



**SUMMARY OF THE
SUSTAINABILITY POLICY
OF EURIZON CAPITAL S.A.**

October 2023

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1. INTRODUCTION

As a financial market participant, Eurizon Capital S.A. (henceforth “Eurizon Capital” or the “Company”) has a fiduciary duty to its Customers and Investors and, more generally, to the other stakeholders that requires it to effectively deal with the issues relating to sustainability, with particular reference to the returns on its financial products and to the issuers in which it invests on behalf of the assets under management. In line with its own “Engagement policy” the Company believes, in fact, that the issuers implementing high standards at social, environmental and corporate governance level are able to generate sustainable performances over the long term.

This Policy describes the financial instrument selection and monitoring methodologies adopted by the Company in order to include the sustainability risk analysis and management¹ as part of its decision-making process on investments relating to collective asset management services and portfolio management and to the recommendations made within the investment advisory service (“Investment Process”).

Along with these methodologies, the adoption of specific financial instruments selection processes are foreseen, which are appropriately calibrated based on the characteristics and objectives of the individual products managed, that take into account environmental, social and corporate governance (ESG) factors, and principles of Sustainable and Responsible Investments (SRI).

The criteria for selecting and monitoring issuers criteria based on ESG and SRI profiles integrate the traditional financial analysis of risk/return profiles of issuers that the Company takes into account when forming its Investment choices, in order to i) avoid environmental, social and governance conditions cause a significant, actual or potential, significant negative impact on the value of the investments of managed assets and ii) lever the capabilities of issuers to benefit from sustainable growth opportunities .

This document represents the Policy for the integration of the sustainability risks in the Investment Process of Eurizon Capital pursuant to pursuant to Article 3² of Regulation (EU) 2019/2088 of the European Parliament and of the Council on information on sustainability in the financial services sector (so called “*Sustainable Finance Disclosure Regulation*” or “*SFDR Regulation*”) and the related implementing regulations.

This document also describes how Eurizon Capital takes into account:

- the main negative effects of investment decisions on sustainability factors pursuant to Article 4³ and 7⁴ of the SFDR Regulation and the related implementing regulations;
- sustainability risks in its Remuneration and Incentive Policy, pursuant to Article 5⁵ of the SFDR Regulation.

The regulatory framework was further extended by the European legislator through the following provisions:

- Regulation (EU) 2020/852 (the ‘Taxonomy Regulation’) on the establishment of a framework for sustainable investment;
- Delegated Regulation (EU) 2021/1253 concerning the integration of client sustainability preferences by investment firms;
- Delegated Regulation (EU) 2021/1269 concerning the integration of sustainability factors into product governance requirements;

¹ i.e. the occurrence of an event or an environmental, social or governance condition that may cause a significant actual or potential negative impact on the investment value.

² Financial market participants publish information on their websites about their policies on integrating sustainability risks into their investment decision-making processes. Financial advisors shall publish on their websites information about their policies on integrating sustainability risks into their investment or insurance advice.

³ Financial market participants shall publish and update on their websites where they consider the main adverse effects of investment decisions on sustainability factors, a statement regarding their due diligence policies with respect to such effects, taking due account of their size, the nature and scope of their activities and the type of financial products they make available.

⁴ [omission] for each financial product, if a financial market participant applies Article 4 [omission], the following shall be included: a) a clear and reasoned explanation of whether, and, if so, how a financial product considers principal adverse impacts on sustainability factors; b) a statement that information on principal adverse impacts on sustainability factors is available in the information to be disclosed pursuant to Article 11(2) of the Regulation.

⁵ Financial market participants and financial advisors include in their remuneration policies information about how those policies are consistent with the integration of sustainability risks and post that information on their websites.

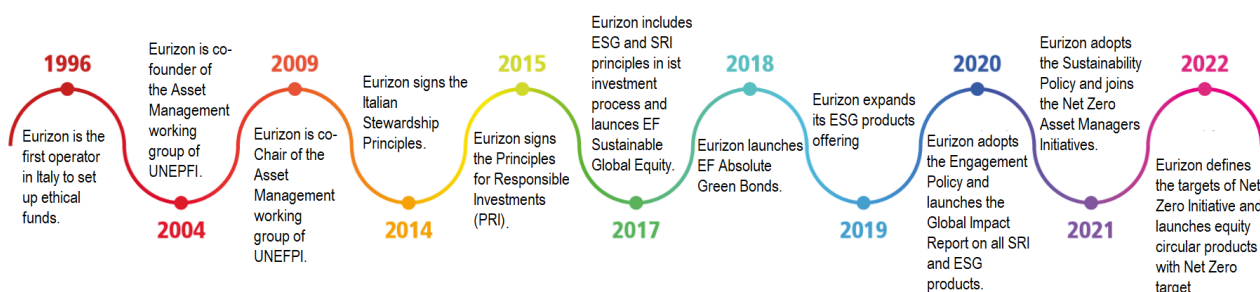
- Commission Delegated Regulation (EU) 2022/1288, as amended outlining regulatory technical standards on the content and presentation of information in pre-contractual documents, websites and periodic reports.

