WORLD IMPACT SICAV

Undertaking for Collective Investments in
Transferable Securities under Luxembourg law

PROSPECTUS
2 February 2026

WORLD IMPACT SICAV
Société d'Investissement à Capital Variable
under the form of a public limited liability company (société anonyme)
R.C.S. Luxembourg B233798

Subscriptions can only be accepted on the basis of this Prospectus, the relevant Key Information Document ("**KID**") as accompanied by the latest Annual Report or the latest Semi-Annual Report if published after the latest Annual Report. These reports form part of the present Prospectus. No information other than that contained in this Prospectus, in the KIDs, in the periodic financial reports as well as in any other document mentioned in the Prospectus and which may be consulted by the public may be given in connection with the offer.

The above-mentioned documents may be obtained free of any charge at the Registered Office of the Company, the Management Company or the Representatives, Paying and Information Agents outside Luxembourg.

The distribution of this Prospectus, the KIDs, any supplementary documentation and the offering of shares may be restricted in certain countries. Potential purchasers of shares should inform themselves as to the requirements within their own country for transactions in shares, any applicable exchange control regulations and the tax consequences of any transaction in shares.

As shares of the Company are not registered in the USA under the United States Securities Act of 1933, they may be neither offered nor sold in the USA including the dependent territories, unless such offer or such sales is permitted by way of an exemption from registration in accordance with the United States Securities Act of 1933.

This Prospectus and the KIDs constitute neither an offer nor a sales promotion through any person in any country in which such is not permitted or in which the respective person is not empowered to do so.

Investors' Rights
The Fund draws the investors' attention to the fact that they will only be able to fully exercise their rights directly against the Fund, notably the right to participate in general meetings of shareholders or to receive compensation in case of NAV errors, if they are registered in their name in the register of shareholders of the Fund. In cases where an investor invests in the Fund through an intermediary on behalf of the investor, it may not always be possible for the investor to exercise certain rights directly against the Fund. Investors are recommended to take advice on their rights.

Information about the environmental or social characteristics promoted by the Company pursuant to article 8 of Regulation (EU) 2019/2088 and, about the sustainable investments that the Company has as its objective pursuant to article 9 of the same Regulation, are available in the section headed ESG DISCLOSURE APPENDIX of this Prospectus.

GLOSSARY

The following summary is qualified in its entirety by reference to the more detailed information included elsewhere in this prospectus.

1915 Law	The Luxembourg law of 10 August 1915 on commercial companies, as such law may be amended, supplemented and replaced from time to time.
2010 Law	The Luxembourg law of 17 December 2010 on undertakings for collective investment, as such law may be amended, supplemented and replaced from time to time.
Accounting Currency	The currency of consolidation of the Company. The consolidated financial statements of the Company are expressed in EUR
AML/CTF Laws and Regulations	International rules and applicable Luxembourg laws and regulations, such as the law dated 12 November 2004 (as amended in particular by the law dated 17 July 2008, the law dated 27 October 2010 and the law dated 13 February 2018), the Grand Ducal Regulation of 1 February 2010, the Grand Ducal Regulation of 29 October 2010, the CSSF Regulation No 12-02 and all the implementing measures, regulations and circulars issued in particular by the EU or by the CSSF made thereunder (as may be amended or supplemented from time to time) and/or any other anti-money laundering, counter terrorist financing and counter financing of proliferation of weapons of mass destruction laws or regulations which may be applicable.
Ancillary Liquid Assets	Bank deposits at sight, such as cash held in current accounts with a bank accessible at any time.
Articles of Incorporation	The articles of incorporation of the Company, as amended from time to time.
Board of Directors or Directors	The members of the board of directors of the Company, together the Board of Directors.
BMR Regulation	Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds Regulation (EU) and amending Directives 2008/48/EC and 2014/17/EU and Regulation No 596/2014.
Categories	Each Class of Shares may be further sub-divided into two Categories of Shares, being Distribution shares and Accumulation shares, as further described under Section *"Distribution policy"*.
CESR / 07-044b	CESR's guidelines concerning eligible assets for investment by UCITS, as amended from time to time.
Class(es)	Pursuant to the Articles of Incorporation, the Board of Directors may decide to issue, within each Sub-Fund, separate Classes of Shares whose assets will be commonly invested but where

	a specific sales or redemption charge structure, fee structure, minimum investment amount, taxation or distribution policy may be applied.
CoCos	Contingent convertible capital instruments (CoCos) are hybrid capital securities because they have the following characteristics of bonds: a. they are subordinated debt instruments; b. payment of interest may be suspended in a discretionary manner or depending on an external target set in the issuance contract; And the following characteristics of shares, because these are convertible hybrid instruments: a. conversion can take a variety of forms (especially into shares); b. the trigger factor of the conversion is set with the aim of protecting the banks' capital. CoCos absorb losses when the capital of the issuing bank falls below a certain level. CoCos have two main defining characteristics: the loss absorption mechanism and the trigger that activates that mechanism (contractual trigger and /or at the point of non-viability: essentially a write-down or equity conversion based on regulatory discretion).
Company	WORLD IMPACT SICAV, an investment company organised under Luxembourg law as a *société anonyme* qualifying as a *société d'investissement à capital variable* (SICAV), comprising several Sub-Funds.
Conversion of Shares	Shareholders may at any time request conversion of their shares into shares of another existing Sub-Fund if such conversion is specifically foreseen in the *Appendix II Sub-Funds details*. Shares are issued and cancelled on the same day on the basis of the applicable net asset values of the shares of both Sub-Fund.
Currency Hedged Share Class	A Share Class denominated in a different currency than the Reference Currency of the relevant Sub-Fund for which the Company/the Investment Manager utilises currency risk hedging arrangements in order to systematically limit investor's currency risk by reducing the effect of the exchange rate fluctuations between the Reference Currency and the currency to which the investor wishes to be exposed, in compliance with ESMA Opinion 34-43-296 dated 30 January 2017. The Investment Manager will ensure to hedge such risk between 95-105 % of the value of each Currency Hedged Share Class.
CSSF	*Commission de Surveillance du Secteur Financier* – The Luxembourg Supervisory Authority.
Crystallization Principle	Any accrued positive performance fee, if any, will be crystallized. When there are redemptions at the Company level the proportion of the accrued fee applicable to the redemption will be crystallized, i.e. become payable (or will be written off) and cannot be eroded by future underperformance. As accrued performance fees are crystallized, the cumulative accrual will adjust with the payable amount without any impact on the NAV. This approach to crystallization protects the interests of the Company's shareholders.

Dark Green Investments	Taxonomy-aligned investments in economic activities whose positive impact on climate change mitigation and adaptation objectives is backed by strong and objective scientific evidence. Dark green investments are those made in environmentally sustainable activities aligned with climate change mitigation and adaptation objectives that are not considered to be transitional or enabling.
Denomination Currency	Currency in which a Share Class can be denominated and which can differ from the Sub-Fund's Reference Currency, as specified for each Sub-Fund in the Appendix II "*Sub-Funds Details"* to this prospectus.
Depositary and Paying Agent	CACEIS Bank, Luxembourg Branch.
Distressed securities	Securities issued by companies experiencing severe financial difficulties, often to the point of being on the verge of bankruptcy. Distressed securities, rated CCC or below, sell at a large discount to their intrinsic value due to the risk of holding them.
Eligible Market	A Regulated Market in an Eligible State.
Eligible State	Any Member State of the EU or any other state in Eastern and Western Europe, Asia, North and South America, Africa and Oceania.
Emerging market ***ESG***	Non-OECD countries. Means respectively Environmental, Social and Governance and refers to three groups of indicators used to screen the level of sustainability and societal impact of an investment decision.
EU	The European Union.
Exchange Traded Companys (ETFs)	Exchange traded products that are structured and regulated as mutual funds or collective investment schemes. Most ETFs are UCITS compliant collective investment schemes. UCITS are not allowed to invest in physical commodities but they are able to use synthetic index replication to obtain exposure to broad commodity indices that satisfy the relevant diversification requirements. United States ETFs (open-ended US ETFs subject to the Investment Company Act of 1940 which qualify as a "Diversified Company") are qualified as other UCIs in the meaning of the 2010 Law provided they meet all the requirements set forth in article 41(1) e) of the 2010 Law, including the requirement that the rules on assets segregation, borrowing, lending and uncovered sales are equivalent to the UCITS requirements (such requirements should be considered satisfied after an appropriate eligibility analysis enabling to conclude that the US ETF actually complies in all material respects with the UCITS restrictions, or by means of a written confirmation of the US ETF or its manager).
Exchange Traded Commodities (ETCs)	ETCs are traded and settled like ETFs but are structured as debt instruments. They track both broad and single commodity indices. ETC may be physically backed by the underlying

	commodity (e.g. precious metals) – but in any case no physical delivery should be considered - or uses fully collateralized swaps or futures to synthetically replicate the index return, the Company will only invest in ETCs qualified as transferable securities in the meaning of the article 41(1) of the 2010 Law, the Article 2. of the Grand-ducal Regulation of 8 February 2008 and the article 17 of the CESR / 07-044b. Furthermore, when ETCs contain embedded derivatives, the underlying shall comply with the provisions of the Article. 8 of the Grand-ducal Regulation of 8 February 2008.
Exchange Traded Notes (ETNs)	ETNs are quite similar to ETCs, they are generally senior, unsecured, unsubordinated debt issued by a single bank and listed. There are two types of ETNs: collateralised and uncollateralised notes. Collateralised ETNs are hedged partly or fully against counterparty risk whereas uncollateralised ETNs are fully exposed to counterparty risk, which means that an investor in an ETN will be fully exposed to issuer credit risk. The Company will only invest in ETNs qualified as transferable securities in the meaning of the article 41(1) of the 2010 Law, the Article 2. of the Grand-ducal Regulation of 8 February 2008 and the article 17 of the CESR / 07-044b. Furthermore, when ETNs contain embedded derivatives, the underlying shall comply with the provisions of the Article 8. of the Grand-ducal Regulation of 8 February 2008.
FATCA	The Foreign Account Tax Compliance Act such as enacted and adopted by the United States of America on 18 March 2010, requiring US individuals to report their financial accounts held outside of the United States and foreign financial institutions to report to the Internal Revenue Service, or the tax authority in their jurisdiction of domicile, information about their US clients.
FATF	Financial Action Task Force (also referred to as Groupe d'Action Financière).
FUND	WORLD IMPACT SICAV, an investment company organised under Luxembourg law as a *société anonyme* qualifying as a *société d'investissement à capital variable* (SICAV), comprising several Sub-Funds.
GIIN	Global Intermediary Identification Number(s)
Grand-ducal Regulation of 8 February 2008	Grand-Ducal Regulation of 8 February 2008 relating to certain definitions of the amended law of 20 December 2002 on undertakings for collective investment and implementing Commission Directive 2007/16/EC of 19 March 2007 implementing Council Directive 85/611/EEC on the coordination of laws, regulations and administrative provisions relating to undertakings for collective investment in transferable securities (UCITS) as regards the clarification of certain definitions.
Hard Currency(-ies)	Means the US Dollar, Euro, Japanese Yen, British Pound Sterling, Canadian Dollar, Australian Dollar, New Zealand Dollar, Swiss Franc.

High Water Mark	With respect to each share class (Share Class) of the Sub-Fund, shall mean the Net Asset Value of the relevant share class as of the end of the most recent reference period for which a performance fee was paid or payable to the Investment Manager, or if no performance fee has been paid since the inception, then the initial Net Asset Value of such Share Class of the Sub-Fund.
Initial Subscription Period	A period during which shares of a Sub-Fund are offered for subscription for the first time, at a pre-determined price, the Initial Subscription Price.
Initial Subscription Price	Price at which shares of a Sub-Fund are offered during an Initial Subscription Period.
Institutional Investors	Any investors, within the meaning of Article 174 (II) of the 2010 Law, which are legal entities, including, but not limited to, insurance companies, pension funds, credit establishments and other professionals in the financial sector investing either on their own behalf or on behalf of their clients who are also investors within the meaning of this definition or under discretionary management, Luxembourg and foreign collective investment schemes and qualified holding companies, legal entities who hold their own account or hold an account on behalf of physical persons in connection with a group savings scheme or an equivalent scheme.
IRS	U.S. Internal Revenue Service
Issue of shares	The Offering Price per share of each Sub-Fund will be the net asset value per share of such Sub-Fund determined on the applicable Valuation Day plus the applicable dealing charge.
KID	Means the Key Information Document as defined by the Law of 17 April 2018 on key information documents for packaged retail and insurance-based investment products, as amended and applicable regulations.
Luxembourg bank business day	A full opened bank business day in Luxembourg
Management Company	IMPact SGR S.p.A. has been appointed as the management company of the Company to be responsible on a day-to-day basis, under supervision of the Directors, for providing administration, marketing and investment management services in respect of all Sub-Funds.
Member State	A Member State of the European Union
MiFID II	The EU's re-cast Markets in Financial Instruments Directive (2014/65/EU) (the "**MiFID II Directive**"), delegated and implementing EU regulations made thereunder, laws and regulations introduced by Member States of the EU to implement the MiFID 2 Directive, and the EU's Markets in Financial Instruments Regulation (600/2014) (together, "**MiFID II**")

Minimum Initial Subscription	In relation with a first investment in a Sub-Fund / Share class, minimum number of shares or amount to be subscribed by an investor.
Net Asset Value (*"*NAV*"*)	In relation to any Share Class of any Sub-fund, the value per Share determined in accordance with the relevant provisions described under the heading "*Net Asset Value*" of this Prospectus.
OECD	Organisation for Economic Co-operation and Development.
Professional Investors	Means investors who possess the experience, knowledge and expertise to make their own investment decisions and properly assess the risks that they incur. In order to be considered as a professional investor, the investor must comply with the following criteria: (1) Entities which are required to be authorised or regulated to operate in the financial markets. The list below shall be understood as including all authorised entities carrying out the characteristic activities of the entities mentioned: entities authorised by a Member State under a Directive, entities authorised or regulated by a Member State without reference to a Directive, and entities authorised or regulated by a third country: (a) Credit institutions; (b) Investment firms; (c) Other authorised or regulated financial institutions; (d) Insurance companies; (e) Collective investment schemes and management companies of such schemes; (f) Pension funds and management companies of such funds; (g) Commodity and commodity derivatives dealers; (h) Local entities who provide/perform investment activities; (i) Other institutional investors. (2) Large undertakings meeting two of the following size requirements on a company basis: - (a) balance sheet total: EUR 20 000 000 - (b) net turnover: EUR 40 000 000 - (c) own funds: EUR 2 000 000 3) National and regional governments, public bodies managing public debt (excludes local authorities), central banks, international and supranational institutions 4) Other institutional investors whose main activity is to invest in financial instruments, including entities dedicated to securitisation of assets or other financing transactions INVESTOR WHO MAY BE TREATED AS PROFESSIONALS ON REQUEST: Investors other than those mentioned above, including public sector bodies, local public authorities, municipalities and private individual investors, may also be allowed to waive some of the protections afforded by the conduct of business rules. Investment firms shall therefore be allowed to treat any of those investors as professionals provided the relevant criteria and procedure mentioned below are fulfilled. Those investors

	shall not, however, be presumed to possess market knowledge and experience comparable to that of the categories listed above. Any such waiver of the protection afforded by the standard conduct of business regime shall be considered to be valid only if an adequate assessment of the expertise, experience and knowledge of the investor, undertaken by the investment firm, gives reasonable assurance, in light of the nature of the transactions or services envisaged, that the invetsor is capable of making investment decisions and understanding the risks involved. The fitness test applied to managers and directors of entities licensed under Directives in the financial field could be regarded as an example of the assessment of expertise and knowledge. In the case of small entities, the person subject to that assessment shall be the person authorised to carry out transactions on behalf of the entity.
Redemption of shares	Shareholders may at any time request redemption of their shares, at a price equal to the net asset value per share of the Sub-Fund concerned, determined on the applicable Valuation Day less any redemption fee as disclosed in the Appendix II "*Sub-Funds Details"* to this prospectus for a specific Sub-Fund.
Reference Currency	The currency in which the Net Asset Value of each Sub-Fund is denominated, as specified for each Sub-Fund in the relevant section.
Regulated Market	A market as defined by the UCITS Directive and any other market which is regulated, operates regularly and is recognised and open to the public.
RESA	*Recueil électronique des sociétés et associations*, Luxembourg legal gazette.
SFDR	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.
SFTR	Regulation (EU) 2015/2365 of the European Parliament and of the Council of 25 November 2015 on transparency of securities financing transactions and of reuse and amending Regulation (EU) No 648/2012.
SFTs	Securities Financing Transactions, such as lending or borrowing of securities, repurchase or reverse repurchase transactions, buy-sell back or sell-buy back transactions, or margin lending transactions.
Shares	Shares of each Sub-Fund are offered in registered form only and all shares must be fully paid up. Fractions of shares will be issued up to three (3) decimals. Shares may also be held through accounts maintained with clearing houses.
Soft Currency(-ies)	Each currency which is not a Hard Currency.
Structured Products	Structured Financial Instruments are transferable securities organized solely with a view to restructuring the investment

	characteristics of certain other investments (underlying investment) and are issued by first-class financial institutions. These institutions issue transferable securities that are backed up by or linked to the interests of the underlying investment. The underlying investments must be in line with the investment objective and policy of the relevant Sub-Fund as further detailed under the Appendix II "*Sub-Funds Details"* and must be taken into account when determining the investment limits set out in Section headed "*Investment Restrictions"* of this prospectus.
Sub-Fund(s)	The Company offers investors, within the same investment vehicle, a choice between several Sub-Funds which are distinguished mainly by their specific investment policy and/or by the currency in which they are denominated. The specifications of each Sub-Fund are described in the Appendix II *"Sub-Funds Details"* to this prospectus. The Board of Directors of the Company may, at any time, decide the creation of further Sub-Funds and in such case, this prospectus will be updated. Each Sub-Fund may have one or more Classes of Shares.
Target Funds	Eligible units/shares of UCITS, UCIs and/or ETFs as defined in the Section "*Investment restrictions*" I (1) c) of the prospectus, which follow the diversification rules as disclosed in the Section "*Investment restrictions*" VI a) of the prospectus, and as per the meaning of and pursuant to limits set by articles 41 (1) e) and 46 of the 2010 Law. When investing in Target Funds, the maximum level of management fees that may be charged to both the Company and the Target Funds will be disclosed in the Appendix II "Sub-Funds Details" of this Prospectus. If the Target Funds are managed by the Management Company, the maximum level of management fees that may be charged to both the Company and the Target Funds is represented by the management fees charged to the Company as indicated in the "Share Classes Fee Schedule" section of each Sub-Fund in the Appendix II "Sub-Funds Details" of this Prospectus.
Target Sub-Fund	a Sub-Fund into which another Sub-Fund will or might invest in accordance with the provisions of this prospectus.
Taxonomy Regulation	*Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088, as amended from time-to-time.*
UCI	Undertaking for Collective Investment.
UCITS	Undertaking for Collective Investment in Transferable Securities.
UCITS Directive	The Directive 2009/65/EC of the European Parliament and of the Council of 13 July 2009 on the coordination of laws, regulations and administrative provisions relating to undertakings for collective investment in transferable securities

	as amended by the Directive 2014/91/EU of the European Parliament and of the Council of 23 July 2014 ("**UCITS V**").
Valuation Day	The Valuation Day is the Luxembourg Bank Business Day on which the net asset value (NAV) is dated. The NAV is calculated as of the first Luxembourg Bank Business Day following the Valuation Day. The prices used are those of the Valuation Day. The Valuation Day might be any day on which banks in Luxembourg are normally open for business unless otherwise defined in Appendix II "*Sub-Funds Details"* to this prospectus for a specific Sub-Fund. The Board of Directors may in its absolute discretion amend the frequency of the Valuation Day for some or all of the Sub-Funds. In such case the Shareholders of the relevant Sub-Fund will be duly informed and the Appendix II "*Sub-Funds Details"* to this Prospectus will be updated accordingly.

