

Disclosure ex art. 10 Reg. UE 2019/2088

ANIMA Italy

Introduction

This financial product promotes environmental and social characteristics but does not have as its objective a sustainable investment.

Environmental and/or social characteristics promoted by this financial product

This financial product promotes in particular 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.

Investment Strategy

The Fund's ESG strategy is based on two pillars:

1. The promotion of certain specific environmental and social characteristics;
2. The monitoring of the ESG quality of its portfolio.

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 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.

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

The overall ESG quality of the portfolio is monitored on a continuous basis and issuers with an 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.

The application of the above exclusions and ESG scores are based on the analyses carried out by specialized third party index and ESG data providers, as detailed in the Methodology and ESG data sources section below.

Asset allocation planned for the product

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

Typically, at least 85% of the Fund's net assets are invested in activities which promote the environmental and social characteristics described above.

Up to 15% of the Fund's net assets may be invested in ancillary liquid assets, as detailed within the 'Investment Policy' of the Fund Information Card, or a mix of ancillary liquid assets and investments in issuers that have no ESG score or have an ESG score lower than 25 (on a scale that goes from 0 to 100, where 100 is the maximum/best), subject to a maximum limit of 10% of the Fund's net asset value for the latter. Those issuers that have no ESG score or have an ESG score lower than 25 will still be compliant with the exclusion criteria set out in the Investment Strategy section.

Any investment included in the above referenced remaining component refers to financial products and instruments deemed to be of interest from a strictly financial point of view (liquidity included) and/or which, given their characteristics, help to complete the thematic, sector and geographic profile of the portfolio.

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).

The implementation of the ESG strategy of the 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 product may use derivative instruments, as detailed within the Fund Information Card, 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, derivatives on indices are not.

Monitoring of environmental or social characteristics

The investment strategy is implemented by the portfolio management team on a discretionary basis. The risk management team monitors on an ongoing basis the compliance of the portfolio with the ESG investment strategy, having due regard to ESG data provided by third party data providers.

Any deviation from the intended ESG investment strategy (i.e. due to price movement or revision of the ESG classification/scoring of the assets in which the Fund is invested into) is analyzed by the Manager and due consideration is given as to the continued holding, or not, as the case may, of the relevant assets within the portfolio, taking into account the best interests of the Fund and its investors.

Methodology and ESG data sources

ANIMA Sgr evaluates the environmental and social profile of the product through the use of ratings, scores and ESG analyses performed by third party data providers, in particular:

- Refinitiv, for the environmental and social assessments of corporate issuers;
- Sustainalytics, for the environmental and social assessments of countries and for a list of countries sanctioned by the UN for violations of human rights, which are then excluded from investments;
- Vigeo, for a list of corporate issuers directly involved in the production or sale of controversial weapons, banned by international treaties, which are again excluded from investments;
- Urgewald, for a list of corporate issuers involved in production of thermal coal;
- MSCI & ICE BofA indices, for a list of companies operating in the tobacco and gambling sectors.

Further details on the analysis methodologies used can be found on the websites of the above-mentioned companies.

Limitations to the analysis

The main limitations to the analysis described above are represented by the degree of ESG coverage of the issuers in the portfolio by external suppliers and by the possible inaccuracies deriving from the standardization of different measurement systems used by the various suppliers.

Due Diligence

The correct application of ESG assessments to the fund's assets is ensured by the automatic and electronic acquisition of third party ESG data, as carried out by the internal Risk Management function.

Active Ownership Policy

With reference to active share ownership practices, ANIMA, in addition to adhering to the Italian Stewardship Principles issued by Assogestioni on the basis of the EFAMA Stewardship Code, has prepared a documented and publicly available policy (see <https://www.animasgr.it/EN/sustainability/Pages/PRISignatories.aspx>) in which it describes how:

- it monitors investee companies, with shares admitted to trading on a regulated market in Italy or in another EU Member State, on relevant issues, including strategy, financial and non-financial results as well as risks, capital structure, social and environmental impact and corporate governance;
- it communicates with investee companies;
- it exercises voting rights and other rights connected to the shares;
- it collaborates with other shareholders;
- it communicates with the relevant stakeholders of the investee companies;