



Discretionary Mandate		Reason for Interaction
Individual/ internal staff engagements	<input checked="" type="checkbox"/> To support investment decisionmaking in & company related ESG issues <input checked="" type="checkbox"/> To enhance corporate practice or identify the need to enhance corporate practice <input type="checkbox"/> Other - specify	
Collaborative engagements	<input type="checkbox"/> To support investment decisionmaking in & company related ESG issues <input type="checkbox"/> To enhance corporate practice or identify the need to enhance corporate practice <input type="checkbox"/> Other - specify	
Service provider engagements	<input type="checkbox"/> To support investment decisionmaking in & company related ESG issues <input type="checkbox"/> To enhance corporate practice or identify the need to enhance corporate practice <input type="checkbox"/> Other - specify	

RI TRANSPARENCY REPORT

2020

Anima Sgr

About this report

The PRI Reporting Framework is a key step in the journey towards building a common language and industry standard for reporting responsible investment (RI) activities. This RI Transparency Report is one of the key outputs of this Framework. Its primary objective is to enable signatory transparency on RI activities and facilitate dialogue between investors and their clients, beneficiaries and other stakeholders. A copy of this report will be publicly disclosed for all reporting signatories on the [PRI website](#), ensuring accountability of the PRI Initiative and its signatories.

This report is an export of the individual Signatory organisation's response to the PRI during the reporting period specified above. It includes their responses to mandatory indicators, as well as responses to voluntary indicators the signatory has agreed to make public. The information is presented exactly as it was reported. Where an indicator offers a response option that is multiple-choice, all options that were available to the signatory to select are presented in this report. Presenting the information exactly as reported is a result of signatory feedback which suggested the PRI not summarise the information.

PRI disclaimer

This document presents information reported directly by signatories. This information has not been audited by the PRI Secretariat or any other party acting on their behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented, and no responsibility or liability can be accepted for any error or omission.

Usage restrictions

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OO 01.1	Select the services and funds you offer
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Select the services and funds you offer	% of asset under management (AUM) in ranges
Fund management	<input type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input checked="" type="radio"/> >50%
Fund of funds, manager of managers, sub-advised products	<input type="radio"/> 0% <input type="radio"/> <10% <input checked="" type="radio"/> 10-50% <input type="radio"/> >50%
Other	<input checked="" type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> >50%
Total 100%	

OO 01.2	Additional information. [Optional]
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ANIMA is a leading Italian independent asset management operator, with approximately €186 billion of assets under management (as of December 2019). A synthesis of different complementary paths and specializations, ANIMA nowadays offers one of the largest range of products and services available on the market. ANIMA's offering is composed of Italian collective investment schemes and foreign SICAVs. The company also offers institutional and private pension funds, as well as private wealth and institutional asset management services

OO 02.1	Select the location of your organisation's headquarters.
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Italy

OO 02.2	Indicate the number of countries in which you have offices (including your headquarters).
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- 1
 2-5
 6-10
 >10

OO 02.3	Indicate the approximate number of staff in your organisation in full-time equivalents (FTE).
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310

OO 03.1	Indicate whether you have subsidiaries within your organisation that are also PRI signatories in their own right.
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- Yes
 No

OO 04.1	Indicate the year end date for your reporting year.
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31/12/2019

OO 04.2	Indicate your total AUM at the end of your reporting year.
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Total AUM
 185,456,388,092 EUR
 204428817175 USD

OO 04.4	Indicate the assets which are subject to an execution and/or advisory approach. Provide this figure based on the end of your reporting year
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Not applicable as we do not have any assets under execution and/or advisory approach

OO 05.1 Provide an approximate percentage breakdown of your AUM at the end of your reporting year using the following asset classes and investment strategies:

	Internally managed (%)	Externally managed (%)
Listed equity	10-50%	0
Fixed income	>50%	0
Private equity	0	0
Property	0	0
Infrastructure	0	0
Commodities	0	0
Hedge funds	0	0
Fund of hedge funds	0	0
Forestry	0	0
Farmland	0	0
Inclusive finance	0	0
Cash	<10%	0
Money market instruments	<10%	0
Other (1), specify	0	0
Other (2), specify	0	0

OO 06 **Mandatory** Descriptive General

OO 06.1 Select how you would like to disclose your asset class mix.

- as percentage breakdown
- as broad ranges

OO 06.3 Indicate whether your organisation has any off-balance sheet assets [Optional].

- Yes
- No

OO 06.5 Indicate whether your organisation uses fiduciary managers.

- Yes, we use a fiduciary manager and our response to OO 5.1 is reflective of their management of our assets.
- No, we do not use fiduciary managers.

OO 07 **Mandatory to Report, Voluntary to Disclose** Gateway General

Private

OO 09 **Mandatory** Peering General

OO 09.1 Indicate the breakdown of your organisation's AUM by market.

99	Developed Markets
1	Emerging Markets
0	Frontier Markets
0	Other Markets

OO 10 **Mandatory** Gateway General

OO 10.1 Select the active ownership activities your organisation implemented in the reporting year.

Listed equity – engagement

- We engage with companies on ESG factors via our staff, collaborations or service providers.
- We do not engage directly and do not require external managers to engage with companies on ESG factors.

Listed equity – voting

- We cast our (proxy) votes directly or via dedicated voting providers
- We do not cast our (proxy) votes directly and do not require external managers to vote on our behalf

Fixed income SSA – engagement

- We engage with SSA bond issuers on ESG factors via our staff, collaborations or service providers.
- We do not engage directly and do not require external managers to engage with SSA bond issuers on ESG factors. Please explain why you do not.

Please explain why you do not engage directly and do not require external managers to engage with companies on ESG factors.

ESG engagement with SSA issuers would not result in material added value for our portfolios and clients

Fixed income Corporate (financial) – engagement

- We engage with companies on ESG factors via our staff, collaborations or service providers.
- We do not engage directly and do not require external managers to engage with companies on ESG factors. Please explain why you do not.

Please explain why you do not engage directly and do not require external managers to engage with companies on ESG factors.

We carry out our engagement activity first and foremost with equity issuers. Most of these equity issuers are fixed income issuers as well and in that case we extend the conclusions of our engagement activity to the potential investment in their fixed income instruments.

Fixed income Corporate (non-financial) – engagement

- We engage with companies on ESG factors via our staff, collaborations or service providers.
- We do not engage directly and do not require external managers to engage with companies on ESG factors. Please explain why you do not.

Please explain why you do not engage directly and do not require external managers to engage with companies on ESG factors.

We carry out our engagement activity first and foremost with equity issuers. Most of these equity issuers are fixed income issuers as well and in that case we extend the conclusions of our engagement activity to the potential investment in their fixed income instruments.

OO 11	Mandatory	Gateway	General
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OO 11.1 Select the internally managed asset classes in which you addressed ESG incorporation into your investment decisions and/or your active ownership practices (during the reporting year).

Listed equity

- We address ESG incorporation.
- We do not do ESG incorporation.