Words or expressions used in the prospectus that are not specifically defined in this Glossary shall have the same meaning as those defined in the 2010 Law.

INTRODUCTION

WORLD IMPACT SICAV, referred to hereafter as the "**Company**" or the "**Fund**", is an open-ended investment company (*Société d'Investissement à Capital Variable* – abbreviated to "**SICAV**"), qualifying as an undertaking for collective investment in transferable securities within the meaning of the UCITS Directive, incorporated for an unlimited duration on 10th April 2019, registered and organised in accordance with the provisions of the Part I of the 2010 Law and of the 1915 Law, with an initial share capital of EUR 30'000.

The Articles of Incorporation of the Company were published in the *Recueil Electronique des Sociétés et Associations* ("**RESA**") on 24th April 2019.

The Company's capital is expressed in euros ("**EUR**") and is at all times equal to the total net assets of the various Sub-Funds. It is represented by fully paid-up shares issued without a designated par value. The capital varies automatically without the notification and specific recording measures required for increases and decreases in the capital of limited companies. Its minimum capital is defined by the UCITS Law.

The Company is registered in the Luxembourg Business Register ("**LBR**") under the number B233798.

The Company is supervised by the CSSF. The registration on the Luxembourg official list of UCITS cannot be construed as an approval by any supervisory authority of the contents of this prospectus or of the quality of the securities offered and held by the Company. Any representation to the contrary would be unauthorised and unlawful.

The Company is structured as an umbrella fund, which means that it is made up of several Sub-Funds having each their specific assets and liabilities and their own distinct investment policy. The details on each Sub-Fund are disclosed in Appendix I and II of this prospectus.

Each Sub-Fund shall have an investment policy and an Accounting Currency that shall be specific to it as determined by the Board of Directors, as fully described in Appendix I and II of this prospectus.

The Company is a single legal entity. In accordance with Article 181 of the UCITS Law:

- the rights of shareholders and creditors in relation to a sub-fund or arising from the constitution, operation or liquidation of a sub-fund are limited to the assets of that sub-fund;
- the assets of a sub-fund are the exclusive property of shareholders in that sub-fund and of creditors where the credit arises from the constitution, operation or liquidation of the sub-fund;
- in relations between shareholders, each sub-fund is treated as a separate entity.

The Board of Directors may at any time create new Sub-Funds, investment policy and offering methods of which will be communicated at the appropriate time by an update to the Prospectus. Shareholders may also be informed via press publications if required by regulations or if deemed appropriate by the Board of Directors. Similarly, the Board of Directors may close Sub-Funds, in accordance with the provisions of the Prospectus.

The Board of Directors may subsequently launch other Sub-Funds, the investment policy and the subscription procedures of which will be conveyed as the occasion arises, by the updating of Appendix II "*Sub-Funds Details"* to this prospectus. It may also launch Sub-Funds or Classes of Shares reserved to institutional investors as defined by guidelines or recommendations issued by the Luxembourg supervisory authority. These shares shall only be registered shares.

This prospectus may not be used for the purpose of offering and promoting sales in any country or under any circumstances where such offers or promotions are not authorised. In particular,

the shares of the Company have not been registered in accordance with any legal provisions pertaining to securities applicable in the United States of America, and may not be offered in the United States or any of its territories or in any possession or area subject to its jurisdiction.

The Shares may be so offered only pursuant to an exemption from registration under the Securities Act of 1933, as amended (the "**1933 Act**"). The Shares have not been registered with the Securities and Exchange Commission or any state securities commission nor has the Company been registered under the Investment Company Act of 1940, as amended (the "**1940 Act**"). No transfer or sale of the Shares shall be made unless, among other things, such transfer or sale is exempt from the registration requirement of the 1933 Act and any applicable state securities laws or is made pursuant to an effective registration statement under the 1933 Act and such securities laws and would not result in the Company becoming subject to registration or regulation under the 1940 Act.

U.S. Foreign Account Tax Compliance Requirements: Although the Company will attempt to secure the compliance of its counterparties with FATCA rules and avoid imposition of the 30% withholding tax on its US source income, no assurance can be given that the Company will be able to satisfy these obligations. If the Company becomes subject to a withholding tax as a result of FATCA, the value of Shares held by all Shareholders of the Company may be materially affected.

No person is authorised to give any information or make any representations other than those contained in this prospectus or in the documents indicated herein, which are available for public inspection.

The Board of Directors accepts responsibility for the accuracy of the information contained in this prospectus on the date of publication.

This prospectus may be updated from time to time with significant amendments. Consequently, subscribers are advised to inquire with the Company as to the publication of a more recent prospectus.

It is recommended to subscribers to seek professional advice on the laws and regulations (*such as those on taxation and exchange control*) applicable to the subscription, purchase, holding and selling of shares in their place of origin, residence or domicile. This is especially applicable in the case of Classes and Sub-Funds intended to institutional investors for which investors should qualify as such. Prior to applying, subscribers are recommended to make enquiries on whether the required criteria are met and whether their subscriptions can be taken into consideration.

Data Protection Policy:

Data Protection

The Company together with the Management Company, may store on computer systems and process, by electronic or other means, personal data (i.e. any information relating to an identified or identifiable natural person, hereafter, the "**Personal Data**") concerning the Shareholders and their representative(s) (including, without limitation, legal representatives and authorised signatories), employees, directors, officers, trustees, settlors, their shareholders, and/or unitholders for, nominees and/or ultimate beneficial owner(s) (as applicable) (i.e. the "**Data Subjects**").

Personal Data provided or collected in connection with an investment in the Company will be processed by the Company, as data controller (i.e. the "**Controller** ") and by the Management Company, the Depositary and Paying Agent, the UCI Administrator, the Distributor and its appointed sub-distributors if any, the Auditor, legal and financial advisers and other potential service providers of the Company (including its information technology providers, cloud service providers and external processing centres) and, any of the foregoing respective agents, delegates, affiliates, subcontractors and/or their successors and assigns, acting as processor on behalf of the Company (i.e. the "**Processors**"). In certain circumstances, the Processors may also process Personal Data of Data Subjects as controller, in particular for compliance with their

legal obligations in accordance with laws and regulations applicable to them (such as anti-money laundering identification) and/or order of any competent jurisdiction, court, governmental, supervisory or regulatory bodies, including tax authorities.

Controller and Processors will process Personal Data in accordance with Directive 95/46/EC of the European Parliament and of the Council of 24 October 1995 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (the "**Data Protection Directive**") as transposed in applicable local laws applicable to them and, when applicable, the Regulation (EU) 2016/679 of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (the "**General Data Protection Regulation**", as well as any law or regulation relating to the protection of personal data applicable to them (together the "**Data Protection Law**").

Further information relating to the processing of Personal Data of Data Subjects may be provided or made available, on an ongoing basis, through additional documentation and/or, through any other communications channels, including electronic communication means, such as electronic mail, internet/intranet websites, portals or platform, as deemed appropriate to allow the Controller and/or Processors to comply with their obligations of information according to Data Protection Law.

Personal Data may include, without limitation, the name, address, telephone number, business contact information, employment and job history, financial and credit history information, current and historic investments, investment preferences and invested amount, KYC information of Data Subjects and any other Personal Data that is necessary to Controller and Processors for the purposes described below. Personal Data is collected directly from Data Subjects by the Processors or through publicly accessible sources, social media, subscription services, worldcheck database, sanction lists, centralised investor database, public registers or other publicly accessible sources.

Personal Data of Data Subjects will be processed by the Controller and Processors for the purposes of (i) offering investment in Shares and performing the related services as contemplated under this Prospectus, the Subscription Form, the Depositary agreement and the UCI Administrator, including, but not limited to, the opening of your account with the Company, the management and administration of your Shares and any related account on an on-going basis and the operation of the Company's investment in Sub-Funds, including processing subscriptions and redemptions, conversion, transfer and additional subscription request, the administration and payment of distribution fees (if any), payments to Shareholders, updating and maintaining records and fee calculation, maintaining the register of Shareholders, providing financial and other information to the Shareholders, (ii) developing and processing the business relationship with the Processors and optimizing their internal business organisation and operations, including the management of risk, (and, (iii) other related services rendered by any service provider of the Controller and/or Processors in connection with the holding of Shares in the Company (hereafter the "**Purposes**").

Personal Data will also be processed by the Controller and Processors to comply with legal or regulatory obligations applicable to them and to pursue their legitimate interests or to carry out any other form of cooperation with, or reporting to, public authorities including, but not limited to, legal obligations under applicable fund and company law, prevention of terrorism financing law, anti-money laundering law, prevention and detection of crime, tax law (such as reporting to the tax authorities under FATCA and CRS Law to prevent tax evasion and fraud) (as applicable), and to prevent fraud, bribery, corruption and the provision of financial and other services to persons subject to economic or trade sanctions on an on-going basis in accordance with the anti-money laundering procedures of the Controller and Processors, as well as to retain AML and other records of the Data Subjects for the purpose of screening by the Controller and Processors, including in relation to other funds or clients of the Management Company and the UCI Administrator (hereafter the "**Compliance Obligations**").

Telephone conversations and electronic communications made to and received from the Management Company /or the UCI Administrator may be recorded by the Company acting as

controllers and / or by the Management Company /or the UCI Administrator, acting as processor on behalf of the Controller where necessary for the performance of a task carried out in the public interest or where appropriate to pursue the Controller's legitimate interests, including (i) for record keeping as proof of a transaction or related communication in the event of a disagreement, (ii) for processing and verification of instructions, (iii) for investigation and fraud prevention purposes, (iv) to enforce or defend the Controller's and Processors' interests or rights in compliance with any legal obligation to which they are subject and (v) for quality, business analysis, training and related purposes to improve the Controller and Processors relationship with the Shareholders in general. Such recordings will be processed in accordance with Data Protection Law and shall not be released to third parties, except in cases where the Controller and/or Processors are compelled or entitled by laws or regulations applicable to them or court order to do so. Such recordings may be produced in court or other legal proceedings and permitted as evidence with the same value as a written document and will be retained for a period of 10 years starting from the date of the recording. The absence of recordings may not in any way be used against the Controller and Processors.

Controller and Processors will collect, use, store, retain, transfer and/or otherwise process Personal Data: (i) as a result of the subscription or request for subscription of the Shareholders to invest in the Company where necessary to perform the Investment Services or to take steps at the request of the Shareholders prior to such subscription, including as a result of the holding of Shares in general and/or; (ii) where necessary to comply with a legal or regulatory obligation of the Controller or Processors and/or; (iii) where necessary for the performance of a task carried out in the public interest and/or; (iv) where necessary for the purposes of the legitimate interests pursued by Controller or and by the Processors, which mainly consist in the performance of the investment and administrative services, including where the subscription agreement is not entered into directly by the Shareholders or, or, in complying with the Compliance Obligations and/or any order of a foreign court, government, supervisory, regulatory or tax authority, including when providing such Investment Services to any beneficial owner and any person holding Shares directly or indirectly in the Company.

Personal Data will only be disclosed to and/or transferred to and/or otherwise accessed by the Processors, and/or any target entities, sub-funds and/or other funds and/or their related entities (including without limitation their respective general partner and/or management company and/or central administration / investment manager / service providers) in or through which the Company intends to invest, as well as any court, governmental, supervisory or regulatory bodies, including tax authorities in Luxembourg or in various jurisdictions, in particular those jurisdictions where (i) the Company is or is seeking to be registered for public or limited offering of its Shares, (ii) the Shareholders are resident, domiciled or citizens or (iii) the Company is, or is seeking to, be registered, licensed or otherwise authorised to invest for carrying out the Purposes and to comply with the Compliance Obligations (i.e. the "**Authorised Recipients**"). The Authorised Recipients may act as processor on behalf of Controller or, in certain circumstances, as controller for pursuing their own purposes, in particular for performing their services or for compliance with their legal obligations in accordance with laws and regulations applicable to them and/or order of court, government, supervisory or regulatory body, including tax authority.

Controller undertakes not to transfer Personal Data to any third parties other than the Authorised Recipients, except as disclosed to Shareholders from time to time or if required by applicable laws and regulations applicable to it or, by any order from a court, governmental, supervisory or regulatory body, including tax authorities.

By investing in Shares in the Company, the Shareholders acknowledge and accept that Personal Data of Data Subjects may be processed for the Purposes and Compliance Obligations described above and in particular, that the transfer and disclosure of such Personal Data may take place to the Authorised Recipients, including the Processors, which may be located outside of the European Union, in countries which are not subject to an adequacy decision of the European Commission and which legislation does not ensure an adequate level of protection ensure an adequate level of protection as regards the processing of personal data. Controller will only transfer Personal Data of Data Subjects for performing the Purposes or for complying with the Compliance Obligations.

Controllers will transfer Personal Data of the Data Subjects to the Authorised Recipients located outside of the European Union (i) on the basis of an adequacy decision of the European Commission with respect to the protection of personal data and/or on the basis of the EU-U.S. Privacy Shield framework or, (ii) in the event it is required by any judgment of a court or tribunal or any decision of an administrative authority, Personal Data of Data Subjects will be transferred on the basis of an international agreement entered into between the European Union or a concerned member state and other jurisdictions worldwide or, (iii) where necessary for the Processors to perform their services rendered in connection with the Purposes which are in the interest of the Data Subjects or, (iv) where necessary for the establishment, exercise or defence of legal claims or, or, (v) where necessary for the purposes of compelling legitimate interests pursued by the Controller, to the extent permitted by Data Protection Law or (vi) where specifically agreed on between the Data Controller and/or Data Processor and/or Data Subject.

Insofar as Personal Data provided by the Shareholders include Personal Data concerning other Data Subjects, the Shareholders represent that they have authority to provide such Personal Data of other Data Subjects to the Controller[s]. If the Shareholders are not natural persons, they must undertake to (i) inform any such other Data Subject about the processing of their Personal Data and their related rights as described under this Issuing Document, in accordance with the information requirements under the Data Protection Law and (ii) where necessary and appropriate, obtain in advance any consent that may be required for the processing of the Personal Data of other Data Subjects as described under this Issuing Document in accordance with the requirement of Data Protection Law.

Answering questions and requests with respect to the Data Subjects' identification and Shares held in the Company, FATCA and/or CRS is mandatory. The Board of Directors / the UCI Administrator reserves the right to reject any application for Shares if the prospective investor does not provide the requested information and/or documentation and/or has not itself complied with the applicable requirements. The Shareholders acknowledge and accept that failure to provide relevant Personal Data requested by the Board of Directors, the UCI Administrator in the course of their relationship with the Company may prevent them from acquiring or maintaining their Shares in the Company and may be reported by the Board Of Directors, the UCI Administrator to the relevant Luxembourg authorities. In addition, failure to provide the requested Personal Data could lead to penalties which may affect the value of the Shareholders' Shares.

The Shareholders acknowledge and accept that the Board of Directors / the UCI Administrator will report any relevant information in relation to their investments in the Company to the Luxembourg tax authorities (*Administration des contributions directes*) which will exchange this information on an automatic basis with the competent authorities in the United States or other permitted jurisdictions as agreed in FATCA and CRS, at OECD and European levels or equivalent Luxembourg legislation.

Each Data Subject may request, in the manner and subject to the limitations prescribed in accordance with Data Protection Law, (i) access to, rectification, or deletion of, any incorrect Personal Data concerning him, (ii) a restriction of processing of Personal Data concerning him and, (iii) to receive Personal Data concerning him in a structured, commonly used and machine readable format or to transmit those Personal Data to another controller and, (iv) to obtain a copy of, or access to, the appropriate or suitable safeguards, such as standard contractual clauses, binding corporate rules, an approved code of conduct, or an approved certification mechanism, which have been implemented for transferring the Personal Data outside of the European Union. In particular, Data Subjects may at any time object, on request, to the processing of Personal Data concerning them for marketing purposes or for any other processing carried out on the basis of the legitimate interests of Controller or Processors. Each Data Subject should address such requests to the Company via post mail or via e-mail.