2. EURIZON'S COMMITMENT TO THE SUSTAINABILITY OF FINANCIAL SERVICES

The Vision and the Mission of Eurizon Capital SGR S.p.A. emphasise the importance for all the companies belonging to the Eurizon Asset Management Division of Intesa Sanpaolo Group to co-operate with the companies in which it invests to promote rules and behaviours that prefer the sustainability aspects of the investments and encourage high governance standards of the investee issuers.

Eurizon Capital believes that those companies that take the ESG factors into account in their own strategies and operational models are more likely to achieve sustainable profits over time and therefore increase their value both economically and financially.

The following diagram shows the key stages of the engagement evolution of the Asset Management Division regarding ESG and SRI issues, since 1996, i.e. the year that the first Ethical funds were marketed by Eurizon Capital SGR S.p.A. on the Italian market:



In this context, the Company promotes a conduct that favours sustainability aspects of investments and the adoption of good corporate governance practices by investee issuers. The next sections describe the Codes, Principles and Initiatives endorsed by the Parent Company Eurizon Capital SGR, in order to adopt ethical *standards* and codes of responsible company conduct which are internationally recognised.

2.1. UNITED NATIONS' PRINCIPLES FOR RESPONSIBLE INVESTMENT (UN PRI)

The integration of ESG factors and SRI principles, in addition to responding to the reference principles and the values of the Intesa Sanpaolo Group and the Asset Management Division, is related to the adherence, since 2015, to the Principles for Responsible Investment -i.e. the guiding principles on socially responsible investments promoted by the United Nations at the initiative of:

- “*UNEP FI*”: the partnership between the “*United Nations Environment Programme*” (UNEP) and the financial sector aiming at analysing the impact of environmental and social considerations on the sustainability of the financial performances;
- “*UN Global Compact*”: the initiative aimed at promoting a sustainable global economy, respectful of human and labour rights, the protection of the environment and the fight against corruption.

As a signatory of the Principles for Responsible Investment, the Asset Management Division is committed to:

1. incorporate environmental, social and governance factors into its investment analysis and decision-making process;
2. integrate environmental, social and governance factors in the active ownership policy;
3. ask the companies in which it invests for a suitable dissemination of information about them regarding the environmental, social and governance factors;
4. promote the acceptance and implementation of the Principles in the investment community;
5. work with the financial community to improve the effectiveness in implementing the Principles;

6. disclose to the public the reports on activities and progress of the companies in applying the Principles.

As a signatory of the Principles for Responsible Investment on behalf of the Asset Management Division, Eurizon Capital SGR S.p.A. is annually required to provide transparent information on its responsible investment activities by preparing the so-called “*RI Transparency Report*”, available on the website www.unpri.org.

2.2. STEWARDSHIP PRINCIPLES

As a adopter of the “Italian Stewardship Principles” for the exercise of administrative and voting rights in listed companies defined by *Assogestioni*⁶, the Company pays particular attention to the policies implemented by the issuers, stimulating comparison with the companies in which it invests.

In this context, the Company:

1. Adopts a documented policy, available to the public, setting out the strategy for exercising the rights inherent in the financial instruments pertaining to the OICR and managed portfolios;
2. Monitors listed issuers;
3. Sets out clear guidelines on the timing and modalities of the interventions with listed issuers in which it invest in order to protect and increase their value;
4. Considers working with other institutional investors where appropriate, paying particular attention to concerted action regulation;
5. Consciously exercises voting rights inherent in financial instruments pertaining to OICR and managed portfolios;
6. track of the exercise of the rights inherent in financial instruments pertaining to the OICR and managed portfolios by adopting a policy on the disclosure of information on external governance.