Fixed income - SSA

- We address ESG incorporation.
- We do not do ESG incorporation.

Fixed income - corporate (financial)

- We address ESG incorporation.
- We do not do ESG incorporation.

Fixed income - corporate (non-financial)

- We address ESG incorporation.
- We do not do ESG incorporation.

Cash

- We address ESG incorporation.
- We do not do ESG incorporation.

Money market instruments

- We address ESG incorporation.
- We do not do ESG incorporation.

OO 12	Mandatory	Gateway	General
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OO 12.1 Below are all applicable modules or sections you may report on. Those which are mandatory to report (asset classes representing 10% or more of your AUM) are already ticked and read-only. Those which are voluntary to report on can be opted into by ticking the box.

Core modules	
<input checked="" type="checkbox"/>	Organisational Overview
<input checked="" type="checkbox"/>	Strategy and Governance
RI implementation directly or via service providers	
Direct - Listed Equity incorporation	
<input checked="" type="checkbox"/>	Listed Equity incorporation
Direct - Listed Equity active ownership	
<input checked="" type="checkbox"/>	Engagements
<input checked="" type="checkbox"/>	(Proxy) voting
Direct - Fixed Income	
<input checked="" type="checkbox"/>	Fixed income - SSA
<input type="checkbox"/>	Fixed income - Corporate (financial)
<input type="checkbox"/>	Fixed income - Corporate (non-financial)
Closing module	
<input checked="" type="checkbox"/>	Closing module

OO LE 01	Mandatory to Report, Voluntary to Disclose	Gateway	General
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Private

OO FI 01	Mandatory to Report, Voluntary to Disclose	Gateway	General
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Private

OO FI 03	Mandatory	Descriptive	General
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OO FI 03.1	Indicate the approximate (+/- 5%) breakdown of your SSA investments, by developed markets and emerging markets.		
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SSA	Developed markets	99
	Emerging markets	1

OO Checks		Checks
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If there are any messages below, please review them before continuing. If there are no messages below, please save this page and continue.

SG 01.1	Indicate if you have an investment policy that covers your responsible investment approach.
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Yes

SG 01.2	Indicate the components/types and coverage of your policy.
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Policy components/types	Coverage by AUM
<input checked="" type="checkbox"/> Policy setting out your overall approach <input type="checkbox"/> Formalised guidelines on environmental factors <input type="checkbox"/> Formalised guidelines on social factors <input type="checkbox"/> Formalised guidelines on corporate governance factors <input checked="" type="checkbox"/> Fiduciary (or equivalent) duties <input type="checkbox"/> Asset class-specific RI guidelines <input type="checkbox"/> Sector specific RI guidelines <input checked="" type="checkbox"/> Screening / exclusions policy <input type="checkbox"/> Other, specify (1) <input type="checkbox"/> Other, specify(2)	<input type="radio"/> Applicable policies cover all AUM <input checked="" type="radio"/> Applicable policies cover a majority of AUM <input type="radio"/> Applicable policies cover a minority of AUM

SG 01.3	Indicate if the investment policy covers any of the following
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- Your organisation's definition of ESG and/or responsible investment and it's relation to investments
- Your investment objectives that take ESG factors/real economy influence into account
- Time horizon of your investment
- Governance structure of organisational ESG responsibilities
- ESG incorporation approaches
- Active ownership approaches
- Reporting
- Climate change
- Understanding and incorporating client / beneficiary sustainability preferences
- Other RI considerations, specify (1)
- Other RI considerations, specify (2)

SG 01.4	Describe your organisation's investment principles and overall investment strategy, interpretation of fiduciary (or equivalent) duties, and how they consider ESG factors and real economy impact.
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In our fiduciary role, we believe that environmental, social, and corporate governance (ESG) issues can affect the risks and returns of portfolios we manage in the long term. We also believe that applying these Principles may better align investors with broader objectives of society. We integrate ESG factors into our investment process by setting a list of exclusions (securities issued by companies or governments that produce weapons that through their use violate fundamental humanitarian principles such as cluster bombs, landmines etc., or are involved in systematic human rights violations) and monitoring exposure of investments to ESG issues, by applying a screening of the issuers' ESG ratings, calculated with an internal methodology on the basis of external ESG research providers data. An ESG Committee reviews periodically the relevant ESG criteria and the list of issuers not aligned to the RI Policy; it also monitors the ESG profile of the portfolios and of their individual securities, to determine whether they continue to meet, on average and individually, Anima's ESG requirements. The ESG Committee supports the Anima's Board of Directors's supervision of the overall ESG process.

No

Private

SG 02.1	Indicate which of your investment policy documents (if any) are publicly available. Provide a URL and an attachment of the document.
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Policy setting out your overall approach

	URL/Attachment
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- URL
<https://www.animasgr.it/IT/investitore-privato/info/Pagine/policy.aspx?search=ESG>
- Attachment (will be made public)
[ANIMA - Policy ESG.pdf](#)
- Fiduciary (or equivalent) duties
- Screening / exclusions policy
- Engagement policy

(Proxy) voting policy

URL/Attachment
<input checked="" type="checkbox"/> URL https://www.animasgr.it/IT/investitore-privato/info/Pagine/policy.aspx?search=stewardship
<input checked="" type="checkbox"/> Attachment (will be made public) Anima - Stewardship e Voto.pdf Estratto della Policy diritto di voto.pdf Sustainability-International-Voting-Guidelines.pdf

We do not publicly disclose our investment policy documents

SG 02.2 Indicate if any of your investment policy components are publicly available. Provide URL and an attachment of the document.

Your organisation's definition of ESG and/or responsible investment and it's relation to investments

URL/Attachment
<input checked="" type="checkbox"/> URL https://www.animasgr.it/IT/investitore-privato/info/Pagine/policy.aspx?search=esg
<input checked="" type="checkbox"/> Attachment ANIMA - Policy ESG.pdf

Governance structure of organisational ESG responsibilities

ESG incorporation approaches

URL/Attachment
<input checked="" type="checkbox"/> URL https://www.animasgr.it/IT/investitore-privato/info/Pagine/policy.aspx?search=esg
<input checked="" type="checkbox"/> Attachment ANIMA - Policy ESG.pdf

Active ownership approaches

URL/Attachment
<input checked="" type="checkbox"/> URL https://www.animasgr.it/IT/investitore-privato/info/Pagine/policy.aspx?search=stewardship
<input checked="" type="checkbox"/> Attachment Anima - Stewardship sintesi per pubblicazione.pdf

Reporting

URL/Attachment
<input checked="" type="checkbox"/> URL https://www.animasgr.it/IT/investitore-privato/info/Pagine/policy.aspx?search=ESG
<input checked="" type="checkbox"/> Attachment ANIMA - Policy ESG.pdf

We do not publicly disclose any investment policy components

SG 02.3 Additional information [Optional].

Please also see our ESG report for the year 2019
<https://esg.animasgr.it/>

SG 03 Mandatory Core Assessed General

SG 03.1 Indicate if your organisation has a policy on managing potential conflicts of interest in the investment process.