The Shareholders are entitled to address any claim relating to the processing of their Personal Data carried out by Controller in relation with the performance of the Purposes or compliance with the Compliance Obligations to the relevant data protection supervisory authority (i.e. in Luxembourg, the *Commission Nationale pour la Protection des Données*).

The Controller and Processors processing Personal Data on behalf of the Controller will accept no liability with respect to any unauthorised third-party receiving knowledge and/or having access to Personal Data, except in the event of proved negligence or wilful misconduct of the Controller or such Processors.

Personal Data of Data Subjects is held until Shareholders cease to have Shares in the Company and a subsequent period of 10 years thereafter where necessary to comply with laws and regulations applicable to them or to establish, exercise or defend actual or potential legal claims, subject to the applicable statutes of limitation, unless a longer period is required by laws and regulations applicable to them. In any case, Personal Data of Data Subjects will not be held for longer than necessary with regard to the Purposes and Compliance Obligations contemplated in this Issuing Document, subject always to applicable legal minimum retention periods.

Table of contents

	Pages
1. Management Company of the Company	21
2. Investment Manager(s)	22
3. Investment Advisor(s)	22
4. Depositary bank	23
5. UCI Administrator	24
6. Investment policies	25
7. Risk Factors	25
8. Techniques and financial instruments	25
9. Investment restrictions	33
10. Risk Management Process	38
11. Shares	39
12. Net asset value	40
13. Suspension of the calculation of net asset value, issue, redemption and conversion of shares	42
14. Issue of shares, subscription and payment procedure	43
15. Conversion of shares	46
16. Redemption of shares	47
17. Transfer of Shares	48
18. Tax considerations	48
19. Distribution policy	51
20. Fees and Expenses	52
21. General meetings of shareholders	53
22. Liquidation of the Company	53
23. Merger of the Company	54
24. Liquidation and merger of Sub-Funds	55
25. Information of shareholders	57
APPENDIX I – RISK FACTORS	59
APPENDIX II – SUB-FUNDS DETAILS	69
WORLD IMPACT SICAV – DIVERSIFIED	70
WORLD IMPACT SICAV – ACTIVE BALANCED	80
WORLD IMPACT SICAV – SUSTAINABLE GLOBAL CREDIT	89
WORLD IMPACT SICAV – GLOBAL BOND	100
WORLD IMPACT SICAV – IMPATTO GLOBAL EQUITY	110
WORLD IMPACT SICAV – IMPATTO ITALIAN EQUITY	122
SUSTAINABILITY-RELATED DISCLOSURE APPENDIX	140

WORLD IMPACT SICAV

Société d'Investissement à Capital Variable
under the form of a public limited liability company (société anonyme)
R.C.S. Luxembourg B233798

Registered office:
5, allée Scheffer, L-2520 Luxembourg
Grand-Duchy of Luxembourg

Board of Directors:

Chairman	**Luca Vallarino** Head of Trading Desk & Fixed Income Portfolio Manager IMPact SGR SpA
Directors	**Gherardo Spinola** Chief Investment Officer IMPact SGR SpA
	Stefano Giovannetti Independent Director
Management Company:	**IMPact SGR S.p.A.** Via Filippo Turati, 25 20121, Milan Italy
Depositary and Paying Agent:	**CACEIS Bank, Luxembourg Branch** 5, allée Scheffer L-2520 Luxembourg Grand Duchy of Luxembourg
UCI Administrator :	**CACEIS Bank, Luxembourg Branch** 5, allée Scheffer L-2520 Luxembourg Grand Duchy of Luxembourg
Independent Auditor:	**Deloitte Audit S.AR.L.** 20, Boulevard de Kockelscheuer, L-1821 Luxembourg,
Legal Adviser:	**CARAT & PARTNERS** 16, Avenue Marie-Thérèse, L-2132 Luxembourg,

1. Management Company of the Company

Pursuant to a Management Company Agreement dated July 1st, 2022, IMPact SGR S.p.A., having its registered office in via Filippo Turati, 25, 20121 Milano, Italy (the "**Management Company**"), has been appointed as Management Company to the Company.

IMPact S.G.R. S.p.A., is a public company established in Italy and supervised by the Banca of Italy and registered in the register of SGR pursuant to Sect. 35 of the Italian consolidated law on finance under number 61 in the section for UCITS managers.

The Management Company is authorised to provide portfolio management, investment advisory, and UCITS collective management services.

The Management Company has a fully paid-up share capital of EUR 1,500,000.

The Management Company will be responsible on a day-to-day basis, under the overall responsibility and supervision of the Board of Directors, for providing administration, marketing, investment management and advisory services in respect of the Company. The Management Company Agreement is terminable by any party thereto by giving not less than three (3) months' prior written notice. The Management Company will provide investment management directly to the Company unless otherwise provided for in the relevant sub-fund schedules.

The Management Company has the possibility to delegate any or all of such functions to third parties, under its responsibility and control and subject to the rules laid down for UCITS management companies by the Banca of Italy. The Management Company has delegated the administration functions to the UCI Administrator. The Management Company may delegate the marketing and distribution functions to distributor(s) as may be appointed.

In accordance with article 122(1) of the 2010 Law, a management company which pursues the activity of collective portfolio management in Luxembourg on a cross-border basis shall comply with the rules of the Management Company's home member state, more particularly the Banca of Italy in relation to delegation, risk management procedures, prudential rules, supervision and reporting.

The Management Company has in place a remuneration policy in line with the Directive 2014/91/EU of the European Parliament and of the Council of July 23, 2014 amending 2009/65/EC of the European Parliament and of the Council of July 13, 2009 on the coordination of laws, regulations and administrative provisions relating to undertakings for collective investment in transferable securities.
The remuneration policy sets out principles applicable to the remuneration of the senior management, all staff members having a material impact on the risk profile of the financial undertakings as well as all staff members carrying out independent control functions.

The remuneration policy is consistent with and promotes sound and effective risk management and does not encourage risk taking which is inconsistent with the articles of incorporation of the Company or the present Prospectus.

The remuneration policy is in line with the business strategy, objectives, values and interests of the Management Company and the Company and of the Company's Unitholders and includes measures to avoid conflicts of interest.

Variable remuneration is paid by the Management Company on the basis of the assessment of performance which is set in a multi-year framework appropriate to the holding period recommended to the Company's Unitholders in order to ensure that the assessment process is based on the longer-term performance of the Company and its investment risks and that the actual payment of performance-based components of remuneration is spread over the same period.

Fixed and variable components of total remuneration paid by the Management Company are appropriately balanced and the fixed component represents a sufficiently high proportion of the total remuneration to allow the operation of a fully flexible policy on variable remuneration components, including the possibility to pay no variable remuneration component.

The details of the updated remuneration policy containing further details and information in particular on how the remuneration and advantages are calculated and the identity of the persons responsible for the attribution of the remuneration and advantages (including the members of the remuneration committee) is available at the following link: https://www.impactsgr.it/informativa-legale/

A hard copy of the remuneration policy or its summary may be obtained free of charge upon request. The remuneration policy is reviewed at least on an annual basis.

2. Investment Manager(s)

The Management Company may delegate its investment management duties for part or all of the Sub-Funds to one or several investments managers (the "**Investment Manager(s)"**), under the overall responsibility of the Board of Directors, subject to the prior approval of the CSSF and disclosure in the relevant Sub-Funds Details in *Appendix II Sub-Funds Details* of the Prospectus.
The Investment Manager is required to adhere strictly to the guidelines laid down by the Management Company. In particular, the Investment Manager is required to ensure that the assets of the Company and each Sub-Fund are invested in a manner consistent with the Company's and the Sub-Funds' investment restrictions and that cash belonging to the Company and each Sub-Fund is invested in accordance with the guidelines laid down by the Directors and the Management Company.

Subject to the prior approval of the Company and the Management Company, the Investment Manager may appoint one or more sub-managers based on their particular knowledge, skills and experience which may be necessary or recommendable for the achievement of the investment objectives of the relevant Sub-Funds. Such a sub-manager will in principle provide its services under the responsibility and at the expense of the Investment Manager, unless otherwise specified in the *Appendix II Sub-Funds Details* of the Prospectus.

The portfolio management duties cannot be delegated to the Depositary or one of its delegates.

3. Investment Advisor(s)

The Management Company and the Investment Manager may appoint investment advisors (the "**Investment Advisor(s)**"), for one or several Sub-Funds from time to time.

The Investment Advisor may seek advice, at its own expenses, for the investment advice given in relation to the assets of the Sub-Fund it is appointed for, from any person or corporation which it may consider appropriate.

The Investment Advisor shall regularly assist the Management Company and / or the Investment Manager by giving advice and recommendations regarding the selection of securities and other permitted assets to be acquired by the Sub-Fund considered in line with the investment policy of the Sub-Fund.

The Investment Advisor shall act in a purely advisory capacity. The Management Company and the Investment Manager shall not be bound by any advice or recommendations provided by the Investment Advisor and shall assume sole responsibility for all decisions taken acting on such advice and recommendations in the management of the Sub-Fund's assets.

Conflicts of Interest

The Investment Manager, the Investment Advisor and the Management Company may from time-to-time act as investment manager, investment advisor or as management company to other investment funds/clients and may act in other capacities in respect of such other investment funds or clients. It is therefore possible that the Investment Manager, the Investment Advisor or the Management Company may, in the course of their business, have potential conflicts of interest with the Company.

The Directors of the Company, the Management Company and/or the Investment Manager and/or the Investment Advisor will (in the event that any conflict of interest actually arises) endeavour to ensure that such conflict is resolved fairly and in the best interests of the Company.

The Company may also invest in other investment funds which are managed by the Management Company or the Investment Manager or the Investment Advisor or any of their affiliated entities. The directors of the Management Company may also be directors of investment funds and the interest of such investment funds and of the Company could result in conflicts. Generally, there may be conflicts between the best interests of the Company and the interests of affiliates of the Management Company in connection with the fees, commissions and other revenues derived from the Company or investment funds. In the event where such a conflict arises, the directors of the Management Company will endeavour to ensure that it is resolved in a fair manner and in the best interests of the Company.

4. Depositary bank

CACEIS Bank, Luxembourg Branch is acting as the Company's depositary (the "Depositary") in accordance with a depositary agreement dated [date] as amended from time to time (the "Depositary Agreement") and the relevant provisions of the 2010 Law.

CACEIS Bank acting through its Luxembourg branch (CACEIS Bank, Luxembourg Branch) is a public limited liability company (société anonyme) incorporated under the laws of France, having its registered office located at 1-3, place Valhubert, 75013 Paris, France, registered with the French Register of Trade and Companies under number 692 024 722 RCS Paris. It is an authorised credit institution supervised by the European Central Bank ("ECB") and the Autorité de contrôle prudential et de resolution ("ACPR"). It is further authorised to exercise through its Luxembourg branch banking and central administration activities in Luxembourg.

Investors may consult upon request at the registered office of the Company, the Depositary Agreement to have a better understanding and knowledge of the limited duties and liabilities of the Depositary.

The Depositary has been entrusted with the custody and/or, as the case may be, recordkeeping and ownership verification of the Sub-Fund's assets, and it shall fulfil the obligations and duties provided for by Part I of the 2010 Law. In particular, the Depositary shall ensure an effective and proper monitoring of the Company' cash flows.

In due compliance with the UCITS Rules the Depositary shall:

(i) ensure that the sale, issue, re-purchase, redemption and cancellation of units of the Company are carried out in accordance with the applicable national law and the UCITS Rules or the Articles;
(ii) ensure that the value of the Units is calculated in accordance with the UCITS Rules, the Articles and the procedures laid down in the Directive;
(iii) carry out the instructions of the Company, unless they conflict with the UCITS Rules, or the Articles;
(iv) ensure that in transactions involving the Company's assets any consideration is remitted to the Company within the usual time limits; and
(v) ensure that an Company's income is applied in accordance with the UCITS Rules and the Articles.

The Depositary may not delegate any of the obligations and duties set out in (i) to (v) of this clause.

In compliance with the provisions of the Directive, the Depositary may, under certain conditions, entrust part or all of the assets which are placed under its custody and/or recordkeeping to Correspondents or Third-Party Custodians as appointed from time to time. The Depositary's liability shall not be affected by any such delegation, unless otherwise specified, but only within the limits as permitted by the 2010 Law.

A list of these correspondents/third party custodians are available on the website of the Depositary (www.caceis.com, section "*veille règlementaire*"). Such list may be updated from time to time. A complete list of all correspondents/third party custodians may be obtained, free of charge and upon request, from the Depositary. Up-to-date information regarding the identity of the Depositary, the description of its duties and of conflicts of interest that may arise, the safekeeping functions delegated by the Depositary and any conflicts of interest that may arise from such a delegation are also made available to investors on the website of the Depositary, as mentioned above, and upon request. There are many situations in which a conflict of interest may arise, notably when the Depositary delegates its safekeeping functions or when the Depositary also performs other tasks on behalf of the Company, such as administrative agency and registrar agency services. These situations and the conflicts of interest thereto related have been identified by the Depositary. In order to protect the Company's and its Shareholders' interests and comply with applicable regulations, a policy and procedures designed to prevent situations of conflicts of interest and monitor them when they arise have been set in place within the Depositary, aiming namely at:

a. identifying and analysing potential situations of conflicts of interest;
b. recording, managing and monitoring the conflict of interest situations either in:
- relying on the permanent measures in place to address conflicts of interest such as maintaining separate legal entities, segregation of duties, separation of reporting lines, insider lists for staff members; or
- implementing a case-by-case management to (i) take the appropriate preventive measures such as drawing up a new watch list, implementing a new Chinese wall, making sure that operations are carried out at arm's length and/or informing the concerned Shareholders of the Company, or (ii) refuse to carry out the activity giving rise to the conflict of interest.

The Depositary has established a functional, hierarchical and/or contractual separation between the performance of its UCITS depositary functions and the performance of other tasks on behalf of the Company, notably, administrative agency and registrar agency services.

The Company and the Depositary may terminate the Depositary Agreement at any time by giving ninety (90) days' notice in writing. The Company may, however, dismiss the Depositary only if a new depositary bank is appointed within two months to take over the functions and responsibilities of the Depositary. After its dismissal, the Depositary must continue to carry out its functions and responsibilities until such time as the entire assets of the Compartments have been transferred to the new depositary bank.

The Depositary has no decision-making discretion nor any advice duty relating to the Company's investments. The Depositary is a service provider to the Company and is not responsible for the preparation of this Prospectus and therefore accepts no responsibility for the accuracy of any information contained in this Prospectus or the validity of the structure and investments of the Company.

5. UCI Administrator

CACEIS Bank, Luxembourg Branch has been appointed as UCI Administrator and Registrar and Transfer Agent in accordance with a central administration Services Agreement dated 10th April 2019.

This agreement has been concluded for an indefinite duration and may be terminated by either party in writing with three months' notice.

In its capacity as UCI Administrator, CACEIS Bank, Luxembourg Branch shall notably perform the calculation of the net asset value of units for each existing Class or Compartment of the Company, management of accounts, the communication with investors within the meaning of CSSF Circular 22/811 as amended (including drafting and dispatching of financial reports and contract notes), the preparation of the annual and semi-annual financial statements, the reconciliation of subscription, redemption and conversion applications and keep and maintain the register of Shareholders of the Company, and execute all tasks required in compliance with the provision of, and as more fully described in, the aforementioned agreement. In such capacity it is also responsible for supervising anti-money laundering measures under the AML Regulations. CACEIS Bank, Luxembourg Branch may request documents necessary for identification of investors.

For the performance of its activities the UCI Administrator may outsource IT and operational functions, particularly those as registrar and transfer agent, including shareholders and investor services, with other entities of the CACEIS or Credit Agricole Group, located in Europe or in third countries, including United Kingdom, Canada and Malaysia. In this context, CACEIS Bank, Luxembourg Branch may be required to transfer to the outsourcing provider data related to investors (such as name, address, nationality, tax number, etc.). The current list of countries where the CACEIS Group is located is available at www.caceis.com.

6. Investment policies

The investment policies of the Company of each Sub-Fund is described in *Appendix II - Sub-Funds Details* to this prospectus.

Besides the investment policy of each Sub-Fund described in *Appendix II - Sub-Funds Details* to this prospectus, the Sub-Funds may use on regular basis techniques and instruments on transferable securities as well as those intended to hedge currency risks. More details on such restrictions and risks are outlined in the *Appendix I* to the Prospectus.

7. Risk Factors

For each specific risk, potential investors shall refer to *Appendix II - Sub-Funds Details*. Such specific risk and other risks are further described in *Appendix I – Risk Factors*.

8. Techniques and financial instruments

The Company is authorised for each Sub-Fund, in the consideration of the risks factors set out in *Appendix I – Risk Factors*, to use techniques and instruments bearing on Transferable Securities, Money Market Instruments, currencies and other eligible assets, on the condition that any use of such techniques and instruments be carried out for the purpose of hedging and / or efficient management of the portfolio, altogether within the meaning of the Grand-ducal Regulation of 8 February 2008. If a Sub-Fund uses such techniques and instruments for investment purposes, detailed information on such techniques and instruments will be disclosed in the investment policy of the relevant Sub-Fund.