In order to regulate the behaviours that the Company adopts to stimulate comparison with the issuers in which it invests, integrating its commitment as a shareholder in the investment strategy, the Company has therefore developed its “Engagement Policy”, in compliance with sector regulations.

Eurizon Capital SA has also adopted, in compliance with sector regulations, specific organisational and/or procedural measures in order to guarantee, in the presence of the discretionary attribution of the exercise of participation and voting rights inherent to the shareholdings managed by the same, independence and autonomy in the exercise of such rights. In this context, the Company has developed a specific “Strategy for the exercise of participation and voting rights attached to the financial instruments held in the managed UCITS” (the “Strategy”).

The Company monitors the effectiveness of the measures taken for engagement with issuers and the exercise of voting rights by reviewing the Strategy and the Engagement Policy at least annually. The Company provides transparent information on these documents at www.eurizoncapital.com.

3. ROLES AND RESPONSIBILITIES IN THE PROCESS TO SELECT AND MONITOR ESG AND SRI CRITERIA

In order to promote a successful implementation of its Sustainability Policy, Eurizon Capital S.A., with the support of the Asset Management competent structures, set up a special framework which includes the involvement of the following corporate bodies and structures:

At the Company's level:

CONDUCTING OFFICERS

With the support of the competent functions and committees and based on the indications of the Asset Management Division, they elaborate the proposals for the Board of Directors on methodologies:

- relating to selection and monitoring methodologies of financial instruments aimed at integrating the sustainability risks within the Investment Process of the managed products;

⁶ The Principles defined by Assogestioni - the Italian professional association of which Eurizon Capital S.A. is a member - are aligned with those in the EFAMA Code for External Governance approved by the European Fund and Asset Management Association (EFAMA) in which Assogestioni participates.

- for identifying the main negative effects of investment decisions on sustainability factors, defining priorities and mitigation actions, the results of which are formalised in the "Principal Adverse Sustainability Impacts Statement";
- for integrating sustainability risks into remuneration and incentive policies.

Within the Risk Committee, they periodically monitor the implementation of the Sustainability Policy of the Company, making also use of the reports prepared by the ESG & Strategic Activism Structure.

BOARD OF DIRECTORS

The Board, with the support of the Conducting Officers, defines the present Sustainability Policy of the Company that includes:

- the methodologies to select and monitor financial instruments in order to integrate the analysis of sustainability risks within the Investment Process of the managed products;
- the methods for identifying the main negative effects of investment decisions on sustainability factors, defining priorities and mitigation actions, the results of which are formalised in the "Principal Adverse Sustainability Impacts Statement";
- the methods for integrating sustainability risks into remuneration and incentive policies.

The Board periodically monitors the correct implementation of the Company's Sustainability Policy.

HEAD OF INVESTMENTS

The Head of Investments, with the support of the ESG & Strategic Activism unit of the Parent Company and the Product Development unit of the Company, coordinates activities related to participation in Shareholders' Meetings in relation to the exercise of voting rights for investments held by the products established by the Company, monitors and coordinates engagement with significant issuers in relation to significant issues in terms of strategy, financial and non-financial results, risks, capital structure, as well as in terms of social, environmental and corporate governance impact.

COMPLIANCE & AML FUNCTION

The Compliance & AML function monitors the compliance with the Sustainability Policy of the Company, overseeing the appropriate implementation of the controls governed in the external and internal regulations.

RISK MANAGEMENT FUNCTION

The Risk Management function monitors the sustainability risk of the products under management and oversees the compliance with the decision-making process and the Operational Limits aimed to reduce the risks, including reputational ones, of the managed portfolios related to ESG and SRI issues.

At the level of the Asset Management Division:

ENVIRONMENTAL, SOCIAL AND GOVERNANCE COMMITTEE

The Environmental, Social and Governance Committee (hereinafter also "ESG Committee") is an advisory body that supports the Managing Director of Eurizon Capital SGR S.p.A. (i) in defining the proposals to be submitted to the Board of Directors of Eurizon Capital SGR S.p.A. regarding sustainability related Policies, (ii) in monitoring the implementation of strategies involving the negative screening of SRI and ESG factors, the positive integration of ESG factors, in the analysis, selection and composition of financial portfolios managed and comparison with investees, through the exercise of voting rights and engagement activities.

Moreover, the ESG Committee (i) monitors, taking into account the available data, the final balance of the main environmental, social and governance indicators relating to the managed assets, defining the appropriate actions for the mitigation of the negative effects connected with the sustainability risks, (ii) defines proposals for the Board of Directors regarding the priorities to be adopted for the following period, (iii) presents an annual statement of the main negative effects of investment decisions on sustainability factors (the "Principal Adverse Sustainability Impacts Statement").

