESG Combined Score higher than 25. Investments in any financial products classified as either Article 8 SFDR or Article 9 SFDR are also considered to be aligned with the environmental and social characteristics promoted by the financial product. While the financial product does not have sustainable investing as its objective, the financial product seeks to invest a minimum of 21% of its assets in sustainable investments with an environmental and/or social objective, as detailed in the sections above.*

*Up to 15% of the financial product's net assets may be invested in money market instruments or consists of margins, collateral and market value of derivative instruments, or a mix of those and investments in issuers that have no ESG Combined Score or have an ESG Combined Score lower than 25, subject to a maximum limit of 10% of the financial product net assets for the latter. Those issuers that have no ESG Combined Score or have an ESG Combined Score lower than 25 are deemed to be of interest from a strictly financial point of view and/or, given their characteristics, help to complete the thematic, sector and geographic profile of the portfolio. Those issuers will still be compliant with the exclusion criteria set out in the "Investment Strategy" section above.*

*The thresholds mentioned above hold unless market or other special conditions warrant a varied asset allocation (i.e. the 85% and 15% thresholds, whereas the 10% maximum threshold is not subject to variation).*

● **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

*The implementation of the ESG strategy of the financial product generally is not based on the use of derivative instruments with specific ESG characteristics, even though the use of such instruments is not forbidden. Also, the financial product may use derivative instruments to manage its risk/return profile.*

*Finally, while derivative instruments on single names are subject to the limitations set out in the "Investment Strategy" section above, derivatives on indices are not.*



**To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?**

0%

To comply with the EU Taxonomy, the criteria for fossil gas include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For nuclear energy, the criteria include comprehensive safety and waste management rules.

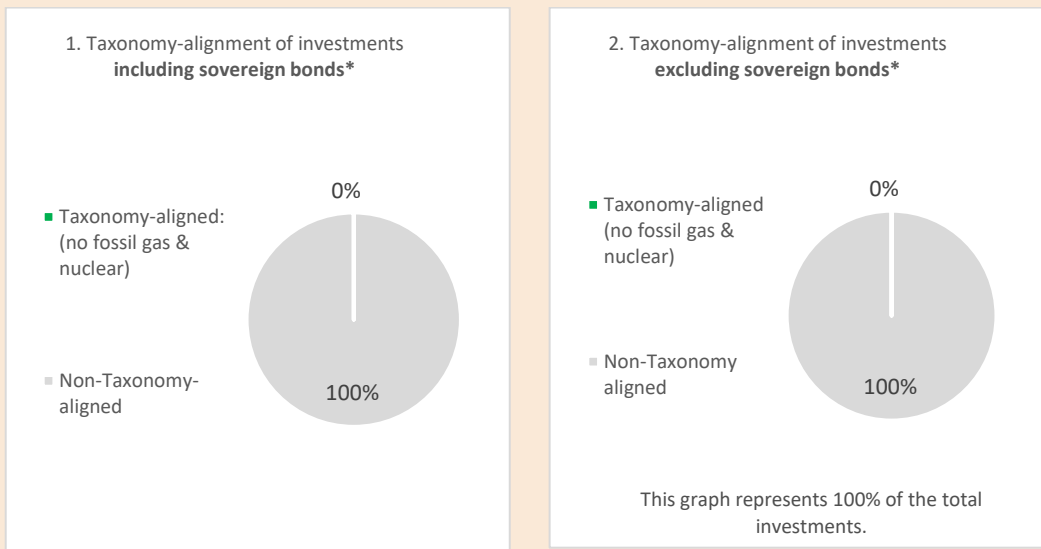
**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>10</sup>?**

- Yes:
  - In fossil gas
  - In nuclear energy
- No

*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


● **What is the minimum share of investments in transitional and enabling activities?**  
0%



**What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy**

As the financial product invests in various types of sustainable investments, it does not commit to a minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy. However, the financial product does commit to making a minimum share of 21% of its

<sup>10</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation”) and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

 are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

assets between (i) sustainable investments with an environmental objective that are not aligned with the EU Taxonomy and (ii) sustainable social investments.



**What is the minimum share of socially sustainable investments?**

As the financial product invests in various types of sustainable investments, it does not commit to a minimum share of socially sustainable investments. However, the financial product does commit to making a minimum share of 21% of its assets between (i) sustainable investments with an environmental objective that are not aligned with the EU Taxonomy and (ii) sustainable social investments.



**What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

*As already clarified in the “Asset allocation” section above, the “#2 Other” part of the financial product consists of up to 15% of the financial product’s net assets may be invested in money market instruments or consists of margins, collateral and market value of derivative instruments, or a mix of those and investments in issuers that have no ESG Combined Score or have an ESG Combined Score lower than 25, subject to a maximum limit of 10% of the financial product net assets for the latter. Those issuers that have no ESG Combined Score or have an ESG Combined Score lower than 25 are deemed to be of interest from a strictly financial point of view and/or, given their characteristics, help to complete the thematic, sector and geographic profile of the portfolio. Those issuers will still be compliant with the exclusion criteria set out in the “Investment Strategy” section above.*



**Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

No

- **How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?**

*Not Applicable*

- **How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?**

*Not Applicable*

- **How does the designated index differ from a relevant broad market index?**

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

*Not Applicable*

- **Where can the methodology used for the calculation of the designated index be found?**

*Not Applicable*



**Where can I find more product specific information online?**

**More product-specific information can be found on the website:  
<https://www.animasgr.it/surl/EN-sustainability-related-disclosures>**

## ANIMA EUROPE EQUITY

Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

### ANIMA Europe Equity

LEI: 213800SLVBZTNAY8NL21

## Environmental and/or social characteristics

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of environmentally sustainable economic activities. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not, depending on the practices.

### Does this financial product have a sustainable investment objective?

Yes   No

<input type="checkbox"/> It will make a minimum of sustainable investments with an environmental objective: ___% <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul>	<input checked="" type="checkbox"/> It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 21% of sustainable investments: <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with a social objective</li> </ul>
<input type="checkbox"/> It will make a minimum of sustainable investments with a social objective: ___%	<input type="checkbox"/> It promotes E/S characteristics, but will not make any sustainable investments

### What environmental and/or social characteristics are promoted by this financial product?

Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.

*This financial product promotes both the preservation of the environment and natural resources, and fair work conditions, democracy and human and social rights on the social side, as pursued by government issuers. From a corporate point of view, this financial product promotes also the following environmental and social characteristics:*

- *the fight against climate change;*
- *the respect of human rights;*
- *the protection of human health;*
- *the protection of human well-being.*

*The promotion of the above environmental and social characteristics are evaluated by the Manager based on the analysis carried out by specialised third party ESG data providers.*

*Further elements of the financial product's ESG strategy are described in the "Asset Allocation" sections below.*

● ***What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?***

*The sustainability indicators used by this financial product are:*

- *the exclusion of corporate issuers involved in the production of thermal coal which accounts for more than 30% of their revenues, for the fight against climate change;*

- *the exclusion of:*

- *corporate issuers involved in the production of controversial weapons, which include anti-personnel land mines, cluster munitions, biological, chemical, blinding weapons, white phosphorus, nuclear armaments and which have mostly been banned by UN treaties;*

- *countries sanctioned at the central government level by the UN for systematic violations of human rights;*

*for the respect of human rights;*

- *the exclusion of issuers involved in the production of tobacco, for the protection of human health;*

- *the exclusion of corporate issuers involved in the gambling sector, for the protection of human well-being.*

● ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

*As mentioned above, although the financial product does not have a sustainable objective, it will invest a minimum of 21% of its NAV in issuers defined as "SFDR" sustainable according to an internal algorithm of the Manager. This algorithm provides that issuers are considered sustainable if they:*

- *comply with the exclusion criteria mentioned in the "Investment Strategy" section further below;*

- *pass the DNSH test, described in the following section;*

- *pass a Good Governance test, which is set at the level of 25 out 100 for their G score;*
- *pass a general E and S test, which is set at the level of 25 out 100 for their E and S scores;*
- *contribute positively to at least one of the following three areas: Climate Transition, Environment or Society. Positive contribution is measured on the basis of issuers' involvement in certain initiatives or on the basis of best-in-class criteria related to specific environmental and/or social factors.*

● ***How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?***

*The assessment that issuers considered to be sustainable do not cause significant harm to other sustainable investment objectives is carried out on the basis of the Do No Significant Harm test (DNSH, developed internally by the Manager), which, in line with regulatory recommendations, is based on the mandatory Principal Indicators of Adverse Impact (PAI, see the RTS to the SFDR). In particular, investments are considered to cause significant harm when they involve issuers that:*

- *do not publish data on Carbon Footprint, Carbon Intensity and Board Gender Diversity;*
- *are involved in the fossil fuels sector or the controversial weapons sector;*
- *are involved in very severe controversies related to compliance with the UN Global Compact and OECD requirements for multinational companies;*
- *exceed strict threshold values (specifically identified by the Manager based on a diversified sample of issuers worldwide) for any of the following PAI indicators: 2\*, 3\*, 5, 6\*, 8, 9, 12 and 13;*
- *exceed critical thresholds (specifically identified by the Manager based on a diversified sample of issuers worldwide) for at least 4 of the following PAI indicators: 2\*, 3\*, 5, 6\*, 7, 8, 9, 10, 11, 12 and 13.*

*Note \*: it should be noted that, for the purposes of the DNSH test, absolute GHG emissions levels (PAI 1) are used to calculate PAIs 2 and 3; also, Carbon Footprint and GHG Intensity are calculated taking into account only Scope 1 and 2 emissions. It should also be noted that PAI 6 currently takes into account the sectoral classification provided by the provider Refinitiv as a proxy for the NACE classification required by the regulations.*

● ***How have the indicators for adverse impacts on sustainability factors been taken into account?***

*Please refer to the preceding section.*

● ***How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?***

*The alignment of sustainable investments with the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights is pursued through several investment selection and management criteria, explained above and consistent with the aforementioned guidelines. In particular:*

- *exclusions relating to controversial weapons, which apply to all investments;*
- *exclusions based on the DNSH principle, applied through the definition of threshold levels on PAI indicators;*
- *inclusions based on the identification of positive contributions to climate, social or environmental objectives;*
- *exclusions of environmental or social ratings that fall into the worst quartile of the rankings based on the data provided by specialized third party providers;*
- *application to equity investments of the voting rights policy, based on the third party provider (ISS) model, which takes into account specific ESG factors and refers to guidelines consistent with sustainable business practices on the environment, fair treatment of labour, non-discriminatory policies and protection of human rights, framed in initiatives such as those of the United Nations Environment Programme Finance Initiative (UNEP FI), United Nations Principles for Responsible Investment (UNPRI), United Nations Global Compact, Global Reporting Initiative (GRI), Carbon Principles, International Labour Organisation Conventions (ILO), CERES Principles, Global Sullivan Principles, MacBride Principles and the European Union Directives on social and environmental issues.*

*The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.*

*The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.*

*Any other sustainable investments must also not significantly harm any environmental or social objectives.*





## Does this financial product consider principal adverse impacts on sustainability factors?

YES

X

NO

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

*Yes, the financial product considers the principal adverse impacts on sustainability factors.*

*In general, the consideration of PAIs is based on the contribution of certain mitigating factors, such as:*

- 1. value exclusions,*
- 2. exclusions/limitations resulting from investing in sustainable issuers according to the SFDR,*
- 3. the setting up of objectives for specific adverse impact indicators, chosen among those belonging to the Mandatory list in the RTS to the SFDR.*

*In particular:*

- 1) from a value perspective, issuers involved in controversial weapons (connection to PAI 14), nuclear weapons, tobacco, gambling and thermal coal mining which accounts for more than 30% of revenues (connection to PAI 4) are excluded;*
- 2) investment in at least 21% of the financial product's NAV in sustainable issuers ensures that these issuers, by construction, pass the Good Governance and general E and S tests (detailed in the "sustainable investment" sections above) and the DNSH test (which takes into consideration all the 14 mandatory PAI, detailed in the "sustainable investment" sections above) while contributing positively to climate, environmental and social topics;*
- 3) objectives for specific mandatory adverse impact indicators:*
  - a. PAI 4 (fossil fuels exposure): the adverse impact is mitigated through the limitation of the exposure to the fossil fuels sector, due to the exclusion of issuers with more than 30% of revenues from thermal coal mining.*
  - b. PAI 14 (controversial weapons): the adverse impact is eliminated through the exclusion of issuers involved in controversial weapons.*
  - c. PAI 16 (human rights violations): the adverse impact is mitigated through the exclusion of issuers sanctioned by the UN for human rights violations (see the "Strategy" sections below).*

*The consideration of PAIs is reported in the annual financial product report, as required by Art. 11(2) of the SFDR."*

## What investment strategy does this financial product follow?

*The financial product's ESG strategy is based on two pillars:*

- 1. the promotion of certain environmental and social characteristics;*
- 2. the limitation of investments in issuers with low ESG quality.*

*More specifically:*

### *1. This financial product promotes in particular:*

- the fight against climate change through the exclusion of corporate issuers involved in the production of thermal coal which accounts for more than 30% of their revenues;*
- the respect of human rights, through the exclusion of:*
  - corporate issuers involved in the production of controversial weapons, which include anti-personnel land mines, cluster munitions, biological, chemical, blinding weapons, white phosphorus, nuclear armaments and which have mostly been banned by UN treaties;*
  - countries sanctioned at the central government level by the UN for systematic violations of human rights;*
- the protection of human health, through the exclusion of issuers involved in the production of tobacco;*
- the protection of human well-being, through the exclusion of corporate issuers involved in the gambling sector.*

*The above exclusions are determined by the Manager based on the analysis carried out by specialized third party index and ESG data providers, in particular:*

- Urgewald for thermal coal;*
  - Vigeo for controversial weapons;*
  - Sustainabilitycs for countries sanctioned by UN for systematic violations of human rights;*
  - MSCI, ICE-BofA indices for identifying issuers involved in tobacco and gambling.*
- 2. The ESG quality of the financial product's portfolio is monitored by the Manager in order to avoid a high concentration of ESG lowly rated issuers in the financial product, where the concentration is taken into consideration in absolute terms (i.e. with reference to the net assets of the financial product) and not relative to the financial product's benchmark (i.e. not in relation to its composition in terms of ESG scores). In particular, issuers are selected by the Manager so that less than 10% of the financial product's net assets are invested in corporate or government*



**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.

issuers without an ESG Combined Score or with an ESG Combined Score below 25, on a scale from 0 to 100 (best).

Regarding the application of ESG scores for corporate or government issuers, the Manager uses scoring data of third party ESG data providers. In particular:

- Refinitiv provides ESG scores and ratings for corporates;
- Sustainalytics provides ESG scores, ratings and analyses for countries;

The overall ESG quality of the portfolio is monitored by the Manager on a continuous basis and issuers with an ESG Combined Score lower than 25 are evaluated at each quarterly meeting of the ESG Committee of the Manager.

The above exclusions and limitations do not apply to positions derived from investments in other collective investment schemes or in index derivatives.

- **What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?**

The binding elements of the investment strategy in order to achieve the environmental and social characteristics promoted by this financial product are those described under the preceding Investment Strategy section.

- **What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?**

Not Applicable

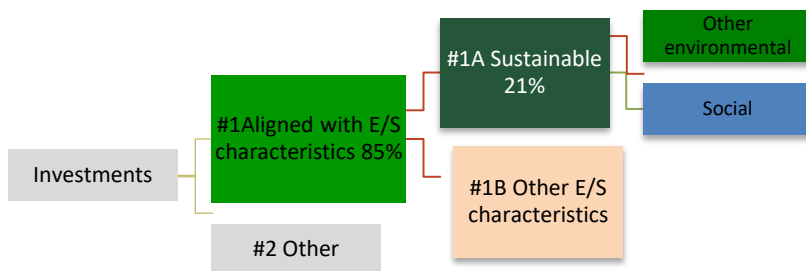
- **What is the policy to assess good governance practices of the investee companies?**

When considering good governance practices, the Manager follows an internal process in order to monitor the governance (G) scores provided by a third party ESG data provider as far as directly owned issuers are concerned. Those G scores are calculated on the basis of 56 sub-indicators that relate to Management Quality (35), Attention to Shareholders (12) and CSR Strategy (9), which take into account specific factors such as: management structures, employee relations, remuneration of staff and tax compliance.



- **What is the asset allocation planned for this financial product?**

The financial product's strategic asset allocation is defined by its risk-return profile and implemented through the active investment in variable proportions.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

**Asset allocation** describes the share of investment in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

*A minimum proportion of 85% of the financial product net assets are invested in issuers which promote the environmental and social characteristics, in accordance with the binding elements of the investment strategy, and which have an ESG Combined Score higher than 25. Investments in any financial products classified as either Article 8 SFDR or Article 9 SFDR are also considered to be aligned with the environmental and social characteristics promoted by the financial product. While the financial product does not have sustainable investing as its objective, the financial product seeks to invest a minimum of 21% of its assets in sustainable investments with an environmental and/or social objective, as detailed in the sections above.*

*Up to 15% of the financial product's net assets may be invested in money market instruments or consists of margins, collateral and market value of derivative instruments, or a mix of those and investments in issuers that have no ESG Combined Score or have an ESG Combined Score lower than 25, subject to a maximum limit of 10% of the financial product net assets for the latter. Those issuers that have no ESG Combined Score or have an ESG Combined Score lower than 25 are deemed to be of interest from a strictly financial point of view and/or, given their characteristics, help to complete the thematic, sector and geographic profile of the portfolio. Those issuers will still be compliant with the exclusion criteria set out in the "Investment Strategy" section above.*

*The thresholds mentioned above hold unless market or other special conditions warrant a varied asset allocation (i.e. the 85% and 15% thresholds, whereas the 10% maximum threshold is not subject to variation).*

- **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

*The implementation of the ESG strategy of the financial product generally is not based on the use of derivative instruments with specific ESG characteristics, even though the use of such instruments is not forbidden. Also, the financial product may use derivative instruments to manage its risk/return profile.*

*Finally, while derivative instruments on single names are subject to the limitations set out in the “Investment Strategy” section above, derivatives on indices are not.*



- **To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?**

0%

- **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>11</sup>?**

Yes:

In fossil gas     In nuclear energy

No

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<sup>11</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation”) and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

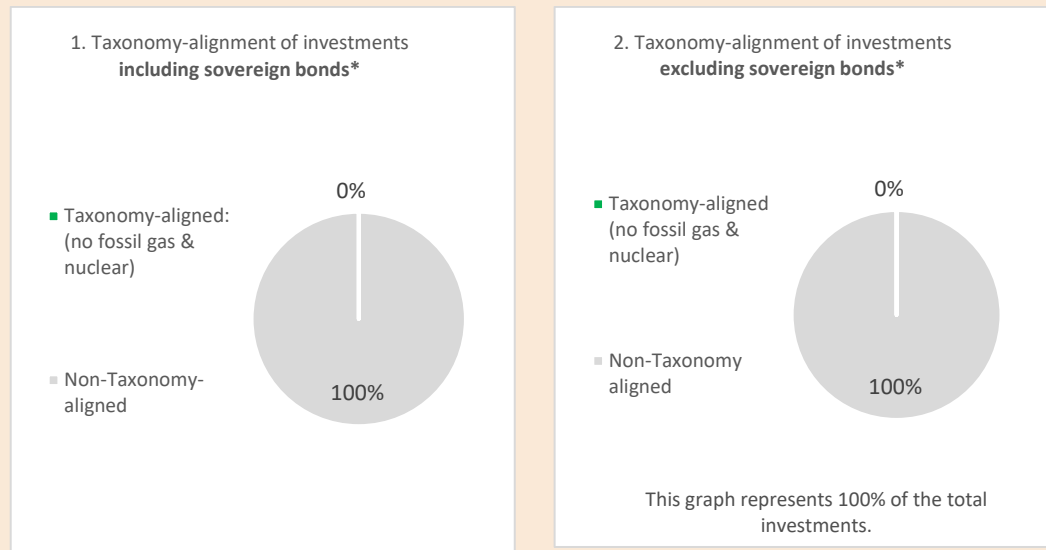
To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under 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

● **What is the minimum share of investments in transitional and enabling activities?**

0%



**What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy**

As the financial product invests in various types of sustainable investments, it does not commit to a minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy. However, the financial product does commit to making a minimum share of 21% of its assets between (i) sustainable investments with an environmental objective that are not aligned with the EU Taxonomy and (ii) sustainable social investments.



**What is the minimum share of socially sustainable investments?**

As the financial product invests in various types of sustainable investments, it does not commit to a minimum share of socially sustainable investments. However, the financial product does commit to making a minimum share of 21% of its assets between (i) sustainable investments with an environmental objective that are not aligned with the EU Taxonomy and (ii) sustainable social investments.