I. Financial derivative instruments

Each Sub-Fund may use financial derivative instruments ("**FDI**") such as options, futures, forwards and swaps or any variation or combination of such instruments, for hedging or investment purposes, in accordance with the conditions set out in this section and the investment objective and policy of the Sub-Fund, as set out in its *Appendix II - Sub-Funds Details*. The use

of financial derivative instruments may not, under any circumstances, cause a Sub-Fund to deviate from its investment objective.
Each Sub-Fund is therefore in particular authorised to carry out transactions involving FDI and other financial techniques and instruments, FDI may include, without limitation the following categories of instruments:

a) Options: an option is an agreement that gives the buyer, who pays a fee or premium, the right but not the obligation to buy or sell a specified amount of a certain underlying at an agreed price (the strike or exercise price) on or until the expiration of the contract. A call option is an option to buy, and a put option an option to sell.

b) Futures contracts: a futures contract is an agreement to buy or sell a stated amount of a security, currency, index (including an eligible commodity index) or other asset at a specific future date and at a pre-agreed price.

c) Forward agreements: a forward agreement is a customised, bilateral agreement to exchange an asset or cash flows at a specified future settlement date at a forward price agreed on the trade date. One party to the forward is the buyer (long), who agrees to pay the forward price on the settlement date; the other is the seller (short), who agrees to receive the forward price.

d) Interest rate swaps: an interest rate swap is an agreement to exchange interest rate cash flows, calculated on a notional principal amount, at specified intervals (payment dates) during the life of the agreement.

e) Equity swap: an equity swap is an agreement which consist of paying out (or receiving) to (from) the swap counterparty:

   i) a positive or negative price return of one security, a basket of securities, a stock, exchange index, a benchmark or a financial index;
   ii) an interest rate, either floating or fixed;
   iii) a foreign exchange rate; or
   iv) a combination of any of the above.

   Against the payment of an interest rate either floating or fixed. There is no exchange of principal in the equity swap and the Company will not hold any security. The underlying asset category of the swap transactions entered into by the Company will be indicated in the description of the investment policy of each Sub-Fund in the *Appendix II - Sub-Funds Details* to this prospectus.

   The Company may not enter into equity swap transactions unless:

   i) its counterpart is a recognized financial institution subject to prudential supervision (such as credit institutions or investment firms) and specialised in the relevant type of transaction;
   ii) it ensures that the level of its exposure to the equity swap is such that it is able, at all times, to have sufficient liquid assets available to meet its redemption obligations and the commitments arising out of such transactions;
   iii) the underlying assets performance referred to under the equity swap agreement is in compliance with the investment policy of the relevant Sub-Fund entering into such transaction.

   The total commitment arising from equity swap transactions of a particular Sub-Fund shall be the market value of the underlying assets used for such transactions at inception.

   The net exposure of equity swap transactions in conjunction with all exposures resulting from the use of options, interest rate swaps and financial futures may not in respect of each Sub-Fund exceed at any time the Net Asset Value of such Sub-Fund.

The equity swap transactions to be entered into will be marked to market daily using the market value of the underlying assets used for the transaction in accordance with the terms of the swap agreement. Typically, investments in equity swap transactions will be made in order to adjust regional exposures, limit settlement and custodian risks as well as repatriation risk in certain markets and to avoid costs and expenses related to direct investments or sale of assets in certain jurisdictions as well as foreign exchange restrictions.

f) Swaptions: a swaption is an agreement that gives the buyer, who pays a fee or premium, the right but not the obligation to enter into an interest rate swap at a present interest rate within a specified period of time.

g) Credit default swaps: a credit default swap or "**CDS**" is a credit derivative agreement that gives the buyer protection, usually the full recovery, in case the reference entity or debt obligation defaults or suffers a credit event. In return the seller of the CDS receives from the buyer a regular fee, called the spread.

The Company may use CDS, where one counterpart (the protection buyer) pays a periodic fee in return for a contingent payment by the protection seller following a credit event of a reference issuer. The protection buyer must either sell particular obligations issued by the reference issuer for its par value (or some other designated reference or strike price) when a credit event occurs or receive a cash settlement based on the difference between the market price and such reference price. A credit event is commonly defined as bankruptcy, insolvency, receivership, material adverse restructuring of debt, or failure to meet payment obligations when due. The *International Swaps and Derivatives Association, Inc.* ("**ISDA**") have produced standardised documentation for these transactions under the umbrella of its ISDA Master Agreement.

The Company may use CDS in order to hedge the specific credit risk of some of the issuers in its portfolio by buying protection.

In addition, the Company may, provided it is in its exclusive interest, buy protection under CDS without holding the underlying assets provided that the aggregate premiums paid together with the present value of the aggregate premiums still payable in connection with CDS purchased together with the amount of the aggregate of premiums paid relating to the purchase of options on transferable securities or on financial instruments for a purpose other than hedging, may not, at any time, exceed 15% of the net assets of the relevant Sub-Fund.

Provided it is in its exclusive interest, the Company may also sell protection under CDS in order to acquire a specific credit exposure. In addition, the aggregate commitments in connection with such CDS sold together with the amount of the commitments relating to the purchase and sale of futures and option contracts on any kind of financial instruments and the commitments relating to the sale of call and put options on transferable securities may not, at any time, exceed the value of the net assets of the relevant Sub-Fund.
The Company will only enter into CDS with highly rated financial institutions specialised in this type of transaction and only in accordance with the standard terms laid down by the ISDA. Also, the Company will only accept obligations upon a credit event that are within the investment policy of the relevant Sub-Fund.
The Company will ensure it can dispose of the necessary assets at any time in order to pay redemption proceeds resulting from redemption requests and to meet its obligations resulting from credit default swaps and other techniques and instruments.

The aggregate commitments of all credit default swap transactions will not exceed 20% of the net assets of any Sub-Fund provided that all swaps will be fully funded.

h) Total return swaps: a total return swap or "**TRS**" is an agreement, as further below described, in which one party (total return payer) transfers the total economic performance of a reference obligation to the other party (total return receiver). Total economic performance includes income from interest and fees, gains or losses from

market movements, and credit losses. Then TRS involve the exchange of the right to receive the total return, coupons plus capital gains or losses, of a specified reference asset, index or basket of assets against the right to make fixed or floating payments. As such, the use of TRSs or other derivatives with similar characteristics allows gaining synthetic exposure to certain markets or underlying assets without investing directly (and/or fully) in these underlying assets. While the entry into TRSs is possible, it is currently not contemplated.

The Company or any of its delegates will report the details of any TRSs concluded to a trade repository or ESMA, as the case may be in accordance with the TRSs may be used in respect of any instrument that is eligible under article 50 of the UCITS Directive.

The maximum and expected proportion of assets that may be subject to TRS will be set out for each Sub-fund in the relevant *Appendix II - Sub-Funds Details*. If a Sub-fund intends to make use of TRS, the relevant *Appendix II - Sub-Funds Details* will include the disclosure requirements of the SFTR.

i) Contracts for differences: a contract for differences or "**CFD**" is an agreement between two parties to pay the other the change in the price of an underlying asset. Depending on which way the price moves, one party pays the other the difference from the time the contract was agreed to the point in time where it ends.

A. OTC Financial Derivative Instruments

Each Sub-Fund may invest into FDI that are traded *over-the- counter* ("**OTC**") including, without limitation, TRS or other FDI with similar characteristics, in accordance with its investment objective and policy and the conditions set out in this section of the Prospectus.

The counterparties to OTC FDI will be selected among recognized financial institutions subject to prudential supervision (such as credit institutions or investment firms) and specialised in the relevant type of transaction. The identity of the counterparties will be disclosed in the annual report of the Company.

The Management Company may use a process for accurate and independent assessment of the value of OTC FDI in accordance with applicable laws and regulations.

In order to limit the exposure of a Sub-Fund to the risk of default of the counterparty under OTC FDI, the Sub-Fund may receive cash or other assets as collateral, as further specified in the paragraph II. C. below entitled "*Collateral management and policy for EPM Techniques*".

B. Financial index and benchmark

Each Sub-Fund may use FDI to replicate or gain exposure to one or more financial index in accordance with its investment objective and policy. The underlying assets of financial index may comprise eligible assets described in this section of the Prospectus and instruments with one or more characteristics of those assets, as well as interest rates, foreign exchange rates or currencies, other financial indices and/or other assets, such as commodities or real estate.

For the purposes of this Prospectus, a "**Financial Index**" is an index which complies with all the criteria set forth in article 9 of the Grand-Ducal Regulation of 8 February 2008 and, at all times, with the following conditions: the composition of the index is sufficiently diversified (each component of a financial index may represent up to 20% of the index, except that one single component may represent up to 35% of the index where justified by exceptional market conditions), the index represents an adequate benchmark for the market to which it refers, and the index is published in an appropriate manner. These conditions are further specified in and supplemented by regulations and guidance issued by the CSSF from time to time.
Furthermore, such index shall be recognised by the CSSF, on the following basis:

– the composition of the index is sufficiently diversified,

– the index represents an adequate benchmark for the market to which it refers,
– it is published in an appropriate manner.

Following the BMR Regulation, a "**Benchmark**" means any index by reference to which the amount payable under a financial instrument or a financial contract, or the value of a financial instrument, is determined, or an index that is used to measure the performance of a Sub-Fund / Share Class with the purpose of tracking the return of such index or of defining the asset allocation of a portfolio or of computing the performance fees.
The use of a Benchmark should comply with the BMR Regulation and should be disclosed in the *Appendix II – Sub-Funds Details*.
The BMR Regulation requires further transparency on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds
In accordance with the BMR Regulation, the Management Company will maintain an index contingency plan setting out the actions to be taken in the event that a benchmark changes materially or ceases to be provided. Also, the BMR requires the prospectus to provide clear and prominent information stating whether the Benchmark that may be used is provided by an administrator included in the register of administrators and Benchmarks, as defined in the article 36 of the BMR (the "**Benchmark Register**"). EU Benchmark administrators have until 1 January 2020 to submit a request to be entered on the Benchmark Register.
Benchmarks may also be used by some funds for comparison purposes or as point of reference against which the performance of a fund may be measured but the funds may freely select the securities in which they invest. Given that the funds are actively managed and investment decisions are made at the discretion of the Investment Manager, the actual holdings and fund performance may differ materially from that of the benchmark(s).
In case the publication of the Benchmark has been stopped or where major changes in that Benchmark have occurred or if for some reason the Board of Directors feels that another benchmark is more appropriate, another Benchmark may be chosen. Any such change of benchmark will be reflected in an updated Prospectus.
The Benchmark Policy of the Management Company complying with Art. 28(2) of the BMR for actions to be taken in the event of material changes to, or cessation of, a benchmark, is available for the Shareholders of the Company at the registered office of the Management Company.

II. Efficient portfolio management techniques

Each Sub-Fund may opt to employ techniques and instruments (within the meaning of, and under the conditions set out in, applicable laws, regulations and CSSF circulars issued from time to time, in particular, but not limited to, CSSF circulars 08/356 and 14/592, ESMA guidelines 2014/937 and SFTR, provided that such techniques and instruments are used for the purposes of efficient portfolio management ("**EPM**"). The use of such techniques and instruments should not result in a change of the declared investment objective of any Sub-Fund or substantially increase the stated risk profile of the Sub-Fund.

The efficient portfolio management techniques ("**EPM Techniques**") that may be employed by the Sub-Funds in accordance with the below, does not include, securities lending, repurchase agreements and reverse repurchase agreements.

The Fund will, for the time being, not enter into SFTs such as repurchase and reverse repurchase agreements or engage in securities lending transactions or other transactions – including total return swaps - foreseen under SFTR. Should the Board of Directors of the Fund decide to use such techniques and instruments in the future for any specific Sub-Fund, the Board of Directors of the Fund will update this Prospectus accordingly and will include related requirements of SFTR under the section "Sub-Funds details" in respect of each relevant Sub-Fund, where applicable.

When investing in FDI relating to transferable securities and money market instruments, each Sub-Fund shall comply with applicable restrictions and in particular with CSSF Circular 08/356 on the rules applicable to undertakings for collective investment when they employ certain techniques and instruments relating to transferable securities and money market instruments,

CSSF circulars 11/512 and 14/592, ESMA Guidelines 2014/937 and Section below entitled "*Investment restrictions*".

The Company's annual report should furthermore contain details of the following:
- the exposure obtained through EPM Techniques;
- the identity of the counterparty(ies) to these EPM Techniques;
- the type and amount of collateral received by the Company to reduce counterparty exposure; and
- the revenues arising from EPM Techniques for the entire reporting period together with the direct and indirect operational costs and fees incurred.

The use of FDI will cause a risk due to leverage. Considering the maximum of 10% of its net assets that a Sub-Fund may borrow, as indicated under point VIII. a) of the Section entitled "*Investment restrictions*" below, the overall exposure of any Sub-Fund must not exceed 210% of the Sub-Fund's net assets.

The investor's attention is further drawn to the increased risk of volatility generated by Sub-Funds using FDI, EPM Techniques and instruments for other purposes than hedging. If the Investment Managers forecast incorrect trends for securities, currency and interest rate markets, the affected Sub-Fund may be worse off than if no such strategy had been used.

All the revenues arising from EPM Techniques, net of direct and indirect operational costs and fees, will be returned to the Company.
Each Sub-Fund may incur costs and fees in connection with EPM Techniques. In particular, a Sub-Fund may pay fees to agents and other intermediaries, which may be affiliated with the Depositary or the Investment Manager to the extent permitted under applicable laws and regulations, in consideration for the functions and risks they assume. The amount of these fees may be fixed or variable. Information on direct and indirect operational costs and fees incurred by each Sub-Fund in this respect, as well as the identity of the entities to which such costs and fees are paid and any affiliation they may have with the Depositary or the Investment Manager, if applicable, will be available in the annual report. The annual report of the Company will contain also all details on the revenues arising from EPM Techniques for the entire reporting period.
These operational costs may reach a maximum of 50 % of revenues arising from efficient portfolio management techniques and do not include hidden revenues.

The risks linked to collateral management, such as operational, liquidity, counterparty and legal risks and, where applicable, the risks arising from its reuse are further described hereunder in *Appendix I - Risk Factors.*

Reuse means the use by a receiving counterparty, in its own name and on its own account or on the account of another counterparty, including any natural person, of financial instruments received under a collateral arrangement, such use comprising transfer of title or exercise of a right of use in accordance with Article 5 of Directive 2002/47/EC on financial collateral arrangements but not including the liquidation of a financial instrument in the event of default of the providing counterparty.

A. Securities lending and securities borrowing transactions

At present the Fund does not make use of securities lending and borrowing transactions. Should the Board of Directors of the Fund decide to use such techniques and instruments in the future for any specific Sub-Fund, the Board of Directors of the Fund will update the Prospectus accordingly and will include related requirements of SFTR under the section "Sub-Funds details" in respect of each relevant Sub-Fund, where applicable.

B. Repurchase Transactions

At present the Fund does not make use of repurchase transactions. Should the Board of Directors of the Fund decide to use such techniques and instruments in the future for any specific Sub-Fund, the Board of Directors of the Fund will update the Prospectus accordingly and will include related requirements of SFTR under the section "Sub-Funds details" in respect of each relevant Sub-Fund, where applicable.

C. Collateral management and policy for EPM Techniques

The Company shall comply with the requirements provided by the provisions laid down in the Circular CSSF 14/592 and set out below when entering into management of collateral for OTC financial derivative transactions and efficient portfolio management techniques (and which modify the Box 26 of the existing guidelines on Risk Measurement and Calculation of Global Exposure and Counterparty Risk for UCITS (Ref. CESR/10-788)):

The risk exposures to a counterparty arising from OTC financial derivative transactions and efficient portfolio management techniques should be combined when calculating the counterparty risk limits of Article 52 of the UCITS Directive.

All assets received by the Sub-Fund in the context of efficient portfolio management techniques should be considered as collateral and should comply with the criteria laid down in paragraph below.

Where a Sub-Fund enters into OTC FDI transactions and EPM Techniques, the Sub-Fund will only accept the following assets as collateral:

(i) Liquid assets. Liquid assets include cash, short term bank certificates and money market instruments as defined within the UCITS Directive. A letter of credit or a guarantee at first demand given by a first class credit institution not affiliated to the counterparty is considered as equivalent to liquid assets.
(ii) Bonds issued or guaranteed by a Member State of the OECD or by their local public authorities or by supranational institutions and undertakings with EU, regional or world-wide scope.
(iii) Shares or units issued by money market UCIs calculating a daily net asset value and being assigned a rating of AAA or its equivalent.
(iv) Shares or units issued by UCITS investing mainly in bonds/shares mentioned in items (v) and (vi) below.
(v) Bonds issued or guaranteed by first class issuers offering an adequate liquidity.
(vi) Shares admitted to or dealt in on a regulated market of a Member State of the European Union or on a stock exchange of a Member State of the OECD, on the condition that these shares are included in a main index.

For the purpose of the above paragraph, all assets received by a Sub-Fund in the context of EPM Techniques should be considered as collateral.

Furthermore, all collateral used to reduce counterparty risk exposure should comply with the following criteria at all times:

a) Liquidity – any collateral received other than cash should be highly liquid and traded on a regulated market or multilateral trading facility with transparent pricing in order that it can be sold quickly at a price that is close to pre-sale valuation. Collateral received should also comply with the provisions of Article 56 of the UCITS Directive.

b) Valuation – collateral received should be valued on at least a daily basis and assets that exhibit high price volatility should not be accepted as collateral unless suitably conservative haircuts are in place. As the Company will accept only highly liquid securities as collateral, Mark-to-Market methodology will be used for the valuation of transferable securities and/or money market instruments listed on a regulated market /multilateral trading facility with transparent pricing, which is based on the last known quotation on the Valuation Day. Shares or units in

underlying open-ended investment funds are valued at their last available Net Asset Value reduced by any applicable charges.

c) Issuer credit quality – collateral received should be of high quality (as above described).

d) Correlation – the collateral received by the Sub-Fund should be issued by an entity that is independent from the counterparty and is expected not to display a high correlation with the performance of the counterparty.

e) Collateral diversification (asset concentration) – collateral should be sufficiently diversified in terms of country, markets and issuers. The criterion of sufficient diversification with respect to issuer concentration is considered to be respected if the Sub-Fund receives from a counterparty of efficient portfolio management and over-the-counter financial derivative transactions a basket of collateral with a maximum exposure to a given issuer of 20% of its net asset value. When the Sub-Fund is exposed to different counterparties, the different baskets of collateral should be aggregated to calculate the 20% limit of exposure to a single issuer.
By way of derogation from this sub-paragraph, a UCITS may be fully collateralised in different transferable securities and money market instruments issued or guaranteed by a Member State, one or more of its local authorities, a third country, or a public international body to which one or more Member States belong. Such a UCITS should receive securities from at least six different issues, but securities from any single issue should not account for more than 30% of the UCITS' net asset value. UCITS that intend to be fully collateralised in securities issued or guaranteed by a Member State should disclose this fact in its prospectus. UCITS should also identify the Member States, local authorities, or public international bodies issuing or guaranteeing securities that they are able to accept as collateral for more than 20% of their net asset value.

f) Risks linked to the management of collateral, such as operational and legal risks, should be identified, managed and mitigated by the risk management process.

g) Where there is a title transfer, the collateral received should be held by the Depositary of the Sub-Fund. For other types of collateral arrangement, the collateral can be held by a third party custodian which is subject to prudential supervision, and which is unrelated to the provider of the collateral.