ESG & STRATEGIC ACTIVISM UNIT

The ESG & Strategic Activism unit ensures the dissemination and implementation of the sustainability principles of the investments, promoting integration of environmental, social and governance factors in the Investment Process across the Asset Management Division.

It is responsible for the development and implementation of company policies in the ESG and SRI areas and for the proper performance of the related operational processes. Monitors market practices and proposes activities to Senior Management to promote innovation on company methodologies and processes.

The structure is divided into the following units

- Corporate Governance which (i) support the Company in the engagement activities with relevant issuers related to corporate governance issues, coordinating - for environmental, social and ethical issues - with the Head of the Sustainability structure;
- Sustainability, which coordinates the Eurizon's strategy on issues of Sustainability and Responsible Investment issuers, supporting Top Management in relation to the integration of environmental, social and governance factors in the Company's Investment Process and in creating and implementing new products and services, (ii) coordinates monitoring and engagement activities regarding issuers, with particular reference to environmental and social issues, and (iii) supports the work of the ESG Committee.

LONG TERM SUSTAINABLE STRATEGIES UNIT

The *Long Term Sustainable Strategies* unit monitors corporate issuers, also using info-providers specialised in ESG and SRI matters in order to identify the lists related to (i) issuers deemed as “not responsible”, or (ii) with a high exposure to ESG risks (“critical issuers”) and/or (iii) that do not comply with good *governance* practices.

This structure is also the divisional competence centre for the control and innovation of the management strategies related to ESG and SRI.

4. SCOPE OF APPLICATION

This Policy requires for all types of assets held by managed products - mutual funds and portfolio managements - that in the pre-contractual information:

- explains the methods of sustainability risk integration in the investment decisions, in accordance with the transparency requirements laid down in Article 6⁷ of SFDR;
- promote environmental or social characteristics, among others, or a combination of these characteristics, provided that the companies in which the investments are made respect good governance practices, pursuant to Article 8⁸ of SFDR;
- has sustainable investment objectives, pursuant to Article 9⁹ of SFDR.

Mandates characterised by the presence of specific indications in their respective investment policies do not fall within the scope of application, considering the lower degree of discretion in the selection of financial instruments.

⁷ Participants in financial markets include the description given below in precontractual disclosure:

a) how sustainability risks are integrated in their investment decisions; and

b) the results of the assessment on the probable impacts of sustainability risks on the return of the financial products they make available.

⁸ If a financial product promotes, among other characteristics, environmental or social characteristics, or a combination of those characteristics, provided that the companies in which the investments are made follow good governance practices, the information to disclose [omission], shall include the following:

a) information on how such characteristics are met;

b) if an index has been designated as a reference benchmark, information on whether and how this index is consistent with those characteristics.

⁹ Where a financial product has sustainable investment as its objective and an index has been designated as a reference benchmark, the information to be disclosed [omission] shall be accompanied by the following:

a) information on how the designated index is aligned with that objective;

b) an explanation as to why and how the designated index aligned with that objective differs from a broad market index.

5. PROCESS TO INTEGRATE SUSTAINABILITY RISKS IN THE MANAGED ASSETS INVESTMENT PROCESS

In line with the obligations envisaged in regulations on sustainability information in the financial services sector, the Company set out specific selection and monitoring methodologies of the financial instruments aimed at integrating the sustainability risks inside the Investment process of the assets under management.

The strategies for the integration of sustainability risks implemented by the managed assets of the Company are described below.