Yes

SG 03.2 Describe your policy on managing potential conflicts of interest in the investment process.

Our policy on conflicts of interest is well detailed and articulated, fully in line with the best industry standards and with that of Assogestioni (Italian Fund Managers Association) of which Anima is a member.

Please see our policy (in Italian) at <https://www.animasgr.it/IT/investitore-privato/info/Pagine/policy.aspx?search=conflitti+>

Please see Assogestioni Protocol (in English): http://www.assogestioni.it/index.cfm/3,812,10975/protocollo-autonomia_2014.pdf

No

SG 04 Voluntary Descriptive General

Private

SG 05	Mandatory	Gateway/Core Assessed	General
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SG 05.1 Indicate if and how frequently your organisation sets and reviews objectives for its responsible investment activities.

- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad-hoc basis
- It is not set/reviewed

SG 06	Voluntary	Descriptive	General
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Private

SG 07	Mandatory	Core Assessed	General
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SG 07.1 Indicate the internal and/or external roles used by your organisation, and indicate for each whether they have oversight and/or implementation responsibilities for responsible investment.

Roles

- Board members or trustees
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Internal Roles (triggers other options)

Select from the below internal roles

 - Chief Executive Officer (CEO), Chief Investment Officer (CIO), Chief Operating Officer (COO), Investment Committee
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
 - Other Chief-level staff or head of department, specify
Head of Investment AdvisorySupport&PrinciplesDept
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
 - Portfolio managers
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
 - Investment analysts
 - Dedicated responsible investment staff
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
 - Investor relations
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
 - Other role, specify (1)
 - Other role, specify (2)
- External managers or service providers

SG 07.2 For the roles for which you have RI oversight/accountability or implementation responsibilities, indicate how you execute these responsibilities.

Investment Principles (IP) Office: designing and monitoring ESG integration in Investment Policy;
 Investment Advisory, Support and Principles (IASP): oversight integration of Esg principles application, inter alia ;
 IP, IASP, CIO, Risk Officer and Marketing Officer form the ESG Committee that analyse ESG issues and makes recommendations to the board of Directors;
 Board of Director periodically reviews ESG Policy, establishes ESG criteria, constraints and indications;

Portfolio Managers: cannot buy excluded issues, must keep the portfolios they are in charge of within the ESG constraints and consistent with the Policy set by the BoD.

SG 07.3	Indicate the number of dedicated responsible investment staff your organisation has.
	2

SG 07 CC	Mandatory to Report, Voluntary to Disclose	Descriptive	General
Private			

SG 08	Voluntary	Additional Assessed	General
Private			

SG 09	Mandatory	Core Assessed	PRI 4,5
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SG 09.1	Select the collaborative organisation and/or initiatives of which your organisation is a member or in which it participated during the reporting year, and the role you played.
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Principles for Responsible Investment

	Your organisation's role in the initiative during the reporting period (see definitions)
	Basic

- Asian Corporate Governance Association
- Australian Council of Superannuation Investors
- AVCA: Sustainability Committee
- France Invest – La Commission ESG
- BVCA – Responsible Investment Advisory Board
- CDP Climate Change

	Your organisation's role in the initiative during the reporting period (see definitions)
	Basic

CDP Forests

	Your organisation's role in the initiative during the reporting period (see definitions)
	Basic

CDP Water

	Your organisation's role in the initiative during the reporting period (see definitions)
	Basic

- CFA Institute Centre for Financial Market Integrity
- Climate Action 100+
- Code for Responsible Investment in SA (CRISA)
- Council of Institutional Investors (CII)
- Eumedion
- Extractive Industries Transparency Initiative (EITI)
- ESG Research Australia
- Invest Europe Responsible Investment Roundtable
- Global Investors Governance Network (GIGN)
- Global Impact Investing Network (GIIN)
- Global Real Estate Sustainability Benchmark (GRESB)
- Green Bond Principles
- HKVCA: ESG Committee
- Institutional Investors Group on Climate Change (IIGCC)
- Interfaith Center on Corporate Responsibility (ICCR)
- International Corporate Governance Network (ICGN)
- Investor Group on Climate Change, Australia/New Zealand (IGCC)
- International Integrated Reporting Council (IIRC)
- Investor Network on Climate Risk (INCR)/CERES
- Local Authority Pension Fund Forum
- Principles for Financial Action in the 21st Century
- Principles for Sustainable Insurance
- Regional or National Social Investment Forums (e.g. UKSIF, Eurosif, ASRIA, RIAA), specify
- Responsible Finance Principles in Inclusive Finance
- Shareholder Association for Research and Education (Share)
- United Nations Environmental Program Finance Initiative (UNEP FI)
- United Nations Global Compact

- Other collaborative organisation/initiative, specify
- Other collaborative organisation/initiative, specify
- Other collaborative organisation/initiative, specify
- Other collaborative organisation/initiative, specify

SG 10	Mandatory	Core Assessed	PRI 4
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SG 10.1	Indicate if your organisation promotes responsible investment, independently of collaborative initiatives.
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Yes

SG 10.2	Indicate the actions your organisation has taken to promote responsible investment independently of collaborative initiatives. Provide a description of your role in contributing to the objectives of the selected action and the typical frequency of your participation/contribution.
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- Provided or supported education or training programmes (this includes peer to peer RI support) Your education or training may be for clients, investment managers, actuaries, broker/dealers, investment consultants, legal advisers etc.)
- Provided financial support for academic or industry research on responsible investment
- Provided input and/or collaborated with academia on RI related work
- Encouraged better transparency and disclosure of responsible investment practices across the investment industry
- Spoke publicly at events and conferences to promote responsible investment
- Wrote and published in-house research papers on responsible investment
- Encouraged the adoption of the PRI
- Responded to RI related consultations by non-governmental organisations (OECD, FSB etc.)

	Description
	Participation in ESMA/EFAMA consultations/discussions about Taxonomy, Eu sustainability package, ESMA's Technical Advice on Integrating Sustainability risks and factors in the UCITS Directive and AIFMD, ESMA'S "Undue Short term pressure on corporation from the financial sector" survey

	Frequency of contribution
<input checked="" type="checkbox"/>	Quarterly or more frequently
<input type="checkbox"/>	Biannually
<input type="checkbox"/>	Annually
<input type="checkbox"/>	Less frequently than annually
<input type="checkbox"/>	Ad hoc
<input type="checkbox"/>	Other

- Wrote and published articles on responsible investment in the media
- A member of PRI advisory committees/ working groups, specify

	Description
	Signed the Statement on ESG Credit Ratings. Signed the Statement of Investor Commitment to support a Just Transition on Climate Change

	Frequency of contribution
<input type="checkbox"/>	Quarterly or more frequently
<input type="checkbox"/>	Biannually
<input type="checkbox"/>	Annually
<input type="checkbox"/>	Less frequently than annually
<input checked="" type="checkbox"/>	Ad hoc
<input type="checkbox"/>	Other

- On the Board of, or officially advising, other RI organisations (e.g. local SIFs)
- Other, specify

No

SG 11	Voluntary	Additional Assessed	PRI 4,5,6
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Private

SG 12	Mandatory	Core Assessed	PRI 4
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SG 12.1	Indicate whether your organisation uses investment consultants.
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- Yes, we use investment consultants
- No, we do not use investment consultants.