The collateral eligibility requirements set out above stem from the ESMA Guidelines 2014/937 and CSSF circular 14/592.

Cash collateral received by a Sub-Fund can only be:

(i) placed on deposit with credit institutions which either have their registered office in an EU Member State or are subject to prudential rules considered by the CSSF as equivalent to those laid down in Community law;
(ii) invested in high-quality government bonds;
(iii) used for the purpose of reverse repo transactions provided the transactions are with credit institutions subject to prudential supervision and the Company is able to recall at any time the full amount of cash on accrued basis;
(iv) invested in Short-Term Money Market Companys as defined in the CESR Guidelines 10-049 on a Common Definition of European Money Market Companys.

Re-invested cash collateral should be diversified in accordance with the diversification requirements applicable to non-cash collateral.

Non-cash collateral received by a Sub-Fund may not be sold, re-invested or pledged.

Collateral posted in favour of a Sub-Fund under a title transfer arrangement should be held by the Depositary. Collateral posted in favour of a Sub-Fund under a security interest arrangement (e.g., a pledge) can be held by a third-party custodian which is subject to prudential supervision, and which is unrelated to the provider of the collateral.

Collateral management risks are further described in the *Appendix I – Risks Factors* of the Prospectus.

D. Haircut Policy

For each of these financial instruments, the following discount rates will be applied (the Management Company reserves the right to vary this policy at any time):

- Cash in a currency other than the currency of exposure: **10%**
- Shares and shares of a UCI: **20%**
- Debt instruments at least investment grade: **15%**
- Non-investment grade debt securities and corporate bonds: **40%**.

The Risk Management makes sure that the collateral used to mitigate counterparty risk is not sold, reinvested or pledged.

A Sub-Fund receiving collateral for at least 30% of its assets should have an appropriate stress testing policy in place to ensure regular stress tests are carried out under normal and exceptional liquidity conditions to enable the Sub-Fund to assess the liquidity risk attached to the collateral. The liquidity stress testing policy should at least prescribe the following:

- Design of stress test scenario analysis including calibration, certification & sensitivity analysis;
- Empirical approach to impact assessment, including back-testing of liquidity risk estimates;
- Reporting frequency and limit/loss tolerance threshold; and
- Mitigation actions to reduce loss including haircut policy and gap risk protection.

A Sub-Fund should have in place a clear haircut policy adapted for each class of assets received as collateral.
When devising the haircut policy, a Sub-Fund should take into account the characteristics of the assets such as the credit standing or the price volatility, as well as the outcome of the stress tests performed. This policy should be documented and should justify each decision to apply a specific haircut, or to refrain from applying any haircut, to a certain class of assets.

The prospectus should also clearly inform investors of the collateral policy of the Company. This should include permitted types of collateral, level of collateral required and haircut policy and, in the case of cash collateral, re-investment policy (including the risks arising from the re-investment policy).

9. Investment restrictions

The Directors shall, based upon the principle of diversification of risks, have power to determine the investment policy for the investments of the Company in respect of each Sub-Fund subject to the following restrictions or subject to any other specific restriction that might be provided for a Sub-Fund in *Appendix II - Sub-Funds Details* to this prospectus:

I. (1) The Company, for each Sub-Fund, may invest in:

a) transferable securities and money market instruments admitted to or dealt in on a regulated market within the meaning of Directive 2004/39/EC or dealt in on another market which operates regularly and is recognised and open to the public in a Member State of the European Union ("EU") or any other state in Eastern and Western Europe, Asia, North and South America and Oceania (an "Eligible Market");

b) recently issued transferable securities and money market instruments, provided that the terms of issue include an undertaking that application will be made for admission to official listing on an Eligible Market and such admission is secured within one year of the issue;

c) units of UCITS and/or other undertakings for collective investment ("other UCIs") within the meaning of Article 1, paragraph (2), points a) and b) of the UCITS Directive, whether or not established in a Member State, provided that:
   - such other UCIs are authorised under laws which provide that they are subject to supervision considered by the CSSF to be equivalent to that that laid down in Community law, and that cooperation between authorities is sufficiently ensured,
   - the level of protection for unitholders in such other UCIs is equivalent to that provided for unitholders in a UCITS, and in particular that the rules on assets segregation, borrowing, lending, and uncovered sales of transferable securities and money market instruments are equivalent to the requirements of the UCITS Directive,
   - the business of such other UCIs is reported in half-yearly and annual reports to enable an assessment of the assets and liabilities, income and operations over the reporting period,
   - no more than 10% of the assets of the UCITS or of the other UCIs, whose acquisition is contemplated, can, according to their management regulations or instruments of incorporation documents, in aggregate be invested in units of other UCITS or other UCIs;

d) each Sub-Fund may, pursuant to their investment policies described in *Appendix II - Sub-Funds Details* to this prospectus, subscribe, acquire, and/or hold securities to be issued or issued by another Sub-Fund of the Fund (the "Target Sub-Fund") provided that:
   - the Target Sub-Fund does not, in turn, invest in the Sub-Fund invested in this Target Sub-Fund;
   - no more than 10% of the assets of the Target Sub-Funds whose acquisition is contemplated may be invested in shares of other Target Sub-Funds of the Fund;
   - voting rights, if any, attached to the relevant Shares are suspended for as long as they are held by the Sub-Fund concerned and without prejudice to the appropriate processing in the accounts and the periodic reports;
   - in any event, for as long as these securities are held by the Fund, their value will not be taken into consideration for the calculation of the net assets of the Fund for the purposes of verifying the minimum threshold of the net assets imposed by the 2010 Law.

e) deposits with a credit institution which are repayable on demand or have the right to be withdrawn, and maturing in no more than 12 months, provided that the credit institution has its registered office in a Member State or, if the registered office of the credit institution is situated in a third country, provided that it is subject to prudential rules considered by the CSSF as equivalent to those laid down in Community law;

f) financial derivative instruments, including equivalent cash-settled instruments, dealt in on an Eligible Market and/or financial derivative instruments dealt in over-the-counter ("OTC derivatives"), provided that:
   - the underlying consists of instruments covered by this section (I) (1), financial indices, interest rates, foreign exchange rates or currencies, in which the Sub-Fund may invest according to its investment objective;
   - the counterparties to OTC derivative transactions are institutions subject to prudential supervision, and belonging to the categories approved by the Luxembourg supervisory authority;
   - the OTC derivatives are subject to reliable and verifiable valuation on a daily basis and can be sold, liquidated or closed by an offsetting transaction at any time at their fair value at the Company's initiative;

g) money market instruments other than those dealt in on an Eligible Market, if the issue or the issuer of such instruments is itself regulated for the purpose of protecting investors and savings, and provided that these instruments are:
   - issued or guaranteed by a central, regional or local authority or by a central bank of a Member State, the European Central Bank, the European Union or the European Investment Bank, a non-EU Member State or, in case of a Federal State, by one of the members making up the federation,

or by a public international body to which one or more EU Member States belong, or

- issued by an undertaking any securities of which are dealt in on Eligible Markets, or
- issued or guaranteed by a credit institution which has its registered office in a third country provided that it is subject to prudential rules considered by the CSSF as equivalent to those laid down in Community law, or
- issued by other bodies belonging to the categories approved by the Luxembourg supervisory authority provided that investments in such instruments are subject to investor protection equivalent to that laid down in the first, the second or the third indent and provided that the issuer is a company whose capital and reserves amount to at least EUR 10 million and which presents and publishes its annual accounts in accordance with Directive 78/660/EEC, is an entity which, within a group of companies which includes one or several listed companies, is dedicated to the financing of the group or is an entity which is dedicated to the financing of securitisation vehicles which benefit from a banking liquidity line.

(2) In addition, the Company may invest a maximum of 10% of the net assets of any Sub-Fund in transferable securities and money market instruments other than those referred to under I (1) above.

II. The Company may hold Ancillary Liquid Assets up to 20% of the net assets of any Sub-Fund.

III. a) (i) The Company will invest no more than 10% of the net assets of any Sub-Fund in transferable securities or money market instruments issued by the same body.

(ii) The Company may not invest more than 20% of the net assets of any Sub-Fund in deposits made with the same body. The risk exposure of a Sub-Fund to a counterparty in an OTC derivative transaction may not exceed 10% of its net assets when the counterparty is a credit institution referred to in I. d) above or 5% of its net assets in other cases.

b) Moreover, where the Company holds on behalf of a Sub-Fund investments in transferable securities and money market instruments of issuing bodies which individually exceed 5% of the net assets of such Sub-Fund, the total of all such investments must not account for more than 40% of the total net assets of such Sub-Fund.

This limitation does not apply to deposits and OTC derivative transactions made with financial institutions subject to prudential supervision.

Notwithstanding the individual limits laid down in paragraph a), the Company may not combine for each Sub-Fund, where this would lead to investment of more than 20% of the Sub-Fund's assets in a single body, any of the following:

- investments in transferable securities or money market instruments issued by that body,
- deposits made with that body, and/or
- exposures arising from OTC derivative transactions undertaken with that body.

c) The limit of 10% laid down in sub-paragraph a) (i) above is increased to a maximum of 35% in respect of transferable securities or money market instruments which are issued or guaranteed by a Member State, its public local authorities, or by another state in Eastern and Western Europe, Asia, North and South America and Oceania or by public international bodies of which one or more Member States are members.

d) The limit of 10% laid down in sub-paragraph a) (i) is increased to 25% for certain bonds when they are issued by a credit institution which has its registered office in a Member State and is subject by law, to special public supervision designed to protect bondholders. In particular, sums deriving from the issue of these bonds must be invested in conformity with the law in assets which, during the whole period of validity of the bonds, are capable of covering

claims attaching to the bonds and which, in case of bankruptcy of the issuer, would be used on a priority basis for the repayment of principal and payment of the accrued interest.

If a Sub-Fund invests more than 5% of its net assets in the bonds referred to in this sub-paragraph and issued by a single issuer, the total value of such investments may not exceed 80% of the net assets of the Sub-Fund.

e) The transferable securities and money market instruments referred to in paragraphs c) and d) shall not be included in the calculation of the limit of 40% in paragraph b).

The limits set out in sub-paragraphs a), b), c) and d) may not be combined and, accordingly, investments in transferable securities or money market instruments issued by the same issuing body, in deposits or in derivative instruments effected with the same issuing body may not, in any event, exceed a total of 35% of any Sub-Fund's net assets.

Companies which are part of the same group for the purposes of the establishment of consolidated accounts, as defined in accordance with Directive 83/349/EEC or in accordance with recognised international accounting rules, are regarded as a single body for the purpose of calculating the limits contained in this paragraph III).

The Company may cumulatively invest up to 20% of the net assets of a Sub-Fund in transferable securities and money market instruments within the same group.

f) **Notwithstanding the above provisions, the Company is authorised to invest up to 100% of the net assets of any Sub-Fund, in accordance with the principle of risk diversification, in transferable securities and money market instruments issued or guaranteed by a Member State, by its local authorities or agencies, or by another member State of the OECD or by public international bodies of which one or more Member States are members, provided that the Sub-Fund's Shareholders benefit from sufficient protection and that that such Sub-Fund must hold securities from at least six different issues and securities from one issue do not account for more than 30% of the net assets of such Sub-Fund.**

IV. a) Without prejudice to the limits laid down in paragraph V., the limits provided in paragraph III. a) to e) are raised to a maximum of 20% for investments in shares and/or debt securities issued by the same body if the aim of the investment policy of a Sub-Fund is to replicate the composition of a certain stock or debt securities index which is is recognised by the CSSF provided that it is sufficiently diversified, represents an adequate benchmark for the market to which it refers, is published in an appropriate manner and disclosed in the relevant Sub-Fund's investment policy.

b) The limit laid down in paragraph a) is raised to 35% where this proves to be justified by exceptional market conditions, in particular on regulated markets within the meaning of Directive 2004/39/EC and any other market which is regulated, operates regularly and is recognised and open to the public ("Regulated Markets") where certain transferable securities or money market instruments are highly dominant. The investment up to this limit is only permitted for a single issuer.

V. a) The Company may not acquire shares carrying voting rights which should enable it to exercise significant influence over the management of an issuing body.

b) The Company may acquire no more than:

- 10% of the non-voting shares of the same issuer;
- 10% of the debt securities of the same issuer;
- 25% of the units of the same UCITS or other UCI within the meaning of Article 2, paragraph (2) of the 2010 Law

- 10% of the money market instruments of the same issuer.

These limits under second and third indents may be disregarded at the time of acquisition, if at that time the gross amount of debt securities or of the money market instruments or the net amount of the instruments in issue cannot be calculated.

c) The provisions of paragraph V. shall not be applicable to transferable securities and money market instruments issued or guaranteed by a Member State or its local authorities or by any other Eligible State or issued by public international bodies of which one or more Member States are members.

The provisions of this paragraph V. are also waived as regards:

- shares held by the Company in the capital of a company incorporated in a non-Member State of the EU which invests its assets mainly in the securities of issuing bodies having their registered office in that State, where under the legislation of that State, such a holding represents the only way in which the Company can invest in the securities of issuing bodies of that State provided that the investment policy of the company from the third country complies with the limits laid down in paragraph III. a) to e), V. a) and b) and VI;
- shares held by one or more investment companies in the capital of subsidiary companies, which Carry on only the business of management, advice or marketing in the country where the subsidiary is established, in regard to the repurchase of units at the request of unitholders exclusively on its or their behalf.

VI. a) The Company may invest up to 100% of any of its Sub-Fund's net assets in units of UCITS and/or other UCIs (Target Companies) referred to in paragraph I) (1) c), provided that no more than 20% of the Sub-Fund's net assets are invested in the units of a single Target Company and subject to the limits set by the 2010 Law.

b) The underlying investments held by the Target Companies in which the Company invests do not have to be considered for the purpose of the investment restrictions set forth under III. a) to e) above.

c) Where a Sub-Fund invests in the shares / units of other Target Companies that are managed, directly or by delegation, by the same management company or by any other company with which the management company is linked by common management or control, or by a substantial direct or indirect holding, that management company or other company may not charge subscription or redemption fees on account of the Sub-Fund investment in the shares / units of such Target Companies.

In respect of a Sub-Fund's investments in Target Companies linked to the Company as described in the preceding paragraph, the management fee (excluding any performance fee, if any) charged to such Sub-Fund and each of the Target Companies concerned shall not exceed a level as disclosed in each Sub-Funds Details in *Appendix II - Sub-Funds Details*. The Company will indicate in its annual report the total management fees charged both to the relevant Sub-Fund and to the Target Companies in which such Sub-Fund has invested during the relevant period.

d) The Company may acquire no more than 25% of the units of the same Target Companies. This limit may be disregarded at the time of acquisition if at that time the gross amount of the units in issue cannot be calculated. In case of a Target Companies with multiple compartments, this restriction is applicable by reference to all units issued by the target sub-fund.

e) The Company may not, in aggregate, invest more than 30% of any of its Sub-Fund's net assets in units of Target Companies.

VII. The Company shall ensure for each Sub-Fund that the global exposure relating to derivative instruments does not exceed the total net value of the relevant Sub-Fund. The exposure is calculated taking into account the current value of the underlying assets, the counterparty risk, future market movements and the time available to liquidate the positions. This shall also apply to the following subparagraphs.

If the Company invests in financial derivative instruments, the exposure to the underlying assets may not exceed in aggregate the investment limits laid down in paragraph III. a) to e) above. When the Company invests in index-based financial derivative instruments, these investments are not required to be combined to the limits laid down in paragraph III a) to e).
When a transferable security or money market instrument embeds a derivative, the latter must be taken into account when complying with the requirements of this paragraph VII.

VIII.

a) The Company may not borrow for the account of any Sub-Fund amounts in excess of 10% of the net assets of that Sub-Fund, any such borrowings to be from banks and to be effected only on a temporary basis, provided that the Company may acquire foreign currencies by means of back to back loans.
b) The Company may not grant loans to or act as guarantor on behalf of third parties.
This restriction shall not prevent the Company from acquiring transferable securities, money market instruments or other financial instruments referred to in I. (1) c), e) and f) which are not fully paid.
c) The Company may not carry out uncovered sales of transferable securities, money market instruments or other financial instruments.
d) The Company may only acquire movable or immovable property which is essential for the direct pursuit of its business, provided that such investment does not represent more than 10% of its assets.
e) Where the Company is authorised to borrow under points a) and d), that borrowing shall not exceed15% of its assets in total.
f) The Company may not acquire either precious metals or certificates representing them.

IX.

a) The Company needs not to comply with the limits laid down in this section when exercising subscription rights attaching to transferable securities or money market instruments which form part of its assets. While ensuring observance of the principle of risk diversification, recently created Sub-Funds may derogate from paragraphs III., IV. and VI. a), b) and c) for a period of six months following the date of their creation.
b) If the limits referred to in paragraph a) are exceeded for reasons beyond the control of the Company or as a result of the exercise of subscription rights, it must adopt as a priority objective for its sales transactions the remedying of that situation, taking due account of the interest of its shareholders.
c) To the extent that an issuer is a legal entity with multiple compartments where the assets of the compartment are exclusively reserved to the investors in such compartment and to those creditors whose claim has arisen in connection with the creation, operation or liquidation of that compartment, each compartment is to be considered as a separate issuer for the purpose of the application of the risk diversification rules set out in paragraphs III. a) to e), IV. and VI.

