

Updated as of 10/03/2021

Disclosure on “ESG integration” practices

Each sub fund follows different approaches for the ESG integration. So far only the sub funds managed by the delegate investment manager Banca Finnat implement ESG integration in the investment process. In this purpose the above mentioned Investment Manager follows two kind of criteria:

- the average portfolio ESG rating and
- a set of additional investment restrictions applied to each specific sub fund.

In this regard:

- the **average portfolio's ESG Rating**, is determined, in house and at least monthly, on an increasing scale ranging from 0 (less virtuous) to 100 (more virtuous), processing on a weighted basis (excluding cash and derivatives component) the scores assigned by external ESG rating providers, again on a scale from 0 to 100, to each asset held in the portfolio. In order to assign the rating, financial instruments are divided into four macro-categories for each of which a “ESG rating”, implemented by primary providers, is identified, as represented in the following table.

Type of Assets	Esg Rating Source
Government Debt Securities	Environmental Performance Index (EPI) – published by Yale University The supplier annually assigns an environmental sustainability score to 180 countries based on 32 different indicators The remaining countries - not covered by a rating - are prudently assigned a score of zero.
Securities of supranational issuers	Supra-national issuers such as European Investment Bank, World Bank, International Monetary Fund, International Bank of Reconstruction and Development etc. are conventionally assigned scores equal to 100 (in consideration of their particular roles and skills in the ESG sector)
Corporate issues (Equity / Bond)	ESG Risk Rating – issued by independent providers Overall percentile rank assigned to each company based on its environmental, social and governance (ESG) total score relative to its industry peers. For the top 1% the percentile is 99%; for the bottom 1% the percentile is 1%. Aggregate ESG performance encompasses a company's level of preparedness, disclosure and controversy involvement across all three ESG themes. Where the aforementioned providers do not issue a rating for certain assets held in the portfolio (for example medium and small companies) to these assets, while remaining eligible from an ESG point of view, a score of zero will be cautiously assigned.
UCI	ESG risk rating – issued by independent providers Since the most common sustainability ratings assign a score from 0 to 100 assigning, conversely, the lower values to the best sustainability level of the UCI analyzed, the final score, for the purpose of homogeneity with the previous categories, will be adjusted as follows: 100 - sustainability rating.

Where the providers do not provide a rating to certain UCIs (for example UCIs having a significant exposure to government issues) such UCIs, while remaining eligible from an ESG point of view, a final score of zero will be cautiously assigned unless to underlying portfolios (look through) is applied the calculation method described above in order to obtain a specific “average portfolio’s ESG Rating” for the relevant funds.

- **Specific restrictions and investment limits** mean additional and specific limits and restrictions of an active and passive nature imposed to the Investment Manager as described in the appendices of the affected sub funds in the paragraph entitled "Sustainability criteria in investment decisions".

The ESG rating providers used, both for the purpose of calculating the average portfolio's ESG Rating and for the purpose of complying with the additional investment restrictions and limits, are leading independent companies whose data are, usually, published on Bloomberg.

Sustainability risk

In accordance with article 2 of the Disclosure Regulation, sustainability risk is defined as an environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of an investment. The impact of environmental, social and governance factors on the value of an investment may vary depending not only on its business activities (e.g. asset type, the sector, size, geographic location and the stage in the life cycle, and liabilities) but also on the governance and strategy of the company for managing them. In accordance with article 3 of the Disclosure Regulation, sustainability risks are integrated in the investment decision-making process of the Fund. The risk assessments and investment decisions are based on internal and external research and assessments on sustainability factors and sustainability risks.

At the present the Fund does not consider “principal adverse impacts” of investment decisions on sustainability factors (as described at the article 4 and 7.2 of the SFDR. The decision not to consider principal adverse impacts of investment decisions on sustainability factors is motivated by a lack of relevant data of a satisfactory quality. Nevertheless a definitive decision will be taken once the further consultation and or guidance on the level 2 regulatory technical standards (RTS) will be disclosed and will enter in force during 2022.