

# **Summary of Policy on the Prohibition of Investment in Manufacturers of Anti-Personnel Mines and Cluster Munitions and Submunitions**

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## References

- [1] Italian Law no. 220 of 9 December 2021 containing identification of “Measures to counter the financing of manufacturers of anti-personnel mines and cluster munitions and submunitions”, issued in implementation of the Ottawa Treaty of 18 September 1997 (ratified by Italian Law no. 106 of 26 March 1999) and of the Convention on Cluster Munitions signed in Oslo on 30 May 2008 (ratified by Italian Law no. 95 of 14 June 2011).

## Changes to the Document

Versions	Date	Description of Changes
00	22/12/2022	First issue and approval by the Board of Directors

## Definitions

- **Management Officers** - team of resources (Managers) who, based on the assigned mandates of internal management, carry out investment activities in relation to the assets under management.

## 1. Introduction and Overview

This policy governs the guidelines adopted by ANIMA SGR (hereinafter “the Company” or the “AMC”) in order to comply with the provisions of Italian Law no. 220 of 9 December 2021 containing identification of “Measures to counter the financing of manufacturers of anti-personnel mines and cluster munitions and submunitions” (hereinafter, the “Law”), issued in implementation of the Ottawa Treaty of 18 September 1997 (ratified by Italian Law no. 106 of 26 March 1999) and of the Convention on Cluster Munitions signed in Oslo on 30 May 2008 (ratified by Italian Law no. 95 of 14 June 2011), referred to hereafter as the “Law”.

## 2. Scope of Application

For the purposes of compliance with the bans provided for by the Law, Anima has defined the following criteria of interpretation to be used in order to define its scope of application:

- **Products:** the prohibition applies without distinction to all products managed by Anima;
- **Financing:** means the direct investment of the portfolios managed in stocks issued by companies involved in the prohibited activities.

The companies in which investment is prohibited are identified by an exclusion list, to be updated every six months, drafted on the basis of:

- findings from publicly available lists deemed reliable and identified from time to time also through comparison with trade associations;
- findings from research provided by the company's info providers.

## 3. Governance

In order to ensure correct implementation of the policies adopted, Anima SGR has defined a governance system dedicated to the management of this policy, as detailed below.

### Board of Directors

1. Defines and approves this Policy and subsequent revisions.
2. Approves the application criteria of the Law and defines the related limitations at the proposal of the ESG Committee.
3. Verifies periodically the correct implementation of the Policy on the basis of the controls carried out by Risk Management.

### ESG Committee

1. Proposes the application criteria of the Law, the public lists to be consulted and the related integrations and sends the list of prohibited issuers to the Board of Directors for approval.
2. Carries out periodic monitoring of the updates to the lists, evaluating their applicability over time and proposing any amendments on the basis of the analyses carried out by the Investment Principles Service.
3. Proposes updates to the list of prohibited issuers to the Board of Directors on the basis of the results of the periodic monitoring described in point 2.

**Investment Principles Service**

1. Proposes the application criteria of the Regulation, the public lists to be consulted and the related integrations to the ESG Committee for its examination and subsequent proposal to the Board of Directors for approval of the limitations.
2. Carries out periodic monitoring of the updates to the lists, evaluating their applicability over time and proposing any amendments to the ESG Committee.
3. Proposes updates to the list of prohibited issuers to the ESG Committee on the basis of the results of the periodic monitoring described in point 2.

**Management Officers**

1. Operate in compliance with the prohibitions and limitations defined in this Policy and approved by the Board of Directors.

**Risk Management**

1. Oversees the implementation of controls and monitoring in compliance with the limitations envisaged by the Regulation and this Policy and the limitations approved by the Board of Directors.

**Compliance**

1. Examines and expresses a judgement of regulatory compliance regarding the proposed criteria and limitations, in relation to assessments carried out in the context of the ESG Committee, for the purposes of subsequent submission to the Board of Directors for approval.

**4. Final Provisions**

This Policy is addressed to all staff of Anima SGR. A summary of it is available for all stakeholders on the company's website.