

Sustainability-related information pursuant to art. 10 of EU Reg. 2019/2088 (“SFDR”) for “ANIMA Thematic XIV”, which promotes environmental or social characteristics according to art. 8 SFDR

	Date	Description
First version	12-04-2024	First version of the document
Second version	28-02-2026	Rewording of sections d), e), g), h)

a) Summary

1. This financial product promotes environmental and social characteristics, while limiting the weight of issuers with low ESG quality.
2. Although this product only promotes environmental and social characteristics, it does not have sustainable investment objective.
3. In particular, the product only promotes the preservation of the environment and natural resources, and fair work conditions, democracy, human and social rights on the social side, as pursued by government issuers. For corporate issuers, it also promotes the fight against climate change, the respect for human rights, the protection of human health, and the protection of human well-being. The promotion of these characteristics is evaluated by the Manager based on the analysis carried out by specialized 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.
4. 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. Regarding the ESG specific investment strategy, the responsible investment strategy is to pursue the environmental and social characteristics described in the previous point and the limitation of investment in low quality ESG issuers, following, in addition, the allocative criteria described in the next point. Moreover, the implementation of the ESG strategy of the product mainly relies on the use of derivative instruments related to the list of ESG indices described in paragraph d) below.
5. A minimum proportion of 85% of the financial product net assets are invested in issuers which promote the environmental and social characteristics as detailed in the sections above and which have an ESG Score higher than 1.429/10 and have passed the good governance test. Investments in any financial product classified as either Article 8 SFDR or Article 9 SFDR or investment in “ESG” indices 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 consists of margins, collateral and market value of derivative instruments, or a mix of those and investments in issuers that have no ESG Score or have an ESG Score lower than 1.429/10, subject to a maximum limit of 10% of the financial product net assets for the latter and always if they pass the good governance test.

6. Environmental and social characteristics are pursued by the Portfolio Management team on a discretionary basis. The Manager's Risk Management team monitors the adherence of the portfolio to its strategy on an ongoing basis.
7. The methodologies, used for assessing the environmental and social characteristics of the countries and investee companies and for identifying issuers subject to exclusion, are those developed by the third-party providers and index providers specifically selected by the Manager.
8. The data are those produced by the third-party providers and index providers and can be either those reported by the companies themselves or estimated by the provider (see paragraph (h) below); they are managed and processed electronically, via computer flows that directly connect the third-party providers and index providers with the Manager's Risk Management team.
9. The main limitations of the analysis methods are the degree of coverage of portfolio issuers by external providers, possible inaccuracies resulting from the normalization of different measurement systems used by different providers, and the use of data estimated by them.
10. The correct application of ESG assessments is ensured by the automatic way in which they are downloaded or transposed, as well as by the parameterization of ESG limits in the front office and risk management systems.
11. With reference to active shareholding practices, the SGR, in addition to adhering to the Italian Stewardship Principles issued by Assogestioni, has prepared a documented and publicly available policy "ANIMA - Engagement Policy," summarized in paragraph k) below.
12. The financial product does not have a reference benchmark for the purpose of measuring the achievement of its promoted environmental or social characteristics.

b) No sustainable investment objective

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

c) Environmental or social characteristics of the 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 case of investments in corporate securities, 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 is evaluated by the Manager based on the analysis carried out by specialized 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.

d) Investment strategy

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 the Fund Information Card.

Regarding the ESG specific investment strategy, the financial product 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:
 - a. the fight against climate change through the exclusion of corporate issuers involved in the production of thermal coal, as identified through data and analysis from the third-party data and index providers used by the Manager;
 - b. the respect of human rights or other significant violations of international law, through the exclusion of:
 - i. corporate issuers involved in the production of conventional, controversial and nuclear weapons, as identified through data and analysis from the third-party data and index providers used by the Manager;
 - ii. countries sanctioned, as identified by the ESG Policy to which the financial product adheres, based on data and analysis from the third-party data and index providers used by the Manager;
 - c. the protection of human health, through the exclusion of issuers involved in the production of tobacco and alcohol, as identified through data and analysis from the third-party data and index providers used by the Manager;
 - d. the protection of human well-being, through the exclusion of corporate issuers involved in the gambling sector and in the defense and aerospace sector, as identified

through data and analysis from the third-party data and index providers used by the Manager.