**What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

As already clarified in the “Asset allocation” section above, the “#2 Other” part of the financial product consists of up to 15% of the financial product’s net assets may be invested in money market instruments or consists of margins, collateral and market value of derivative instruments, or a mix of those and investments in issuers that have no ESG Combined Score or have an ESG Combined Score lower than 25, subject to a maximum limit of 10% of the financial product net assets for the latter. Those issuers that have no ESG Combined Score or have an ESG Combined Score lower than 25 are deemed to be of interest from a strictly financial point of view and/or, given their characteristics, help to complete the thematic, sector and geographic profile of the portfolio. Those issuers will still be compliant with the exclusion criteria set out in the “Investment Strategy” section above.

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



**Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

No

- **How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?**

Not Applicable

- **How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?**

Not Applicable

- **How does the designated index differ from a relevant broad market index?**

Not Applicable

- **Where can the methodology used for the calculation of the designated index be found?**

Not Applicable



**Where can I find more product specific information online?**

More product-specific information can be found on the website:  
<https://www.animasgr.it/surl/EN-sustainability-related-disclosures>



## ANIMA U.S. EQUITY

Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

### ANIMA U.S. Equity

LEI: 213800GBQ60L1IZIWQ12

## Environmental and/or social characteristics

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the **Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

### Does this financial product have a sustainable investment objective?

<input checked="" type="radio"/> <input type="radio"/> <b>Yes</b>	<input checked="" type="radio"/> <input type="radio"/> <input checked="" type="checkbox"/> <b>No</b>
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective: ___%</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: ___%</b>	<input checked="" type="checkbox"/> <b>It promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 21% of sustainable investments: <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with a social objective</li> </ul> <input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>

### What environmental and/or social characteristics are promoted by this financial product?

*This financial product promotes both the preservation of the environment and natural resources, and fair work conditions, democracy and human and social rights on the social side, as pursued by government issuers. From a corporate point of view, this financial product promotes also the following environmental and social characteristics:*

- *the fight against climate change;*
- *the respect of human rights;*
- *the protection of human health;*



- *the protection of human well-being.*

*The promotion of the above environmental and social characteristics are evaluated by the Manager based on the analysis carried out by specialised third party ESG data providers.*

*Further elements of the financial product's ESG strategy are described in the "Asset Allocation" sections below.*

● ***What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?***

*The sustainability indicators used by this financial product are:*

- *the exclusion of corporate issuers involved in the production of thermal coal which accounts for more than 30% of their revenues, for the fight against climate change;*

- *the exclusion of:*

- *corporate issuers involved in the production of controversial weapons, which include anti-personnel land mines, cluster munitions, biological, chemical, blinding weapons, white phosphorus, nuclear armaments and which have mostly been banned by UN treaties;*

- *countries sanctioned at the central government level by the UN for systematic violations of human rights;*

*for the respect of human rights;*

- *the exclusion of issuers involved in the production of tobacco, for the protection of human health;*

- *the exclusion of corporate issuers involved in the gambling sector, for the protection of human well-being.*

● ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

*As mentioned above, although the financial product does not have a sustainable objective, it will invest a minimum of 21% of its NAV in issuers defined as "SFDR" sustainable according to an internal algorithm of the Manager. This algorithm provides that issuers are considered sustainable if they:*

- *comply with the exclusion criteria mentioned in the "Investment Strategy" section further below;*

- *pass the DNSH test, described in the following section;*
  - *pass a Good Governance test, which is set at the level of 25 out 100 for their G score;*
  - *pass a general E and S test, which is set at the level of 25 out 100 for their E and S scores;*
  - *contribute positively to at least one of the following three areas: Climate Transition, Environment or Society. Positive contribution is measured on the basis of issuers' involvement in certain initiatives or on the basis of best-in-class criteria related to specific environmental and/or social factors.*
- ***How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?***

*The assessment that issuers considered to be sustainable do not cause significant harm to other sustainable investment objectives is carried out on the basis of the Do No Significant Harm test (DNSH, developed internally by the Manager), which, in line with regulatory recommendations, is based on the mandatory Principal Indicators of Adverse Impact (PAI, see the RTS to the SFDR). In particular, investments are considered to cause significant harm when they involve issuers that:*

- *do not publish data on Carbon Footprint, Carbon Intensity and Board Gender Diversity;*
- *are involved in the fossil fuels sector or the controversial weapons sector;*
- *are involved in very severe controversies related to compliance with the UN Global Compact and OECD requirements for multinational companies;*
- *exceed strict threshold values (specifically identified by the Manager based on a diversified sample of issuers worldwide) for any of the following PAI indicators: 2\*, 3\*, 5, 6\*, 8, 9, 12 and 13;*
- *exceed critical thresholds (specifically identified by the Manager based on a diversified sample of issuers worldwide) for at least 4 of the following PAI indicators: 2\*, 3\*, 5, 6\*, 7, 8, 9, 10, 11, 12 and 13.*

*Note \*: it should be noted that, for the purposes of the DNSH test, absolute GHG emissions levels (PAI 1) are used to calculate PAIs 2 and 3; also, Carbon Footprint and GHG Intensity are calculated taking into account only Scope 1 and 2 emissions. It should also be noted that PAI 6 currently takes into account the sectoral classification provided by the provider Refinitiv as a proxy for the NACE classification required by the regulations.*

***How have the indicators for adverse impacts on sustainability factors been taken into account?***

*Please refer to the preceding section.*

***How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?***

*The alignment of sustainable investments with the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights is pursued through several investment selection and management criteria, explained above and consistent with the aforementioned guidelines. In particular:*

- exclusions relating to controversial weapons, which apply to all investments;*
- exclusions based on the DNSH principle, applied through the definition of threshold levels on PAI indicators;*
- inclusions based on the identification of positive contributions to climate, social or environmental objectives;*
- exclusions of environmental or social ratings that fall into the worst quartile of the rankings based on the data provided by specialized third party providers;*
- application to equity investments of the voting rights policy, based on the third party provider (ISS) model, which takes into account specific ESG factors and refers to guidelines consistent with sustainable business practices on the environment, fair treatment of labour, non-discriminatory policies and protection of human rights, framed in initiatives such as those of the United Nations Environment Programme Finance Initiative (UNEP FI), United Nations Principles for Responsible Investment (UNPRI), United Nations Global Compact, Global Reporting Initiative (GRI), Carbon Principles, International Labour Organisation Conventions (ILO),*

CERES Principles, Global Sullivan Principles, MacBride Principles and the European Union Directives on social and environmental issues.

*The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.*

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

*Any other sustainable investments must also not significantly harm any environmental or social objectives.*



**Does this financial product consider principal adverse impacts on sustainability factors?**

**YES**

**X**

**NO**

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

*Yes, the financial product considers the principal adverse impacts on sustainability factors.*

*In general, the consideration of PAIs is based on the contribution of certain mitigating factors, such as:*

1. *value exclusions,*
2. *exclusions/limitations resulting from investing in sustainable issuers according to the SFDR,*
3. *the setting up of objectives for specific adverse impact indicators, chosen among those belonging to the Mandatory list in the RTS to the SFDR.*

*In particular:*

- 1) *from a value perspective, issuers involved in controversial weapons (connection to PAI 14), nuclear weapons, tobacco, gambling and thermal coal mining which accounts for more than 30% of revenues (connection to PAI 4) are excluded;*

- 2) *investment in at least 21% of the financial product's NAV in sustainable issuers ensures that these issuers, by construction, pass the Good Governance and general E and S tests (detailed in the “sustainable investment” sections above) and the DNSH test (which takes into consideration all the 14 mandatory PAI, detailed in the “sustainable investment” sections above) while contributing positively to climate, environmental and social topics;*
- 3) *objectives for specific mandatory adverse impact indicators:*
  - a. *PAI 4 (fossil fuels exposure): the adverse impact is mitigated through the limitation of the exposure to the fossil fuels sector, due to the exclusion of issuers with more than 30% of revenues from thermal coal mining.*
  - b. *PAI 14 (controversial weapons): the adverse impact is eliminated through the exclusion of issuers involved in controversial weapons.*
  - c. *PAI 16 (human rights violations): the adverse impact is mitigated through the exclusion of issuers sanctioned by the UN for human rights violations (see the “Strategy” sections below).*

*The consideration of PAIs is reported in the annual financial product report, as required by Art. 11(2) of the SFDR.*

### **What investment strategy does this financial product follow?**

*The financial product's ESG strategy is based on two pillars:*

1. *the promotion of certain environmental and social characteristics;*
2. *the limitation of investments in issuers with low ESG quality.*

*More specifically:*

*1. This financial product promotes in particular:*

- *the fight against climate change through the exclusion of corporate issuers involved in the production of thermal coal which accounts for more than 30% of their revenues;*
- *the respect of human rights, through the exclusion of:*
  - *corporate issuers involved in the production of controversial weapons, which include anti-personnel land mines, cluster munitions, biological, chemical, blinding weapons, white phosphorus, nuclear armaments and which have mostly been banned by UN treaties;*
  - *countries sanctioned at the central government level by the UN for systematic violations of human rights;*
- *the protection of human health, through the exclusion of issuers involved in the production of tobacco;*



**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.

- *the protection of human well-being, through the exclusion of corporate issuers involved in the gambling sector.*

*The above exclusions are determined by the Manager based on the analysis carried out by specialized third party index and ESG data providers, in particular:*

- *Urgewald for thermal coal;*
- *Vigeo for controversial weapons;*
- *Sustainalytics for countries sanctioned by UN for systematic violations of human rights;*
- *MSCI, ICE-BofA indices for identifying issuers involved in tobacco and gambling.*

2. *The ESG quality of the financial product's portfolio is monitored by the Manager in order to avoid a high concentration of ESG lowly rated issuers in the financial product, where the concentration is taken into consideration in absolute terms (i.e. with reference to the net assets of the financial product) and not relative to the financial product's benchmark (i.e. not in relation to its composition in terms of ESG scores). In particular, issuers are selected by the Manager so that less than 10% of the financial product's net assets are invested in corporate or government issuers without an ESG Combined Score or with an ESG Combined Score below 25, on a scale from 0 to 100 (best).*

*Regarding the application of ESG scores for corporate or government issuers, the Manager uses scoring data of third party ESG data providers. In particular:*

- *Refinitiv provides ESG scores and ratings for corporates;*
- *Sustainalytics provides ESG scores, ratings and analyses for countries;*

*The overall ESG quality of the portfolio is monitored by the Manager on a continuous basis and issuers with an ESG Combined Score lower than 25 are evaluated at each quarterly meeting of the ESG Committee of the Manager.*

*The above exclusions and limitations do not apply to positions derived from investments in other collective investment schemes or in index derivatives.*

- ***What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?***

*The binding elements of the investment strategy in order to achieve the environmental and social characteristics promoted by this financial product are those described under the preceding Investment Strategy section.*

- ***What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?***

**Asset allocation** describes the share of investment in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

Not Applicable

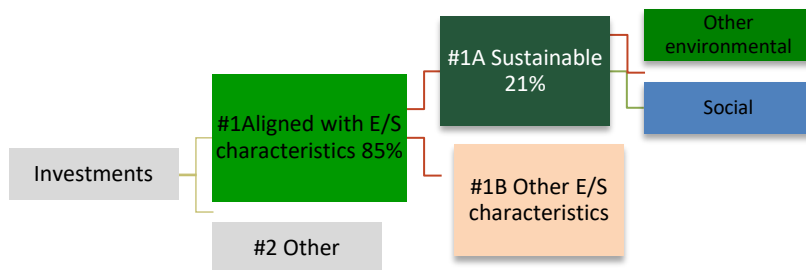
**What is the policy to assess good governance practices of the investee companies?**

When considering good governance practices, the Manager follows an internal process in order to monitor the governance (G) scores provided by a third party ESG data provider as far as directly owned issuers are concerned. Those G scores are calculated on the basis of 56 sub-indicators that relate to Management Quality (35), Attention to Shareholders (12) and CSR Strategy (9), which take into account specific factors such as: management structures, employee relations, remuneration of staff and tax compliance.



**What is the asset allocation planned for this financial product?**

The financial product's strategic asset allocation is defined by its risk-return profile and implemented through the active investment in variable proportions.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

*A minimum proportion of 85% of the financial product net assets are invested in issuers which promote the environmental and social characteristics, in accordance with the binding elements of the investment strategy, and which have an ESG Combined Score higher than 25. Investments in any financial products classified as either Article 8 SFDR or Article 9 SFDR are also considered to be aligned with the environmental and social characteristics promoted by the financial product. While the financial product does not have sustainable investing as its objective, the financial product seeks to invest a minimum of 21% of its assets in sustainable investments with an environmental and/or social objective, as detailed in the sections above.*

Up to 15% of the financial product's net assets may be invested in money market instruments or consists of margins, collateral and market value of derivative instruments, or a mix of those and investments in issuers that have no ESG Combined Score or have an ESG Combined Score lower than 25, subject to a maximum limit of 10% of the financial product net assets for the latter. Those issuers that have no ESG Combined Score or have an ESG Combined Score lower than 25 are deemed to be of interest from a strictly financial point of view and/or, given their characteristics, help to complete the thematic, sector and geographic profile of the portfolio. Those issuers will still be compliant with the exclusion criteria set out in the "Investment Strategy" section above.

The thresholds mentioned above hold unless market or other special conditions warrant a varied asset allocation (i.e. the 85% and 15% thresholds, whereas the 10% maximum threshold is not subject to variation).

● **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

The implementation of the ESG strategy of the financial product generally is not based on the use of derivative instruments with specific ESG characteristics, even though the use of such instruments is not forbidden. Also, the financial product may use derivative instruments to manage its risk/return profile.

Finally, while derivative instruments on single names are subject to the limitations set out in the "Investment Strategy" section above, derivatives on indices are not.



**To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?**

0%

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>12</sup>?**

Yes:

In fossil gas  In nuclear energy

No

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<sup>12</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

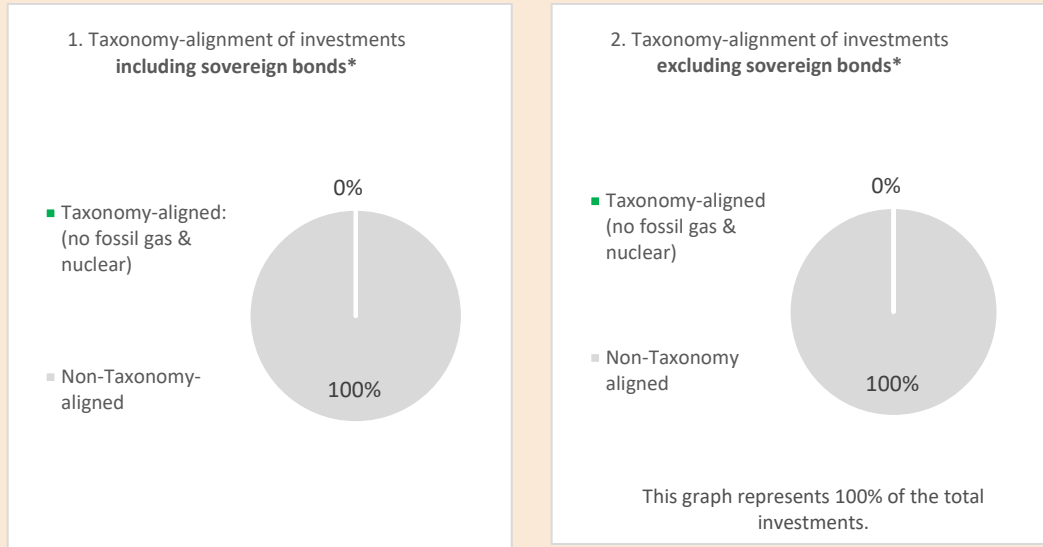


To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

*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

● **What is the minimum share of investments in transitional and enabling activities?**  
0%



**What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy**

As the financial product invests in various types of sustainable investments, it does not commit to a minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy. However, the financial product does commit to making a minimum share of 21% of its assets between (i) sustainable investments with an environmental objective that are not aligned with the EU Taxonomy and (ii) sustainable social investments.



**What is the minimum share of socially sustainable investments?**

As the financial product invests in various types of sustainable investments, it does not commit to a minimum share of socially sustainable investments. However, the financial product does commit to making a minimum share of 21% of its assets between (i) sustainable investments with an environmental objective that are not aligned with the EU Taxonomy and (ii) sustainable social investments.



**What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

*As already clarified in the “Asset allocation” section above, the “#2 Other” part of the financial product consists of up to 15% of the financial product’s net assets may be invested in money market instruments or consists of margins, collateral and market value of derivative instruments, or a mix of those and investments in issuers that have no ESG Combined Score or have an ESG Combined Score lower than 25, subject to a maximum limit of 10% of the financial product net assets for the latter. Those issuers that have no ESG Combined Score or have an ESG Combined Score lower than 25 are deemed to be of interest from a strictly financial point of view and/or, given their characteristics, help to complete the thematic, sector and geographic profile of the portfolio. Those issuers will still be compliant with the exclusion criteria set out in the “Investment Strategy” section above.*



**Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

No

- **How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?**

*Not Applicable*

- **How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?**

*Not Applicable*

- **How does the designated index differ from a relevant broad market index?**

*Not Applicable*

- **Where can the methodology used for the calculation of the designated index be found?**

*Not Applicable*

**Where can I find more product specific information online?**



**More product-specific information can be found on the website: <https://www.animasgr.it/surl/EN-sustainability-related-disclosures>**

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

## ANIMA ASIA/PACIFIC EQUITY

Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

### ANIMA Asia/Pacific Equity

LEI: 213800GTH3GM45WFT162

## Environmental and/or social characteristics

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Does this financial product have a sustainable investment objective?**

**Yes**
  **No**

<p><input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective: ___%</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <p><input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: ___%</b></p>	<p><input checked="" type="checkbox"/> <b>It promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of <b>21%</b> of sustainable investments:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with a social objective</li> </ul> <p><input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b></p>
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## What environmental and/or social characteristics are promoted by this financial product?