NEGATIVE SCREENING

- **SRI EXCLUSIONS OR RESTRICTIONS:** issuers operating in sectors considered "not responsible" ' excluded from the Investment Universe of individual managed assets (known as "SRI Binding screening");
- The exclusions are applied to all active management products, while in the case of *Limited Tracking Error* products (except those that specifically integrate ESG factors) and index-linked products, the maximum direct investment allowed is equal to the weight of the issuer in the sustainable benchmark; Issuers operating in sectors considered "not responsible" are (i) companies with an evident, direct involvement in the manufacture of unconventional weapons¹⁰ (*Anti-personnel mines; Land mines; Cluster bombs; Nuclear weapons¹¹; Impoverished uranium; Biological weapons; Chemical weapons; Non-detectable fragment weapons; Blinding lasers; Incendiary weapons; White phosphorous* ("unconventional weapons", (ii) companies that derive at least 25% of their turnover from mining or electricity production activities linked to thermal coal or (iii) companies that derive at least 10% of their turnover from the extraction of oil & gas from bituminous sands (so-called oil sands); For issuers with an exposure to the thermal coal and oil sands extraction sectors below the prescribed thresholds, specific *engagement*¹² processes are activated which may determine restrictions and/or exclusions with respect to the Investment Universe of the single managed assets; if, at the end of the engagement process, positive effects are not identified, such as the definition of "phase out" plans for the thermal coal generation or oil sands extraction sectors, the SGR evaluates whether to continue the monitoring period or to start the process to divest the managed assets;
- **ESG EXCLUSIONS OR RESTRICTIONS:** ¹³"critical" issuers for which an escalation process is activated that leads to restrictions and/or exclusions determines with respect to the Investment Universe of individual managed assets ("ESG Binding screening"). The exclusions are applied to all active management products, while in the case of *Limited Tracking Error* products and index-linked products (with the exception of those that specifically integrate ESG factors), the maximum direct investment allowed is equal to the weight of the issuer in the sustainable benchmark. "Critical" issuers are those companies

¹⁰ These provisions do not apply to activities that are permitted under the following treaties and/or conventions:

- the Ottawa Treaty (1997) which prohibits the use, stockpiling, production and transfer of anti-personnel mines;
- the Convention on Cluster Munitions (2008) which prohibits the use, stockpiling, production and transfer of cluster munitions;
- the Chemical Weapons Convention (1997) which prohibits the use, stockpiling, production and transfer of chemical weapons;
- the Biological Weapons Convention (1975) which prohibits the use, stockpiling, production and transfer of biological weapons;
- Council Regulation (EU) 2018/1542 concerning restrictive measures against the proliferation and use of chemical weapons;
- The Treaty on the Non-Proliferation of Nuclear Weapons of 1 July 1968.

¹¹ Issuers based in States that are not signatories to the "Treaty on the Non-Proliferation of Nuclear Weapons" of 1 July 1968 are not considered.

¹² In particular, these activities aim to ensure that no new thermal coal generation or oil sands extraction projects are developed, as well as the gradual "phase out" from such activities.

¹³ Consistently with the provisions of the "*Engagement Policy of Eurizon Capital SGR S.p.A.*", the Company has defined the following methods of intervention with regard to the identified issuers: (i) organisation of specific meetings with the members of the company bodies (including minority bodies), or the entities appointed by them, of the listed issuer invested in (which are minuted by the Corporate Governance unit); (ii) preparation of a formal communication to the company bodies and senior management of the companies; (iii) promotion of forms of collective engagement with other institutional investors; in this regard, the SGR considers this solution when it believes it is the most effective choice for improving communication with the issuers (for example, in the case of significant corporate events or matters of public interest); (iv) makes public statements at Shareholder Meetings.

with the highest exposure to environmental, social and corporate governance risks, i.e. with a lower ESG sustainability rating level (equal to "CCC" assigned by the specialised info-provider "MSCI ESG Research") in the equity and bond investment universe;

POSITIVE SCREENING

- **INTEGRATION OF ESG FACTORS:** integration of ESG factors in the analysis, selection and composition of the managed portfolios (known as "ESG integration") with aims to build, in accordance with good governance practices, a portfolio with (i) a higher average ESG score than that of its investment universe (known as "ESG Score Integration") ; (ii) the process of selecting the investments, based on specific positive and negative criteria provided in the offer documentation, such as in the case of ethical and thematic products (so-called "Thematic Integration");(iii) investment selection processes based on sustainable investment criteria in accordance with the SFDR; this objective is achieved by investing in issuers whose activities contribute to one or more sustainable development objectives, such as the Sustainable Development Goals (SDGs) promoted by the United Nations (so-called "Sustainable Integration");(iv) investment selection processes based on the screening of target UCIs, applicable to "wrapper" products, such as funds of funds, retail portfolio management and unit-linked products, provided that such products invest at least 70% of their assets in target UCIs that promote environmental or social characteristics or sustainable investment goals (so-called "Manager Selection Integration"); (v) investment selection processes that take into account the construction logic of the relative benchmarks, identified on the basis of environmental, social and corporate governance criteria, provided that such products - such as, for example, Limited Tracking Error products and indexed products - invest at least 90% of their assets in issuers present in the benchmark (so-called "Index Integration"), (vi) processes for selecting government issuers that use the indicators provided by the so-called 'Sustainable Development Report' and indicators used to monitor the main adverse impacts on government issuers; this is achieved by investing at least 70% of assets in such issuers (so-called 'Sovereign Integration')¹⁴ (vii) the integration of procedures to measure the carbon footprint generated by issuers, i.e. the carbon dioxide (CO₂) emissions, in order to create portfolios with a carbon footprint below that of the investment universe.