SG 13	Mandatory	Descriptive	PRI 1
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SG 13.1	Indicate whether the organisation carries out scenario analysis and/or modelling, and if it does, provide a description of the scenario analysis (by asset class, sector, strategic asset allocation, etc.).
<input type="checkbox"/> Yes, in order to assess future ESG factors <input type="checkbox"/> Yes, in order to assess future climate-related risks and opportunities <input checked="" type="checkbox"/> No, our organisation does not currently carry out scenario analysis and/or modelling	

SG 14	Mandatory to Report, Voluntary to Disclose	Additional Assessed	PRI 1
Private			

SG 14 CC	Voluntary		General
Private			

SG 15	Mandatory to Report, Voluntary to Disclose	Descriptive	PRI 1
Private			

SG 16	Mandatory	Descriptive	General
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SG 16.1	Describe how you address ESG issues for internally managed assets for which a specific PRI asset class module has yet to be developed or for which you are not required to report because your assets are below the minimum threshold.
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Asset Class	Describe what processes are in place and the outputs or outcomes achieved
Fixed income - Corporate (financial)	<p>Same process as other assets over minimum threshold:</p> <p>We integrate ESG factors into our investment process by setting a list of exclusions (securities issued by companies or governments that produce weapons that through their use violate fundamental humanitarian principles such as cluster bombs, landmines etc., or are involved in systematic human rights violations) and monitoring exposure to ESG issues, through ESG ratings.</p> <p>We have an internal ESG dashboard that shows individual securities ratings, avg portfolio and benchmark ratings, portfolio rating breakdown, portfolios watchlists.</p> <p>An ESG Committee reviews periodically the relevant ESG criteria, list of issuers not aligned with the RI Policy, monitors the ESG profile of the portfolios and of the individual securities to determine whether they continue to meet, on average and individually, Anima's ESG requirements. The ESG Committee supports the Anima's Board of Directors's decisions regarding the periodical review of the criteria and the decisions regarding the relevant investment positions.</p>
Fixed income - Corporate (non-financial)	<p>Same process as other assets over minimum threshold:</p> <p>We integrate ESG factors into our investment process by setting a list of exclusions (securities issued by companies or governments that produce weapons that through their use violate fundamental humanitarian principles such as cluster bombs, landmines etc., or are involved in systematic human rights violations) and monitoring exposure to ESG issues, through ESG ratings.</p> <p>We have an internal ESG dashboard that shows individual securities ratings, avg portfolio and benchmark ratings, portfolio rating breakdown, portfolios watchlists.</p> <p>An ESG Committee reviews periodically the relevant ESG criteria, list of issuers not aligned with the RI Policy, monitors the ESG profile of the portfolios and of the individual securities to determine whether they continue to meet, on average and individually, Anima's ESG requirements. The ESG Committee supports the Anima's Board of Directors's decisions regarding the periodical review of the criteria and the decisions regarding the relevant investment positions.</p>
Cash	<p>Cash is rated with the same ESG rating of the custodian bank with which the cash is deposited. The rest of the process is the same as the other assets above the minimum threshold, specifically:</p> <p>We have an internal ESG dashboard that shows individual securities ratings, avg portfolio and benchmark ratings, portfolio rating breakdown, portfolios watchlists.</p> <p>An ESG Committee reviews periodically the relevant ESG criteria, list of issuers not aligned with the RI Policy, monitors the ESG profile of the portfolios and of the individual securities to determine whether they continue to meet, on average and individually, Anima's ESG requirements. The ESG Committee supports the Anima's Board of Directors's decisions regarding the periodical review of the criteria and the decisions regarding the relevant investment positions.</p>
Money market instruments	<p>Same process as other assets over minimum threshold:</p> <p>We integrate ESG factors into our investment process by setting a list of exclusions (securities issued by companies or governments that produce weapons that through their use violate fundamental humanitarian principles such as cluster bombs, landmines etc., or are involved in systematic human rights violations) and monitoring exposure to ESG issues, through ESG ratings.</p> <p>We have an internal ESG dashboard that shows individual securities ratings, avg portfolio and benchmark ratings, portfolio rating breakdown, portfolios watchlists.</p> <p>An ESG Committee reviews periodically the relevant ESG criteria, list of issuers not aligned with the RI Policy, monitors the ESG profile of the portfolios and of the individual securities to determine whether they continue to meet, on average and individually, Anima's ESG requirements. The ESG Committee supports the Anima's Board of Directors's decisions regarding the periodical review of the criteria and the decisions regarding the relevant investment positions.</p>

SG 18	Voluntary	Descriptive	General
Private			

SG 19	Mandatory	Core Assessed	PRI 2, 6
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SG 19.1	Indicate whether your organisation typically discloses asset class specific information proactively. Select the frequency of the disclosure to clients/beneficiaries and the public, and provide a URL to the public information.
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Listed equity - Incorporation

Do you disclose?

- We do not proactively disclose it to the public and/or clients/beneficiaries
- We disclose to clients/beneficiaries only.
- We disclose it publicly

The information disclosed to clients/beneficiaries is the same

- Yes
- No

Disclosure to public and URL

Disclosure to public and URL

- Broad approach to ESG incorporation
- Detailed explanation of ESG incorporation strategy used

Annually

<https://www.animasgr.it/IT/investitore-privato/info/Pagine/policy.aspx?search=ESG>
<https://esg.animasgr.it/>

Listed equity - Engagement

Do you disclose?

- We do not disclose to either clients/beneficiaries or the public.
- We disclose to clients/beneficiaries only.
- We disclose to the public

The information disclosed to clients/beneficiaries is the same

- Yes
- No

Disclosure to public and URL

Disclosure to public and URL

- Details on the overall engagement strategy
- Details on the selection of engagement cases and definition of objectives of the selections, priorities and specific goals
- Number of engagements undertaken
- Breakdown of engagements by type/topic
- Breakdown of engagements by region
- An assessment of the current status of the progress achieved and outcomes against defined objectives
- Examples of engagement cases
- Details on eventual escalation strategy taken after the initial dialogue has been unsuccessful (i.e. filing resolutions, issuing a statement, voting against management, divestment etc.)
- Details on whether the provided information has been externally assured
- Outcomes that have been achieved from the engagement
- Other information

Annually

<https://www.animasgr.it/IT/investitore-privato/info/Pagine/policy.aspx?areas=1>
<https://www.animasgr.it/IT/investitore-privato/info/Pagine/policy.aspx?search=VOTO>

Listed equity – (Proxy) Voting

Do you disclose?