10. Risk Management Process

The Management Company, on behalf of the Company, will employ a risk-management process (the "**RMP**") which enables it to monitor and measure at any time the risk of the positions and their contribution to the overall risk profile of each Sub-Fund. The Management Company, on behalf of the Company, will employ, if applicable, a process for accurate and independent assessment of the value of any OTC derivative instruments.
As part of the RMP within the meaning of the applicable regulation to the Management Company, the Bank of Italy Regulation on collective management of savings of 19 January 2015 (as last amended by the Bank of Italy Provision of 23 December 2021) and its Annex V.3.3 and the ESMA Guidelines 10-788, the Management Company will calculate the global exposure of each Sub-Fund on a daily basis despite of NAV frequency. This global exposure, depending on the risk profile of each Sub-Fund could be calculated using the commitment approach (the

"**Commitment Approach**") or the Value at Risk ("**VaR**") Approach (the "**VaR Approach**"), either relative or absolute.

The Commitment approach is defined as the sum of the absolute value of the individual commitments of financial derivatives instruments, after taking into account possible effects of netting and hedging.

The VaR approach quantifies the maximum potential loss that a UCITS could suffer within a certain time horizon and a given level of confidence under normal market conditions. The Management Company shall use a one month (20 days) historical VaR with one year of history and a confidence level of 99%.

The risk profile will be evaluated by the Risk Management department of the Management Company, the result of this evaluation will be communicated to the Board of the Company that will confirm the approach chosen or propose a new one. More specifically, the selection of the approach will result from the investment policy and strategy of each Sub-Fund (including its use of financial derivative instruments).

The approach chosen for each Sub-Fund could be found in *Appendix II - Sub-Funds Details* of the present prospectus. In case of a VaR approach, the expected level of leverage as well as the benchmark or the appropriate mix of assets (if managed with a relative VaR approach) will be indicated. The expected level of leverage will be calculated as the sum of notionals but could be completed by the commitment approach.

11. Shares

Within the meaning of Article 181 of the 2010 Law, the Company may issue within each Sub-Fund one or more Classes of Shares whose assets will be commonly invested pursuant to the specific investment policy of the Sub-Fund concerned but may differ, *inter alia*, in respect of specific sales and redemption charge structure, management charge structure, distribution policy, hedging policy or any other features as the Board of Directors shall from time to time determine in respect of each Sub-Fund.

Currently, the Board of Directors may decide to issue within each Sub-Fund, the Classes of Shares as further described in *Appendix II - Sub-Funds Details* to this Prospectus.

In accordance with the above, the Board of Directors may also decide to issue within the same class of Shares, two categories as further described in *Appendix II - Sub-Funds Details* of this prospectus.

For each Sub-Fund shares are only in registered form.

The Company may also issue fractional shares (*thousands*) which are only in registered form. In the event that fractional registered shares are issued, a confirmation of subscription shall be issued.
The inscription of the shareholder's name in the shareholders' register evidences his right to ownership of such registered shares. The shareholders' register is kept at the registered office of the UCI Administrator.

Shares must be fully paid-up and are issued with no par value. There is no restriction with regard to the number of shares which may be issued, unless otherwise decided by the Board.

The rights attached to the shares are those provided for in the 1915 Law, unless superseded by the 2010 Law.

All shares of the Company have an equal voting right, whatever their value (fraction of share do not allow a voting right). The shares of the Company have equal rights to the liquidation proceeds of the Company.

12. Net asset value

The net asset value per share of the Company is determined on the Valuation Day, under the responsibility of the Board of Directors. The Valuation Day applicable for each Sub-fund is disclosed under *Appendix II - Sub-Funds Details*.

The net asset value per share of the Company is expressed in Euro. It is determined by dividing the net assets of the Company by the total number of shares of the Company outstanding. If a Valuation Day is a (legal or bank) holiday in Luxembourg, the Valuation Day shall be the next following Luxembourg Bank Business Day.

The net assets of the Company shall be assessed as follows:

1. In particular, the Company's assets shall include:

- all cash on hand and on deposit, including interest due but not yet received as well as interest accrued on these deposits up to the Valuation Day;
- all bills and demand notes and accounts receivable (including the results of securities sold insofar as the proceeds have not yet been collected);
- All debt securities, time notes, certificates of deposit, shares, stock, debentures, debenture stocks, subscription rights, warrants, options and other securities, financial instruments and similar assets owned or contracted for by the Company (provided that the Company may make adjustments in a manner not inconsistent with paragraph (a) below with regards to fluctuations in the market value of securities caused by trading ex-dividends, ex-rights, or by similar practices);
- all dividends and distribution proceeds to be received by the Company in cash or securities insofar as the Company is aware of such;
- all interest accrued but not yet received and all interest produced until the Valuation Day on securities owned by the Company, unless this interest is included in the principal amount of such assets;
- the incorporation expenses of the Company, insofar as they have not yet been written off;
- all other assets of whatever kind and nature, including prepaid expenses.

The value of these assets shall be determined as follows:

(a) the value of any cash on hand or on deposit, bills and demand notes and accounts receivable, prepaid expenses, dividends and interests declared or due but not yet received shall be deemed to be the full value of such assets, unless it is unlikely that such values be received, in which case the value thereof shall be determined by deducting such amount the Company may consider appropriate to reflect the true value of these assets;

(b) the valuation of securities and/or money market instruments listed on an official stock exchange or dealt in on another regulated market which operates regularly, is recognised and open to the public, is based on the last quotation known in Luxembourg on the Valuation day and, if such security is traded on several markets, on the basis of the last available price known on the market considered to be the main market for trading this security. If the last available price is not representative, the valuation shall be based on the probable sales value estimated by the Board of Directors with prudence and in good faith;

(c) securities not listed on a stock exchange or dealt in on another regulated market which operates regularly, is recognised and open to the public shall be assessed on the basis of the probable sales value estimated with prudence and in good faith;

(d) securities expressed in a currency other than the currency of the Company shall be converted into that currency on the basis of the last available exchange rate;

(e) the money market instruments which are not listed on any official stock exchange or traded on any other organised market will be valued in accordance with market practice;

(f) shares or units in underlying open-ended investment funds shall be valued at their last available net asset value reduced by any applicable charges;

(g) the financial derivative instruments which are not listed on any official stock exchange or traded on any other organised market, operating regularly and recognised and open to the public, will be valued in accordance with market practice;

(h) Swaps will be valued at their fair value based on the underlying securities.

In the event that the above-mentioned calculation methods are inappropriate or misleading, the Board of Directors may adjust the value of any investment or permit some other method of valuation to be used for the assets of the Company if it considers that the circumstances justify that such adjustment or other method of valuation should be adopted to reflect more fairly the value of such investments.

2. The liabilities of the Company shall include:

- all loans, bills matured and accounts due;
- all known liabilities, whether matured or not, including all matured contractual obligations that involve payments in cash or in kind (including the amount of any unpaid dividends declared by the Company);
- all reserves, authorised or approved by the Board of Directors, in particular those formed for covering potential depreciation on some of the Company's investments;
- all other liabilities of the Company, of whatever kind and nature with the exception of those represented by the Company's own resources.

  To assess the amount of such other liabilities, the Company shall take into account all expenses payable by it, including, without limitation, remuneration and expenses of its Directors, employees or agents, fees payable to the Management Company if any, its service providers, the formation expenses and those for subsequent amendments to the Articles of Incorporation, fees and expenses payable to the investment advisers, managers, accountants, custodians and correspondents, domiciliation agents, paying agents or other agents and employees of the Company, as well as the permanent representatives of the Company in countries where it is subject to registration, the costs for legal assistance and for the auditing of the Company's annual reports, the costs for promoting, printing and publishing the sales documents for the shares, printing costs of annual and interim financial reports, the cost of convening and holding shareholders' and Board of Directors' meetings, reasonable travelling expenses of Directors and managers, Directors' fees, the costs of registration statements, all taxes and duties charged by governmental authorities and stock exchanges, the costs of publication of the issue and redemption prices as well as any other operating costs, including financial costs, bank charges and brokerage incurred at purchase or sale of assets or otherwise as well as any other administrative charges.

  For the valuation of the amount of such liabilities, the Company shall take into account administrative and other expenses of a regular or periodic nature on a *pro rata temporis* basis.

- Towards third parties, the Company represents one and the same legal entity. However, the assets of a specific Sub-Fund are liable only for debts, charges and obligations of such Sub-Fund. The assets, liabilities, charges and expenses, which are not attributable to a Sub-Fund shall be attributed to all the Sub-Funds, in equal proportions or as long as justified by the amounts concerned, to the *pro rata* of their respective net assets.

3. Each share of the Company to be redeemed is considered as an issued and existing share until the close of business on the Valuation Day applicable to the redemption of such share and its price shall be considered as a liability of the Company from the close of business on such day and this, until the relevant price is paid.

   Each share to be issued by the Company in accordance with subscription applications received, shall be considered as having been issued as from the close of business on the Valuation Day of its issue price and such price shall be considered as an amount to be received by the Company until the Company shall have received it.

4. Insofar as possible, each investment or disinvestment decided by the Company until the Valuation Day shall be taken into account by the Company. However, the bookkeeping of transactions will be done only in accordance with the procedures as set among the different parties concerned. A copy of such procedures may be consulted at the registered office of the Company as well as at the Company’s representative offices in the countries where the shares are distributed.

13. Suspension of the calculation of net asset value, issue, redemption and conversion of shares

The Board of Directors is authorised to suspend temporarily the calculation of the net asset value of the Company, and consequently the issuance, redemption and conversion of Shares under the following circumstances:

(a) during any period when any of the principal stock exchanges, Regulated Market or any Other Regulated Market in a Member State or in a non-Member State on which a substantial part of the Company's investments attributable to such Sub-Fund is quoted, or when one or more foreign exchange markets in the currency in which a substantial portion of the assets of the Sub-Fund is denominated, are closed otherwise than for ordinary holidays or during which dealings are substantially restricted or suspended; or

(b) when political, economic, military, monetary or other emergency events beyond the control, liability and influence of the Company make the disposal of the assets of any Sub-Fund impossible under normal conditions or such disposal would be detrimental to the interests of the Shareholders of the Company; or

(c) during any breakdown in the means of communication network normally employed in determining the price or value of any of the relevant Sub-Fund's investments or the current price or value on any market or stock exchange in respect of the assets attributable to such Sub-Fund; or

(d) during any period where the Company is unable to repatriate funds for the purpose of making payments on the redemption of Shares of such Sub-Fund or during which any transfer of funds involved in the realization or acquisition of investments or payments due on redemption of Shares cannot, in the opinion of the Board of Directors, be effected at normal rates of exchange; or

(e) during any period when for any other reason the prices of any investments owned by the Company, including in particular the financial derivative instruments and repurchase transactions entered into by the Company in respect of any Sub-Fund, cannot promptly or accurately be ascertained; or

(f) following a decision to merge, liquidate or dissolve the Company or, if applicable, one or several Sub-Fund(s); or

(g) following the suspension of (i) the calculation of the net asset value per share/unit, (ii) the issue, (iii) the redemption and/or (iv) the conversion of the shares/units issued at the level of a master in which the Sub-Fund invests in its quality as feeder within the meaning of the 2010 Law; or

(h) during any period when the Board of Directors so decides, provided all Shareholders are treated on an equal footing and all relevant laws and regulations are applied as soon as an extraordinary general meeting of Shareholders of the Company or of a Sub-Fund has been convened for the purpose of deciding on the liquidation or dissolution of the Company or a Sub-Fund; or

(i) during a period where the relevant indices underlying the derivative instruments which may be entered into by the Sub-Funds of the Company are not compiled or published; or

(j) upon the order of the Luxembourg supervisory authority; or

(k) in any case, at the Board of Directors' discretion when it is in the best interest of the Shareholders.

Shareholders offering shares for redemption, subscription, or conversion shall be notified of the suspension of the net asset value calculation by the Transfer and Registrar Agent of the Company.

The suspension of the calculation of the Net Asset Value and of the issue, redemption, and Conversion of Shares will be published on the Management Company's website, and as the case may be on the Company's website, as appropriate.

Pending applications for subscription, conversion and redemption may be withdrawn in writing insofar as notification thereon be received by the Company before the end of suspension.

Applications for subscriptions and redemptions which are suspended by written request may be withdrawn before the end of the suspension period, provided that such request is received by the Company or by any other appointed entity acting on behalf of the Company. Subscriptions and redemptions which are suspended shall be taken into consideration on the first Valuation Day immediately following the end of the suspension period.

14. Issue of shares, subscription and payment procedure

The Board of Directors is authorised to issue shares at any time and without limitation. It may also authorise that subscriptions within the Sub-Funds are done by a contribution in kind. In the latter case, this contribution will be the subject of a report established beforehand by an independent auditor. The relevant fees will be paid by the subscriber.

Investors can subscribe Shares in a Sub-Fund directly from the Company. Investors may also purchase Shares in a Sub-Fund by using the nominee services (the "**Nominee**") offered by the Distributors or by the Local Paying Agents. A Distributor or a Local Paying Agent then subscribes and holds the Shares as a nominee in its own name but for the account of the investor. The Distributor or Local Paying Agent then confirms the subscription of the Shares to the investor by means of a letter of confirmation. Distributors and Local Paying Agents that offer nominee services are either seated in countries that have ratified the resolutions adopted by the FATF or *Groupe d'action financière internationale* ("**GAFI**") or execute transactions through a correspondent bank seated in a FATF country. Investors who use a nominee service may issue instructions to the nominee regarding the exercise of votes conferred by their Shares as well as request direct ownership by submitting an appropriate request in writing to the relevant Distributor or Local Paying Agent offering the Nominee-Service.

On the basis of this mandate, the Nominee is specifically required to:
- send requests for subscription, conversion, and redemption, grouped by share category, share class, sub-fund and distributor to the Company;
- be listed on the Company's register in its name "on behalf of a third party"; and
- exercise the investor's voting right (if any), according to the investor's instructions.

The Nominee must make every effort to keep an up-to-date electronic list of investors' names and addresses and the number of shares held; the status of shareholder can be verified via the confirmation letter sent to the investor by the Nominee.
Investors are informed that they may be required to pay additional fees for the activity of the above Nominee.
For further details, investors are invited to read the subscription documents available from their usual distributor.

Shareholders who have invested in the Company through a Nominee can at any time request the transfer to their own name of the shares subscribed via the Nominee. In this case, the shareholders will be recorded in the register of shareholders in their own name as soon as the transfer instruction is received from the Nominee.

The Company draws the investors' attention to the fact that any investor will only be able to fully exercise his investor rights directly against the Company, notably the right to participate in general shareholders' meetings, if the investor is registered himself

and in his own name in the shareholders' register of the Company. In cases where an investor invests in the Company through an intermediary investing into the Company in his own name but on behalf of the investor, it may not always be possible for the investor to exercise certain shareholder rights directly against the Company. Investors are advised to take advice on their rights.

Investors may subscribe to the Transfer and Registrar Agent of the Company directly without necessarily subscribing via a Distributor / Nominee.

For the Italian market, only the Local Paying Agent may group the subscription, conversion and redemptions requests, and forward such requests to the Company on a cumulative basis, in the name of the Local Paying Agent and on behalf of the investors. In this case, the Shares will be registered in the Company Shareholder register in the name of the Local Paying Agent, with the diction "on behalf of third party" or the equivalent. In the Application Form, the investors will grant to the Local Paying Agent the relevant mandate.

Any Investor shall self-certify its FATCA status to the Company (or its delegates) via the forms prescribed by the FATCA regulations in force in the relevant jurisdiction (e.g. through the W8, W9 or equivalent filling forms) to be renewed regularly or provide the Company (or its delegates) with their GIIN numbers if the Investors are FFIs. The Investors shall inform the Company (or its delegates) of a change of circumstances in their FATCA status immediately in writing in order to ensure correct reporting.

It is the responsibility of the Nominee to identify its clients for FATCA purposes.

The Investors/Distributors that either have not properly documented their FATCA status as requested or have refused to disclose such a FATCA status within tax legally prescribed timeframe may be classified as "recalcitrant" and be subject to a reporting towards tax or governmental authorities and may suffer potential withholding tax.

If you have any doubt on the possible implications of FATCA on the Company or yourself, you should seek independent professional advice. You are strongly recommended to seek independent advice from your own qualified U.S. tax advisor if you have queries related to FATCA or if you wish to know more about FATCA and its effect on you.

The Company has delegated to the Management Company the administration and marketing services in respect of all the Sub-Funds. Pursuant to such delegation, the Management Company or its delegates will monitor the prevention of anti-money laundering measures. Measures aimed at the prevention of money laundering may require an applicant for shares to certify its identity to the Management Company or its delegates. Depending on the circumstances of each application, verification may not be required where the applicant makes the payment from an account held in the applicant's name at a recognised financial institution, or the application is made through a recognised intermediary. These exceptions will only apply if the financial institution or intermediary referred to above is established within a country recognised by Luxembourg as having equivalent anti-money laundering regulations. Thus, for the subscription to be valid and acceptable by the Company, shareholders shall attach, at least, the following documents to the application forms, as well as any additional documents as requested from time to time by the Administrative, Registrar and Transfer Agent in compliance with the applicable laws and regulation in Luxembourg:

- if the investor is a *physical person*, a copy of one of his/her identification documents *(passport or ID card)*,
  or
- if the investor is a *legal entity*, a copy of its corporate documents *(such as the articles, published balances, excerpt of the Trade Register, …)* and the copies of the identification documents of its economic eligible parties *(passport or ID card).*

These documents shall be certified true copies of the originals.

