

## Plenisfer SUSTAINABILITY RELATED DISCLOSURES (SFDR)

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

**Legal Entity Identifier: 984500E9CB9BBCE3E272.**

**Date of publication (version 3): March 2025**

On 10 March 2021, the regulation on sustainability disclosure in the financial services sector (Regulation (EU) 2019/2088 – Sustainable Finance Disclosure Regulation - 'SFDR') came into force, which establishes harmonised rules in order to increase the transparency on risks and opportunities in sustainability-related investment decision making. SFDR requires “Financial Markets Participants” to disclose information regarding sustainability risks and the how such risks impact Plenisfer Investments SGR S.p.A.’s (“the Company”) investment process. SFDR also sets our guidelines for transparency around how firms can integrate sustainability risks and adverse impacts on certain sustainability factors.

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 .

#### **Our integration of sustainability risks (Article 3 SFDR)**

The Company places the understanding of ESG and sustainability risks as a key component of its proprietary fundamental and macroeconomic analytical process. The Company’s approach evaluates sustainability risks as a key part of the investment decision making and the proprietary analytical process forms the basis for the Company’s investment decisions.

In evaluating investment opportunities, the Company analyses financial and non-financial criteria. The non-financial evaluation includes an analysis of ESG criteria and sustainability risks, which may arise relative to specific investments in question.

The evaluation of ESG criteria and sustainability risks includes the analysts and portfolio managers’ consideration of the following non-exhaustive items:

- the geographical areas in which companies and issuers operate;
- governance practices and trends related to the companies and issuers in question;
- reputation and track record of management related to environmental issues and labour relations;
- profile related to operational and reputational event management, especially relating to environmental issues and labour relations;
- trends related to ESG and sustainability risk metrics, both qualitatively and quantitatively where possible.

\

#### **Plenisfer Investments SGR S.p.A.**

Registered Address: 4 Niccolò Machiavelli, 34132 - Trieste (TS)  
Operational Headquarter: via Sant’Andrea 10/A, 20121 - Milano (MI)  
Registered in the Asset Management Companies Register referred to in art. 35 of Legislative decree n. 58/1998 (UCITS Managers Section no. 59)  
Registered to The National Compensation Fund  
A public limited company with limited liability incorporated in Italy registered with Chambers of Commerce, Italy  
Subject to the management and coordination of Generali Investments Holding S.p.A

Trieste Business Register, VAT n. & Tax ID: IT 01328320328  
Belonging to Generali VAT group: 01333550323  
Paid-up Share Capital: € 5.000.000,00  
Switchboard: 0200644000  
Legal email address: [01328320328ri@legalmail.it](mailto:01328320328ri@legalmail.it)  
Registered in England and Wales as UK Establishment with registration no. FC037902/BR022993 and address: 55 Ludgate Hill, London, EC4M 7JW  
Registered in Ireland with registration no. 9 09483 and address: 5th Floor, 40 Mespil Road, Dublin 4, D04 C2N4

In the end, the analysis of ESG and sustainability risks forms part of each investment case incorporating the main socio-environmental considerations as an integral part of the final decision-making process. To assist in this activity, the Company has engaged a leading third party ESG data provider.

The Company shall apply an overall exclusion criterion to its investment decisions unless otherwise directed by external clients where the Company is acting as a delegated investment manager. Under this overall exclusion criteria, the Company shall not purchase securities issued by companies or entities that meet the following criteria:

- Direct involvement in manufacturing or selling controversial weapons (cluster munitions, anti-personnel mines and / or biological / chemical weapons);
- Direct involvement leading to violation of the Treaty on the Non-Proliferation of Nuclear Weapons;
- Direct involvement on public lists of entities subject to international sanctions (e.g. OFAC, UN, EU, UK).

In addition, the Italian Law n. 220/2021 has introduced a total ban on “financing of companies in any established legal form, having their headquarters in Italy or abroad, which, directly or through subsidiary or associated companies, pursuant to article 2359 of the civil code, carry out construction, production, development, assembly activities, repair, preservation, use, storage, possession, promotion, sale, distribution, import, export, transfer or transport of antipersonnel mines, ammunition and cluster submunitions, of any nature or composition, or parts thereof. It is also forbidden to carry out technological research, manufacture, sale and transfer, for any reason, export, import and possession of ammunition and cluster submunitions, of any nature or composition, or parts thereof”.

In compliance with L. 220/2021, the Company periodically, and at least once a year, consults ESG data providers and relevant publicly available lists in order to identify, to the greatest extent possible on the best effort basis, the companies that fall under the scope of L. 220/2021. No new purchase is allowed regarding companies that fall under the scope of the Law. For any issuers falling within the scope of Law 220/2021, the Company shall place operating blocks in the front-end system.

During the holding period of its investments, the Company monitors investment positions to ensure proper safeguarding of assets including assessment of underlying and changing sustainability risks.

Dialogue with issuers is a fundamental activity in responsible investment management. The Company believes regular interaction with the companies and issuers in which it invests is necessary and contributes to the creation of value.

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

The Policy considers the Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (“SFDR”).

In particular, 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

#### **Plenisfer Investments SGR S.p.A.**

Registered Address: 4 Niccolò Machiavelli, 34132 - Trieste (TS)  
Operational Headquarter: via Sant’Andrea 10/A, 20121 - Milano (MI)  
Registered in the Asset Management Companies Register referred to in art. 35 of Legislative decree n. 58/1998 (UCITS Managers Section no. 59)  
Registered to The National Compensation Fund  
A public limited company with limited liability incorporated in Italy registered with Chambers of Commerce, Italy  
Subject to the management and coordination of Generali Investments Holding S.p.A

Trieste Business Register, VAT n. & Tax ID: IT 01328320328  
Belonging to Generali VAT group: 01333550323  
Paid-up Share Capital: € 5.000.000,00  
Switchboard: 0200644000  
Legal email address: [01328320328ri@legalmail.it](mailto:01328320328ri@legalmail.it)  
Registered in England and Wales as UK Establishment with registration no. FC037902/BR022993 and address: 55 Ludgate Hill, London, EC4M 7JW  
Registered in Ireland with registration no. 9 09483 and address: 5th Floor, 40 Mespil Road, Dublin 4, D04 C2N4

### **Principal Adverse Impacts (PAIs)**

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, 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.**

Registered Address: 4 Niccolò Machiavelli, 34132 - Trieste (TS)  
Operational Headquarter: via Sant’Andrea 10/A, 20121 - Milano (MI)  
Registered in the Asset Management Companies Register  
referred to in art. 35 of Legislative decree n. 58/1998  
(UCITS Managers Section no. 59)  
Registered to The National Compensation Fund  
A public limited company with limited liability incorporated in Italy  
registered with Chambers of Commerce, Italy  
Subject to the management and coordination of Generali Investments Holding S.p.A

Trieste Business Register, VAT n. & Tax ID: IT 01328320328  
Belonging to Generali VAT group: 01333550323  
Paid-up Share Capital: € 5.000.000,00  
Switchboard: 0200644000  
Legal email address: [01328320328ri@legalmail.it](mailto:01328320328ri@legalmail.it)  
Registered in England and Wales as UK Establishment  
with registration no. FC037902/BR022993 and address: 55  
Ludgate Hill, London, EC4M 7JW  
Registered in Ireland with registration no. 9 09483 and  
address: 5th Floor, 40 Mespil Road, Dublin 4, D04 C2N4