- We do not disclose to either clients/beneficiaries or the public.
- We disclose to clients/beneficiaries only.
- We disclose to the public

The information disclosed to clients/beneficiaries is the same

- Yes
- No

Disclosure to public and URL	
	Disclosure to public and URL
<input type="radio"/> Disclose all voting decisions <input checked="" type="radio"/> Disclose some voting decisions <input type="radio"/> Only disclose abstentions and votes against management	
Annually	
https://www.animasgr.it/IT/investitore-privato/info/Pagine/policy.aspx?search=VOTO https://www.animasgr.it/IT/investitore-privato/info/Pagine/policy.aspx	

Fixed income

Do you disclose?	
<input type="radio"/> We do not disclose to either clients/beneficiaries or the public. <input type="radio"/> We disclose to clients/beneficiaries only. <input checked="" type="radio"/> We disclose to the public	
	The information disclosed to clients/beneficiaries is the same
<input checked="" type="radio"/> Yes <input type="radio"/> No	

Disclosure to public and URL	
	Disclosure to public and URL
<input checked="" type="radio"/> Broad approach to RI incorporation <input type="radio"/> Detailed explanation of RI incorporation strategy used	
Annually	
https://www.animasgr.it/IT/investitore-privato/info/Pagine/policy.aspx?search=esg https://esg.animasgr.it/	

SG 19.2 Additional information [Optional]

Please see our ESG report at <https://esg.animasgr.it/>

SG Checks

Checks

If there are any messages below, please review them before continuing. If there are no messages below, please save this page and continue.

LEI 01	Mandatory	Gateway	PRI 1				
Private							
LEI 02	Voluntary	Additional Assessed	PRI 1				
Private							
LEI 03	Voluntary	Additional Assessed	PRI 1				
Private							
LEI 04	Mandatory	Descriptive	PRI 1				
LEI 04.1	Indicate and describe the type of screening you apply to your internally managed active listed equities.						
<input checked="" type="checkbox"/> Negative/exclusionary screening <ul style="list-style-type: none"> <input type="checkbox"/> Product <input checked="" type="checkbox"/> Activity <input type="checkbox"/> Sector <input type="checkbox"/> Country/geographic region <input checked="" type="checkbox"/> Environmental and social practices and performance <input type="checkbox"/> Corporate governance <table border="1" style="width: 100%;"> <thead> <tr> <th style="width: 150px;"></th> <th>Description</th> </tr> </thead> <tbody> <tr> <td></td> <td> <p>We established a list of exclusions consisting of issuers which are direct producers of controversial weapons such as cluster bombs, landmines etc.</p> <p>We then monitor exposure of investments to ESG issues, by monitoring their ESG ratings . In this respect, we use an internal ESG dashboard, that can be accessed by all staff, that shows individual securities ratings and their E, S & G components, portfolio and benchmark ratings and portfolio rating breakdowns. Based on our scale that goes from A+ to D-, each security with a D or lower rating and each portfolio with a total of at least 15% invested in securities with a D+ or lower rating, or without rating, are included in a watchlist and must be discussed by the portfolio managers and the ESG Committee, where appropriate action is decided and recommended to the board of Directors.</p> <p>The Board of Directors issues ESG guidelines and may issue specific investment decisions, both binding for the portfolio managers.</p> </td> </tr> </tbody> </table> <ul style="list-style-type: none"> <input type="checkbox"/> Positive/best-in-class screening <input type="checkbox"/> Norms-based screening 					Description		<p>We established a list of exclusions consisting of issuers which are direct producers of controversial weapons such as cluster bombs, landmines etc.</p> <p>We then monitor exposure of investments to ESG issues, by monitoring their ESG ratings . In this respect, we use an internal ESG dashboard, that can be accessed by all staff, that shows individual securities ratings and their E, S & G components, portfolio and benchmark ratings and portfolio rating breakdowns. Based on our scale that goes from A+ to D-, each security with a D or lower rating and each portfolio with a total of at least 15% invested in securities with a D+ or lower rating, or without rating, are included in a watchlist and must be discussed by the portfolio managers and the ESG Committee, where appropriate action is decided and recommended to the board of Directors.</p> <p>The Board of Directors issues ESG guidelines and may issue specific investment decisions, both binding for the portfolio managers.</p>
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LEI 04.2	Describe how you notify clients and/or beneficiaries when changes are made to your screening criteria.						
We inform institutional clients individually and update the online policy after revisions go into effect							
LEI 05	Mandatory	Core Assessed	PRI 1				
LEI 05.1	Indicate which processes your organisation uses to ensure ESG screening is based on robust analysis.						
<input type="checkbox"/> Comprehensive ESG research is undertaken or sourced to determine companies' activities and products. <input checked="" type="checkbox"/> Companies are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies. <input type="checkbox"/> External research and data used to identify companies to be excluded/included is subject to internal audit by ESG/RI staff, the internal audit function or similar. <input checked="" type="checkbox"/> Third-party ESG ratings are updated regularly to ensure that portfolio holdings comply with fund policies. <input checked="" type="checkbox"/> Trading platforms blocking / restricting flagged securities on the black list. <input checked="" type="checkbox"/> A committee, body or similar with representatives independent of the individuals who conduct company research reviews some or all screening decisions. <input type="checkbox"/> A periodic review of internal research is carried out. <input checked="" type="checkbox"/> Review and evaluation of external research providers. <input type="checkbox"/> Other; specify <input type="checkbox"/> None of the above							
LEI 05.3	Indicate how frequently third party ESG ratings are updated for screening purposes.						
<input checked="" type="radio"/> Quarterly or more frequently <input type="radio"/> Bi-Annually <input type="radio"/> Annually <input type="radio"/> Less frequently than annually							
LEI 06	Voluntary	Additional Assessed	PRI 1				
Private							
LEI 08	Mandatory	Core Assessed	PRI 1				
LEI 08.1	Indicate the proportion of actively managed listed equity portfolios where E, S and G factors are systematically researched as part of your investment analysis.						

ESG issues	Proportion impacted by analysis	
Environmental	Environmental	
	<input checked="" type="checkbox"/> <10% <input type="checkbox"/> 10-50% <input type="checkbox"/> 51-90% <input type="checkbox"/> >90%	
Social	Social	
	<input checked="" type="checkbox"/> <10% <input type="checkbox"/> 10-50% <input type="checkbox"/> 51-90% <input type="checkbox"/> >90%	
Corporate Governance	Corporate Governance	
	<input checked="" type="checkbox"/> <10% <input type="checkbox"/> 10-50% <input type="checkbox"/> 51-90% <input type="checkbox"/> >90%	

LEI 09	Mandatory	Core Assessed	PRI 1
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LEI 09.1 Indicate which processes your organisation uses to ensure ESG integration is based on robust analysis.

- Comprehensive ESG research is undertaken or sourced to determine companies' activities and products
- Companies are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies
- Third-party ESG ratings are updated regularly
- A periodic review of the internal research is carried out
- Structured, regular ESG specific meetings between responsible investment staff and the fund manager or within the investments team
- ESG risk profile of a portfolio against benchmark
- Analysis of the impact of ESG factors on investment risk and return performance
- Other; specify
- None of the above

LEI 09.3 Indicate how frequently third party ESG ratings that inform your ESG integration strategy are updated.