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

*This financial product promotes both the preservation of the environment and natural resources, and fair work conditions, democracy and human and social rights on the social side, as pursued by government issuers. From a corporate point of view, this financial product promotes also the following environmental and social characteristics:*

- *the fight against climate change;*
- *the respect of human rights;*
- *the protection of human health;*
- *the protection of human well-being.*

*The promotion of the above environmental and social characteristics are evaluated by the Manager based on the analysis carried out by specialised third party ESG data providers.*

*Further elements of the financial product's ESG strategy are described in the "Asset Allocation" sections below.*

### ● **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

*The sustainability indicators used by this financial product are:*

- *the exclusion of corporate issuers involved in the production of thermal coal which accounts for more than 30% of their revenues, for the fight against climate change;*
- *the exclusion of:*
  - *corporate issuers involved in the production of controversial weapons, which include anti-personnel land mines, cluster munitions, biological, chemical, blinding weapons, white phosphorus, nuclear armaments and which have mostly been banned by UN treaties;*
  - *countries sanctioned at the central government level by the UN for systematic violations of human rights;*

*for the respect of human rights;*

- *the exclusion of issuers involved in the production of tobacco, for the protection of human health;*
- *the exclusion of corporate issuers involved in the gambling sector, for the protection of human well-being.*

● **What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?**

*As mentioned above, although the financial product does not have a sustainable objective, it will invest a minimum of 21% of its NAV in issuers defined as “SFDR” sustainable according to an internal algorithm of the Manager. This algorithm provides that issuers are considered sustainable if they:*

- *comply with the exclusion criteria mentioned in the “Investment Strategy” section further below;*
- *pass the DNSH test, described in the following section;*
- *pass a Good Governance test, which is set at the level of 25 out 100 for their G score;*
- *pass a general E and S test, which is set at the level of 25 out 100 for their E and S scores;*
- *contribute positively to at least one of the following three areas: Climate Transition, Environment or Society. Positive contribution is measured on the basis of issuers' involvement in certain initiatives or on the basis of best-in-class criteria related to specific environmental and/or social factors.*

● **How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?**

*The assessment that issuers considered to be sustainable do not cause significant harm to other sustainable investment objectives is carried out on the basis of the Do No Significant Harm test (DNSH, developed internally by the Manager), which, in line with regulatory recommendations, is based on the mandatory Principal Indicators of Adverse Impact (PAI, see the RTS to the SFDR). In particular, investments are considered to cause significant harm when they involve issuers that:*

- *do not publish data on Carbon Footprint, Carbon Intensity and Board Gender Diversity;*
- *are involved in the fossil fuels sector or the controversial weapons sector;*
- *are involved in very severe controversies related to compliance with the UN Global Compact and OECD requirements for multinational companies;*
- *exceed strict threshold values (specifically identified by the Manager based on a diversified sample of issuers worldwide) for any of the following PAI indicators: 2\*, 3\*, 5, 6\*, 8, 9, 12 and 13;*

- *exceed critical thresholds (specifically identified by the Manager based on a diversified sample of issuers worldwide) for at least 4 of the following PAI indicators: 2\*, 3\*, 5, 6\*, 7, 8, 9, 10, 11, 12 and 13.*

*Note \*: it should be noted that, for the purposes of the DNSH test, absolute GHG emissions levels (PAI 1) are used to calculate PAIs 2 and 3; also, Carbon Footprint and GHG Intensity are calculated taking into account only Scope 1 and 2 emissions. It should also be noted that PAI 6 currently takes into account the sectoral classification provided by the provider Refinitiv as a proxy for the NACE classification required by the regulations.*

● ***How have the indicators for adverse impacts on sustainability factors been taken into account?***

*Please refer to the preceding section.*

● ***How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?***

*The alignment of sustainable investments with the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights is pursued through several investment selection and management criteria, explained above and consistent with the aforementioned guidelines. In particular:*

- *exclusions relating to controversial weapons, which apply to all investments;*
- *exclusions based on the DNSH principle, applied through the definition of threshold levels on PAI indicators;*
- *inclusions based on the identification of positive contributions to climate, social or environmental objectives;*
- *exclusions of environmental or social ratings that fall into the worst quartile of the rankings based on the data provided by specialized third party providers;*
- *application to equity investments of the voting rights policy, based on the third party provider (ISS) model, which takes into account specific ESG factors and refers to guidelines consistent with sustainable business practices on the environment, fair treatment of labour, non-discriminatory policies and protection of human rights, framed in initiatives such as those of the United Nations Environment Programme Finance Initiative (UNEP FI), United Nations Principles for Responsible Investment (UNPRI), United Nations Global Compact, Global Reporting Initiative (GRI), Carbon Principles, International Labour Organisation Conventions (ILO), CERES Principles, Global Sullivan Principles, MacBride Principles and the European Union Directives on social and environmental issues.*

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

*The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.*

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

*Any other sustainable investments must also not significantly harm any environmental or social objectives.*



**Does this financial product consider principal adverse impacts on sustainability factors?**

**YES**

**NO**



*Yes, the financial product considers the principal adverse impacts on sustainability factors.*

*In general, the consideration of PAIs is based on the contribution of certain mitigating factors, such as:*

- 1. value exclusions,*
- 2. exclusions/limitations resulting from investing in sustainable issuers according to the SFDR,*
- 3. the setting up of objectives for specific adverse impact indicators, chosen among those belonging to the Mandatory list in the RTS to the SFDR.*

*In particular:*

- 1) from a value perspective, issuers involved in controversial weapons (connection to PAI 14), nuclear weapons, tobacco, gambling and thermal coal mining which accounts for more than 30% of revenues (connection to PAI 4) are excluded;*

- 2) *investment in at least 21% of the financial product's NAV in sustainable issuers ensures that these issuers, by construction, pass the Good Governance and general E and S tests (detailed in the “sustainable investment” sections above) and the DNSH test (which takes into consideration all the 14 mandatory PAI, detailed in the “sustainable investment” sections above) while contributing positively to climate, environmental and social topics;*
- 3) *objectives for specific mandatory adverse impact indicators:*
  - a. *PAI 4 (fossil fuels exposure): the adverse impact is mitigated through the limitation of the exposure to the fossil fuels sector, due to the exclusion of issuers with more than 30% of revenues from thermal coal mining.*
  - b. *PAI 14 (controversial weapons): the adverse impact is eliminated through the exclusion of issuers involved in controversial weapons.*
  - c. *PAI 16 (human rights violations): the adverse impact is mitigated through the exclusion of issuers sanctioned by the UN for human rights violations (see the “Strategy” sections below).*

*The consideration of PAIs is reported in the annual financial product report, as required by Art. 11(2) of the SFDR.*

### **What investment strategy does this financial product follow?**

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.

*The financial product's ESG strategy is based on two pillars:*

1. *the promotion of certain environmental and social characteristics;*
2. *the limitation of investments in issuers with low ESG quality.*

*More specifically:*

1. *This financial product promotes in particular:*

- *the fight against climate change through the exclusion of corporate issuers involved in the production of thermal coal which accounts for more than 30% of their revenues;*
- *the respect of human rights, through the exclusion of:*
  - *corporate issuers involved in the production of controversial weapons, which include anti-personnel land mines, cluster munitions, biological, chemical, blinding weapons, white phosphorus, nuclear armaments and which have mostly been banned by UN treaties;*
  - *countries sanctioned at the central government level by the UN for systematic violations of human rights;*
- *the protection of human health, through the exclusion of issuers involved in the production of tobacco;*





- *the protection of human well-being, through the exclusion of corporate issuers involved in the gambling sector.*

*The above exclusions are determined by the Manager based on the analysis carried out by specialized third party index and ESG data providers, in particular:*

- *Urgewald for thermal coal;*
- *Vigeo for controversial weapons;*
- *Sustainalytics for countries sanctioned by UN for systematic violations of human rights;*
- *MSCI, ICE-BofA indices for identifying issuers involved in tobacco and gambling.*

2. *The ESG quality of the financial product's portfolio is monitored by the Manager in order to avoid a high concentration of ESG lowly rated issuers in the financial product, where the concentration is taken into consideration in absolute terms (i.e. with reference to the net assets of the financial product) and not relative to the financial product's benchmark (i.e. not in relation to its composition in terms of ESG scores). In particular, issuers are selected by the Manager so that less than 10% of the financial product's net assets are invested in corporate or government issuers without an ESG Combined Score or with an ESG Combined Score below 25, on a scale from 0 to 100 (best).*

*Regarding the application of ESG scores for corporate or government issuers, the Manager uses scoring data of third party ESG data providers. In particular:*

- *Refinitiv provides ESG scores and ratings for corporates;*
- *Sustainalytics provides ESG scores, ratings and analyses for countries;*

*The overall ESG quality of the portfolio is monitored by the Manager on a continuous basis and issuers with an ESG Combined Score lower than 25 are evaluated at each quarterly meeting of the ESG Committee of the Manager.*

*The above exclusions and limitations do not apply to positions derived from investments in other collective investment schemes or in index derivatives.*

- ***What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?***

*The binding elements of the investment strategy in order to achieve the environmental and social characteristics promoted by this financial product are those described under the preceding Investment Strategy section.*

- ***What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?***

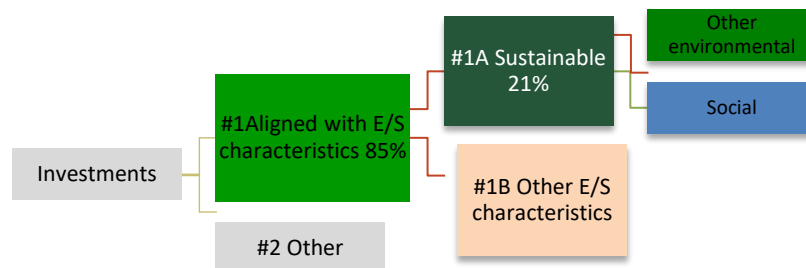
Not Applicable

● **What is the policy to assess good governance practices of the investee companies?**

When considering good governance practices, the Manager follows an internal process in order to monitor the governance (G) scores provided by a third party ESG data provider as far as directly owned issuers are concerned. Those G scores are calculated on the basis of 56 sub-indicators that relate to Management Quality (35), Attention to Shareholders (12) and CSR Strategy (9), which take into account specific factors such as: management structures, employee relations, remuneration of staff and tax compliance.

**What is the asset allocation planned for this financial product?**

The financial product's strategic asset allocation is defined by its risk-return profile and implemented through the active investment in variable proportions.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

*A minimum proportion of 85% of the financial product net assets are invested in issuers which promote the environmental and social characteristics, in accordance with the binding elements of the investment strategy, and which have an ESG Combined Score higher than 25. Investments in any financial products classified as either Article 8 SFDR or Article 9 SFDR are also considered to be aligned with the environmental and social characteristics promoted by the financial product. While the financial product does not have sustainable investing as its objective, the financial product seeks to invest a minimum of 21% of its assets in sustainable investments with an environmental and/or social objective, as detailed in the sections above.*

**Asset allocation** describes the share of investment in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

Up to 15% of the financial product's net assets may be invested in money market instruments or consists of margins, collateral and market value of derivative instruments, or a mix of those and investments in issuers that have no ESG Combined Score or have an ESG Combined Score lower than 25, subject to a maximum limit of 10% of the financial product net assets for the latter. Those issuers that have no ESG Combined Score or have an ESG Combined Score lower than 25 are deemed to be of interest from a strictly financial point of view and/or, given their characteristics, help to complete the thematic, sector and geographic profile of the portfolio. Those issuers will still be compliant with the exclusion criteria set out in the "Investment Strategy" section above.

The thresholds mentioned above hold unless market or other special conditions warrant a varied asset allocation (i.e. the 85% and 15% thresholds, whereas the 10% maximum threshold is not subject to variation).

● **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

The implementation of the ESG strategy of the financial product generally is not based on the use of derivative instruments with specific ESG characteristics, even though the use of such instruments is not forbidden. Also, the financial product may use derivative instruments to manage its risk/return profile.

Finally, while derivative instruments on single names are subject to the limitations set out in the "Investment Strategy" section above, derivatives on indices are not.



**To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?**

0%

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>13</sup>?**

Yes:

In fossil gas  In nuclear energy

No

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<sup>13</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

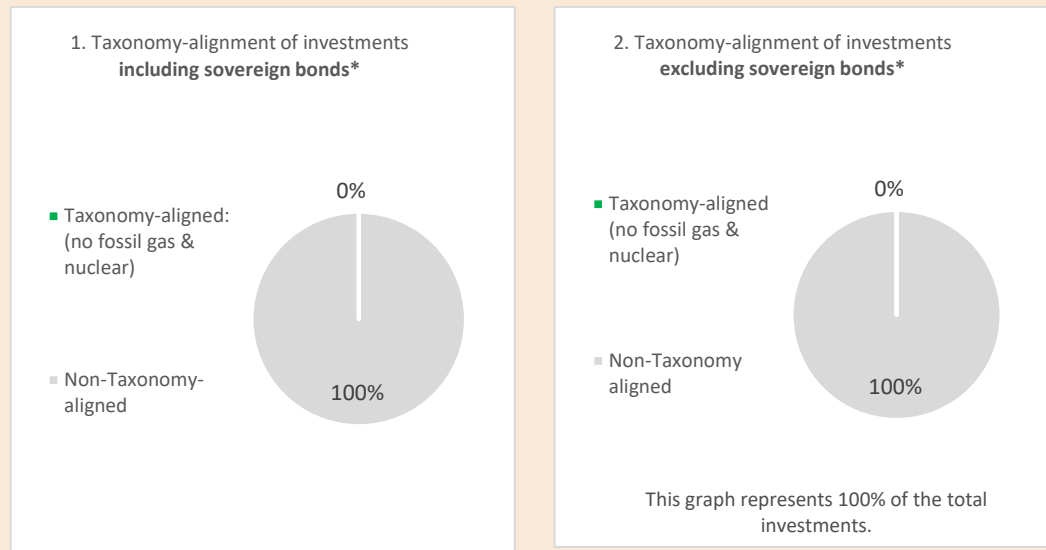
To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

**not take into account the criteria** for environmentally sustainable economic activities under 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

● **What is the minimum share of investments in transitional and enabling activities?**  
0%

🌍 **What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy**  
As the financial product invests in various types of sustainable investments, it does not commit to a minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy. However, the financial product does commit to making a minimum share of 21% of its assets between (i) sustainable investments with an environmental objective that are not aligned with the EU Taxonomy and (ii) sustainable social investments.

👤 **What is the minimum share of socially sustainable investments?**

As the financial product invests in various types of sustainable investments, it does not commit to a minimum share of socially sustainable investments. However, the financial product does commit to making a minimum share of 21% of its assets between (i) sustainable investments with an environmental

objective that are not aligned with the EU Taxonomy and (ii) sustainable social investments.



**What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

*As already clarified in the “Asset allocation” section above, the “#2 Other” part of the financial product consists of up to 15% of the financial product’s net assets may be invested in money market instruments or consists of margins, collateral and market value of derivative instruments, or a mix of those and investments in issuers that have no ESG Combined Score or have an ESG Combined Score lower than 25, subject to a maximum limit of 10% of the financial product net assets for the latter. Those issuers that have no ESG Combined Score or have an ESG Combined Score lower than 25 are deemed to be of interest from a strictly financial point of view and/or, given their characteristics, help to complete the thematic, sector and geographic profile of the portfolio. Those issuers will still be compliant with the exclusion criteria set out in the “Investment Strategy” section above.*



**Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

*No*

- ***How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?***

*Not Applicable*

- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

*Not Applicable*

- ***How does the designated index differ from a relevant broad market index?***

*Not Applicable*

- ***Where can the methodology used for the calculation of the designated index be found?***

*Not Applicable*

**Where can I find more product specific information online?**

**More product-specific information can be found on the website:**

**<https://www.animasgr.it/surl/EN-sustainability-related-disclosures>**

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.





## ANIMA EURO EQUITY

Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

### ANIMA Euro Equity

LEI: 2138001MPVLI3KMZME29

## Environmental and/or social characteristics

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

#### Does this financial product have a sustainable investment objective?

Yes

No

It will make a minimum of **sustainable investments with an environmental objective**: \_\_\_%

- in economic activities that qualify as environmentally sustainable under the EU Taxonomy
- in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

It will make a minimum of **sustainable investments with a social objective**: \_\_\_%

It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 21% of sustainable investments:

- with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
- with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
- with a social objective

It promotes E/S characteristics, but **will not make any sustainable investments**

#### What environmental and/or social characteristics are promoted by this financial product?

*This financial product promotes both the preservation of the environment and natural resources, and fair work conditions, democracy and human and social rights on the social side, as pursued by government issuers. From a corporate point of view, this financial product promotes also the following environmental and social characteristics:*

- *the fight against climate change;*
- *the respect of human rights;*

- *the protection of human health;*
- *the protection of human well-being.*

*The promotion of the above environmental and social characteristics are evaluated by the Manager based on the analysis carried out by specialised third party ESG data providers.*

*Further elements of the financial product’s ESG strategy are described in the “Asset Allocation” sections below.*

● ***What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?***

*The sustainability indicators used by this financial product are:*

- *the exclusion of corporate issuers involved in the production of thermal coal which accounts for more than 30% of their revenues, for the fight against climate change;*
- *the exclusion of:*
  - *corporate issuers involved in the production of controversial weapons, which include anti-personnel land mines, cluster munitions, biological, chemical, blinding weapons, white phosphorus and nuclear armaments;*
  - *countries sanctioned at the central government level by the UN for systematic violations of human rights;*

*for the respect of human rights;*

- *the exclusion of issuers involved in the production of tobacco, for the protection of human health;*
- *the exclusion of corporate issuers involved in the gambling sector, for the protection of human well-being.*

● ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

*As mentioned above, although the financial product does not have a sustainable objective, it will invest a minimum of 21% of its NAV in issuers defined as “SFDR” sustainable according to an internal algorithm of the Manager. This algorithm provides that issuers are considered sustainable if they:*

- *comply with the exclusion criteria mentioned in the “Investment Strategy” section further below;*

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.



- *pass the DNSH test, described in the following section;*
- *pass a Good Governance test, which is set at the level of 25 out 100 for their G score;*
- *pass a general E and S test, which is set at the level of 25 out 100 for their E and S scores;*
- *contribute positively to at least one of the following three areas: Climate Transition, Environment or Society. Positive contribution is measured on the basis of issuers' involvement in certain initiatives or on the basis of best-in-class criteria related to specific environmental and/or social factors.*

● ***How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?***

*The assessment that issuers considered to be sustainable do not cause significant harm to other sustainable investment objectives is carried out on the basis of the Do No Significant Harm test (DNSH, developed internally by the Manager), which, in line with regulatory recommendations, is based on the mandatory Principal Indicators of Adverse Impact (PAI, see the RTS to the SFDR). In particular, investments are considered to cause significant harm when they involve issuers that:*

- *do not publish data on Carbon Footprint, Carbon Intensity and Board Gender Diversity;*
- *are involved in the fossil fuels sector or the controversial weapons sector;*
- *are involved in very severe controversies related to compliance with the UN Global Compact and OECD requirements for multinational companies;*
- *exceed strict threshold values (specifically identified by the Manager based on a diversified sample of issuers worldwide) for any of the following PAI indicators: 2\*, 3\*, 5, 6\*, 8, 9, 12 and 13;*
- *exceed critical thresholds (specifically identified by the Manager based on a diversified sample of issuers worldwide) for at least 4 of the following PAI indicators: 2\*, 3\*, 5, 6\*, 7, 8, 9, 10, 11, 12 and 13.*

*Note \*: it should be noted that, for the purposes of the DNSH test, absolute GHG emissions levels (PAI 1) are used to calculate PAIs 2 and 3; also, Carbon Footprint and GHG Intensity are calculated taking into account only Scope 1 and 2 emissions. It should also be noted that PAI 6 currently takes into account the sectoral classification provided by the provider Refinitiv as a proxy for the NACE classification required by the regulations.*



● ***How have the indicators for adverse impacts on sustainability factors been taken into account?***

*Please refer to the preceding section.*

● ***How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?***

*The alignment of sustainable investments with the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights is pursued through several investment selection and management criteria, explained above and consistent with the aforementioned guidelines. In particular:*

- *exclusions relating to controversial weapons, which apply to all investments;*
- *exclusions based on the DNSH principle, applied through the definition of threshold levels on PAI indicators;*
- *inclusions based on the identification of positive contributions to climate, social or environmental objectives;*
- *exclusions of environmental or social ratings that fall into the worst quartile of the rankings based on the data provided by specialized third party providers;*
- *application to equity investments of the voting rights policy, based on the third party provider (ISS) model, which takes into account specific ESG factors and refers to guidelines consistent with sustainable business practices on the environment, fair treatment of labour, non-discriminatory policies and protection of human rights, framed in initiatives such as those of the United Nations Environment Programme Finance Initiative (UNEP FI), United Nations Principles for Responsible Investment (UNPRI), United Nations Global Compact, Global Reporting Initiative (GRI), Carbon Principles, International Labour Organisation Conventions (ILO), CERES Principles, Global Sullivan Principles, MacBride Principles and the European Union Directives on social and environmental issues.*



**Does this financial product consider principal adverse impacts on sustainability factors?**

YES

NO

*Yes, the financial product*

*The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.*

*The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.*

*Any other sustainable investments must also not significantly harm any environmental or social objectives.*

*considers the principal adverse impacts on sustainability factors.*

*In general, the consideration of PAIs is based on the contribution of certain mitigating factors, such as:*

- 1. value exclusions,*
- 2. exclusions/limitations resulting from investing in sustainable issuers according to the SFDR,*
- 3. the setting up of objectives for specific adverse impact indicators, chosen among those belonging to the Mandatory list in the RTS to the SFDR.*

*In particular:*

- 1) from a value perspective, issuers involved in controversial weapons (connection to PAI 14), nuclear weapons, tobacco, gambling and thermal coal mining which accounts for more than 30% of revenues (connection to PAI 4) are excluded;*
- 2) investment in at least 21% of the financial product's NAV in sustainable issuers ensures that these issuers, by construction, pass the Good Governance and general E and S tests (detailed in the “sustainable investment” sections above) and the DNSH test (which takes into consideration all the 14 mandatory PAI, detailed in the “sustainable investment” sections above) while contributing positively to climate, environmental and social topics;*

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.