The products may implement one or more of the aforesaid strategies, based on their significance in relation to the management style and/or asset classes selected by the entities of the Investments Department in charge of implementing the investment policy. If the product entail the use of more than one strategy, the controls are performed on respective portions of the portfolio;

- **SUSTAINABLE INVESTMENT GOALS:** procedure to achieve, in compliance with good governance practices, sustainable investment objectives (so-called "Sustainable Investments") through investment selection methodologies aimed at (i) contributing to sustainable development objectives through investment selection processes based on sustainable investment criteria pursuant to the SFDR Regulation (so-called "SDG Investing") (ii) generating a social or environmental impact along with a measurable financial return (known as "Impact investing");
- **GOOD GOVERNANCE PRACTICES:** the products classified pursuant to Articles 8 and 9 of the SFDR invest in corporate issuers that comply with good governance practices in accordance with the same Regulation, i.e. issuers that (i) have solid management structures, and do not have critical aspects at the level of (ii) relations with personnel, (iii) personnel remuneration and (iv) compliance with tax obligations ("Good Governance");

STEWARDSHIP: the promotion through proactive interaction with issuers of exercising participation and voting rights, and engagement with the investees through engagement with the management of the companies ("Active ownership - engagement").

The next table shows the correspondence between the Strategies adopted by the Company and procedures for the integration of sustainability risks of financial products pursuant to the SFDR:

¹⁴ This strategy is applicable to products that, according to their investment policy, invest predominantly (i.e. at least 70 per cent) in government issuers.

MACRO-STRATEGY	STRATEGY	INTEGRATION METHODOLOGY		ARTICLE 6	ARTICLE 8	ARTICLE 9
NEGATIVE SCREENING	SRI EXCLUSIONS OR RESTRICTIONS (SRI Binding screening)	Issuers operating in sectors deemed not responsible	Unconventional weapons	●	●	●
			Thermal Coal	●	●	●
			Bituminous Sands	●	●	●
	ESG EXCLUSIONS OR RESTRICTIONS (ESG Binding screening)	Critical issues		●	●	●
POSITIVE SCREENING	INTEGRATION OF ESG FACTORS (ESG integration)	ESG Score Integration			●	
		(ESG integration)			●	
		Sustainable Integration			●	
		Manager Selection Integration			●	
		Index Integration			●	
		Sovereign Integration			●	
		Carbon Footprint			●	
	Sustainable Investment Goals (Sustainable Investments)	SDG Investing				●
		Impact Investing				●
	GOOD GOVERNANCE PRACTICES	Good Governance			●	●
STEWARDSHIP	STEWARDSHIP	Active ownership - Engagement		●	●	●

For each of the Strategies, the Company has defined specific decision-making processes and operational limits aimed at limiting the risks, including reputational risks, of managed portfolios in relation to ESG and SRI topics; the compliance with the operational limits is monitored by the Risk Management Function with the support of the Compliance & AML Function.

6. PROCESS FOR SCREENING THE ASSET SELECTED FROM MANAGED FUNDS

6.1. TARGET UCIS

The Company invests in target UCIs of third-party fund houses provided they are included in the UCI buy-list transmitted by the competent functions of the Asset Management Division.

In particular, as part of the process of selecting and monitoring the target UCIs of third-party fund houses, the Multimanager Investments & Unit Linked unit of the Investment Department of the Parent Company assesses - in addition to economic and financial analyses the level of integration of SRI and/or ESG factors and related sustainability risks in the light of:

- the investment decision-making processes of fund houses, in accordance with Article 6 of Regulation (EU) 2019/2088;
- the investment policy of each UCI, monitoring:
 - the promotion, among other things, of environmental or social characteristics, or a combination of these as well as compliance with good governance practices, pursuant to Article 8 of SFDR;
 - the adoption of sustainable investment objectives, pursuant to Article 9 of SFDR;
 - as well as the presence of any additional ESG-type distinctive elements in management of each product.