- Quarterly or more frequently
- Bi-Annually
- Annually
- Less frequently than annually

LEI 09.5 Describe how ESG information is held and used by your portfolio managers.

- ESG information is held within centralised databases or tools, and it is accessible by all relevant staff
- ESG information or analysis is a standard section or aspect of all company research notes or industry/sector analysis generated by investment staff
- Systematic records are kept that capture how ESG information and research were incorporated into investment decisions
- Other; specify
- None of the above

LEI 10	Mandatory to Report, Voluntary to Disclose	Core Assessed	PRI 1
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Private

LEI Checks			Checks
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If there are any messages below, please review them before continuing. If there are no messages below, please save this page and continue.

LEA 01.1 Indicate whether your organisation has an active ownership policy (includes engagement and/or voting).

Yes

LEA 01.2 Attach or provide a URL to your active ownership policy.

Attachment provided:

Anima - Stewardship.pdf
 Policy diritto di voto.pdf
 Politica di gestione conflitti di interessi.pdf
 Sustainability-International-Voting-Guidelines.pdf

URL provided:

LEA 01.3 Indicate what your active engagement policy covers:

General approach to Active Ownership

- Conflicts of interest
- Alignment with national stewardship code requirements
- Assets/funds covered by active ownership policy
- Expectations and objectives
- Engagement approach

Engagement

- ESG issues
- Prioritisation of engagement
- Methods of engagement
- Transparency of engagement activities
- Due diligence and monitoring process
- Insider information
- Escalation strategies
- Service Provider specific criteria
- Other, (specify)

(Proxy) voting approach

Voting

- ESG issues
- Prioritisation and scope of voting activities
- Methods of voting
- Transparency of voting activities
- Regional voting practice approaches
- Filing or co-filing resolutions
- Company dialogue pre/post-vote
- Decision-making processes
- Securities lending processes
- Other, (specify)

Other

None of the above

No

LEA 01.4 Do you outsource any of your active ownership activities to service providers?

Yes

No

LEA 02.1 Indicate the method of engagement, giving reasons for the interaction.

Type of engagement

Reason for interaction

Individual / Internal staff engagements	<input type="checkbox"/> To influence corporate practice (or identify the need to influence it) on ESG issues <input type="checkbox"/> To encourage improved/increased ESG disclosure <input checked="" type="checkbox"/> To gain an understanding of ESG strategy and/or management <input type="checkbox"/> We do not engage via internal staff
Collaborative engagements	<input checked="" type="checkbox"/> To influence corporate practice (or identify the need to influence it) on ESG issues <input checked="" type="checkbox"/> To encourage improved/increased ESG disclosure <input checked="" type="checkbox"/> To gain an understanding of ESG strategy and/or management <input type="checkbox"/> We do not engage via collaborative engagements
Service provider engagements	<input type="checkbox"/> To influence corporate practice (or identify the need to influence it) on ESG issues <input type="checkbox"/> To encourage improved/increased ESG disclosure <input type="checkbox"/> To gain an understanding of ESG strategy and/or management <input checked="" type="checkbox"/> We do not engage via service providers

LEA 03	Mandatory	Core Assessed	PRI 2
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LEA 03.1 Indicate whether your organisation has a formal process for identifying and prioritising engagements.

Yes

LEA 03.2 Indicate the criteria used to identify and prioritise engagements for each type of engagement.

Type of engagement	Criteria used to identify/prioritise engagements		
Individual / Internal staff engagements	<table border="1"> <thead> <tr> <th>Individual / Internal staff engagements</th> </tr> </thead> <tbody> <tr> <td> <input checked="" type="checkbox"/> Geography/market of the companies <input type="checkbox"/> Materiality of the ESG factors <input checked="" type="checkbox"/> Exposure (size of holdings) <input type="checkbox"/> Responses to ESG impacts that have already occurred <input type="checkbox"/> Responses to divestment pressure <input type="checkbox"/> Consultation with clients/beneficiaries <input type="checkbox"/> Consultation with other stakeholders (e.g. NGOs, trade unions, etc.) <input type="checkbox"/> Follow-up from a voting decision <input type="checkbox"/> Client request <input type="checkbox"/> Breaches of international norms <input type="checkbox"/> Other; (specify) <input type="checkbox"/> We do not outline engagement criteria for our individual engagements </td> </tr> </tbody> </table>	Individual / Internal staff engagements	<input checked="" type="checkbox"/> Geography/market of the companies <input type="checkbox"/> Materiality of the ESG factors <input checked="" type="checkbox"/> Exposure (size of holdings) <input type="checkbox"/> Responses to ESG impacts that have already occurred <input type="checkbox"/> Responses to divestment pressure <input type="checkbox"/> Consultation with clients/beneficiaries <input type="checkbox"/> Consultation with other stakeholders (e.g. NGOs, trade unions, etc.) <input type="checkbox"/> Follow-up from a voting decision <input type="checkbox"/> Client request <input type="checkbox"/> Breaches of international norms <input type="checkbox"/> Other; (specify) <input type="checkbox"/> We do not outline engagement criteria for our individual engagements
	Individual / Internal staff engagements		
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<table border="1"> <thead> <tr> <th>Collaborative engagements</th> </tr> </thead> <tbody> <tr> <td> <input checked="" type="checkbox"/> Potential to enhance knowledge of ESG issues through other investors <input checked="" type="checkbox"/> Ability to have greater impact on ESG issues <input checked="" type="checkbox"/> Ability to add value to the collaboration <input checked="" type="checkbox"/> Geography/market of the companies targeted by the collaboration <input checked="" type="checkbox"/> Materiality of the ESG factors addressed by the collaboration <input checked="" type="checkbox"/> Exposure (size of holdings) to companies targeted by the collaboration <input checked="" type="checkbox"/> Responses to ESG impacts addressed by the collaboration that have already occurred <input type="checkbox"/> Responses to divestment pressure <input type="checkbox"/> Follow-up from a voting decision <input type="checkbox"/> Alleviate the resource burden of engagement <input type="checkbox"/> Consultation with clients/beneficiaries <input checked="" type="checkbox"/> Consultation with other stakeholders (e.g. NGOs, trade unions, etc.) <input type="checkbox"/> Other; (specify) <input type="checkbox"/> We do not outline engagement criteria for our collaborative engagement providers </td> </tr> </tbody> </table>	Collaborative engagements	<input checked="" type="checkbox"/> Potential to enhance knowledge of ESG issues through other investors <input checked="" type="checkbox"/> Ability to have greater impact on ESG issues <input checked="" type="checkbox"/> Ability to add value to the collaboration <input checked="" type="checkbox"/> Geography/market of the companies targeted by the collaboration <input checked="" type="checkbox"/> Materiality of the ESG factors addressed by the collaboration <input checked="" type="checkbox"/> Exposure (size of holdings) to companies targeted by the collaboration <input checked="" type="checkbox"/> Responses to ESG impacts addressed by the collaboration that have already occurred <input type="checkbox"/> Responses to divestment pressure <input type="checkbox"/> Follow-up from a voting decision <input type="checkbox"/> Alleviate the resource burden of engagement <input type="checkbox"/> Consultation with clients/beneficiaries <input checked="" type="checkbox"/> Consultation with other stakeholders (e.g. NGOs, trade unions, etc.) <input type="checkbox"/> Other; (specify) <input type="checkbox"/> We do not outline engagement criteria for our collaborative engagement providers	
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No

LEA 04	Mandatory	Core Assessed	PRI 2
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LEA 04.1 Indicate whether you define specific objectives for your organisation's engagement activities.