3) *objectives for specific mandatory adverse impact indicators:*

- a. *PAI 4 (fossil fuels exposure): the adverse impact is mitigated through the limitation of the exposure to the fossil fuels sector, due to the exclusion of issuers with more than 30% of revenues from thermal coal mining.*
- b. *PAI 14 (controversial weapons): the adverse impact is eliminated through the exclusion of issuers involved in controversial weapons.*
- c. *PAI 16 (human rights violations): the adverse impact is mitigated through the exclusion of issuers sanctioned by the UN for human rights violations (see the “Strategy” sections below).*

*The consideration of PAIs is reported in the annual financial product report, as required by Art. 11(2) of the SFDR.*

**What investment strategy does this financial product follow?**

*The financial product's ESG strategy is based on two pillars:*

1. *the promotion of certain environmental and social characteristics;*
2. *the limitation of investments in issuers with low ESG quality.*

*More specifically:*

1. *This financial product promotes in particular:*

- *the fight against climate change through the exclusion of corporate issuers involved in the production of thermal coal which accounts for more than 30% of their revenues;*
- *the respect of human rights, through the exclusion of:*
  - *corporate issuers involved in the production of controversial weapons, which include anti-personnel land mines, cluster munitions, biological, chemical, blinding weapons, white phosphorus and nuclear armaments;*
  - *countries sanctioned at the central government level by the UN for systematic violations of human rights;*
- *the protection of human health, through the exclusion of issuers involved in the production of tobacco;*
- *the protection of human well-being, through the exclusion of corporate issuers involved in the gambling sector.*

*The above exclusions are determined by the Manager based on the analysis carried out by specialized third party index and ESG data providers, in particular:*

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

- *Urgewald for thermal coal;*
- *Moody's/Vigeo for controversial weapons;*
- *Sustainalitics for countries sanctioned by UN for systematic violations of human rights;*
- *MSCI, ICE-BofA indices for identifying issuers involved in tobacco and gambling.*

2. *The ESG quality of the financial product's portfolio is monitored by the Manager in order to avoid a high concentration of ESG lowly rated issuers in the financial product, where the concentration is taken into consideration in absolute terms (i.e. with reference to the net assets of the financial product) and not relative to the financial product's benchmark (i.e. not in relation to its composition in terms of ESG scores). In particular, issuers are selected by the Manager so that less than 10% of the financial product's net assets are invested in corporate or government issuers without an ESG Combined Score or with an ESG Combined Score below 25, on a scale from 0 to 100 (best).*

*Regarding the application of ESG scores for corporate or government issuers, the Manager uses scoring data of third party ESG data providers. In particular:*

- *Refinitiv provides ESG scores and ratings for corporates;*
- *Sustainalytics provides ESG scores, ratings and analyses for countries;*

*The overall ESG quality of the portfolio is monitored by the Manager on a continuous basis and issuers with an ESG Combined Score lower than 25 are evaluated at each quarterly meeting of the ESG Committee of the Manager.*

*The above exclusions and limitations do not apply to positions derived from investments in other collective investment schemes or in index derivatives.*

- ***What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?***

*The binding elements of the investment strategy in order to achieve the environmental and social characteristics promoted by this financial product are those described under the preceding Investment Strategy section.*

- ***What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?***

*Not Applicable*

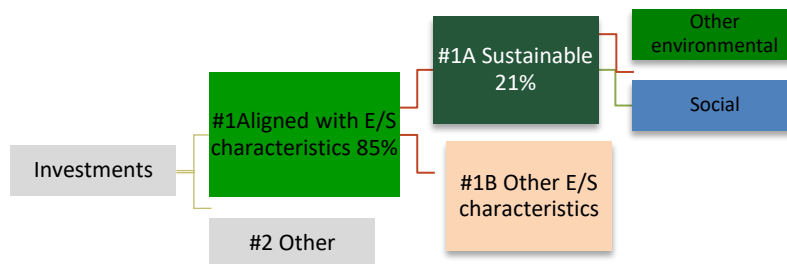
- ***What is the policy to assess good governance practices of the investee companies?***

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.

When considering good governance practices, the Manager follows an internal process in order to monitor the governance (G) scores provided by a third party ESG data provider as far as directly owned issuers are concerned. Those G scores are calculated on the basis of 56 sub-indicators that relate to Management Quality (35), Attention to Shareholders (12) and CSR Strategy (9), which take into account specific factors such as: management structures, employee relations, remuneration of staff and tax compliance.

### What is the asset allocation planned for this financial product?

The financial product's strategic asset allocation is defined by its risk-return profile and implemented through the active investment in variable proportions.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

A minimum proportion of 85% of the financial product net assets are invested in issuers which promote the environmental and social characteristics, in accordance with the binding elements of the investment strategy, and which have an ESG Combined Score higher than 25. Investments in any financial products classified as either Article 8 SFDR or Article 9 SFDR are also considered to be aligned with the environmental and social characteristics promoted by the financial product. While the financial product does not have sustainable investing as its objective, the financial product seeks to invest a minimum of 21% of its assets in sustainable investments with an environmental and/or social objective, as detailed in the sections above.

Up to 15% of the financial product's net assets may be invested in money market instruments or consists of margins, collateral and market value of derivative instruments, or a mix of those and investments in issuers that have no ESG Combined Score or have an ESG Combined Score lower than 25, subject to a maximum limit of 10% of the financial

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure (CapEx)** showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure (OpEx)** reflecting green operational activities of investee companies.

As a result, the financial product invests in specific assets.

product net assets for the latter. Those issuers that have no ESG Combined Score or have an ESG Combined Score lower than 25 are deemed to be of interest from a strictly financial point of view and/or, given their characteristics, help to complete the thematic, sector and geographic profile of the portfolio. Those issuers will still be compliant with the exclusion criteria set out in the “Investment Strategy” section above.

The thresholds mentioned above hold unless market or other special conditions warrant a varied asset allocation (i.e. the 85% and 15% thresholds, whereas the 10% maximum threshold is not subject to variation).

● **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

The implementation of the ESG strategy of the financial product generally is not based on the use of derivative instruments with specific ESG characteristics, even though the use of such instruments is not forbidden. Also, the financial product may use derivative instruments to manage its risk/return profile.

Finally, while derivative instruments on single names are subject to the limitations set out in the “Investment Strategy” section above, derivatives on indices are not.



**To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?**

0%

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>14</sup>?**

Yes:

In fossil gas  In nuclear energy

No


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<sup>14</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation”) and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

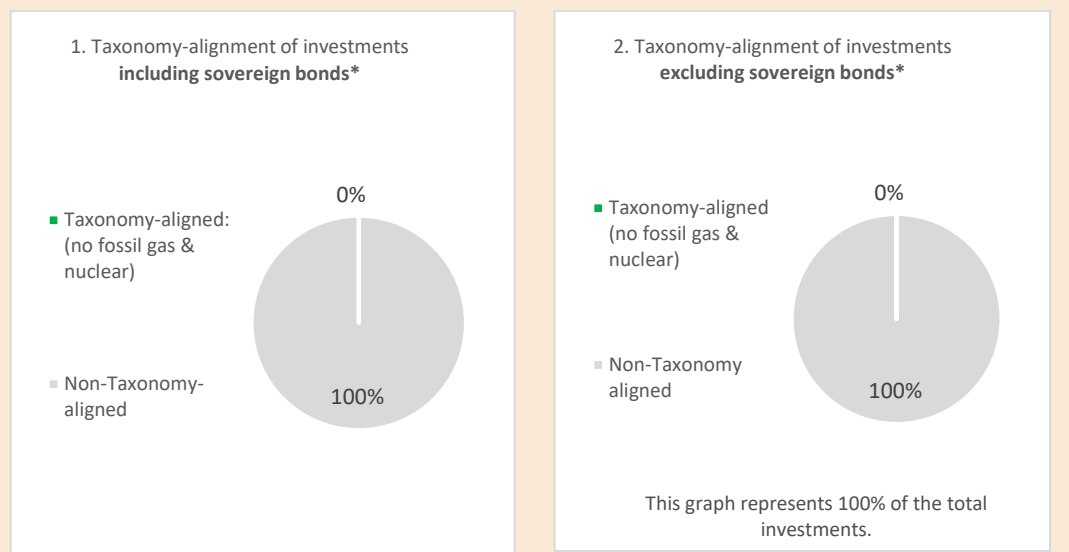
To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

 are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under 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

● **What is the minimum share of investments in transitional and enabling activities?**

0%



**What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy**

As the financial product invests in various types of sustainable investments, it does not commit to a minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy. However, the financial product does commit to making a minimum share of 21% of its assets between (i) sustainable investments with an environmental objective that are not aligned with the EU Taxonomy and (ii) sustainable social investments.



**What is the minimum share of socially sustainable investments?**

As the financial product invests in various types of sustainable investments, it does not commit to a minimum share of socially sustainable investments. However, the financial product does commit to making a minimum share of 21% of its assets between (i) sustainable investments with an environmental objective that are not aligned with the EU Taxonomy and (ii) sustainable social investments.



**What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**



As already clarified in the “Asset allocation” section above, the “#2 Other” part of the financial product consists of up to 15% of the financial product’s net assets may be invested in money market instruments or consists of margins, collateral and market value of derivative instruments, or a mix of those and investments in issuers that have no ESG Combined Score or have an ESG Combined Score lower than 25, subject to a maximum limit of 10% of the financial product net assets for the latter. Those issuers that have no ESG Combined Score or have an ESG Combined Score lower than 25 are deemed to be of interest from a strictly financial point of view and/or, given their characteristics, help to complete the thematic, sector and geographic profile of the portfolio. Those issuers will still be compliant with the exclusion criteria set out in the “Investment Strategy” section above.



**Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

No

- **How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?**

Not Applicable

- **How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?**

Not Applicable

- **How does the designated index differ from a relevant broad market index?**

Not Applicable

- **Where can the methodology used for the calculation of the designated index be found?**

Not Applicable

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that it promotes.



**Where can I find more product specific information online?**

**More product-specific information can be found on the website:**

<https://www.animasgr.it/surl/EN-sustainability-related-disclosures>



## ANNEX 2

**Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

### ANIMA Liquidity

LEI: 213800SMT7YGFZ96E263

## Environmental and/or social characteristics

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the

Does this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input type="radio"/> <b>Yes</b>	<input type="radio"/> <input checked="" type="radio"/> <input checked="" type="checkbox"/> <b>No</b>
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective: ___%</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: ___%</b>	<input checked="" type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of _ % of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with a social objective</li> </ul> <input checked="" type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>

**What environmental and/or social characteristics are promoted by this financial product?**

*This financial product promotes both the preservation of the environment and natural resources, and fair work conditions, democracy and human and social rights on the social side, as pursued by government issuers.*

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

*The promotion of the above environmental and social characteristics by a government issuer are evaluated by the Manager based on the analysis carried out by a specialised third party ESG data provider.*

*Further elements of the financial product’s ESG strategy are described in the “Asset Allocation” sections below.*

- ***What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?***

*The sustainability indicators, used to measure the attainment of each of the environmental or social characteristics promoted by this financial product, are the E, S and G scores by a third party ESG data provider, which assess countries’ prosperity by considering its access to – and management of – natural, human and institutional wealth.*

*The scores assigned to the 3 factors above are then averaged in one final score (the Country ESG Score), on a scale that goes from 0 to 100 (100 being the best score).*

- ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

*Not Applicable*

- ***How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?***

*Not Applicable*

***How have the indicators for adverse impacts on sustainability factors been taken into account?***

*Not Applicable*

***How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?***

*Not Applicable*

*The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.*

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

*Any other sustainable investments must also not significantly harm any environmental or social objectives.*



### Does this financial product consider principal adverse impacts on sustainability factors?

YES

X

NO

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

*Yes, the financial product considers the principal adverse impacts on sustainability factors (PAI). Given that the financial product only invests in short term Euro government bonds and money markets instruments, where the short term nature of its investments is not very well suited for the evaluation of long term features such as the adverse impacts on sustainability factors, it considers specifically only PAI 16 (human rights violations) from the list of mandatory indicators, included in the RTS to the SFDR. In this respect, the adverse impact is mitigated through the exclusion of countries sanctioned at the central government level by the UN for systematic violations of human rights.*



### What investment strategy does this financial product follow?

*The financial product's ESG strategy is based on two pillars:*

1. *the promotion of the environmental and social characteristics described in the sections above, as evaluated through the Country ESG Score described above. Specifically, no more than 10% of the financial product's net assets can be invested in government issuers with no Country ESG Score or with a Country ESG Score less than 25;*
2. *the exclusion of government issuers sanctioned by the UN for systematic violations of human rights.*

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.

The overall ESG quality of the portfolio is monitored by the Manager on a continuous basis and issuers with no Country ESG Score or with a Country ESG Score lower than 25 are evaluated at each quarterly meeting of the ESG Committee of the Manager.

The above exclusions and limitations do not apply to positions derived from investments in other collective investment schemes or in index derivatives.

- **What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?**

The binding elements of the investment strategy in order to achieve the environmental and social characteristics promoted by this financial product are those described under the preceding section.

- **What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?**

Not Applicable

- **What is the policy to assess good governance practices of the investee companies?**

Not Applicable

**Asset allocation** describes the share of investment in specific assets.

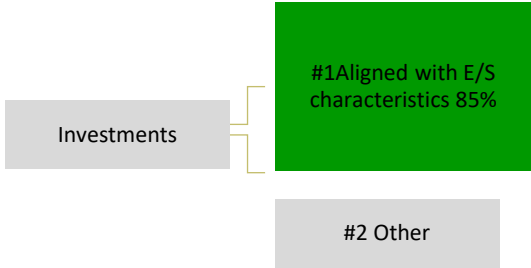


**What is the asset allocation planned for this financial product?**

The financial product's strategic asset allocation is defined by its risk-return profile and implemented through the active investment in variable proportions.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

*A minimum proportion of 85% of the financial product net assets are invested in issuers which promote the environmental and social characteristics, in accordance with the binding elements of the investment strategy, and which have an ESG Combined Score higher than 25. Investments in any financial products classified as either Article 8 SFDR or Article 9 SFDR are also considered to be aligned with the environmental and social characteristics promoted by the financial product.*

*Up to 15% of the financial product's net assets may be invested in money market instruments or consists of margins, collateral and market value of derivative instruments, or a mix of those and investments in issuers that have no ESG Combined Score or have an ESG Combined Score lower than 25, subject to a maximum limit of 10% of the financial product net assets for the latter. Those issuers that have no ESG Combined Score or have an ESG Combined Score lower than 25 are deemed to be of interest from a strictly financial point of view and/or, given their characteristics, help to complete the thematic, sector and geographic profile of the portfolio. Those issuers will still be compliant with the exclusion criteria set out in the "Investment Strategy" section above.*

*The thresholds mentioned above hold unless market or other special conditions warrant a varied asset allocation (i.e. the 85% and 15% thresholds, whereas the 10% maximum threshold is not subject to variation).*

● **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

*The implementation of the ESG strategy of the financial product generally is not based on the use of derivative instruments with specific ESG characteristics, even though the use of such instruments is not forbidden. Also, the financial product may use derivative instruments to manage its risk/return profile.*

*Finally, while derivative instruments on single names are subject to the limitations set out in the "Investment Strategy" section above, derivatives on indices are not.*



**To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?**

0%

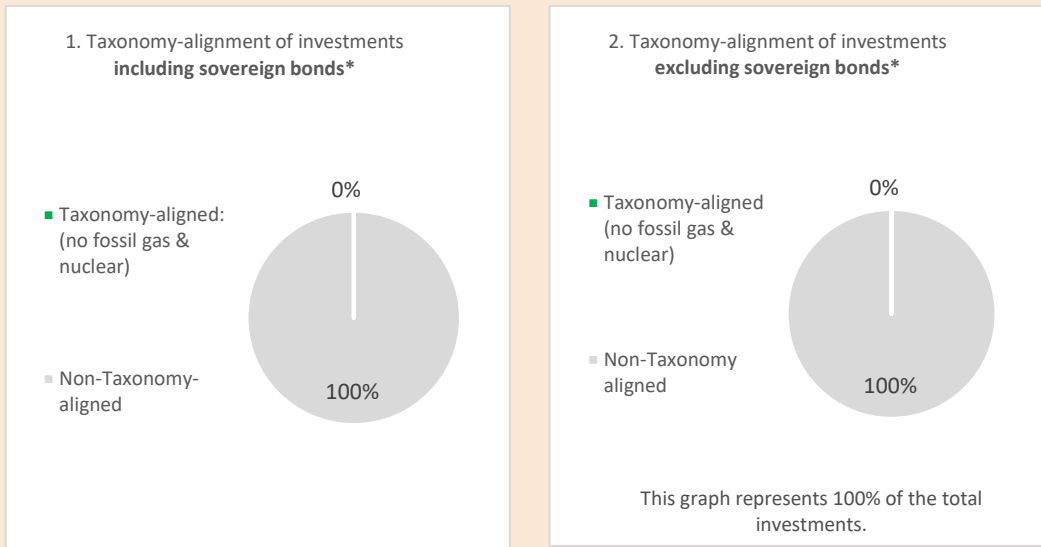
● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>15</sup>?**

<sup>15</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to fighting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective -

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste

- Yes:
  - In fossil gas
  - In nuclear energy
- No

*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

**What is the minimum share of investments in transitional and enabling activities?**  
0%



**What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy**  
Not Applicable



**What is the minimum share of socially sustainable investments?**  
Not Applicable



**What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

As already clarified in the “Asset allocation” section above, the “#2 Other” part of the financial product consists of up to 15% of the financial product’s net assets may be invested in money market instruments or consists of margins, collateral and market value of derivative instruments, or a mix of those and investments in issuers that have no ESG Combined Score or have an ESG Combined Score lower than 25, subject to a maximum limit of 10% of the financial product net assets for the latter. Those issuers that have no ESG Combined Score or have an ESG Combined Score lower than 25 are deemed to be of interest from a strictly financial point of view and/or, given their characteristics, help to complete the thematic, sector and geographic profile of the portfolio. Those issuers will still be compliant with the exclusion criteria set out in the “Investment Strategy” section above.

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



**Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

No

- **How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?**

*Not Applicable*

- **How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?**

*Not Applicable*

- **How does the designated index differ from a relevant broad market index?**

*Not Applicable*

- **Where can the methodology used for the calculation of the designated index be found?**

*Not Applicable*



**Where can I find more product specific information online?**

More product-specific information can be found on the website: <https://www.animasgr.it/surl/EN-sustainability-related-disclosures>

ANNEX I

ANIMA SHORT TERM CORPORATE BONDS

Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

ANIMA Short Term Corporate Bond

LEI: 213800YGYPD7YECSMD70

Environmental and/or social characteristics

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Does this financial product have a sustainable investment objective?**

Yes   No

<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective:</b> ___% <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul>	<input checked="" type="checkbox"/> It promotes <b>Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 10% of sustainable investments: <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with a social objective</li> </ul>
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective:</b> ___%	<input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>

**What environmental and/or social characteristics are promoted by this financial product?**

*This financial product promotes both the preservation of the environment and natural resources, and fair work conditions, democracy and human and social rights on the social side, as pursued by government issuers. From a corporate point of view, this financial product promotes also the following environmental and social characteristics:*

- *the fight against climate change;*



- *the respect of human rights;*
- *the protection of human health;*
- *the protection of human well-being.*

*The promotion of the above environmental and social characteristics are evaluated by the Manager based on the analysis carried out by specialised third party ESG data providers.*

*Further elements of the financial product’s ESG strategy are described in the “Asset Allocation” sections below.*

● ***What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?***

*The sustainability indicators used by this financial product are:*

- *the exclusion of corporate issuers involved in the production of thermal coal which accounts for more than 30% of their revenues, for the fight against climate change;*
- *the exclusion of:*
  - *corporate issuers involved in the production of controversial weapons, which include anti-personnel land mines, cluster munitions, biological, chemical, blinding weapons, white phosphorus and nuclear armaments;*
  - *countries sanctioned at the central government level by the UN for systematic violations of human rights;*

*for the respect of human rights;*

- *the exclusion of issuers involved in the production of tobacco, for the protection of human health;*
- *the exclusion of corporate issuers involved in the gambling sector, for the protection of human well-being.*

● ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

*As mentioned above, although the financial product does not have a sustainable objective, it will invest a minimum of 10% of its NAV in issuers defined as “SFDR” sustainable according to an internal algorithm of the Manager. This algorithm provides that issuers are considered sustainable if they:*

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

- *comply with the exclusion criteria mentioned in the “Investment Strategy” section further below;*
- *pass the DNSH test, described in the following section;*
- *pass a Good Governance test, which is set at the level of 25 out 100 for their G score;*
- *pass a general E and S test, which is set at the level of 25 out 100 for their E and S scores;*
- *contribute positively to at least one of the following three areas: Climate Transition, Environment or Society. Positive contribution is measured on the basis of issuers' involvement in certain initiatives or on the basis of best-in-class criteria related to specific environmental and/or social factors.*

● ***How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?***

*The assessment that issuers considered to be sustainable do not cause significant harm to other sustainable investment objectives is carried out on the basis of the Do No Significant Harm test (DNSH, developed internally by the Manager), which, in line with regulatory recommendations, is based on the mandatory Principal Indicators of Adverse Impact (PAI, see the RTS to the SFDR). In particular, investments are considered to cause significant harm when they involve issuers that:*

- *do not publish data on Carbon Footprint, Carbon Intensity and Board Gender Diversity;*
- *are involved in the fossil fuels sector or the controversial weapons sector;*
- *are involved in very severe controversies related to compliance with the UN Global Compact and OECD requirements for multinational companies;*
- *exceed strict threshold values (specifically identified by the Manager based on a diversified sample of issuers worldwide) for any of the following PAI indicators: 2\*, 3\*, 5, 6\*, 8, 9, 12 and 13;*
- *exceed critical thresholds (specifically identified by the Manager based on a diversified sample of issuers worldwide) for at least 4 of the following PAI indicators: 2\*, 3\*, 5, 6\*, 7, 8, 9, 10, 11, 12 and 13.*

*Note \*: it should be noted that, for the purposes of the DNSH test, absolute GHG emissions levels (PAI 1) are used to calculate PAIs 2 and 3; also, Carbon Footprint and GHG Intensity are calculated taking into account only Scope 1 and 2 emissions. It should*

also be noted that PAI 6 currently takes into account the sectoral classification provided by the provider Refinitiv as a proxy for the NACE classification required by the regulations.