This information - acquired directly from fund houses and / or through specialized info-providers is

assessed as one of the elements considered for possible approval in the UCI buy-list, and as a possible choice criterion, among others, by the portfolio managers of the Company.

As part of its own due diligence activities, the Multimanager Investments & Unit Linked structure of the Parent Company gives preference to investment houses that provide a high level of transparency on the products they manage, including with regard to how they integrate sustainability risks and integrate environmental, social and corporate governance (ESG) factors and sustainable and responsible investment (SRI) principles within their respective investment processes.

In this context, the Risk management with the support of Credit Risk Management unit of the Parent Company verifies, on the basis of the offer documentation and any further documentation obtained from the fund house, the results of the analyses relating to the level of integration of SRI and/or ESG factors and the related sustainability risks.

7. SUSTAINABLE INVESTMENTS

The next sections describe the methodology adopted by the Company to identify “sustainable investments” pursuant to the SFDR, with particular reference to (i) issuers of financial instruments - shares and/or bonds, and (ii) target UCIs.

7.1. FINANCIAL INSTRUMENTS - SHARES AND/OR BONDS

The model defined by the Company envisages the assessment of issuers based on an internal methodology which leverages data made available by the specialized *info-provider* “MSCI ESG Research” and which measures the extent of an issuer’s alignment with the 17 SDGs promoted by the United Nations.

The methodology assesses the degree of alignment with each of the SDGs based on the following two components:

- “*Product Alignment*”, i.e. the indicator of the level of “net alignment”¹⁵ of the products and services of an issuer with the targets associated with each SDG;
- “*Operational Alignment*”, i.e. the indicator of the level of alignment of production processes of issuers in relation to specific sustainable development goals (SDG).

Each component is given a summary score on a 5-tier scale which may vary from “*Strongly aligned*” to “*Strongly misaligned*”. An issuer is automatically considered as “*Strongly Misaligned*” (and consequently not sustainable) if (i) 50% or more of its revenues are from products with adverse impacts on the SDGs or (ii) is involved in one or more disputes classified as *Very severe*“.

On this basis, the Company believes that an investment may be considered as “sustainable” if the issuer has at least 1 SDG with a score equal to “*Aligned*” or “*Strongly Aligned*”, and no SDG with a score equal to “*Misaligned*” or “*Strongly Misaligned*”.

Green Bonds or similar instruments¹⁶ are considered to be “sustainable”.

7.2. TARGET UCIs

As regards to *target* UCIs (mutual investment funds and SICAVs), the Company has defined an assessment methodology which aims to estimate the part of the product invested in sustainable issuers. For this purpose, UCIs that promote, among others, environmental or social characteristics, or their combination, pursuant to Article 8 of the SFDR, the Company considers:

- for products managed by the SGR or its subsidiaries, the methodology to estimate sustainable issuers referred to in the previous paragraph (the “*look-through*” approach);
- for products issued by third-party fund houses - without prejudice to the due diligence activities indicated in the paragraph “*Screening process for the target UCIs of third-party fund houses related to SRI and ESG factors*” - the minimum exposure declared in the offering documentation.

¹⁵ The net impact implies that some products and services of a company may be well aligned with the sustainable development goals, while other products may have a negative impact and be misaligned with the goals.

¹⁶ Such as *social bonds* and *sustainable bonds*.

Lastly, it should be noted that UCIs which pursue sustainable investment goals pursuant to Article 9 of the SFDR are considered as sustainable.

8. MANAGEMENT MANDATES TO THIRD PARTY FUND HOUSES

In case the investment management activities of Company's products are delegated to a third-party manager, the Company ensures, through its initial and ongoing due diligence process conducted by the Company's competent functions that such managers are compliant with the mandatory requirements in term of sustainable framework.

9. MAIN NEGATIVE EFFECTS ON THE SUSTAINABILITY OF INVESTMENT CHOICES

9.1. TRANSPARENCY AT A FINANCIAL PRODUCT LEVEL

The assessment of the main negative effects¹⁷ of investment choices on sustainability factors and the definition of possible related mitigation actions are an integral part of Eurizon's approach to sustainability.

In this context, the Company has a specific framework that defines how the so-called "Principal Adverse Impact indicators" ("PAI") are taken into account within the assets under management, in accordance with the Regulatory Technical Standards (RTS) of SFDR.