Individual / Internal staff engagements	<input checked="" type="checkbox"/> All engagement activities <input type="checkbox"/> Majority of engagement activities <input type="checkbox"/> Minority of engagement activities <input type="checkbox"/> We do not define specific objectives for engagement activities carried out by internal staff
Collaborative engagements	<input checked="" type="checkbox"/> All engagement activities <input type="checkbox"/> Majority of engagement activities <input type="checkbox"/> Minority of engagement activities <input type="checkbox"/> We do not define specific objectives for engagement activities carried out through collaboration

LEA 05	Mandatory	Core Assessed	PRI 2
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LEA 05.1 Indicate whether you monitor and/or review engagement outcomes.

Individual / Internal staff engagements	<input checked="" type="checkbox"/> Yes, in all cases <input type="checkbox"/> Yes, in a majority of cases <input type="checkbox"/> Yes, in a minority of cases <input type="checkbox"/> We do not monitor, or review engagement outcomes when the engagement is carried out by our internal staff.
Collaborative engagements	<input checked="" type="checkbox"/> Yes, in all cases <input type="checkbox"/> Yes, in a majority of cases <input type="checkbox"/> Yes, in a minority of cases <input type="checkbox"/> We do not monitor, or review engagement outcomes when the engagement is carried out through collaboration.

LEA 05.2 Indicate whether you do any of the following to monitor and/or review the progress of engagement activities.

Individual / Internal staff engagements	<input type="checkbox"/> Define timelines/milestones for your objectives <input checked="" type="checkbox"/> Track and/or monitor progress against defined objectives and/or KPIs <input type="checkbox"/> Track and/or monitor the progress of action taken when original objectives are not met <input type="checkbox"/> Revisit and, if necessary, revise objectives on a continuous basis <input type="checkbox"/> Other; specify
Collaborative engagements	<input type="checkbox"/> Define timelines/milestones for your objectives <input checked="" type="checkbox"/> Track and/or monitor progress against defined objectives and/or KPIs <input type="checkbox"/> Track and/or monitor the progress of action taken when original objectives are not met <input type="checkbox"/> Revisit and, if necessary, revise objectives on a continuous basis <input type="checkbox"/> Other; specify

LEA 06	Mandatory	Additional Assessed	PRI 2,4
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LEA 06.1 Indicate whether your organisation has an escalation strategy when engagements are unsuccessful.

Yes

LEA 06.2 Indicate the escalation strategies used at your organisation following unsuccessful engagements.

- Collaborating with other investors
- Issuing a public statement
- Filing/submitting a shareholder resolution
- Voting against the re-election of the relevant directors
- Voting against the board of directors or the annual financial report
- Submitting nominations for election to the board
- Seeking legal remedy / litigation
- Reducing exposure (size of holdings)
- Divestment
- Other; specify

No

LEA 07	Voluntary	Additional Assessed	PRI 1,2
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Private

LEA 08	Mandatory	Gateway	PRI 2
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LEA 08.1 Indicate whether you track the number of your engagement activities.

Type of engagement	Tracking engagements
Individual/Internal staff engagements	<input checked="" type="checkbox"/> Yes, we track the number of our engagements in full <input type="checkbox"/> Yes, we partially track the number of our engagements <input type="checkbox"/> We do not track
Collaborative engagements	<input checked="" type="checkbox"/> Yes, we track the number of collaborative engagements in full <input type="checkbox"/> Yes, we partially track the number of our collaborative engagements <input type="checkbox"/> We do not track

LEA 09 Mandatory to Report, Voluntary to Disclose Core Assessed PRI 2

Private

LEA 10 Voluntary Additional Assessed PRI 2

Private

LEA 12 Mandatory Descriptive PRI 2

LEA 12.1 Indicate how you typically make your (proxy) voting decisions.

Approach

We use our own research or voting team and make voting decisions without the use of service providers.
 We hire service providers who make voting recommendations and/or provide research that we use to guide our voting decisions.

Based on

The service-provider voting policy we sign off on
 Our own voting policy
 Our clients' requests or policies
 Other (explain)

We hire service providers who make voting decisions on our behalf, except in some pre-defined scenarios where we review and make voting decisions.
 We hire service providers who make voting decisions on our behalf.

LEA 12.2 Provide an overview of how you ensure that your agreed-upon voting policy is adhered to, giving details of your approach when exceptions to the policy are made.

We cast our (proxy) votes directly or via dedicated voting providers on the basis of specific research and principles set by our internal proxy voting guidelines. We use ISS Institutional Shareholder Services, Inc. proxy voting web platform. During 2019 we adopted ISS Sustainability policy and adjusted it to our specific needs for the Italian stock market. The portfolio manager reviews the recommendations and, on his/her input, we may deviate from the recommendation on a specific basis.

LEA 14 Voluntary Additional Assessed PRI 2

Private

LEA 15 Mandatory Descriptive PRI 2

LEA 15.1 Indicate the proportion of votes participated in within the reporting year in which where you or the service providers acting on your behalf raised concerns with companies ahead of voting.

- 100%
- 99-75%
- 74-50%
- 49-25%
- 24-1%
- Neither we nor our service provider(s) raise concerns with companies ahead of voting

LEA 15.2 Indicate the reasons for raising your concerns with these companies ahead of voting.

- Vote(s) concerned selected markets
- Vote(s) concerned selected sectors
- Vote(s) concerned certain ESG issues
- Vote(s) concerned companies exposed to controversy on specific ESG issues
- Vote(s) concerned significant shareholdings
- Client request
- Other

LEA 15.3 Additional information. [Optional]

We raised our concerns in the presence of compensation packages that could have been, in our opinion and in accordance with our policy, better designed /

LEA 16	Mandatory	Core Assessed	PRI 2
LEA 16.1	Indicate the proportion of votes where you, and/or the service provider(s) acting on your behalf, communicated the rationale to companies for abstaining or voting against management recommendations. Indicate this as a percentage out of all eligible votes.		
<input type="radio"/> 100% <input type="radio"/> 99-75% <input type="radio"/> 74-50% <input type="radio"/> 49-25% <input type="radio"/> 24-1% <input checked="" type="checkbox"/> We do not communicate the rationale to companies <input type="radio"/> Not applicable because we and/or our service providers did not abstain or vote against management recommendations			