● ***How have the indicators for adverse impacts on sustainability factors been taken into account?***

*Please refer to the preceding section.*

● ***How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?***

*The alignment of sustainable investments with the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights is pursued through several investment selection and management criteria, explained above and consistent with the aforementioned guidelines. In particular:*

- *exclusions relating to controversial weapons, which apply to all investments;*
- *exclusions based on the DNSH principle, applied through the definition of threshold levels on PAI indicators;*
- *inclusions based on the identification of positive contributions to climate, social or environmental objectives;*
- *exclusions of environmental or social ratings that fall into the worst quartile of the rankings based on the data provided by specialized third party providers;*
- *application of the voting rights policy, based on the third party provider (ISS) model, which takes into account specific ESG factors and refers to guidelines consistent with sustainable business practices on the environment, fair treatment of labour, non-discriminatory policies and protection of human rights, framed in initiatives such as those of the United Nations Environment Programme Finance Initiative (UNEP FI), United Nations Principles for Responsible Investment (UNPRI), United Nations Global Compact, Global Reporting Initiative (GRI), Carbon Principles, International Labour Organisation Conventions (ILO), CERES Principles, Global Sullivan Principles, MacBride Principles and the European Union Directives on social and environmental issues.*



## Does this financial product consider principal adverse impacts on sustainability factors?

YES

NO

X

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

*Yes, the financial product considers the principal adverse impacts on sustainability factors.*

*In general, the consideration of PAIs is based on the contribution of certain mitigating factors, such as:*

- 1. value exclusions,*
- 2. exclusions/limitations resulting from investing in sustainable issuers according to the SFDR,*
- 3. the setting up of objectives for specific adverse impact indicators, chosen among those belonging to the Mandatory list in the RTS to the SFDR.*

*In particular:*

- 1) from a value perspective, issuers involved in controversial weapons (connection to PAI 14), nuclear weapons, tobacco, gambling and thermal coal mining which accounts for more than 30% of revenues (connection to PAI 4) are excluded;*
- 2) investment in at least 10% of the financial product's NAV in sustainable issuers ensures that these issuers, by construction, pass the Good Governance and general E and S tests (detailed in the "sustainable investment" sections above) and the DNSH test (which takes into consideration all the 14 mandatory PAI, detailed in the "sustainable investment" sections above) while contributing positively to climate, environmental and social topics;*
- 3) objectives for specific mandatory adverse impact indicators:*
  - a. PAI 4 (fossil fuels exposure): the adverse impact is mitigated through the limitation of the exposure to the fossil fuels sector, due to the exclusion of issuers with more than 30% of revenues from thermal coal mining.*
  - b. PAI 14 (controversial weapons): the adverse impact is eliminated through the exclusion of issuers involved in controversial weapons.*
  - c. PAI 16 (human rights violations): the adverse impact is mitigated through the exclusion of issuers sanctioned by the UN for human rights violations (see the "Strategy" sections below).*

*The consideration of PAIs is reported in the annual financial product report, as required by Art. 11(2) of the SFDR.*

*The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.*

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

*Any other sustainable investments must also not significantly harm any environmental or social objectives.*

### **What investment strategy does this financial product follow?**

*The financial product's ESG strategy is based on two pillars:*

- 1. the promotion of certain environmental and social characteristics;*
- 2. the limitation of investments in issuers with low ESG quality.*

*More specifically:*

#### *1. This financial product promotes in particular:*

- the fight against climate change through the exclusion of corporate issuers involved in the production of thermal coal which accounts for more than 30% of their revenues;*
- the respect of human rights, through the exclusion of:*
  - corporate issuers involved in the production of controversial weapons, which include anti-personnel land mines, cluster munitions, biological, chemical, blinding weapons, white phosphorus and nuclear armaments;*
  - countries sanctioned at the central government level by the UN for systematic violations of human rights;*
- the protection of human health, through the exclusion of issuers involved in the production of tobacco;*
- the protection of human well-being, through the exclusion of corporate issuers involved in the gambling sector.*

*The above exclusions are determined by the Manager based on the analysis carried out by specialized third party index and ESG data providers, in particular:*

- Urgewald for thermal coal;*



**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

- *Moody's/ Vigeo for controversial weapons;*
- *Sustainalycs for countries sanctioned by UN for systematic violations of human rights;*
- *MSCI, ICE-BofA indices for identifying issuers involved in tobacco and gambling.*

2. *The ESG quality of the financial product's portfolio is monitored by the Manager in order to avoid a high concentration of ESG lowly rated issuers in the financial product, where the concentration is taken into consideration in absolute terms (i.e. with reference to the net assets of the financial product) and not relative to the financial product's benchmark (i.e. not in relation to its composition in terms of ESG scores). In particular, issuers are selected by the Manager so that less than 15% of the financial product's net assets are invested in corporate or government issuers without an ESG Combined Score or with an ESG Combined Score below 25, on a scale from 0 to 100 (best).*

*Regarding the application of ESG scores for corporate or government issuers, the Manager uses scoring data of third party ESG data providers. In particular:*

- *Refinitiv provides ESG scores and ratings for corporates;*
- *Sustainalytics provides ESG scores, ratings and analyses for countries;*

*The overall ESG quality of the portfolio is monitored by the Manager on a continuous basis and issuers with an ESG Combined Score lower than 25 are evaluated at each quarterly meeting of the ESG Committee of the Manager.*

*The above exclusions and limitations do not apply to positions derived from investments in other collective investment schemes or in index derivatives.*

- ***What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?***

*The binding elements of the investment strategy in order to achieve the environmental and social characteristics promoted by this financial product are those described under the preceding Investment Strategy section.*

- ***What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?***

*Not Applicable*

- ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

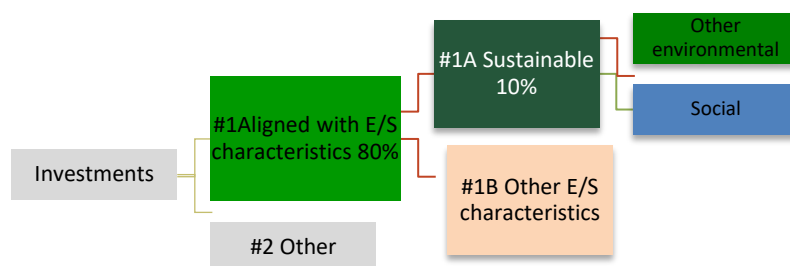
When considering good governance practices, the Manager follows an internal process in order to monitor the governance (G) scores provided by a third party ESG data provider as far as directly owned issuers are concerned. Those G scores are calculated on the basis of 56 sub-indicators that relate to Management Quality (35), Attention to Shareholders (12) and CSR Strategy (9), which take into account specific factors such as: management structures, employee relations, remuneration of staff and tax compliance.



## What is the asset allocation planned for this financial product?

The financial product's strategic asset allocation is defined by its risk-return profile and implemented through the active investment in variable proportions.

**Asset allocation** describes the share of investments in specific assets.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

*A minimum proportion of 80% of the financial product net assets are invested in issuers which promote the environmental and social characteristics, in accordance with the binding elements of the investment strategy, and which have an ESG Combined Score higher than 25. Investments in any financial products classified as either Article 8 SFDR or Article 9 SFDR are also considered to be aligned with the environmental and social characteristics promoted by the financial product. While the financial product does not have sustainable investing as its objective, the financial product seeks to invest a minimum of 10% of its assets in sustainable investments with an environmental and/or social objective, as detailed in the sections above.*

*Up to 20% of the financial product's net assets may be invested in money market instruments or consists of margins, collateral and market value of derivative instruments, or a mix of those and investments in issuers that have no ESG Combined Score or have an ESG Combined Score lower than 25, subject to a maximum limit of 15%*

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.



of the financial product net assets for the latter. Those issuers that have no ESG Combined Score or have an ESG Combined Score lower than 25 are deemed to be of interest from a strictly financial point of view and/or, given their characteristics, help to complete the thematic, sector and geographic profile of the portfolio. Those issuers will still be compliant with the exclusion criteria set out in the “Investment Strategy” section above.

The thresholds mentioned above hold unless market or other special conditions warrant a varied asset allocation (i.e. the 80% and 20% thresholds, whereas the 15% maximum threshold is not subject to variation).

● **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

The implementation of the ESG strategy of the financial product generally is not based on the use of derivative instruments with specific ESG characteristics, even though the use of such instruments is not forbidden. Also, the financial product may use derivative instruments to manage its risk/return profile.

Finally, while derivative instruments on single names are subject to the limitations set out in the “Investment Strategy” section above, derivatives on indices are not.



**To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?**

0%

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>17</sup>?**

Yes:

In fossil gas     In nuclear energy

No

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<sup>17</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation”) and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



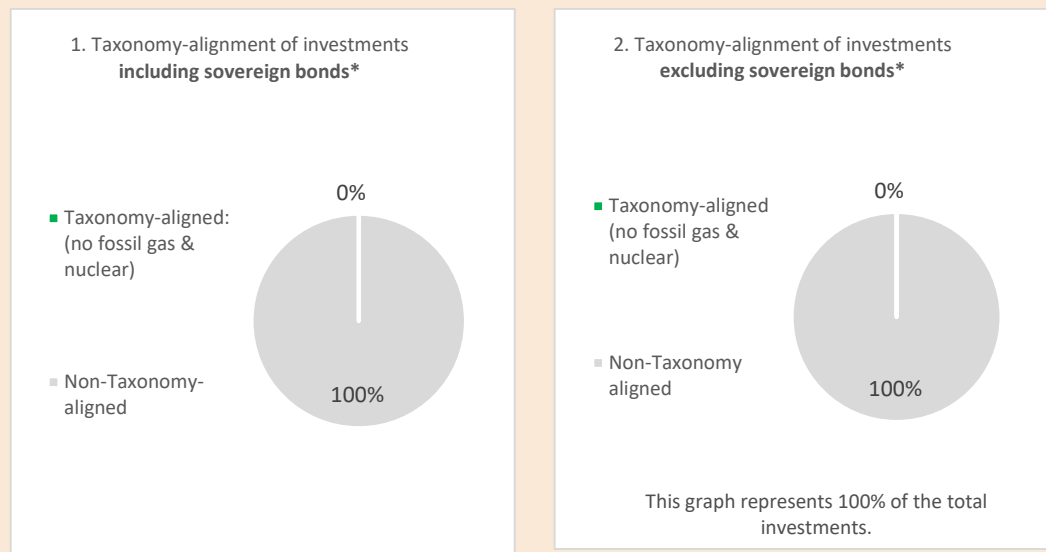
To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under 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

● **What is the minimum share of investments in transitional and enabling activities?**

0%

● **What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy**

As the financial product invests in various types of sustainable investments, it does not commit to a minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy. However, the financial product does commit to making a minimum share of 10% of its assets between (i) sustainable investments with an environmental objective that are not aligned with the EU Taxonomy and (ii) sustainable social investments.

● **What is the minimum share of socially sustainable investments?**

As the financial product invests in various types of sustainable investments, it does not commit to a minimum share of socially sustainable investments. However, the financial product does commit to making a minimum share of 10% of its assets between (i) sustainable investments with an environmental objective that are not aligned with the EU Taxonomy and (ii) sustainable social investments.

● **What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

As already clarified in the “Asset allocation” section above, the “#2 Other” part of the financial product consists of up to 20% of the financial product’s net assets may be invested in money market instruments or consists of margins, collateral and market value of derivative instruments, or a mix of those and investments in issuers that have no ESG Combined Score or have an ESG Combined Score lower than 25, subject to a maximum limit of 15% of the financial product net assets for the latter. Those issuers that have no ESG Combined Score or have an ESG Combined Score lower than 25 are deemed to be of interest from a strictly financial point of view and/or, given their characteristics, help to complete the thematic, sector and geographic profile of the portfolio. Those issuers will still be compliant with the exclusion criteria set out in the “Investment Strategy” section above.



**Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

*No*

- ***How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?***

*Not Applicable*

- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

*Not Applicable*

- ***How does the designated index differ from a relevant broad market index?***

*Not Applicable*

- ***Where can the methodology used for the calculation of the designated index be found?***

*Not Applicable*

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



**Where can I find more product specific information online?**

**More product-specific information can be found on the website:**  
<https://www.animasgr.it/surl/EN-sustainability-related-disclosures>

ANNEX 1

Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852



## ANIMA Euro Government Bond

LEI: 213800MYMBS3FLKE4U39

### Environmental and/or social characteristics

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

**Does this financial product have a sustainable investment objective?**

**Yes**

   **No**

<p><input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective</b>: ___%</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <p><input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective</b>: ___%</p>	<p><input checked="" type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of ___% of sustainable investments:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with a social objective</li> </ul> <p><input checked="" type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b></p>
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**What environmental and/or social characteristics are promoted by this financial product?**

*This financial product promotes both the preservation of the environment and natural resources, and fair work conditions, democracy and human and social rights on the social*

side, as pursued by government issuers. From a corporate point of view, this financial product promotes also the following environmental and social characteristics:

- the fight against climate change;
- the respect of human rights;
- the protection of human health;
- the protection of human well-being.

The promotion of the above environmental and social characteristics are evaluated by the Manager based on the analysis carried out by specialised third party ESG data providers.

Further elements of the financial product's ESG strategy are described in the "Asset Allocation" section below.

● **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

The sustainability indicators used by this financial product are:

- the exclusion of corporate issuers involved in the production of thermal coal which accounts for more than 30% of their revenues, for the fight against climate change;
- the exclusion of:
  - corporate issuers involved in the production of controversial weapons, which include anti-personnel land mines, cluster munitions, biological, chemical, blinding weapons, white phosphorus, nuclear armaments and which have mostly been banned by UN treaties;
  - countries sanctioned at the central government level by the UN for systematic violations of human rights;
- for the respect of human rights;
- the exclusion of corporate issuers involved in the production of tobacco, for the protection of human health;
- the exclusion of corporate issuers involved in the gambling sector, for the protection of human well-being.

● **What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?**

Not Applicable

- **How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?**

*Not Applicable*

**How have the indicators for adverse impacts on sustainability factors been taken into account?**

*Not Applicable*

**How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?**

*Not Applicable*

*The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.*

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

*Any other sustainable investments must also not significantly harm any environmental or social objectives.*

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

**Does this financial product consider principal adverse impacts on sustainability factors?**



**YES**

**X**

**NO**

*Yes, the financial product considers the principal adverse impacts on sustainability factors.*

*In general, the consideration of PAIs is based on the contribution of certain mitigating factors, such as:*

1. *exclusions based on values,*



2. *the setting up of objectives for specific adverse impact indicators, chosen among those belonging to the Mandatory list in the RTS to the SFDR.*

*In particular:*

- 1) *from a values perspective, corporate issuers involved in controversial weapons (connection to PAI 14), nuclear weapons, tobacco, gambling and thermal coal mining which accounts for more than 30% of their revenues (connection to PAI 4) are excluded;*
- 2) *objectives for specific mandatory adverse impact indicators:*
  - a. *PAI 4 (Fossil fuels exposure): the adverse impact is mitigated through the limitation of the exposure to the fossil fuels sector, due to the exclusion of corporate issuers with more than 30% of revenues from thermal coal mining.*
  - b. *PAI 14 (controversial weapons): the adverse impact is eliminated through the exclusion of issuers involved in controversial weapons.*

*As for specific PAI objectives on government issuers, the financial product has regard to:*

*PAI 16 (human rights violations): the adverse impact is mitigated through the exclusion of issuers sanctioned by the UN for human rights violations (see the “Investment Strategy” sections below).*

*The consideration of PAIs is reported in the annual financial product report, as required by Art. 11(2) of the SFDR.*

### **What investment strategy does this financial product follow?**

*The financial product's ESG strategy is based on two pillars:*

1. *the promotion of certain environmental and social characteristics;*
2. *the limitation of investments in issuers with low ESG quality.*

*More specifically:*

1. *this financial product promotes in particular:*

- *the preservation of the environment and natural resources, and fair work conditions, democracy and human and social rights on the social side, as pursued by government issuers;*
- *the fight against climate change through the exclusion of corporate issuers involved in the production of thermal coal which accounts for more than 30% of their revenues;*
- *the respect of human rights, through the exclusion of:*

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.

- *corporate issuers involved in the production of controversial weapons, which include anti-personnel land mines, cluster munitions, biological, chemical, blinding weapons, white phosphorus, nuclear armaments and which have mostly been banned by UN treaties;*
- *countries sanctioned at the central government level by the UN for systematic violations of human rights;*
- *the protection of human health, through the exclusion of issuers involved in the production of tobacco;*
- *the protection of human well-being, through the exclusion of corporate issuers involved in the gambling sector.*

*The above exclusions are determined by the Manager based on the analysis carried out by specialized third party index and ESG data providers, in particular:*

- *Urgewald for thermal coal;*
- *Vigeo for controversial weapons;*
- *Sustainalitics for countries sanctioned by UN for systematic violations of human rights;*
- *MSCI, ICE-BofA indices for identifying issuers involved in tobacco and gambling.*

*2. The ESG quality of the financial product's portfolio is monitored by the Manager in order to avoid a high concentration of ESG lowly rated issuers in the financial product, where the concentration is taken into consideration in absolute terms (i.e. with reference to the net assets of the financial product) and not relative to the financial product's benchmark (i.e. not in relation to its composition in terms of ESG scores). In particular, issuers are selected by the Manager so that less than 10% of the financial product's net assets are invested in corporate or government issuers without an ESG Combined Score or with an ESG Combined Score below 25, on a scale from 0 to 100 (where 100 is the maximum/best).*

*Regarding the application of ESG scores for corporate or government issuers, the Manager uses scoring data of third party ESG data providers. In particular:*

- *Refinitiv provides ESG scores and ratings for corporates;*
- *Sustainalytics provides ESG scores, ratings and analyses for countries.*

*The overall ESG quality of the portfolio is monitored by the Manager on a continuous basis and issuers with an ESG Combined Score lower than 25 are evaluated at each quarterly meeting of the ESG Committee of the Manager.*

*The above exclusions and limitations do not apply to positions derived from investments in other collective investment schemes or in index derivatives.*

- **What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?**

The binding elements of the investment strategy in order to achieve the environmental and social characteristics promoted by this financial product are those described under the preceding Investment Strategy section.

- **What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?**

Not Applicable

- **What is the policy to assess good governance practices of the investee companies?**

When considering good governance practices, the Manager follows an internal process in order to monitor the governance (G) scores provided by a third party ESG data provider as far as directly owned issuers are concerned. Those G scores are calculated on the basis of 56 sub-indicators that relate to Management Quality (35), Attention to Shareholders (12) and CSR Strategy (9), which take into account specific factors such as: management structures, employee relations, remuneration of staff and tax compliance.

**Asset allocation** describes the share of investments in specific assets.

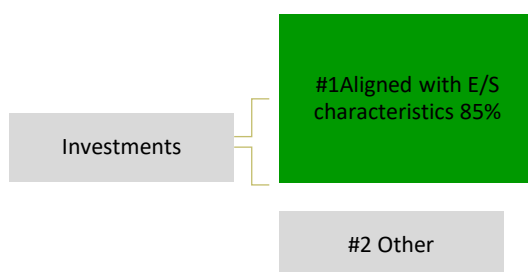
Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.



### What is the asset allocation planned for this financial product?

The financial product's strategic asset allocation is defined by its risk-return profile and implemented through the active investment in variable proportions.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.



