

## ***Plenisfer SUSTAINABILITY RELATED DISCLOSURES (SFDR)***

### ***Details relating to Art. 3, 4 and 5 of Regulation (EU) 2019/2088 (cd. "SFDR")***

SFDR requires "Financial Markets Participants" to disclose information regarding sustainability risks and how such risks impact the Company's investment process. SFDR also sets our guidelines for transparency around how firms can integrate sustainability risks and adverse impacts on certain sustainability factors.

Plenisfer Investments SGR SpA (the Company) is considered a Financial Market Participant given its role as an Investment Manager. The statements below represent the Company's relevant SFDR disclosures.

The Company strives to provide clear and comprehensive information regarding SFDR through this document, but should you have any questions or seek further clarification, please contact us at [info@plenisfer.com](mailto:info@plenisfer.com).

### **Our integration of sustainability risks**

SFDR defines sustainability risk as a potential environmental, social or governance outcome, which should it arise could have a materially negative impact on an investment.

Our investment process considers sustainability risks and opportunities alongside others to better understand the total risk and reward profile of any given investment opportunity. We see understanding sustainability risks as a key component of our analysis, which forms the basis on which we take our investment decisions. Sustainability risks are an important component of the assessment of any investment decision, but there are many other factors involved in analysing any one investment opportunity. As such, sustainability risks may not on their own prevent the Company from making investment decisions on behalf of its clients.

### **Sustainability with regards to Plenisfer's remuneration policy**

Plenisfer's Remuneration Policy reinforces the Company's policies and in particular, its policy approach towards Sustainability Risks. The Remuneration Policy embeds an assessment of individual accountability towards the Company's policies in general and more specifically towards the policy approach related to sustainability.

### **Adverse sustainability impacts**

As defined by Article 4 of SFDR, the Company has chosen 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. Plenisfer 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.