LEA 17	Mandatory	Core Assessed	PRI 2
LEA 17.1	For listed equities in which you or your service provider have the mandate to issue (proxy) voting instructions, indicate the percentage of votes cast during the reporting year.		
<input checked="" type="checkbox"/> We do track or collect this information			
	Votes cast (to the nearest 1%)		
	15%		
	Specify the basis on which this percentage is calculated		
<input checked="" type="checkbox"/> Of the total number of ballot items on which you could have issued instructions <input type="radio"/> Of the total number of company meetings at which you could have voted <input type="radio"/> Of the total value of your listed equity holdings on which you could have voted <input type="radio"/> We do not track or collect this information			

LEA 17.2	Explain your reason(s) for not voting on certain holdings		
<input type="checkbox"/> Shares were blocked <input type="checkbox"/> Notice, ballots or materials not received on time <input type="checkbox"/> Missed deadline <input type="checkbox"/> Geographical restrictions (non-home market) <input checked="" type="checkbox"/> Cost <input checked="" type="checkbox"/> Conflicts of interest <input checked="" type="checkbox"/> Holdings deemed too small <input checked="" type="checkbox"/> Administrative impediments (e.g., power of attorney requirements, ineligibility due to participation in share placement) <input type="checkbox"/> Client request <input type="checkbox"/> Other (explain)			

LEA 18	Voluntary	Additional Assessed	PRI 2
Private			

LEA 19	Mandatory	Core Assessed	PRI 2
LEA 19.1	Indicate whether your organisation has a formal escalation strategy following unsuccessful voting.		
<input checked="" type="checkbox"/> Yes <input type="radio"/> No			
LEA 19.2	Indicate the escalation strategies used at your organisation following abstentions and/or votes against management.		
<input type="checkbox"/> Contacting the company's board <input type="checkbox"/> Contacting the company's senior management <input type="checkbox"/> Issuing a public statement explaining the rationale <input checked="" type="checkbox"/> Initiating individual/collaborative engagement <input type="checkbox"/> Directing service providers to engage <input checked="" type="checkbox"/> Reducing exposure (holdings) / divestment <input type="checkbox"/> Other			

LEA 20	Voluntary	Descriptive	PRI 2
Private			

LEA Checks			Checks
<input checked="" type="checkbox"/> If there are any messages below, please review them before continuing. If there are no messages below, please save this page and continue.			

FI 01.1 Indicate (1) Which ESG incorporation strategy and/or combination of strategies you apply to your actively managed fixed income investments; and (2) The proportion (+/- 5%) of your total actively managed fixed income investments each strategy applies to.

SSA	Screening alone	0
	Thematic alone	0
	Integration alone	0
	Screening + integration strategies	100
	Thematic + integration strategies	0
	Screening + thematic strategies	0
	All three strategies combined	0
	No incorporation strategies applied	0

FI 01.2 Describe your reasons for choosing a particular ESG incorporation strategy and how combinations of strategies are used.

We established our ESG Policy in 2019. The most readily available yet most effective integration strategy for us at that stage was to integrate ESG factors into our investment process by primarily identifying and monitoring ESG risks posed to our portfolios through ESG ratings and appropriate ESG constraints. We integrate ESG factors into our investment process by setting a list of exclusions (securities issued by companies or that produce weapons that through their use violate fundamental humanitarian principles such as cluster bombs, landmines etc., or governments involved in systematic human rights violations) and monitoring exposure to ESG issues through ESG ratings

We receive ESG ratings and information from Sustainalytics, Refinitiv, Vigeo and produce our own ESG ratings and lists of exclusions

Based on our scale that goes from A to D -, each security with a D or lower rating and each portfolio with a total of 15% invested in securities with a D+ or lower rating, or without rating, are included in a watchlist and must be discussed by the portfolio managers and the ESG Committee, where appropriate action is decided and recommended to the board of Directors

CM1 01	Mandatory	Additional Assessed	General				
CM1 01.1	Indicate whether the reported information you have provided for your PRI Transparency Report this year has undergone:						
<input type="checkbox"/> Third party assurance over selected responses from this year's PRI Transparency Report <input type="checkbox"/> Third party assurance over data points from other sources that have subsequently been used in your PRI responses this year <input type="checkbox"/> Third party assurance or audit of the correct implementation of RI processes (that have been reported to the PRI this year) <input type="checkbox"/> Internal audit of the correct implementation of RI processes and/or accuracy of RI data (that have been reported to the PRI this year) <input checked="" type="checkbox"/> Internal verification of responses before submission to the PRI (e.g. by the CEO or the board) <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Whole PRI Transparency Report has been internally verified <input type="checkbox"/> Selected data has been internally verified <input type="checkbox"/> Other, specify <input type="checkbox"/> None of the above							
CM1 01.2	Additional information [OPTIONAL]						
2019 was the first year in which we adopted a policy. As part of gradually improving our general ESG integration process and enhancing our confidence building measures, we will design an internal audit procedure that assures/evaluates both of our RI processes and the accuracy our 2021 PRI Report data (2020 data)							
CM1 02	Mandatory	Descriptive	General				
CM1 02.1	We undertook third party assurance on last year's PRI Transparency Report						
<input type="radio"/> Whole PRI Transparency Report was assured last year <input type="radio"/> Selected data was assured in last year's PRI Transparency Report <input type="radio"/> We did not assure last year's PRI Transparency report <input checked="" type="radio"/> None of the above, we were in our preparation year and did not report last year.							
CM1 03	Mandatory	Descriptive	General				
CM1 03.1	We undertake confidence building measures that are unspecific to the data contained in our PRI Transparency Report:						
<input type="checkbox"/> We adhere to an RI certification or labelling scheme <input type="checkbox"/> We carry out independent/third party assurance over a whole public report (such as a sustainability report) extracts of which are included in this year's PRI Transparency Report <input type="checkbox"/> ESG audit of holdings <input type="checkbox"/> Other, specify <input checked="" type="checkbox"/> None of the above							
CM1 04	Mandatory	Descriptive	General				
CM1 04.1	Do you plan to conduct third party assurance of this year's PRI Transparency report?						
<input type="radio"/> Whole PRI Transparency Report will be assured <input type="radio"/> Selected data will be assured <input checked="" type="radio"/> We do not plan to assure this year's PRI Transparency report							
CM1 07	Mandatory	Descriptive	General				
CM1 07.1	Indicate who has reviewed/verified internally the whole - or selected data of the - PRI Transparency Report . and if this applies to selected data please specify what data was reviewed						
<input type="checkbox"/> CEO or other Chief-Level staff <input type="checkbox"/> The Board <input type="checkbox"/> Investment Committee <input type="checkbox"/> Compliance Function <input checked="" type="checkbox"/> RI/ESG Team <input type="checkbox"/> Investment Teams <input type="checkbox"/> Legal Department <input checked="" type="checkbox"/> Other (specify) <table border="1" style="width: 100%; margin-top: 5px;"> <tr> <td style="width: 150px;">specify</td> <td></td> </tr> <tr> <td>CIO and ESG Committee</td> <td></td> </tr> </table>				specify		CIO and ESG Committee	
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