This framework includes the use of specific indicators, as set out in the Commission Delegated Regulation (EU) 2022/1288¹⁸, which are associated, based on the characteristics and objectives of the individual financial products, based on oversight already defined by the SGR which includes the use of the following mechanisms (i) negative SRI and ESG screening, with the aim of mitigating the risks of exposure to companies operating in sectors deemed "responsible" (including, among others, exposure to the fossil fuels and unconventional weapons sectors) or which are characterised by critical environmental, social or corporate governance issues, (ii) Positive ESG screening in the analysis, selection and composition of financial portfolios and the selection of sustainable investments pursuant to the SFDR, (iii) the exercise of voting rights and engagement with investee issuers.

The following table shows the reconciliation matrix between adverse impact indicators and how financial products' sustainability risks are integrated in accordance with the SFDR:

ADVERSE IMPACT INDICATOR	INDICATOR TYPE	ART.6	ART.8 ¹⁹	ART.9 ²⁰
Indicators applicable to corporate securities				
Intensity of greenhouse gas of owned companies (Scope 1 + 2)	Environmental		●	●
Exposure to companies active in fossil fuel sector	Environmental	●	●	●
Share of non-renewable energy consumption and production	Environmental			●
Activities negatively affecting biodiversity-sensitive areas	Environmental		●	●
Board gender diversity	Social	●	●	●
Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical and biological weapons)	Social	●	●	●
Indicators applicable to investments in sovereign and supranational securities				
Intensity of greenhouse gas	Environmental		●	●
Investee countries subject to social violations	Social		● ²¹	●

¹⁷ The term 'main adverse effects' (or 'main adverse impacts') refers to the effects of investment decisions and investment advice that lead to negative impacts on sustainability factors

¹⁸ The Commission Delegated Regulation indicates the content, methodologies and procedures for the presentation of information required under Article 4 of the SFDR in relation to the principal adverse impacts at an entity level for sustainability indicators (i) on the climate and other adverse impacts related to the environment and (ii) in the social dimension and regarding employees, respect for human rights and the fight against corruption and bribery.

¹⁹ For products with the 'ESG Index Integration' strategy, the impact indicators depend on the characteristics of the selected index.

²⁰ In relation to the products classified under Art. 9 SFDR that use the Impact Investing strategy, with regard to the PAIs "Greenhouse gas intensity of investee companies (Scope 1 + 2)" and "Non-renewable energy consumption and production" applicable to investments in corporate bonds as well as the PAIs applicable to investments in sovereign and supranational bonds, these indicators are assessed through due diligence on the instrument being invested in. Finally, the PAI "Activities that adversely affect biodiversity-sensitive areas" is not applicable to these products.

²¹ For products characterised by the 'Sovereign ESG Integration' strategy.

10. INTEGRATION OF SUSTAINABILITY RISKS IN REMUNERATION AND INCENTIVE POLICIES

The Company's Remuneration and Incentive Policies take into consideration sustainability risks pursuant to art. 5²² of the SFDR.

In particular, the annual Incentive Systems provide for:

- the attribution to Group Risk Takers, company Risk Takers and Middle Management who do not belong to the chain of managers of a specific objective, among those of strategic action, linked to the initiatives of the Company that take into account environmental, social and governance factors (so-called "Environmental, Social and Governance factors" - ESG);
- a corrective mechanism of the theoretical premium related to the population belonging to the chain of managers connected to the management of sustainability risks (so-called "sustainability corrective mechanism") which provides for the comparison between the "sustainability rating" of the portfolios managed (i. e. weighted average ESG score of the products referred to the individual manager) and the target rating (i.e. average ESG score of the parameters associated with the product, i.e. the benchmark or the investment universe) in accordance with the methods described in Paragraph 5.3 "Integration of ESG factors (ESG Integration)".

11. POLICY REVIEW AND PUBLICITY

The Sustainability Policy of the Company is subject to annual review by the Compliance & AML function with the support of the *ESG & Strategic Activism* unit and in coordination with the Compliance & AML Function of the Parent Company Eurizon Capital SGR S.p.A., to assess the consistency of the methodologies adopted by the Company with the evolution of *best practices* developed at national and international level.

12. REPORTING

In accordance with the provisions of the current regulations, the Company provides its clients/investors and other *stakeholders* with a Synthesis of the Sustainability, as well as any relevant amendment, if any, via its website.

²² Pursuant to Article 5 of the SFDR, "Financial market participants and financial advisors shall include in their remuneration policies information on how such policies are consistent with the integration of sustainability risks and shall publish such information on their websites."