This requirement is mandatory, except if:

- the application form is sent through another professional of the financial sector established in a State member of the FATF and that this professional has already ascertained the identity of the applicant in a manner equivalent to that required by Luxembourg law, and
- a delegation contract of the identification obligations has been signed between such professional and the Administrative, Registrar and Transfer Agent.

Applications for subscriptions must be sent in writing, by, fax or electronic means (swift) to the UCI Administrator or with any other appointed agent (if sent by fax or by electronic means to be followed promptly by the original by post).
Applications for subscription may, at the subscriber's choice, pertain to a number of shares to be subscribed or to an amount to be invested in the Company. In this latter case, fractional shares may be issued, to one thousandth of a Share.

Shares shall be allotted at the net asset value per share as of the Valuation Day. The transactions will be confirmed to the Shareholders on the day the NAV is available with reference to the applicable Valuation Day. A subscription fee expressed as a percentage of the net asset value of the shares may be charged to the investors by the appointed entities acting in relation to the distribution/placing/marketing of the Shares as described in *Appendix II - Sub-Funds Details* to this Prospectus.

Shareholders are informed that their personal data or information given in the subscription documents or otherwise in connection with an application to subscribe for shares, as well as details of their shareholding, will be stored in digital form and processed in compliance with the provisions of the Data Protection Law. In particular, such process of personal data or information implies that subscribing the Company, shareholders consent that their personal data or any information relating to them be disclosed (i) to any entity of the promoter's group and any affiliate, (ii) to the Administrative, registrar and Transfer Agent or (iii) to any authority in any country when required by law or regulation.

Unless otherwise disclosed in *Appendix II - Sub-Funds Details* to this prospectus for a Sub-Fund, applications for subscription received by the Transfer and Registrar Agent at the latest at 12:00 noon (Luxembourg time) on the applicable Valuation Day shall be carried out, if accepted, on the basis of the net asset value as dated as of this Valuation Day. Applications notified after this deadline shall be executed on the following Valuation Day. The subscription price of each share is payable within 3 (three) Luxembourg Bank Business Days following the applicable Valuation Day.

The Company reserves the right to:
- refuse all or part of a application for subscription of shares;
- repurchase, at any time, shares held by persons not authorised to buy or own the Company's shares.

The Directors reserve the right to reject any application for subscription or conversion of shares from investors whom they consider to be excessive traders. The Company may further compulsorily redeem shares held by an investor who is suspected to be or to have been engaged in excessive trading. The repeated purchase and sale of shares designed to take advantage of pricing inefficiencies in the Company – also known as "**Market Timing**"- may disrupt portfolio investment strategies and increase the Company's expenses and adversely affect the interests of the Company's long-term shareholders. To deter such practice, the Board of Directors reserve the right, in case of reasonable doubt and whenever an investment is suspected to be related to Market Timing, which the Board of Directors shall be free to appreciate, to suspend, revoke or cancel any subscription or conversion order placed by investors who have been identified as doing frequent in and out trades within the Company.

The Board of Directors, as safeguard of the fair treatment of all investors, takes necessary measures to ensure that (i) the exposure of the Company to Market Timing activities is adequately assessed on an ongoing basis, and (ii) sufficient procedures and controls are implemented to minimize the risks of Market Timing in the Company.

Saving Plans

The shares of the Company may be locally offered for subscription via regular savings plans, redemption and conversion programs, specific to this local supply, and may be subject to additional charges.
In the event that a regular savings plan is terminated prior to the agreed final date, the sum of entry fees payable by the shareholders concerned may be greater than would have been the case for standard subscriptions.

To have further information on savings plan the investor can consult the documents in force in the different countries where the shares are distributed.

15. Conversion of shares

If specifically foreseen in *Appendix II - Sub-Funds Details,* any shareholder may request the conversion of all or part of his shares of one Sub-Fund into shares of another Sub-Fund at a price equal to the respective net values of the shares of the different Sub-Funds. A conversion fee may be charged for the benefit of the various financial intermediaries concerned as disclosed in *Appendix II - Sub-Funds Details*.

When distribution and capitalisation shares are issued within the Sub-Funds, holders of distribution shares may request the conversion of their shares into capitalisation shares and vice-versa at a price equal to the respective net values calculated on the applicable Valuation Day. Conversions between Classes of Shares of the same Sub-Fund are also allowed and are done free of charge, unless otherwise disclosed in *Appendix II - Sub-Funds Details*. However, a conversion towards a Sub-Fund or a class of shares reserved to institutional investors can only be required by investors qualified as such.

A shareholder who wishes a conversion of shares shall make a request in writing, by by fax or electronic means (swift) to the Registrar and Transfer Agent of the Company indicating the number and the reference name of the shares to be converted.

The conversion shall be made within three Luxembourg Bank Business Days after the applicable Valuation Day.

Except in the case of a suspension of the calculation of the net assets, and unless otherwise specified for a Sub-Fund in *Appendix II - Sub-Funds Details* to this Prospectus, the conversion shall be carried out on the applicable Valuation day, provided that (i) the request is notified to the Company in Luxembourg at the latest at 12:00 noon (Luxembourg time) and (ii) the applicable Valuation day is a common Valuation day for the respective Sub-Funds and that the possibilities to acquire shares of a class towards another class are met.

The number of shares allocated in the new Sub-Fund or Class shall be established as follows :

$$A = \frac{(B \times C \times D) - f}{E}$$

Where:
A number of shares allotted in the new Sub-Fund/class;
B number of shares presented for conversion in the original Sub-Fund/class;
C net asset value, on the applicable Valuation Day, of the shares of the original Sub-Fund/class, presented for conversion;
D exchange rate applicable on the day of the operation between the currencies of both Classes of Shares;
E net asset value on the applicable Valuation Day of the shares allotted in the new Sub-Fund/class;
f represents the fee in favour of the financial intermediaries.

After the conversion, the Company shall inform the shareholders of the number of new shares obtained at conversion as well as their price.

16. Redemption of shares

Any shareholder is entitled, at any time and without limitation to have his shares redeemed by the Company. Shares redeemed by the Company shall be cancelled.

Redemption procedure

Applications for redemption must be sent in writing, by fax or electronic means (swift) to the Administrative, Registrar and Transfer Agent or with any other appointed agent (if sent by fax to be followed promptly by the original by post). The application must indicate the number of shares or the amount to be redeemed as well as all useful references for the settlement of the redemption.

The application must be accompanied by the certificates carrying the name of the registered owner as well as any document vouching for the transfer of the certificates.

Unless otherwise specified for a Sub-Fund in *Appendix II - Sub-Funds Details* to this prospectus, all the shares presented for redemption, accompanied by the share certificates, must be received by the Registrar and Transfer Agent of the Company at the latest at 12:00 noon (Luxembourg time) on the applicable Valuation Day.

Shares shall be repurchased at the net asset value of the Company as determined on the applicable Valuation Day. Applications notified after this deadline shall be dealt with on the next following Valuation Day. A redemption fee of as disclosed in the *Appendix II - Sub-Funds Details* may be charged for the benefit of the various financial intermediaries concerned.

The payment for shares redeemed shall be made within 3 (three) Luxembourg Bank Business Days following the applicable Valuation Day, unless otherwise specified for a Sub-Fund in *Appendix II - Sub-Funds Details*, provided the Company has received all the documents pertaining to the redemption. The redemption amount for each Share Class will be reimbursed in principle on a *pro rata* basis, in the subscription currency, less, where necessary, the applicable redemption fees.
At the shareholder's request, the payment may be made in a currency other than the subscription currency of the redeemed shares, in which case the exchange costs will be borne by the shareholder and charged against the redemption price.
The Company reserves the right to postpone redemption requests if the order is incomplete. The Company cannot be held responsible for the delayed processing of incomplete orders.

Redemptions in kind are possible upon specific approval of the Board of Directors, provided that the remaining Shareholders are not prejudiced and that a valuation report is produced by the Company's Auditor. The type and kind of assets that may be transferred in such cases will be determined by the Investment Manager, taking into account the investment policy and restrictions of the sub-fund in question. The costs of such transfers will be borne by the applicant.

Where redemption request(s) received for one Sub-Fund on any Valuation Day exceed 10% of the net assets thereof, or if it is in the best interests of the Company, a Sub-Fund or a Class, the Board of Directors may decide to:

(i) Either totally or partially defer such redemption request until the next Valuation Day. On the next Valuation Day, or Valuation Days until completion of the redemption requests received in excess of the 10% of the net assets, deferred redemption requests will be dealt in priority to any redemption requests received later on, as the case may be; or
(ii) Delay the date of the payment of such redemption request until the closest next Luxembourg Bank Business Day on which liquidity has been made available.

The Board of Directors will ensure the consistent treatment of all Shareholders who have sought to redeem Shares as of any Valuation Day at which redemptions are deferred.

The redemption price of shares may be higher or lower than the price paid at the time of subscription (or conversion), depending on whether the net asset value has appreciated or depreciated in the interval.

17. Transfer of Shares

A Shareholder may transfer Shares to one or more other persons, provided that all Shares have been paid in full and each transferee is qualified as eligible investor for the relevant share class.

In order to transfer Shares, the Shareholder must notify the Registrar and Transfer Agent of the number of Shares transferred. The Registrar and Transfer Agent only will recognize a transfer with a future date. In addition, each transferee must complete an application form, and approve explicitly such transfer. Once the Registrar and Transfer Agent will have received all required information from each transferee, it will proceed to the transfer on the next Valuation Day.

The Shareholder should send its notice and each completed application form to:

CACEIS Bank, Luxembourg Branch
5, Allée Scheffer, L-2520 Luxembourg

The Registrar and Transfer Agent may request a transferee to provide additional information to substantiate any representation made by the transferee in its application. Any application that has not been completed to the satisfaction of the Registrar and Transfer Agent will be rejected.

The Registrar and Transfer Agent will not effectuate any transfer until it is satisfied with the form of notice, has accepted each transferee's subscription application and has determined the AML/KYC's profile of the transferee is compliant with applicable laws and regulations.

Any Shareholder transferring Shares and each transferee, jointly and severally, agree to hold the relevant Sub-Fund and each of its agents harmless with respect to any loss suffered by one or more of them in connection with a transfer.

18. Tax considerations

1. Taxation of the Company

In accordance with the law in force and current practice, the Company is not liable to any Luxembourg tax on income and capital gains. Likewise, dividends paid by the Company are not subject to any Luxembourg withholding tax. The Company is subject to an annual tax in Luxembourg corresponding to 0.05% of the value of the net assets. This tax is payable quarterly on the basis of the Company's net assets calculated at the end of the relevant quarter. The rate of this tax may be reduced to 0.01% of the value of the net assets for Sub-Funds, Classes of Shares reserved to Institutional Investors. To the extent that the assets of the Company are invested in investment funds established in Luxembourg, no such tax is payable.

Certain income of the Company's portfolio, consisting of dividends and interests, may be subject to payment of withholding tax at various rates in its country of origin.

2. Taxation of the Shareholders

Under Council Directive 2003/48/EC on the taxation of savings income (the Savings Directive), EU Member States are required to provide the tax authorities of other EU Member States with details of certain payments of interest or similar income paid or secured by a paying agent (within the meaning of the Savings Directive) established in a EU Member State to or for the benefit of an individual resident in another EU Member State or certain limited types of entities established in another EU Member State.

For a transitional period, Austria is required (unless during that period it elects otherwise) to operate a withholding system in relation to such payments. The end of the transitional period is

dependent upon the conclusion of certain other agreements relating to information exchange with certain other countries. A number of non-EU countries and territories including Switzerland have adopted similar measures (a withholding system in the case of Switzerland).

On 10 November 2015, the Council of the European Union approved Council Directive 2015/2060/EU (published in the Official Journal of the EU on 18 November 2015) repealing the Savings Directive from 1 January 2017 in the case of Austria and from 1 January 2016 in the case of all other EU Member States (subject to on-going requirements to fulfil administrative obligations such as the reporting and exchange of information relating to, and accounting for withholding taxes on, payments made before those dates). This is to prevent overlap between the Savings Directive and a new automatic exchange of information regime (CRS) to be implemented under Council Directive 2011/16/EU on Administrative Cooperation in the field of Taxation (as amended by Council Directive 2014/107/EU).

If a payment were to be made in or collected through a EU Member State which has opted for a withholding system and an amount of, or in respect of, tax were to be withheld from that payment, neither the relevant issuer, the guarantor, the principal paying agent, nor any of the paying agents (as defined in the Conditions of the Notes), nor any other person would be obliged to pay additional amounts with respect to any note as a result of the imposition of such withholding tax. The relevant issuer is required to maintain a paying agent in an EU Member State that is not obliged to withhold or deduct tax pursuant to the Savings Directive.

Where the provisions of the European Savings Directive continue to apply (e.g. for certain non-EU-countries and dependent or associated territories, until the automatic exchange of financial account information in line with CRS is applicable for those countries and territories) , dividends distributed by a Company will be subject to the European Savings Directive if more than 15% of such Company's assets are invested in debt claims and proceeds realised by investors on the transfer or sale of Shares in a Company will be subject to the European Savings Directive if more than 25% of such Company's assets are invested in debt claims.

3. FATCA

a) General Rules and Legal background

FATCA is part of the U.S. Hiring Incentives to Restore Employment Act. It is designed to prevent U.S. taxpayers from avoiding U.S. tax on their income by investing through foreign financial institutions and offshore funds.

FATCA applies to so-called Foreign Financial Institutions ("**FFIs**"), which notably include certain investment vehicles ("Investment Entities"), among which UCITS.

According to the FATCA Rules, FFIs, unless they can rely under ad-hoc lighter or exempted regimes, need to report to the IRS certain holdings by/ and payments made to a/ certain U.S. investors b/ certain U.S. controlled foreign entity investor, c/ non-U.S. financial institution investors that do not comply with their obligations under FATCA and d/ clients that are not able to document clearly their FATCA status. Investors not properly documented or not complying with their FATCA obligations may also suffer a 30% withholding tax on so called "witholdable payments".

On 28 March 2014, the Luxembourg and U.S. governments entered into a Model I IGA which aims to coordinate and facilitate the reporting obligations under FATCA with other U.S. reporting obligations of Luxembourg financial institutions (the "**Luxembourg IGA**" or the "**IGA**").

According to the terms of the IGA, Reporting Luxembourg FFIs will have to report to the Luxembourg tax authorities instead of directly to the IRS. Information will be communicated onward by the Luxembourg authorities to the IRS under the general information exchange provisions of the U.S. Luxembourg income tax treaty.

The Luxembourg law of 24 July 2015 transposing the Luxembourg-US IGA was promulgated and published on 29 July 2015.

b) Other parties

Additional intergovernmental agreements similar to the IGA have been entered into or are under discussion by other jurisdictions with the U.S. Investors holding investments via distributors or custodians that are not in Luxembourg or in another IGA country should check with such distributors or custodians as to the distributor's or custodian's intention to comply with FATCA. Additional information may be required by the Company, custodians or distributors from certain investors in order to comply with their obligations under FATCA or under an applicable IGA.

The foregoing is only a summary of the implications of FATCA, is based on the current interpretation thereof and does not purport to be complete in all respects.

Shareholders and prospective investors should contact their own tax adviser regarding the application of FATCA to their particular circumstances.

c) FATCA Status

The Company has elected for the FATCA status of "Reporting FI" under the Luxembourg IGA and has obtained the following GIIN number: WLKCME.99999.SL.442.

As part of its reporting obligations, the Company (or its delegates, including in particular, the Administrative, Registrar and Transfer Agent) may be required to disclose certain confidential information (including, but not limited to, the investor's name, address, tax identification number, if any, and certain information relating to the investor's investment in the Company self-certification, GIIN number or other documentation) that they have received from (or concerning) their investors and automatically exchange information with the Luxembourg taxing authorities or other authorized authorities as necessary to comply with FATCA, related IGA or other applicable law or regulation.

The Company will continually assess the extent of the requirements that FATCA and notably the Luxembourg IGA places upon it.

4. *Common Reporting Standard considerations*

The OECD developed a common reporting standard (**CRS**) to achieve a comprehensive and multilateral automatic exchange of information (**AEOI**) in the future on a global basis. The CRS will require Luxembourg financial institutions to identify financial assets holders and establish if they are fiscally resident in countries with which Luxembourg has a tax information sharing agreement. Luxembourg financial institutions will then report financial account information of the assets holder to the Luxembourg tax authorities, which will thereafter automatically transfer this information to the competent foreign tax authorities on a yearly basis. Shareholders may therefore be reported to the Luxembourg and other relevant tax authorities under the applicable rules.
On this basis, a Council Directive 2014/107/EU amending Directive 2011/16/EU as regards mandatory automatic exchange of information in the field of taxation (the **Euro-CRS Directive**) has been adopted on 9 December 2014 in order to implement the CRS among the EU Member States. Under the Euro-CRS Directive, the first AEOI must be applied by 30 September 2017 within the limit of the EU Member States for the data relating to calendar year 2016.

In addition, Luxembourg tax authorities signed the OECD's multilateral competent authority agreement (**Multilateral Agreement**) to automatically exchange information under the CRS. In that respect, the Luxembourg law of 18 December 2015 relating to the automatic exchange of information in tax matters (the 2015 Tax Law) has been published in the Official Journal on 24 December 2015. The 2015 Tax Law transposes Euro-CRS Directive and entered into force on 1 January 2016.

Under the 2015 Tax Law, the first exchange of information is expected to be applied by 30 September 2017 for information related to the year 2016. Accordingly, the Company may be required to run additional due diligence process on its Shareholders and to report the identity

and residence of financial account holders (including certain entities and their controlling persons), account details, reporting entity, account balance/value and income/sale or redemption proceeds to the local tax authorities of the country of residency of the foreign investors to the extent that they are resident of another EU Member State or of a country for which the Multilateral Agreement is in full force and applicable.

Shareholders should consult their professional advisors on the possible tax and other consequences with respect to the implementation of the CRS.

The Company has elected for the status of "*Reporting Financial Institution*" for CRS purposes.