*A minimum proportion of 85% of the financial product net assets are invested in issuers which promote the environmental and social characteristics, in accordance with the binding elements of the investment strategy, and which have an ESG Combined Score higher than 25. Investments in any financial products classified as either Article 8 SFDR or Article 9 SFDR are also considered to be aligned with the environmental and social characteristics promoted by the financial product.*

*Up to 15% of the financial product's net assets may be invested in money market instruments or consists of margins, collateral and market value of derivative instruments, or a mix of those and investments in issuers that have no ESG Combined Score or have an ESG Combined Score lower than 25, subject to a maximum limit of 10% of the financial product net assets for the latter. Those issuers that have no ESG Combined Score or have an ESG Combined Score lower than 25 are deemed to be of interest from a strictly financial point of view and/or, given their characteristics, help to complete the thematic, sector and geographic profile of the portfolio. Those issuers will still be compliant with the exclusion criteria set out in the "Investment Strategy" section above.*

*The thresholds mentioned above hold unless market or other special conditions warrant a varied asset allocation (i.e. the 85% and 15% thresholds, whereas the 10% maximum threshold is not subject to variation).*

● **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

*The implementation of the ESG strategy of the financial product generally is not based on the use of derivative instruments with specific ESG characteristics, even though the use of such instruments is not forbidden. Also, the financial product may use derivative instruments to manage its risk/return profile.*

*Finally, while derivative instruments on single names are subject to the limitations set out in the "Investment Strategy" section above, derivatives on indices are not.*



**To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?**

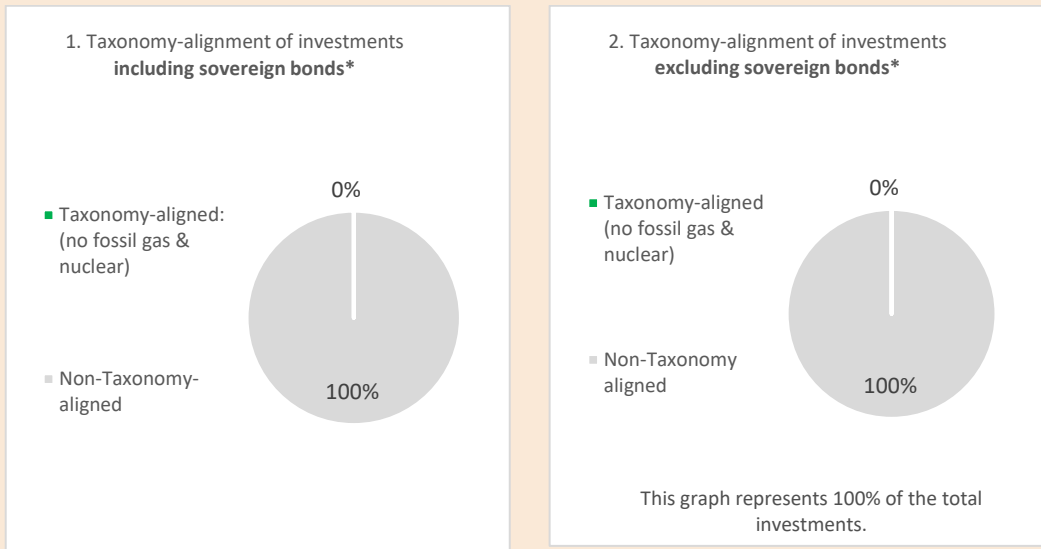
0%

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>20</sup>?**

ssil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to

- Yes:
  - In fossil gas
  - In nuclear energy
- No

**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

● **What is the minimum share of investments in transitional and enabling activities?**

0%



**What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy**

Not Applicable.



**What is the minimum share of socially sustainable investments?**

Not Applicable

limiting climate change (“climate change mitigation”) and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



**What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

*As already clarified in the “Asset allocation” section above, the “#2 Other” part of the financial product consists of up to 15% of the financial product’s net assets may be invested in money market instruments or consists of margins, collateral and market value of derivative instruments, or a mix of those and investments in issuers that have no ESG Combined Score or have an ESG Combined Score lower than 25, subject to a maximum limit of 10% of the financial product net assets for the latter. Those issuers that have no ESG Combined Score or have an ESG Combined Score lower than 25 are deemed to be of interest from a strictly financial point of view and/or, given their characteristics, help to complete the thematic, sector and geographic profile of the portfolio. Those issuers will still be compliant with the exclusion criteria set out in the “Investment Strategy” section above.*



**Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

No

- **How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?**

*Not Applicable*

- **How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?**

*Not Applicable*

- **How does the designated index differ from a relevant broad market index?**

*Not Applicable*

- **Where can the methodology used for the calculation of the designated index be found?**

*Not Applicable*

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



**Where can I find more product specific information online?**

**More product-specific information can be found on the website:**  
<https://www.animasgr.it/surl/EN-sustainability-related-disclosures>

## ANNEX 1

**Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

# ANIMA International Bond

LEI: 213800J53RXVZG1ABH53

## Environmental and/or social characteristics

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

Does this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input type="radio"/> Yes	<input type="radio"/> <input checked="" type="radio"/> No
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective: ___%</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: ___%</b>	<input checked="" type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of ___% of sustainable investments: <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with a social objective</li> </ul> <input checked="" type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>

**What environmental and/or social characteristics are promoted by this financial product?**

*This financial product promotes both the preservation of the environment and natural resources, and fair work conditions, democracy and human and social rights on the social side, as pursued by government issuers. From a corporate point of view, this financial product promotes also the following environmental and social characteristics:*

- *the fight against climate change;*
- *the respect of human rights;*
- *the protection of human health;*
- *the protection of human well-being.*

*The promotion of the above environmental and social characteristics are evaluated by the Manager based on the analysis carried out by specialised third party ESG data providers.*

*Further elements of the financial product’s ESG strategy are described in the “Asset Allocation” section below.*

● ***What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?***

*The sustainability indicators used by this financial product are:*

- *the exclusion of corporate issuers involved in the production of thermal coal which accounts for more than 30% of their revenues, for the fight against climate change;*
- *the exclusion of:*
  - *corporate issuers involved in the production of controversial weapons, which include anti-personnel land mines, cluster munitions, biological, chemical, blinding weapons, white phosphorus, nuclear armaments and which have mostly been banned by UN treaties;*
  - *countries sanctioned at the central government level by the UN for systematic violations of human rights;*

*for the respect of human rights;*

- *the exclusion of corporate issuers involved in the production of tobacco, for the protection of human health;*
- *the exclusion of corporate issuers involved in the gambling sector, for the protection of human well-being.*

● ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

*Not Applicable*

- **How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?**

*Not Applicable*

**How have the indicators for adverse impacts on sustainability factors been taken into account?**

*Not Applicable*

**How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?**

*Not Applicable*

*The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.*

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

*Any other sustainable investments must also not significantly harm any environmental or social objectives.*

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.



**Does this financial product consider principal adverse impacts on sustainability factors?**

YES

NO

*Yes, the financial product considers the principal adverse impacts on sustainability factors.*

*In general, the consideration of PAIs is based on the contribution of certain mitigating factors, such as:*

- 1. exclusions based on values,*
- 2. the setting up of objectives for specific adverse impact indicators, chosen among those belonging to the Mandatory list in the RTS to the SFDR.*

*In particular:*

- 1) from a values perspective, corporate issuers involved in controversial weapons (connection to PAI 14), nuclear weapons, tobacco, gambling and thermal coal mining which accounts for more than 30% of revenues (connection to PAI 4) are excluded;*
- 2) objectives for specific mandatory adverse impact indicators:*
  - a. PAI 4 (Fossil fuels exposure): the adverse impact is mitigated through the limitation of the exposure to the fossil fuels sector, due to the exclusion of corporate issuers with more than 30% of revenues from thermal coal mining.*
  - b. PAI 14 (controversial weapons): the adverse impact is eliminated through the exclusion of issuers involved in controversial weapons.*



*As for specific PAI objectives on government issuers, the financial product has regard to:*

*PAI 16 (human rights violations): the adverse impact is mitigated through the exclusion of issuers sanctioned by the UN for human rights violations (see the "Investment Strategy" sections below).*

*The consideration of PAIs is reported in the annual financial product report, as required by Art. 11(2) of the SFDR.*

### **What investment strategy does this financial product follow?**

*The financial product's ESG strategy is based on two pillars:*

- 1. the promotion of certain environmental and social characteristics;*
- 2. the limitation of investments in issuers with low ESG quality.*

*More specifically:*

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.



**Good governance**  
practices include  
sound management  
structures,  
employee relations,  
remuneration of  
staff and tax  
compliance.

1. *this financial product promotes in particular:*

- *the preservation of the environment and natural resources, and fair work conditions, democracy and human and social rights on the social side, as pursued by government issuers;*
- *the fight against climate change through the exclusion of corporate issuers involved in the production of thermal coal which accounts for more than 30% of their revenues;*
- *the respect of human rights, through the exclusion of:*
  - *corporate issuers involved in the production of controversial weapons, which include anti-personnel land mines, cluster munitions, biological, chemical, blinding weapons, white phosphorus, nuclear armaments and which have mostly been banned by UN treaties;*
  - *countries sanctioned at the central government level by the UN for systematic violations of human rights;*
  - *the protection of human health, through the exclusion of issuers involved in the production of tobacco;*
  - *the protection of human well-being, through the exclusion of corporate issuers involved in the gambling sector.*

*The above exclusions are determined by the Manager based on the analysis carried out by specialized third party index and ESG data providers, in particular:*

- *Urgewald for thermal coal;*
- *Vigeo for controversial weapons;*
- *Sustainalytics for countries sanctioned by UN for systematic violations of human rights;*
- *MSCI, ICE-BofA indices for identifying issuers involved in tobacco and gambling.*

2. *The ESG quality of the financial product's portfolio is monitored by the Manager in order to avoid a high concentration of ESG lowly rated issuers in the financial product, where the concentration is taken into consideration in absolute terms (i.e. with reference to the net assets of the financial product) and not relative to the financial product's benchmark (i.e. not in relation to its composition in terms of ESG scores). In particular, issuers are selected by the Manager so that less than 10% of the financial product's net assets are invested in corporate or government issuers without an ESG Combined Score or with an ESG Combined Score below 25, on a scale from 0 to 100 (where 100 is the maximum/best).*

*Regarding the application of ESG scores for corporate or government issuers, the Manager uses scoring data of third party ESG data providers. In particular:*

- Refinitiv provides ESG scores and ratings for corporates;
- Sustainalytics provides ESG scores, ratings and analyses for countries.

The overall ESG quality of the portfolio is monitored by the Manager on a continuous basis and issuers with an ESG Combined Score lower than 25 are evaluated at each quarterly meeting of the ESG Committee of the Manager.

The above exclusions and limitations do not apply to positions derived from investments in other collective investment schemes or in index derivatives.

- **What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?**

The binding elements of the investment strategy in order to achieve the environmental and social characteristics promoted by this financial product are those described under the preceding Investment Strategy section.

- **What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?**

Not Applicable

- **What is the policy to assess good governance practices of the investee companies?**

When considering good governance practices, the Manager follows an internal process in order to monitor the governance (G) scores provided by a third party ESG data provider as far as directly owned issuers are concerned. Those G scores are calculated on the basis of 56 sub-indicators that relate to Management Quality (35), Attention to Shareholders (12) and CSR Strategy (9), which take into account specific factors such as: management structures, employee relations, remuneration of staff and tax compliance.

**Asset allocation**

describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies

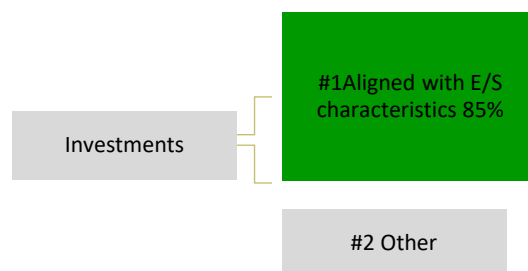
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.

- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.



**What is the asset allocation planned for this financial product?**

The financial product's strategic asset allocation is defined by its risk-return profile and implemented through the active investment in variable proportions.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

*A minimum proportion of 85% of the financial product net assets are invested in issuers which promote the environmental and social characteristics, in accordance with the binding elements of the investment strategy, and which have an ESG Combined Score higher than 25. Investments in any financial products classified as either Article 8 SFDR or Article 9 SFDR are also considered to be aligned with the environmental and social characteristics promoted by the financial product.*

*Up to 15% of the financial product's net assets may be invested in money market instruments or consists of margins, collateral and market value of derivative instruments, or a mix of those and investments in issuers that have no ESG Combined Score or have an ESG Combined Score lower than 25, subject to a maximum limit of 10% of the financial product net assets for the latter. Those issuers that have no ESG Combined Score or have an ESG Combined Score lower than 25 are deemed to be of interest from a strictly financial point of view and/or, given their characteristics, help to complete the thematic, sector and geographic profile of the portfolio. Those issuers will still be compliant with the exclusion criteria set out in the "Investment Strategy" section above.*

*The thresholds mentioned above hold unless market or other special conditions warrant a varied asset allocation (i.e. the 85% and 15% thresholds, whereas the 10% maximum threshold is not subject to variation).*

● **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

*The implementation of the ESG strategy of the financial product generally is not based on the use of derivative instruments with specific ESG characteristics, even though the use of such instruments is not forbidden. Also, the financial product may use derivative instruments to manage its risk/return profile.*

*Finally, while derivative instruments on single names are subject to the limitations set out in the "Investment Strategy" section above, derivatives on indices are not.*




**To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?**

0%

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

 are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

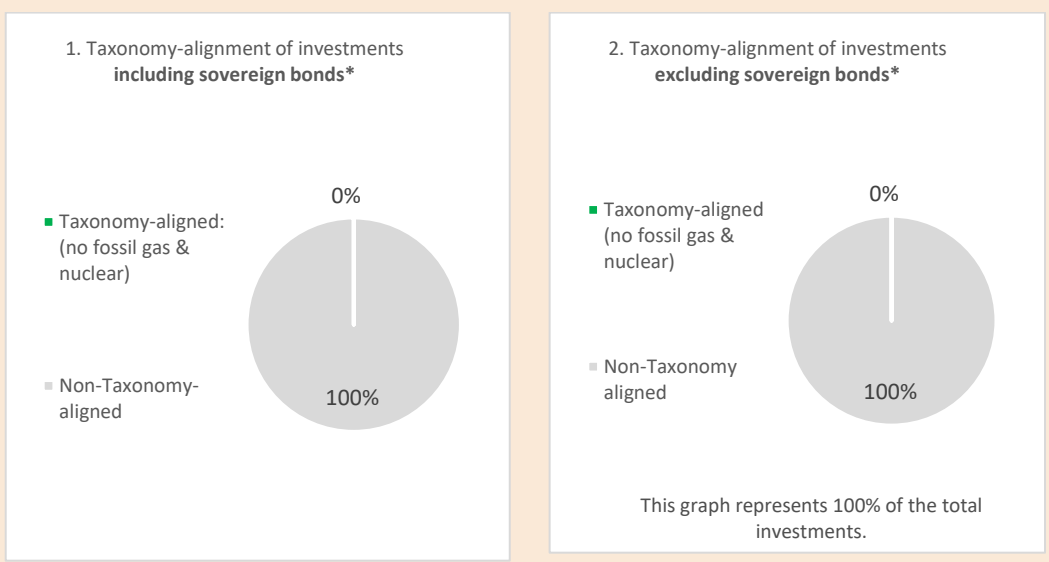
**Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>23</sup>?**

Yes:

In fossil gas     In nuclear energy

No

*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

**What is the minimum share of investments in transitional and enabling activities?**

0%



**What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy**

Not Applicable.

ossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - planatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



**What is the minimum share of socially sustainable investments?**

*Not Applicable*



**What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

*As already clarified in the “Asset allocation” section above, the “#2 Other” part of the financial product consists of up to 15% of the financial product’s net assets may be invested in money market instruments or consists of margins, collateral and market value of derivative instruments, or a mix of those and investments in issuers that have no ESG Combined Score or have an ESG Combined Score lower than 25, subject to a maximum limit of 10% of the financial product net assets for the latter. Those issuers that have no ESG Combined Score or have an ESG Combined Score lower than 25 are deemed to be of interest from a strictly financial point of view and/or, given their characteristics, help to complete the thematic, sector and geographic profile of the portfolio. Those issuers will still be compliant with the exclusion criteria set out in the “Investment Strategy” section above.*



**Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

*No*

- ***How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?***

*Not Applicable*

- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

*Not Applicable*

- ***How does the designated index differ from a relevant broad market index?***

*Not Applicable*

- ***Where can the methodology used for the calculation of the designated index be found?***

*Not Applicable*

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



**Where can I find more product specific information online?**

**More product-specific information can be found on the website:**  
<https://www.animasgr.it/surl/EN-sustainability-related-disclosures>



Annex 1

Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

# ANIMA Megatrend People Fund

LEI: 549300OPY4VPHVHZQ284

## Environmental and/or social characteristics

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not. **Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

**Does this financial product have a sustainable investment objective?**

Yes   No

<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective: ___%</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: ___%</b>	<input checked="" type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 21% of sustainable investments: <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with a social objective</li> </ul> <input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>
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### What environmental and/or social characteristics are promoted by this financial product?

*This financial product promotes both the preservation of the environment and natural resources, and fair work conditions, democracy and human and social rights on the social side, as pursued by government issuers. From a corporate point of view, this financial product promotes also the following environmental and social characteristics:*

- *the fight against climate change;*
- *the respect of human rights;*

- *the protection of human health;*
- *the protection of human well-being.*

*The promotion of the above environmental and social characteristics are evaluated by the Manager based on the analysis carried out by specialised third party ESG data providers.*

*Further elements of the financial product's ESG strategy are described in the "Asset Allocation" sections below.*

● ***What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?***

*The sustainability indicators used by this financial product are:*

- *the exclusion of corporate issuers involved in the production of thermal coal which accounts for more than 30% of their revenues, for the fight against climate change;*
- *the exclusion of:*
  - *corporate issuers involved in the production of controversial weapons, which include anti-personnel land mines, cluster munitions, biological, chemical, blinding weapons, white phosphorus, nuclear armaments and which have mostly been banned by UN treaties;*
  - *countries sanctioned at the central government level by the UN for systematic violations of human rights;*

*for the respect of human rights;*

- *the exclusion of issuers involved in the production of tobacco, for the protection of human health;*
- *the exclusion of corporate issuers involved in the gambling sector, for the protection of human well-being.*

● ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

*As mentioned above, although the financial product does not have a sustainable objective, it will invest a minimum of 21% of its NAV in issuers defined as "SFDR" sustainable according to an internal algorithm of the Manager. This algorithm provides that issuers are considered sustainable if they:*

- *comply with the exclusion criteria mentioned in the "Investment Strategy" section further below;*



- *pass the DNSH test, described in the following section;*
  - *pass a Good Governance test, which is set at the level of 25 out 100 for their G score;*
  - *pass a general E and S test, which is set at the level of 25 out 100 for their E and S scores;*
  - *contribute positively to at least one of the following three areas: Climate Transition, Environment or Society. Positive contribution is measured on the basis of issuers' involvement in certain initiatives or on the basis of best-in-class criteria related to specific environmental and/or social factors.*
- ***How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?***

*The assessment that issuers considered to be sustainable do not cause significant harm to other sustainable investment objectives is carried out on the basis of the Do No Significant Harm test (DNSH, developed internally by the Manager), which, in line with regulatory recommendations, is based on the mandatory Principal Indicators of Adverse Impact (PAI, see the RTS to the SFDR). In particular, investments are considered to cause significant harm when they involve issuers that:*

- *do not publish data on Carbon Footprint, Carbon Intensity and Board Gender Diversity;*
- *are involved in the fossil fuels sector or the controversial weapons sector;*
- *are involved in very severe controversies related to compliance with the UN Global Compact and OECD requirements for multinational companies;*
- *exceed strict threshold values (specifically identified by the Manager based on a diversified sample of issuers worldwide) for any of the following PAI indicators: 2\*, 3\*, 5, 6\*, 8, 9, 12 and 13;*
- *exceed critical thresholds (specifically identified by the Manager based on a diversified sample of issuers worldwide) for at least 4 of the following PAI indicators: 2\*, 3\*, 5, 6\*, 7, 8, 9, 10, 11, 12 and 13.*

*Note \*: it should be noted that, for the purposes of the DNSH test, absolute GHG emissions levels (PAI 1) are used to calculate PAIs 2 and 3; also, Carbon Footprint and GHG Intensity are calculated taking into account only Scope 1 and 2 emissions. It should also be noted that PAI 6 currently takes into account the sectoral classification provided by the provider Refinitiv as a proxy for the NACE classification required by the regulations.*

● ***How have the indicators for adverse impacts on sustainability factors been taken into account?***

*Please refer to the preceding section.*

● ***How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?***

*The alignment of sustainable investments with the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights is pursued through several investment selection and management criteria, explained above and consistent with the aforementioned guidelines. In particular:*

- *exclusions relating to controversial weapons, which apply to all investments;*
  - *exclusions based on the DNSH principle, applied through the definition of threshold levels on PAI indicators;*
  - *inclusions based on the identification of positive contributions to climate, social or environmental objectives;*
  - *exclusions of environmental or social ratings that fall into the worst quartile of the rankings based on the data provided by specialized third party providers;*
- 
- *application to equity investments of the voting rights policy, based on the third party provider (ISS) model, which takes into account specific ESG factors and refers to guidelines consistent with sustainable business practices on the environment, fair treatment of labour, non-discriminatory policies and protection of human rights, framed in initiatives such as those of the United Nations Environment Programme Finance Initiative (UNEP FI), United Nations Principles for Responsible Investment (UNPRI), United Nations Global Compact, Global Reporting Initiative (GRI), Carbon Principles, International Labour Organisation Conventions (ILO), CERES Principles, Global Sullivan Principles, MacBride Principles and the European Union Directives on social and environmental issues.*

*The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.*

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

*Any other sustainable investments must also not significantly harm any environmental or social objectives.*



**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

X

**Does this financial product consider principal adverse impacts on sustainability factors?**

YES

NO

*Yes, the financial product considers the principal adverse impacts on sustainability factors.*

*In general, the consideration of PAIs is based on the contribution of certain mitigating factors, such as:*

- 1. value exclusions,*
- 2. exclusions/limitations resulting from investing in sustainable issuers according to the SFDR,*
- 3. the setting up of objectives for specific adverse impact indicators, chosen among those belonging to the Mandatory list in the RTS to the SFDR.*

*In particular:*

- 1) from a value perspective, issuers involved in controversial weapons (connection to PAI 14), nuclear weapons, tobacco, gambling and thermal coal mining which accounts for more than 30% of revenues (connection to PAI 4) are excluded;*

2) *investment in at least 21% of the financial product's NAV in sustainable issuers ensures that these issuers, by construction, pass the Good Governance and general E and S tests (detailed in the “sustainable investment” sections above) and the DNSH test (which takes into consideration all the 14 mandatory PAI, detailed in the “sustainable investment” sections above) while contributing positively to climate, environmental and social topics;*

3) *objectives for specific mandatory adverse impact indicators:*



a. *PAI 4 (fossil fuels exposure): the adverse impact is mitigated through the limitation of the exposure to the fossil fuels sector, due to the exclusion of issuers with more than 30% of revenues from thermal coal mining.*

b. *PAI 14 (controversial weapons): the adverse impact is eliminated through the exclusion of issuers involved in controversial weapons.*

c. *PAI 16 (human rights violations): the adverse impact is mitigated through the exclusion of issuers sanctioned by the UN for human rights violations (see the “Strategy” sections below).*

*The consideration of PAIs is reported in the annual financial product report, as required by Art. 11(2) of the SFDR.*

### **What investment strategy does this financial product follow?**

*The financial product's ESG strategy is based on two pillars:*

1. *the promotion of certain environmental and social characteristics;*
2. *the limitation of investments in issuers with low ESG quality.*

*More specifically:*

1. *This financial product promotes in particular:*

- *the fight against climate change through the exclusion of corporate issuers involved in the production of thermal coal which accounts for more than 30% of their revenues;*

- *the respect of human rights, through the exclusion of:*

- *corporate issuers involved in the production of controversial weapons, which include anti-personnel land mines, cluster munitions, biological, chemical, blinding weapons, white phosphorus, nuclear armaments and which have mostly been banned by UN treaties;*

- *countries sanctioned at the central government level by the UN for systematic violations of human rights;*

- *the protection of human health, through the exclusion of issuers involved in the production of tobacco;*

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.