The above exclusions are determined by the Manager based on the analysis carried out by specialized third-party index and ESG data providers.

2. The ESG quality of the financial product 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 Score or with an ESG Score below 1.429/10, on a scale from 0 to 10 (best), provided that those issuers pass the good governance test. Furthermore, a minimum proportion of 85% of the Fund 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 Score higher than or equal to 1.429, 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 are considered an eligible investment for this Fund, whether they are made directly or indirectly through derivative instruments.

Regarding the application of ESG scores to corporate or government issuers, the Manager uses scoring data of third-party ESG data providers.

The overall ESG quality of the financial portfolio is monitored on a continuous basis and issuers with no ESG Score or with an ESG Score lower than 1.429/10 are evaluated at each quarterly meeting of the ESG Committee of the Manager.

The Investment Strategy described above is pursued mainly through direct investments in investee companies and government bonds and through investments in derivatives 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.

Finally, while derivative instruments on corporate issuers and on ESG indices are subject to the limitations set out in the "Investment Strategy" section above, derivatives on other indices and derivatives on government issuers are not.

e) Proportion of investments

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

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 Score higher than 1.429/10, 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 above under “Investment strategy” section) 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 Score or have an ESG Score lower than 1.429/10, subject to a maximum limit of 10% of the financial product net assets for the latter. Those issuers that have no ESG Score or have an ESG Score lower than 1.429/10, 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.

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).

f) 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 financial product with the ESG investment strategy, having due regard to ESG data provided by third-party data providers and index 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 this financial product is invested into) is analyzed by the Manager and due consideration is given as to the continued holding, or not, as the case may be, of the relevant assets within the portfolio of the financial product, taking into account the best interests of its investors.

g) Methodologies

The methodologies, used to assess the environmental and social characteristics of the countries and investee companies and to identify issuers subject to exclusion, are those developed by the third-party providers selected.

Further details on the analysis of the methodologies used can be found on the websites of the companies, who are among the best known and widely used on the market, so that their well appreciated professional skills are the main assurance on the quality of their ESG data.

h) Data sources and processing

The data, used for assessing the environmental and social characteristics of countries and investee companies and for identifying issuers subject to exclusion, are those produced by the third-party providers and index providers used and can be either those reported by the companies themselves or estimated (by the provider). In this regard, for the corporate asset class, the third-party provider uses estimates solely to assess exposure to risks or opportunities related to specific relevant themes and sectors where companies do not provide detailed data. In general, no more than 15% of a company's rating may be based on estimates, although this may vary depending on the sector. However, in most cases, no estimated values are used. With respect to the government asset class, the use of estimates is even more limited, representing approximately 7% of the total data. In this area as well, estimated values are generally not used.

It is also reasonable to assume that the use of estimated data will decrease over time, given the coming obligations for companies to publish a larger set of sustainability related information and data points.

At the moment, the Manager doesn't use internally estimated ESG data.

Data are managed and processed electronically, via informatic flows directly connecting third-party providers with the Risk Management of the Asset Manager.

i) Limitations to methodologies and data

The main limitations to the analysis described above are represented by the degree of ESG coverage of the issuers in the portfolio of the financial product by external suppliers and by the possible inaccuracies deriving from the standardization of different measurement systems used by the various suppliers for the calculation of issuers ESG scores and the use of data estimated by them. Such limitations do not affect how the environmental and social characteristics promoted by this financial product are met, because the ESG coverage of the invested issuers is very high.

j) Due diligence

The correct application of ESG assessments to the financial product assets is ensured by the automatic and electronic acquisition of third-party and index providers ESG data, as carried out by the internal Risk Management function. Furthermore, the binding elements of the investment strategy are translated into investment restrictions, which are defined by the Manager ESG Committee, approved by its Product Committee, and shared with the BoD. Those quantitative restrictions are then applied to the compliance software by the Risk Management team of the Manager.

k) Engagement policies

With reference to active share ownership practices, the Manager, in addition to adhering to the Italian Stewardship Principles issued by Assogestioni based on the EFAMA Stewardship Code, has prepared a documented and publicly available policy (see

<https://www.animasgr.it/EN/sustainability/Pages/Policies-procedures.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.

I) Designated reference benchmark

The financial product does not have a reference benchmark for the purpose of measuring the achievement of its promoted environmental or social characteristics.