

Plenisfer Investments SGR S.p.A. - EU Sustainable Finance Disclosure Regulation - No consideration of adverse impacts of investment decisions on sustainability factors

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Plenisfer Investments SGR S.p.A. (the “Management Company”) makes the following disclosures in accordance with the Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector (the “SFDR”).

Pursuant to Article 4 of the SFDR, the Management Company is required to disclose whether or not they consider the Principal Adverse Impacts (“PAIs”) at the entity level.

At the moment, Plenisfer Investments SGR S.p.A. (the “Company”) does not to consider adverse impacts of investment decisions on sustainability factors in the context of its role as investment manager.

Sustainability factors as defined by SFDR are environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters. Such factors are of great importance to Plenisfer. However, the Company’s size, multi-asset approach, which includes developed and developing markets, and the known limitations regarding reliable and consistent sustainability data in such markets and asset classes makes measuring such adverse impacts very challenging. Such challenges coupled with the developing regulatory technical standards would place significant administrative burdens and costs of obtaining, implementing and monitoring compliance measures would have a material negative impact on the investment results.

The Company will continue to monitor the SFDR implementing measures, including the regulatory technical standards, and the feasibility of data and analytics regarding the information, methodologies and tools required to implement the adverse sustainability impact statement.

Plenisfer Investments SGR S.p.A.

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Soggetta all’attività di Direzione e Coordinamento
da parte di Generali Investments Holding S.p.A

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