- *the protection of human well-being, through the exclusion of corporate issuers involved in the gambling sector.*

*The above exclusions are determined by the Manager based on the analysis carried out by specialized third party index and ESG data providers, in particular:*

- *Urgewald for thermal coal;*
- *Vigeo for controversial weapons;*
- *Sustainalytics for countries sanctioned by UN for systematic violations of human rights;*
- *MSCI, ICE-BofA indices for identifying issuers involved in tobacco and gambling.*

2. *The ESG quality of the financial product's portfolio is monitored by the Manager in order to avoid a high concentration of ESG lowly rated issuers in the financial product, where the concentration is taken into consideration in absolute terms (i.e. with reference to the net assets of the financial product) and not relative to the financial product's benchmark (i.e. not in relation to its composition in terms of ESG scores). In particular, issuers are selected by the Manager so that less than 10% of the financial product's net assets are invested in corporate or government issuers without an ESG Combined Score or with an ESG Combined Score below 25, on a scale from 0 to 100 (best).*

*Regarding the application of ESG scores for corporate or government issuers, the Manager uses scoring data of third party ESG data providers. In particular:*

- *Refinitiv provides ESG scores and ratings for corporates;*
- *Sustainalytics provides ESG scores, ratings and analyses for countries;*

*The overall ESG quality of the portfolio is monitored by the Manager on a continuous basis and issuers with an ESG Combined Score lower than 25 are evaluated at each quarterly meeting of the ESG Committee of the Manager.*

*The above exclusions and limitations do not apply to positions derived from investments in other collective investment schemes or in index derivatives.*

- ***What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?***

*The binding elements of the investment strategy in order to achieve the environmental and social characteristics promoted by this financial product are those described under the preceding Investment Strategy section.*

- ***What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?***

Not Applicable

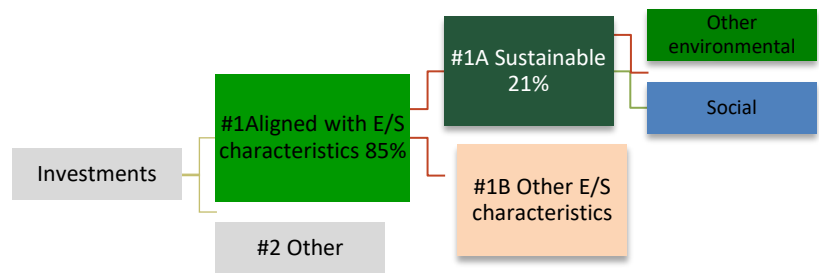
● **What is the policy to assess good governance practices of the investee companies?**

When considering good governance practices, the Manager follows an internal process in order to monitor the governance (G) scores provided by a third party ESG data provider as far as directly owned issuers are concerned. Those G scores are calculated on the basis of 56 sub-indicators that relate to Management Quality (35), Attention to Shareholders (12) and CSR Strategy (9), which take into account specific factors such as: management structures, employee relations, remuneration of staff and tax compliance.

**What is the asset allocation planned for this financial product?**

The financial product's strategic asset allocation is defined by its risk-return profile and implemented through the active investment in variable proportions.

**Asset allocation** describes the share of investment in specific assets.



Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

*A minimum proportion of 85% of the financial product net assets are invested in issuers which promote the environmental and social characteristics, in accordance with the binding elements of the investment strategy, and which have an ESG Combined Score higher than 25. Investments in any financial products classified as either Article 8 SFDR or Article 9 SFDR are also considered to be aligned with the environmental and social characteristics promoted by the financial product. While the financial product does not have sustainable investing as its objective, the financial product seeks to invest a minimum of 21% of its assets in sustainable investments with an environmental and/or social objective, as detailed in the sections above.*

Up to 15% of the financial product's net assets may be invested in money market instruments or consists of margins, collateral and market value of derivative instruments, or a mix of those and investments in issuers that have no ESG Combined Score or have an ESG Combined Score lower than 25, subject to a maximum limit of 10% of the financial product net assets for the latter. Those issuers that have no ESG Combined Score or have an ESG Combined Score lower than 25 are deemed to be of interest from a strictly financial point of view and/or, given their characteristics, help to complete the thematic, sector and geographic profile of the portfolio. Those issuers will still be compliant with the exclusion criteria set out in the "Investment Strategy" section above.

The thresholds mentioned above hold unless market or other special conditions warrant a varied asset allocation (i.e. the 85% and 15% thresholds, whereas the 10% maximum threshold is not subject to variation).

● **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

The implementation of the ESG strategy of the financial product generally is not based on the use of derivative instruments with specific ESG characteristics, even though the use of such instruments is not forbidden. Also, the financial product may use derivative instruments to manage its risk/return profile.

Finally, while derivative instruments on single names are subject to the limitations set out in the "Investment Strategy" section above, derivatives on indices are not.



**To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?**

0%

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>25</sup>?**

Yes:

In fossil gas  In nuclear energy

No

<sup>25</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

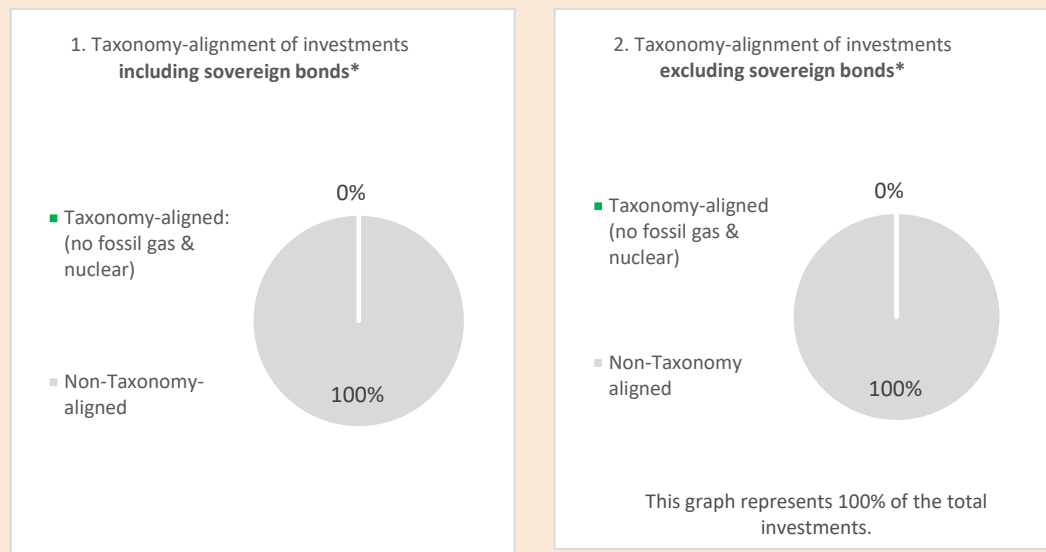


To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

*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

● **What is the minimum share of investments in transitional and enabling activities?**  
0%



**What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy**

As the financial product invests in various types of sustainable investments, it does not commit to a minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy. However, the financial product does commit to making a minimum share of 21% of its assets between (i) sustainable investments with an environmental objective that are not aligned with the EU Taxonomy and (ii) sustainable social investments.



**What is the minimum share of socially sustainable investments?**

As the financial product invests in various types of sustainable investments, it does not commit to a minimum share of socially sustainable investments. However, the financial product does commit to making a minimum share of 21% of its assets between (i) sustainable investments with an environmental



objective that are not aligned with the EU Taxonomy and (ii) sustainable social investments.



**What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

*As already clarified in the “Asset allocation” section above, the “#2 Other” part of the financial product consists of up to 15% of the financial product’s net assets may be invested in money market instruments or consists of margins, collateral and market value of derivative instruments, or a mix of those and investments in issuers that have no ESG Combined Score or have an ESG Combined Score lower than 25, subject to a maximum limit of 10% of the financial product net assets for the latter. Those issuers that have no ESG Combined Score or have an ESG Combined Score lower than 25 are deemed to be of interest from a strictly financial point of view and/or, given their characteristics, help to complete the thematic, sector and geographic profile of the portfolio. Those issuers will still be compliant with the exclusion criteria set out in the “Investment Strategy” section above.*

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



**Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

*No*

- ***How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?***

*Not Applicable*

- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

*Not Applicable*

- ***How does the designated index differ from a relevant broad market index?***

*Not Applicable*

- ***Where can the methodology used for the calculation of the designated index be found?***

*Not Applicable*



**Where can I find more product specific information online?**

**More product-specific information can be found on the website:**  
<https://www.animasgr.it/surl/EN-sustainability-related-disclosures>

Annex 1

Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

**ANIMA Italy**

LEI: 549300MGC95MSII64183

## Environmental and/or social characteristics

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?	
●● <input type="checkbox"/> Yes	●● <input checked="" type="checkbox"/> No
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective: ___%</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul>	<input checked="" type="checkbox"/> <b>It promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of <b>21%</b> of sustainable investments: <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with a social objective</li> </ul>
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: ___%</b>	<input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>

**What environmental and/or social characteristics are promoted by this financial product?**

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

*This financial product promotes both the preservation of the environment and natural resources, and fair work conditions, democracy and human and social rights on the social side, as pursued by government issuers. From a corporate point of view, this financial product promotes also the following environmental and social characteristics:*

- *the fight against climate change;*
- *the respect of human rights;*
- *the protection of human health;*
- *the protection of human well-being.*

*The promotion of the above environmental and social characteristics are evaluated by the Manager based on the analysis carried out by specialised third party ESG data providers.*

*Further elements of the financial product's ESG strategy are described in the "Asset Allocation" sections below.*

● ***What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?***

*The sustainability indicators used by this financial product are:*

- *the exclusion of corporate issuers involved in the production of thermal coal which accounts for more than 30% of their revenues, for the fight against climate change;*
- *the exclusion of:*
  - *corporate issuers involved in the production of controversial weapons, which include anti-personnel land mines, cluster munitions, biological, chemical, blinding weapons, white phosphorus, nuclear armaments and which have mostly been banned by UN treaties;*
  - *countries sanctioned at the central government level by the UN for systematic violations of human rights;*

*for the respect of human rights;*

- *the exclusion of issuers involved in the production of tobacco, for the protection of human health;*
- *the exclusion of corporate issuers involved in the gambling sector, for the protection of human well-being.*

● ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

*As mentioned above, although the financial product does not have a sustainable objective, it will invest a minimum of 21% of its NAV in issuers defined as "SFDR" sustainable according to an internal algorithm of the Manager. This algorithm provides that issuers are considered sustainable if they:*

- *comply with the exclusion criteria mentioned in the "Investment Strategy" section further below;*
- *pass the DNSH test, described in the following section;*

- *pass a Good Governance test, which is set at the level of 25 out 100 for their G score;*
- *pass a general E and S test, which is set at the level of 25 out 100 for their E and S scores;*
- *contribute positively to at least one of the following three areas: Climate Transition, Environment or Society. Positive contribution is measured on the basis of issuers' involvement in certain initiatives or on the basis of best-in-class criteria related to specific environmental and/or social factors.*

● ***How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?***

*The assessment that issuers considered to be sustainable do not cause significant harm to other sustainable investment objectives is carried out on the basis of the Do No Significant Harm test (DNSH, developed internally by the Manager), which, in line with regulatory recommendations, is based on the mandatory Principal Indicators of Adverse Impact (PAI, see the RTS to the SFDR). In particular, investments are considered to cause significant harm when they involve issuers that:*

- *do not publish data on Carbon Footprint, Carbon Intensity and Board Gender Diversity;*
- *are involved in the fossil fuels sector or the controversial weapons sector;*
- *are involved in very severe controversies related to compliance with the UN Global Compact and OECD requirements for multinational companies;*
- *exceed strict threshold values (specifically identified by the Manager based on a diversified sample of issuers worldwide) for any of the following PAI indicators: 2\*, 3\*, 5, 6\*, 8, 9, 12 and 13;*
- *exceed critical thresholds (specifically identified by the Manager based on a diversified sample of issuers worldwide) for at least 4 of the following PAI indicators: 2\*, 3\*, 5, 6\*, 7, 8, 9, 10, 11, 12 and 13.*

*Note \*: it should be noted that, for the purposes of the DNSH test, absolute GHG emissions levels (PAI 1) are used to calculate PAIs 2 and 3; also, Carbon Footprint and GHG Intensity are calculated taking into account only Scope 1 and 2 emissions. It should also be noted that PAI 6 currently takes into account the sectoral classification provided by the provider Refinitiv as a proxy for the NACE classification required by the regulations.*

● ***How have the indicators for adverse impacts on sustainability factors been taken into account?***

*Please refer to the preceding section.*

● ***How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?***

*The alignment of sustainable investments with the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights is pursued through several investment selection and management criteria, explained above and consistent with the aforementioned guidelines. In particular:*

- exclusions relating to controversial weapons, which apply to all investments;*
- exclusions based on the DNSH principle, applied through the definition of threshold levels on PAI indicators;*
- inclusions based on the identification of positive contributions to climate, social or environmental objectives;*
- exclusions of environmental or social ratings that fall into the worst quartile of the rankings based on the data provided by specialized third party providers;*
- application to equity investments of the voting rights policy, based on the third party provider (ISS) model, which takes into account specific ESG factors and refers to guidelines consistent with sustainable business practices on the environment, fair treatment of labour, non-discriminatory policies and protection of human rights, framed in initiatives such as those of the United Nations Environment Programme Finance Initiative (UNEP FI), United Nations Principles for Responsible Investment (UNPRI), United Nations Global Compact, Global Reporting Initiative (GRI), Carbon Principles, International Labour Organisation Conventions (ILO), CERES Principles, Global Sullivan Principles, MacBride Principles and the European Union Directives on social and environmental issues.*

*The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.*

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

*Any other sustainable investments must also not significantly harm any environmental or social objectives.*

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.



**Does this financial product consider principal adverse impacts on sustainability factors?**

**YES**

**X**

**NO**

*Yes, the financial product considers the principal adverse impacts on sustainability factors.*

*In general, the consideration of PAIs is based on the contribution of certain mitigating factors, such as:*

- 1. value exclusions,*
- 2. exclusions/limitations resulting from investing in sustainable issuers according to the SFDR,*
- 3. the setting up of objectives for specific adverse impact indicators, chosen among those belonging to the Mandatory list in the RTS to the SFDR.*

*In particular:*

- 1) from a value perspective, issuers involved in controversial weapons (connection to PAI 14), nuclear weapons, tobacco, gambling and thermal coal mining which accounts for more than 30% of revenues (connection to PAI 4) are excluded;*
- 2) investment in at least 21% of the financial product's NAV in sustainable issuers ensures that these issuers, by construction, pass the Good Governance and general E and S tests (detailed in the “sustainable investment” sections above) and the DNSH test (which takes*

into consideration all the 14 mandatory PAI, detailed in the “sustainable investment” sections above) while contributing positively to climate, environmental and social topics;

3) objectives for specific mandatory adverse impact indicators:

- a. PAI 4 (fossil fuels exposure): the adverse impact is mitigated through the limitation of the exposure to the fossil fuels sector, due to the exclusion of issuers with more than 30% of revenues from thermal coal mining.
- b. PAI 14 (controversial weapons): the adverse impact is eliminated through the exclusion of issuers involved in controversial weapons.
- c. PAI 16 (human rights violations): the adverse impact is mitigated through the exclusion of issuers sanctioned by the UN for human rights violations (see the “Strategy” sections below).

The consideration of PAIs is reported in the annual financial product report, as required by Art. 11(2) of the SFDR.

### **What investment strategy does this financial product follow?**

The financial product's ESG strategy is based on two pillars:

1. the promotion of certain environmental and social characteristics;
2. the limitation of investments in issuers with low ESG quality.

More specifically:

1. This financial product promotes in particular:

- the fight against climate change through the exclusion of corporate issuers involved in the production of thermal coal which accounts for more than 30% of their revenues;
- the respect of human rights, through the exclusion of:
  - corporate issuers involved in the production of controversial weapons, which include anti-personnel land mines, cluster munitions, biological, chemical, blinding weapons, white phosphorus, nuclear armaments and which have mostly been banned by UN treaties;
  - countries sanctioned at the central government level by the UN for systematic violations of human rights;
- the protection of human health, through the exclusion of issuers involved in the production of tobacco;
- the protection of human well-being, through the exclusion of corporate issuers involved in the gambling sector.



**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.



*The above exclusions are determined by the Manager based on the analysis carried out by specialized third party index and ESG data providers, in particular:*

- *Urgewald for thermal coal;*
- *Vigeo for controversial weapons;*
- *Sustainalycs for countries sanctioned by UN for systematic violations of human rights;*
- *MSCI, ICE-BofA indices for identifying issuers involved in tobacco and gambling.*

2. *The ESG quality of the financial product's portfolio is monitored by the Manager in order to avoid a high concentration of ESG lowly rated issuers in the financial product, where the concentration is taken into consideration in absolute terms (i.e. with reference to the net assets of the financial product) and not relative to the financial product's benchmark (i.e. not in relation to its composition in terms of ESG scores). In particular, issuers are selected by the Manager so that less than 10% of the financial product's net assets are invested in corporate or government issuers without an ESG Combined Score or with an ESG Combined Score below 25, on a scale from 0 to 100 (best).*

*Regarding the application of ESG scores for corporate or government issuers, the Manager uses scoring data of third party ESG data providers. In particular:*

- *Refinitiv provides ESG scores and ratings for corporates;*
- *Sustainalytics provides ESG scores, ratings and analyses for countries;*

*The overall ESG quality of the portfolio is monitored by the Manager on a continuous basis and issuers with an ESG Combined Score lower than 25 are evaluated at each quarterly meeting of the ESG Committee of the Manager.*

*The above exclusions and limitations do not apply to positions derived from investments in other collective investment schemes or in index derivatives.*

- ***What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?***

*The binding elements of the investment strategy in order to achieve the environmental and social characteristics promoted by this financial product are those described under the preceding Investment Strategy section.*

- ***What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?***

*Not Applicable*

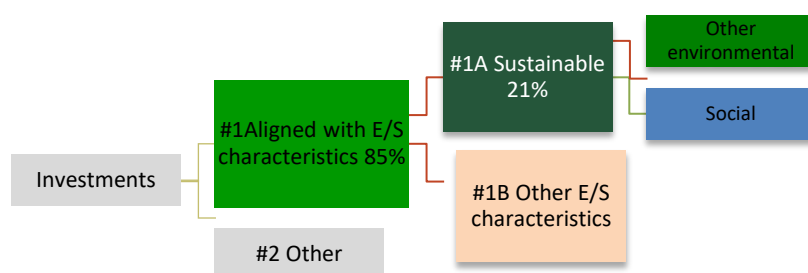
- ***What is the policy to assess good governance practices of the investee companies?***

When considering good governance practices, the Manager follows an internal process in order to monitor the governance (G) scores provided by a third party ESG data provider as far as directly owned issuers are concerned. Those G scores are calculated on the basis of 56 sub-indicators that relate to Management Quality (35), Attention to Shareholders (12) and CSR Strategy (9), which take into account specific factors such as: management structures, employee relations, remuneration of staff and tax compliance.



## What is the asset allocation planned for this financial product?

The financial product's strategic asset allocation is defined by its risk-return profile and implemented through the active investment in variable proportions.



**Asset allocation** describes the share of investment in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

*A minimum proportion of 85% of the financial product net assets are invested in issuers which promote the environmental and social characteristics, in accordance with the binding elements of the investment strategy, and which have an ESG Combined Score higher than 25. Investments in any financial products classified as either Article 8 SFDR or Article 9 SFDR are also considered to be aligned with the environmental and social characteristics promoted by the financial product. While the financial product does not have sustainable investing as its objective, the financial product seeks to invest a minimum of 21% of its assets in sustainable investments with an environmental and/or social objective, as detailed in the sections above.*

*Up to 15% of the financial product's net assets may be invested in money market instruments or consists of margins, collateral and market value of derivative*

*instruments, or a mix of those and investments in issuers that have no ESG Combined Score or have an ESG Combined Score lower than 25, subject to a maximum limit of 10% of the financial product net assets for the latter. Those issuers that have no ESG Combined Score or have an ESG Combined Score lower than 25 are deemed to be of interest from a strictly financial point of view and/or, given their characteristics, help to complete the thematic, sector and geographic profile of the portfolio. Those issuers will still be compliant with the exclusion criteria set out in the “Investment Strategy” section above.*

*The thresholds mentioned above hold unless market or other special conditions warrant a varied asset allocation (i.e. the 85% and 15% thresholds, whereas the 10% maximum threshold is not subject to variation).*

● **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

*The implementation of the ESG strategy of the financial product generally is not based on the use of derivative instruments with specific ESG characteristics, even though the use of such instruments is not forbidden. Also, the financial product may use derivative instruments to manage its risk/return profile.*

*Finally, while derivative instruments on single names are subject to the limitations set out in the “Investment Strategy” section above, derivatives on indices are not.*



**To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?**

0%

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>27</sup>?**

Yes:

In fossil gas  In nuclear energy

No

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<sup>27</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation”) and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

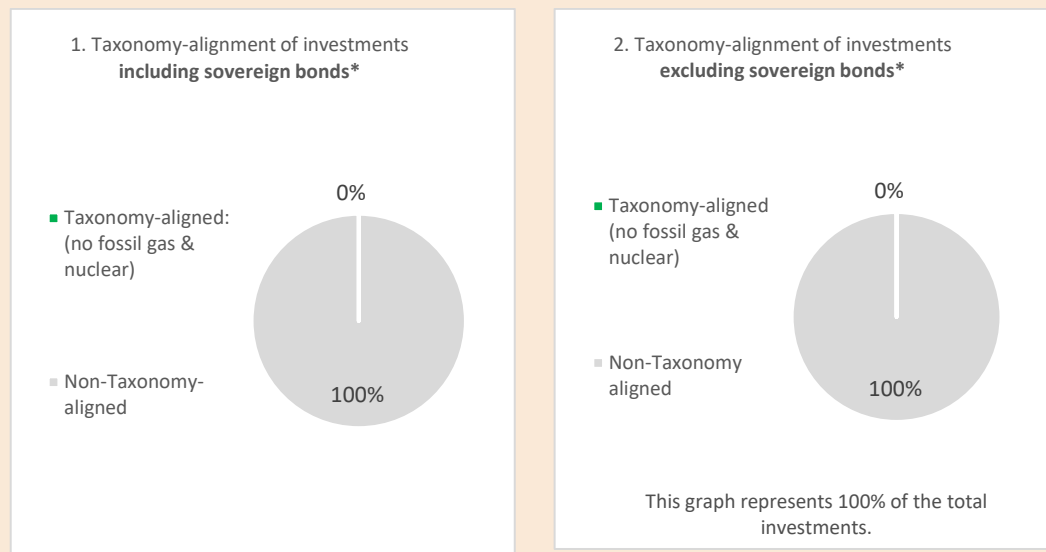
To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

**not take into account the criteria** for environmentally sustainable economic activities under 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

● **What is the minimum share of investments in transitional and enabling activities?**  
0%



**What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy**

As the financial product invests in various types of sustainable investments, it does not commit to a minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy. However, the financial product does commit to making a minimum share of 21% of its assets between (i) sustainable investments with an environmental objective that are not aligned with the EU Taxonomy and (ii) sustainable social investments.



**What is the minimum share of socially sustainable investments?**

As the financial product invests in various types of sustainable investments, it does not commit to a minimum share of socially sustainable investments. However, the financial product does commit to making a minimum share of 21% of its assets between (i) sustainable investments with an environmental objective that are not aligned with the EU Taxonomy and (ii) sustainable social investments.



**What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

*As already clarified in the “Asset allocation” section above, the “#2 Other” part of the financial product consists of up to 15% of the financial product’s net assets may be invested in money market instruments or consists of margins, collateral and market value of derivative instruments, or a mix of those and investments in issuers that have no ESG Combined Score or have an ESG Combined Score lower than 25, subject to a maximum limit of 10% of the financial product net assets for the latter. Those issuers that have no ESG Combined Score or have an ESG Combined Score lower than 25 are deemed to be of interest from a strictly financial point of view and/or, given their characteristics, help to complete the thematic, sector and geographic profile of the portfolio. Those issuers will still be compliant with the exclusion criteria set out in the “Investment Strategy” section above.*



**Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

*No*

- ***How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?***

*Not Applicable*

- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

*Not Applicable*

- ***How does the designated index differ from a relevant broad market index?***

*Not Applicable*

- ***Where can the methodology used for the calculation of the designated index be found?***

*Not Applicable*



**Where can I find more product specific information online?**

**More product-specific information can be found on the website:  
<https://www.animasgr.it/surl/EN-sustainability-related-disclosures>**

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

ANNEX 1

Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

ANIMA Thematic XIV

LEI: 213800G5UFOPN2SYFW41

Environmental and/or social characteristics

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Does this financial product have a sustainable investment objective?**

**Yes**
   **No**

<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective: ___%</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul>	<input type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of _ % of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with a social objective</li> </ul>
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: ___%</b>	<input checked="" type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>

**What environmental and/or social characteristics are promoted by this financial product?**

*This financial product promotes both the preservation of the environment and natural resources, fair work conditions, democracy and human and social rights on the social side, as pursued by government issuers in which this financial product invests.*



*In case of investments in corporate securities, this financial product also promotes the following environmental and social characteristics:*

- *the fight against climate change;*
- *the respect of human rights;*
- *the protection of human health;*
- *the protection of human well-being.*

*The promotion of the above environmental and social characteristics is evaluated by the Manager based on the analysis carried out by specialised third party ESG data and index providers and is pursued mainly through investments in derivatives instruments based on ESG indices and through direct investments in investee companies and government bonds.*

*Further elements of the financial product's ESG strategy are described in the "Investment Strategy" section below.*

***What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?***

*The sustainability indicators used by this financial product are:*

- *the exclusion of corporate issuers involved in the production of thermal coal, for the fight against climate change;*
- *the exclusion of:*
  - *corporate issuers involved in the production of conventional, controversial and nuclear weapons; and*
  - *countries sanctioned at the central government level by the UN for systematic violations of human rights, for the respect of human rights;*
- *the exclusion of corporate issuers involved in the production of tobacco and alcohol, for the protection of human health;*
- *the exclusion of corporate issuers involved in the gambling sector and in the defense-aerospace sector, for the protection of human well-being;*
- *the ESG Combined Score (as further described in the section headed "What investment strategy does this financial product follow?"), which helps the Manager to evaluate the quality of the environmental, social and governance credentials of the investee companies and government issuers.*

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

- **What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?**

*Not Applicable.*

- **How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?**

*Not Applicable.*

- **How have the indicators for adverse impacts on sustainability factors been taken into account?**

*Not Applicable.*

- **How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?**

*Not Applicable.*

*The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria. The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU*

**Does this financial product consider principal adverse impacts on sustainability factors?**

**YES**

**NO**



**X**

*Yes, the financial product considers the principal adverse impacts on sustainability factors.*

*In general, the consideration of PAIs is based on the contribution of certain mitigating factors, such as:*

- 1. exclusions based on values,*
- 2. the setting up of objectives for specific adverse impact indicators, chosen among those belonging to the Mandatory list in the RTS to the SFDR.*

*In particular:*



1) from a value perspective, corporate issuers involved in conventional, controversial and nuclear weapons (connection to PAI 14), tobacco and alcohol, defense-aerospace, gambling and thermal coal (connection to PAI 4) are excluded;

2) objectives for specific mandatory adverse impact indicators:

a. PAI 4 (Fossil fuels exposure): the adverse impact is mitigated through the limitation of the exposure to the fossil fuels sector, due to the exclusion of corporate issuers involved in the production of thermal coal,

b. PAI 14 (conventional, controversial and nuclear weapons): the adverse impact is eliminated through the exclusion of issuers involved in conventional, controversial and nuclear weapons.



As for specific PAI objectives on government issuers, the financial product has regard to:

PAI 16 (human rights violations): the adverse impact is mitigated through the exclusion of issuers sanctioned by the UN for human rights violations (see the “Investment Strategy” section below).

The consideration of PAIs is reported in the annual financial product report, as required by Art. 11(2) of the SFDR.

### **What investment strategy does this financial product follow?**

In respect of its non-ESG related investment strategy, the financial product directly invests in Debt Instruments (preference will be given to government bonds of European countries), enters into a series of unfunded interest rate swaps, may use credit default swaps for investment purposes, takes exposure to a dynamically managed basket of equities and/or equity/fixed income/commodity indices and may also invest in Money Market/Short Term Instruments and deposits for ancillary purposes. Further information in respect of the non-ESG related investment policy and investment strategy of the financial product including the asset classes in which the financial product may invest is detailed in the Fund Information Card under the headings “Investment Policy” and “Financial Derivative Instruments” which should be read in conjunction with Annex 1 of this Fund Information Card.

With regard to the ESG specific investment strategy, the financial product's ESG strategy is based on two pillars:

1. the promotion of certain environmental and social characteristics;
2. the limitation of investments in issuers with low ESG quality.

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

*More specifically:*

*1. This financial product promotes in particular:*

- *the fight against climate change through the exclusion of corporate issuers involved in the production of thermal coal,*
- *the respect of human rights, through the exclusion of:*
  - *corporate issuers involved in the production of conventional, controversial and nuclear weapons,*
  - *countries sanctioned at the central government level by the UN for systematic violations of human rights,*
- *the protection of human health, through the exclusion of corporate issuers involved in the production of tobacco and alcohol,*
- *the protection of human well-being, through the exclusion of corporate issuers involved in the gambling sector and in the defense-aerospace sector.*

*The above exclusions are determined as appropriate by the Manager based on the analysis carried out by specialized third party index and ESG data providers, in particular:*

- *Urgewald for thermal coal;*
- *Moody's-Vigeo for controversial weapons;*
- *Morningstar-Sustainabilitycs for countries sanctioned by UN for systematic violations of human rights;*
- *MSCI, ECPI and ICE-BofA as ESG index providers.*

*2. The ESG quality of the financial product's portfolio is monitored to avoid a high concentration of ESG lowly rated issuers in the financial product, where the concentration is taken into consideration in absolute terms. In particular, issuers are selected so that less than 10% of the financial product's net assets are invested in corporate or government issuers without an ESG Combined Score or with an ESG Combined Score below 25, on a scale from 0 to 100 (best), provided that those issuers pass the good governance test internally developed by the Manager and further described below under **'What is the policy to assess good governance practices of the investee companies?'**.*

*Regarding the application of ESG scores for corporate or government issuers, the Manager uses scoring data of third party ESG data providers. In particular:*

- *Refinitiv provides ESG scores and ratings for corporates;*
- *Morningstar-Sustainalytics provides ESG scores, ratings and analyses for countries.*

*The overall ESG quality of the financial portfolio is monitored on a continuous basis and issuers with no ESG Combined Score or with an ESG Combined Score lower than 25 are evaluated at each quarterly meeting of the ESG Committee of the Manager.*

*The above exclusions and limitations do not apply to positions derived from investments in other collective investment schemes or in derivatives on indices with no ESG features.*

*The Investment Strategy described above is pursued mainly through investments in derivatives instruments based on ESG indices and through direct investments in investee companies and government bonds.*

- ***What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?***

*The binding elements of the investment strategy used to select the investments to attain each of the environmental and social characteristics promoted by this financial product are those described within the section headed “**What investment strategy does this financial product follow**”, and can be summarised as follows:*

- 1. the promotion of certain environmental and social characteristics, namely (i) the fight against climate change through the exclusion of corporate issuers involved in the production of thermal coal (ii) the respect of human rights, through the exclusion of (a) corporate issuers involved in the production of conventional, controversial and nuclear weapons and (b) countries sanctioned at the central government level by the UN for systematic violations of human rights (iii) the protection of human health, through the exclusion of corporate issuers involved in the production of tobacco and alcohol and (iv) the protection of human well-being, through the exclusion of corporate issuers involved in the gambling sector and in the defense-aerospace sector; and*
- 2. the limitation of investments in issuers with low ESG quality.*

- ***What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?***

*Not Applicable.*

- ***What is the policy to assess good governance practices of the investee companies?***

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

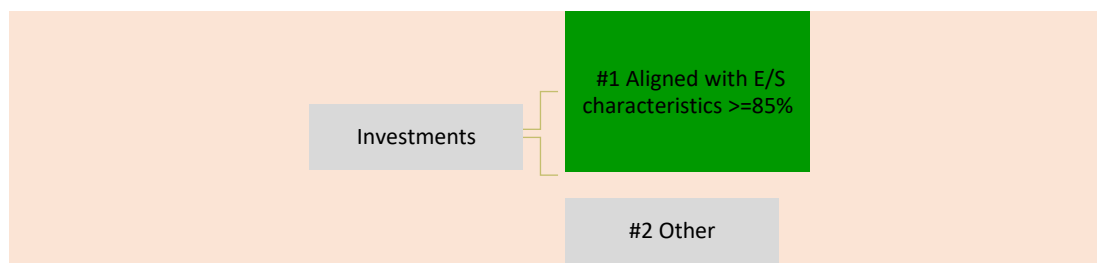
**Good governance practices** include sound management structures, employee relations, remuneration of

To assess the good governance practices of the investee companies, the Manager follows an internal process that mainly relies on the governance (G) scores provided by a third party ESG data provider as far as directly owned issuers are concerned. Those G scores are calculated on the basis of 56 sub-indicators that relate to Management Quality (35), Attention to Shareholders (12) and CSR Strategy (9), which take into account specific factors such as: management structures, employee relations, remuneration of staff and tax compliance.



### What is the asset allocation planned for this financial product?

The financial product's strategic asset allocation is defined by its risk-return profile and implemented through the active investment in variable proportions.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2Other** includes the remaining investments of the financial product which are not aligned with the environmental or social characteristics promoted by the financial product.

**Asset allocation** describes the share of investments in specific assets.

A minimum proportion of 85% of the financial product net assets are invested in issuers which promote the environmental and social characteristics, in accordance with the binding elements of the investment strategy, and which have an ESG Combined Score higher than 25, provided that they pass the good governance test. Investments in any financial product classified as either Article 8 SFDR or Article 9 SFDR or investment in “ESG” indices (as further described below under “**How does the use of derivatives attain the environmental or social characteristics promoted by the financial product**”) are considered an eligible investment for this financial product, whether they are made directly or indirectly through derivative instruments.

Up to 15% of the financial product’s net assets may be invested in money market instruments or consist of margin, collateral and market value of derivative instruments, or a mix of those, and investments in issuers that have no ESG Combined Score or have an ESG Combined Score lower than 25, subject to a maximum limit of 10% of the financial product net assets for the latter. Those issuers that have no ESG Combined Score or have an ESG Combined Score lower than 25, provided that they pass the good governance test, are deemed to be of interest from

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

*a strictly financial point of view and/or, given their characteristics, help to complete the thematic, sector and geographic profile of the portfolio. Those issuers will still be compliant with the exclusion criteria set out in the “Investment Strategy” section above.*

*The thresholds mentioned above hold unless market or other special conditions warrant a varied asset allocation (i.e. the 85% and 15% thresholds, whereas the 10% maximum threshold is not subject to variation).*

● **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

*The implementation of the ESG strategy of the product mainly relies on the use of derivative instruments related to the following list of ESG indices:*

- ECPI World ESG,
- MSCI World Climate Paris Aligned,
- MSCI World ESG Leaders NR,
- MSCI World ESG Universal,
- MSCI World Impact ESG Selection Children Rights,
- ICE BofA-Euro Large-Cap Corporate ESG

*Also, the financial product may use derivative instruments to manage its risk/return profile.*

*Finally, while derivative instruments on single names and on ESG indices are subject to the limitations set out in the “Investment Strategy” section above, derivatives on other indices are not.*



**To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?**

0%.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?**

Yes:

In fossil gas   In nuclear energy

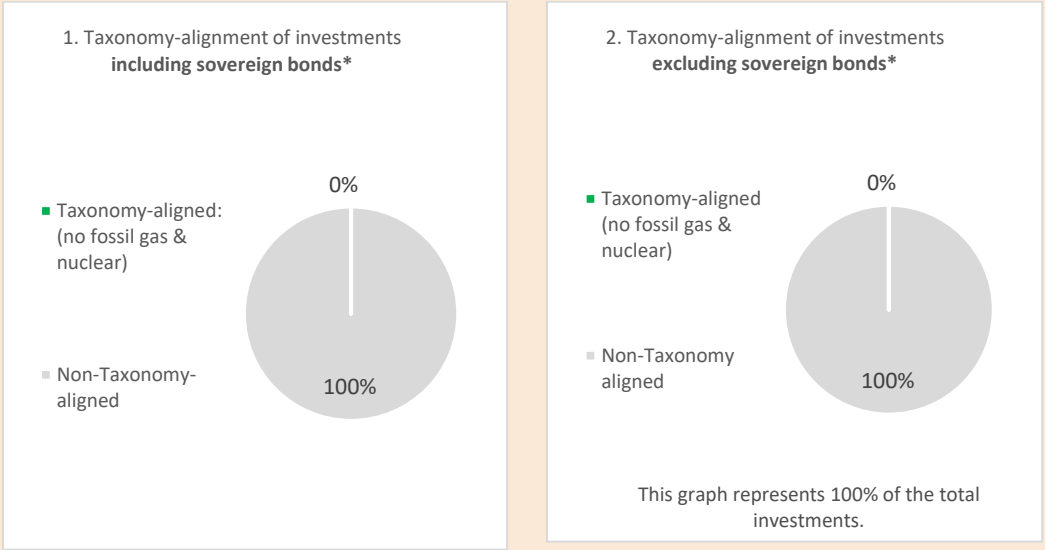
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<sup>1</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation”) and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

No

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules. **Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective. **Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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.



**What is the minimum share of investments in transitional and enabling activities?**  
0%.

**What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy**  
Not Applicable.

**What is the minimum share of socially sustainable investments?**  
Not Applicable.

**What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

As already clarified in the “Asset allocation” section above, the “#2 Other” part of the financial product consists of up to 15% of the financial product’s net assets which may be invested in money market instruments or consist of margin, collateral and market value of derivative instruments, or a mix of those and investments in issuers that have no ESG Combined Score or have an ESG Combined Score lower than 25, subject to a maximum limit of 10% of the financial product net assets for the latter. Those issuers that have no ESG

Combined Score or have an ESG Combined Score lower than 25, provided that they pass the good governance test, are deemed to be of interest from a strictly financial point of view and/or, given their characteristics, help to complete the thematic, sector and geographic profile of the portfolio. Those issuers will still be compliant with the exclusion criteria set out in the “Investment Strategy” section above.



**Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

*No.*

- **How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?**

*Not Applicable.*

- **How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?**

*Not Applicable.*

- **How does the designated index differ from a relevant broad market index?**

*Not Applicable.*

- **Where can the methodology used for the calculation of the designated index be found?**

*Not Applicable.*



**Where can I find more product specific information online?**

**More product-specific information can be found on the website:**

<https://www.animasgr.it/surl/EN-sustainability-related-disclosures>

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.