As part of its reporting obligations, the Company and/or the Management Company (or its delegates, including in particular, the Administrative, Registrar and Transfer Agent) may be required to disclose certain confidential information (including, but not limited to, the Shareholder's name, address, tax identification number, if any, and certain information relating to the Shareholder's investment in the Company self-certification or other documentation) that they have received from (or concerning) their investors and automatically exchange information with the Luxembourg taxing authorities or other authorized authorities as necessary to comply with CRS or other applicable law or regulation.

19. Distribution policy

The Board of Directors has decided that shares in all Sub-Funds and Share Classes shall be issued as Capitalisation or Distribution shares, which shall have the following characteristics:

Distribution shares
The Distribution shares will have that portion of the Sub-Fund's net investment income, which is attributable to such shares, distributed by way of a dividend.
Distribution shares may pay dividend to shareholders on an annual, monthly or quarterly basis. The general meeting of shareholders holding Distribution shares for each Sub-Fund concerned decides each year on the Board of Directors' proposal to pay a dividend, which is calculated in accordance with the limitations defined by law and the Articles of Association. In this respect, the general meeting reserves the right to distribute the net assets of each of the Company's Sub-Funds up to the limit of the legal minimum capital. The nature of the distribution (net investment income or capital) will be mentioned in the Company's Financial Statements. If, given market conditions, it is in the shareholders' interest not to distribute a dividend, then no such distribution will be carried out. If it deems it advisable, the Board of Directors may decide to distribute interim dividends. The Board of Directors determines the payment methods for the dividends and interim dividends that have been decided upon. Dividends will, in principle, be paid in the Denomination Currency of the class (exchange costs incurred for payments in different currencies will be borne by the investor). Declared dividends and interim dividends not collected by shareholders within a period of five years from the payment date will lapse and revert to the sub-fund concerned. Interest will not be paid on declared and unclaimed dividends or interim dividends, which will be held by the Company on behalf of the shareholders of the sub-fund for the duration of the legal limitation period.

Capitalisation shares
The Capitalisation shares will have that portion of the Sub-Fund's net investment income, which is attributable to such shares, retained within the Sub-Fund thereby accumulating value in the price of the Capitalisation shares.

The general meeting of holders of distribution shares in the Sub-Funds shall decide upon the proposals made by the Board of Directors on this matter. Should the Board of Directors decide to propose the payment of a dividend to the general meeting, such dividend shall be calculated in accordance with the legal and statutory limits for this purpose.

As far as distribution shares are concerned, the Board will propose the distribution of a dividend within the limits of their available assets. This dividend may include, beside the net investment income, the realised and unrealised capital gains after deduction of realised and unrealised

capital losses. The Board of Directors may also decide the payment of an interim dividend of the previous or the current year in accordance with the legal provisions applicable.

Registered shareholders are paid by bank transfer sent to the address indicated in the shareholders' register according to their instructions.

Each shareholder is offered the possibility to reinvest his dividend free of charge up to the available share unit. Dividends not claimed within five years after their payment shall no longer be payable to the beneficiaries and shall revert to the Company.

All dividend payment notices may be published in a newspaper as required by law or if deemed appropriate by the Board of Directors.

With regard to the capitalisation shares, the income will be reinvested.

20. Fees and Expenses

The Management Company shall receive a Management Company Fee, a Management Fee and a Performance Fee, as the case may be, for each Sub-Fund as further described in the *Appendix II - Sub-Funds Details* to this prospectus.

The Management Company Fee per annum is calculated on the net assets of the Sub-Fund for the provision of the Management Company services. The Management Company will also remunerate the distributors, any other financial intermediaries involved in the distribution, placement and marketing of the Shares and, as the case may be, the Investment Manager(s) and the Investment Advisor(s) out of the Management Fee, unless otherwise described in the *Appendix II - Sub-Funds Details* of the Prospectus.

The Management Company may invoice the Company for middle office fees and pre matching fees, as well as for marketing expenses and website development, legal and distribution support or other services requested by the Company.

The Depositary will receive a remuneration from the Company as further described in the *Appendix II - Sub-Funds Details* of the Prospectus. Such fees do not include brokerage fees, settlement fees and sub-custody fees, commissions charged by banks, brokers and prime brokers and other customary fees arising from transactions relating to securities and investment instruments in the Company portfolio. The amounts effectively paid will be disclosed in the Company’s financial reports.

The UCI Administrator will receive a remuneration from the Company as further described in the *Appendix II - Sub-Funds Details* of the Prospectus

The Company bears its administrative and operational costs including but not limited to the rental cost of its office, the cost of buying and selling portfolio securities, settlement fees, governmental fees, taxes, fees and out-of-pocket expenses of its Directors, including their insurance cover, legal and auditing fees, publishing and printing expenses, marketing expenses and website development and up-dating, the cost of preparing the explanatory memoranda, financial reports and other documents for the Shareholders, postage, telephone and telex. The Company also pays advertising expenses, the costs of the preparation of this Prospectus, any other registration fees, all expenses connected to the authorisation of the Company, regulatory compliance obligations and reporting requirements of the Company (such as administrative fees, filing fees, insurance costs and other types of fees and expenses incurred by the implementation and compliance with regulatory requirements). All expenses are taken into account in the determination of the net asset value of the shares of each Sub-Fund.

All recurring expenses will be charged first to the Company’s income, then to realised capital gains, then to the Company’s assets.

Fees and expenses set forth under this section shall be deemed to exclude VAT. Where applicable, VAT may additionally be charged.

The organisation expenses of the Company shall be amortised over the first 5 (five) accounting years. These expenses will be divided in equal parts between the Sub-Funds in existence at the time of incorporation of the Company, six months after the end of the initial offering period. In case where further Sub-Funds are created in the future, these Sub-Funds will bear their own formation expenses which may also be amortised over 5 (five) accounting years.

During an initial period of one year following the creation of a new Sub-Fund or until the total net assets of such new Sub-Fund exceed Euro 10 million, the Management Company may, at its own discretion, resolve to pay entirely or partly any fees payable by such Sub-Fund.

SGSS S.p.A., with its head office in Milan, Via Benigno Crespi 19A – MAC2, has been appointed as local paying agent for the Company in Italy (the "**Italian Paying Agent**"). For its services in Italy, the Italian Paying Agent will receive from the Company a maximum remuneration of 0.07% per annum on the assets of the Company registered in the books of the Italian Paying Agent. This remuneration excludes costs that may be charged for the communications to be sent to investors as requested by the Company or as required by applicable laws and/or by this Prospectus.

In the case where any asset, liability, fees and expenses of the Company cannot be considered as being attributable to a particular Share Class, such asset or liability shall be allocated to all the Share Classes pro rata to the Net Asset Value per Share of the relevant Share Classes or in such other manner as determined by the Board of Directors acting in good faith. Each Sub-Fund shall only be responsible for the liabilities which are attributable to such Sub-Fund.

21. General meetings of shareholders

The annual general meeting of shareholders is held each year at the Company's registered office or at any other place in Luxembourg specified in the convening notice.

The annual general meeting of shareholders shall be held within four months following the financial year end, in accordance with any applicable Luxembourg Law.

Convening notices for all, ordinary and extraordinary, general meetings shall be sent by registered letters to all shareholders to their address indicated in the shareholders' register, at least eight days before the general meeting.

These notices shall indicate the time and place of the general meeting, the conditions for admission, the agenda and the prescriptions of Luxembourg law regarding quorum and majority.

Such notices may be published in the *Recueil Electronique des Sociétés et Associations* and/or any newspaper(s) as deemed necessary by the Board or required by any applicable laws and regulations of the countries where the Shares of the Company are registered for sale.

Each Share confers the right to one vote. Any change in the Articles of Incorporation affecting the rights of a Sub-Fund must be approved by a resolution of both the general meeting of the Company and the Shareholders of the Sub-Fund concerned.

22. Liquidation of the Company

The liquidation of the Company shall take place in accordance with the provisions of the 2010 Law.

If the capital of the Company is lower than two thirds of the minimum capital, the Directors are required to submit the question of liquidation of the Company to the general meeting for which

no quorum shall be prescribed and which shall decide by a simple majority of the shares represented at the meeting.

If the capital of the Company is lower than one fourth of the minimum capital, the directors are required to submit the question of liquidation of the Company to the general meeting for which no quorum shall be prescribed; dissolution may be resolved by shareholders holding one fourth of the shares at the meeting.

The meeting must be convened so that it is held within forty days as from the ascertainment that the net assets have fallen below two thirds or one fourth of the minimum capital. In addition, the Company may be dissolved by a decision taken by the general meeting deliberating in accordance with the statutory provisions in this matter.

Issues of new shares as well as redemptions of shares are suspended as soon as the decision to liquidate the Company is taken.

The decisions of the general meeting pronouncing the dissolution or the liquidation of the Company shall be published in the *Recueil Electronique des Sociétés et Associations* and, as may be required by the applicable law and regulation or deemed necessary by the Board of Directors, in two newspapers with adequate circulation, including at least one Luxembourg newspaper. These publications shall be made at the request of the liquidator(s).

In the event the dissolution and liquidation of the Company would follow a Court order (*liquidation judiciaire*), such decisions of the Court shall be published in the *Recueil Electronique des Sociétés et Associations* and in any case in two newspapers with adequate circulation, including at least one Luxembourg newspaper.

In case of dissolution of the Company, liquidation shall be carried out by one or several liquidators appointed in accordance with the Company's Articles of Incorporation and the 2010 Law.

The net proceeds of the liquidation shall be distributed to shareholders in proportion to the number of shares held. Any amounts unclaimed by shareholders at the close of liquidation shall be deposited with the Caisse de Consignation in Luxembourg. Failing their being claimed before expiry of the prescription period (30 years), these amounts can no longer be claimed.

23. Merger of the Company

1. The Board of Directors may decide to proceed with a merger of the Company, either as receiving or absorbed UCITS, with:

- another new or existing Luxembourg or foreign UCITS; or
- a Sub-Fund thereof.

In case the Company is the receiving UCITS (within the meaning of the 2010 Law), solely the Board of Directors will decide on the merger and effective date thereof.

In case the Company is the absorbed UCITS (within the meaning of the 2010 Law), and hence ceases to exist, the general meeting of the Shareholders of the Company has to approve and decide on the effective date of such merger by a resolution adopted with no quorum requirement and at a simple majority of the votes validly cast at such meeting. As a consequence of the Merger, the Shares of the Company will be redesignated as shares of the receiving UCITS, or of the relevant sub-fund thereof as applicable.

2. The general meeting of the Shareholders may decide to proceed with a merger of the Company, either as receiving or absorbed UCITS, with:

- another new or existing Luxembourg or foreign UCITS; or
- a Sub-Fund thereof.

The merger decision shall be adopted by the general meeting of Shareholders with a presence quorum requirement of at least 50% of the Shares in issue; and a majority requirement of at least two thirds of the Shares present or represented and voting at such meeting.

Such a merger shall be subject to the conditions and procedures imposed by the 2010 Law, in particular concerning the merger project and the information to be provided to the Shareholders.

Shareholders will be entitled to request, without any charge other than those retained by the Company to meet disinvestment costs, the repurchase or redemption of their Shares pursuant to the provisions of the 2010 Law.

Holders of Shares shall be notified in writing.

24. Liquidation and merger of Sub-Funds

Closure of Sub-Funds and/or Share Classes

1. In the event that for any reason the value of the net assets in any Sub-Fund or Class has decreased to an amount determined by the Board of Directors to be the minimum level for such Sub-Fund or Class to be operated in an economically efficient manner, or if a change in the economic, political or monetary situation relating to the Sub-Fund or Class concerned would have material adverse consequences on the investments of that Sub-Fund or if the Board of Directors otherwise considers it to be in the best interest of the Shareholders of the relevant Sub-Fund and/or Class, the Board of Directors may decide to compulsorily redeem all the Shares of the relevant Class or Share Classes issued in such Sub-Fund or the relevant Class at the Net Asset Value per Share (taking into account actual realisation prices of investments and realisation expenses), determined as of the Valuation Day at which such decision shall take effect and therefore close the relevant Sub-Fund or Class. The Company shall serve a notice to the Shareholders of the relevant Class or Share Classes prior to the effective date for the compulsory redemption, which will indicate the reasons for, and the procedure of, the redemption operations. Unless it is otherwise decided in the interests of, or to keep equal treatment between the Shareholders, the Shareholders of the Sub-Fund or Class concerned may continue to request redemption or conversion of their Shares free of charge (but taking into account actual realisation prices of investments and realisation expenses) prior to the effective date of the compulsory redemption.

2. Notwithstanding the powers conferred to the Board of Directors by the paragraph above, the general meeting of Shareholders of any Sub-Fund or Class within any Sub-Fund may, upon a proposal from the Board of Directors, redeem all the Shares of the relevant Class within the relevant Sub-Fund and refund to the Shareholders the Net Asset Value of their Shares (taking into account actual realisation prices of investments and realisation expenses) determined as of the Valuation Day at which such decision shall take effect. There shall be no quorum requirements for such general meeting of Shareholders which shall decide by resolution taken by simple majority of those present or represented and voting.

3. Assets which may not be distributed to the relevant beneficiaries upon the implementation of the redemption will be deposited with the Depositary for the period required by Luxembourg law; after such period, the assets will be deposited with the "*Caisse de Consignation*" on behalf of the persons entitled thereto.

4. All redeemed Shares shall be cancelled.

5. The liquidation of the last remaining Sub-Fund of the Company will result in the liquidation of the Company under the conditions of the 2010 Law.

Mergers of Sub-Funds and Amalgamation of Share Classes

1. The Board of Directors may decide to proceed with a merger of any Sub-Fund, either as receiving or absorbed Sub-Fund, with:

- another new or existing Luxembourg or foreign UCITS; or
- another new or existing Sub-Fund within the Company or within another Luxembourg or foreign UCITS,

In the case the last, or unique Sub-Fund involved in a merger is the absorbed UCITS (within the meaning of the 2010 Law) and, hence, ceases to exist upon completion of the merger, the general meeting of the Shareholders, rather than the Board of Directors, has to approve, and decide on the effective date of, such merger by a resolution adopted with no quorum requirement and at a simple majority of the votes validly cast at such meeting. As a consequence of the Merger, the Shares of the Sub-Fund will be redesignated as shares of the receiving UCITS, or of the relevant sub-fund thereof as applicable.

In addition, when the interest of the shareholders so requires, the Board of Directors may also decide on the closing of one or several Sub-Funds through contribution to one or several other Sub-Funds in the Company or to one or several sub-funds of another UCITS incorporated under Luxembourg law and subject to the provisions of Part I of the 2010 Law.

2. The general meeting of the Shareholders of a Sub-Fund may also decide to proceed with a merger of the relevant Sub-Fund, either as receiving or absorbed Sub-Fund, with:

- any new or existing Luxembourg or foreign UCITS; or
- any new or existing Sub-Fund within the Company or within another Luxembourg or foreign UCITS,

By a resolution adopted with a presence quorum requirement of at least 50% of the Shares in issue; and a majority requirement of at least two third of the Shares present or represented and voting at such meeting.

Such a merger shall be subject to the conditions and procedures imposed by the 2010 Law, in particular concerning the merger project and the information to be provided to the Shareholders.

Shareholders will be entitled to request, without any charge other than those retained by the Sub-Fund to meet disinvestment costs, the repurchase or redemption of their Shares or, where possible, the conversion of those Shares into Shares of other classes within the same Sub-Fund or into Shares of same or other classes within another Sub-Fund pursuant to the provisions of the 2010 Law.

Holders of Shares shall be notified in writing.

3. In the event that for any reason the value of the net assets in any Class of Shares has decreased below the minimum level under which the Sub-Fund may no longer operates in an economically efficient manner, or as a matter of economic rationalisation or for any reason determined by the Board of Directors, the Board of Directors may decide to allocate the assets of any Class to those of another existing Class within the Company and to redesignate the Shares of the Class or Classes concerned as Shares of another Class (following a split or consolidation, if necessary, and the payment of the amount corresponding to any fractional entitlement to Shareholders). The Company shall send a written notice to the Shareholders of the relevant Class as required by any applicable law. The decision of the Board of Directors will be subject to the right of the relevant Shareholders to request, without any charges, other than those retained by the Sub-Fund to meet disinvestment costs the repurchase or redemption of their Shares or, where possible, the conversion of those Shares into Shares of other Classes within the same Sub-Fund or into Shares of same or other Classes within another Sub-Fund.

Split of Sub-Funds

In the event that the Board of Directors believes it would be in the interests of the Shareholders of the relevant Sub-Fund or in the event of a change in the economic or political situation which would have material consequences on the relevant Sub-Fund, the Board of Directors may decide to reorganise a Sub-Fund by splitting it into two or more Sub-Funds. Such a decision will be notified and/or published as required by any applicable law.

25. Information of shareholders

1. Publication of the net asset value

The net asset value of the Sub-Funds and Classes will be published on the Luxembourg Bank Business Day following the applicable Valuation Day at the Company's registered office and in any other newspaper the Board of Directors deems appropriate.

2. Information notices and publications

Information notices may be published in those countries where the Company is marketed and to the extent required by local law and regulations, and concerning the Grand-Duchy of Luxembourg, they shall be sent to all of the Shareholders by regular mail and published in a Luxembourg newspaper as deemed necessary by the Board or to the extent required by Luxembourg law and regulations.

In addition, information on changes to the Company shall be published on the Management Company website: www.impactsgr.it and may be published in a Luxemburg newspaper, and in any other newspapers deemed appropriate by the Board of Directors, in countries in which the Company markets its shares.

3. Financial year and reports for shareholders

The financial year begins on 1 January and ends on 31 December. The first annual audited report was issued on 31 December 2019.

Every year, the Company publishes a detailed report on its activities and the management of its assets, including the balance sheet and consolidated profit and loss accounts and the report of the independent auditor.

Furthermore, at the end of each half-year, it shall establish a report including *inter alia*, the composition of the portfolio, the number of shares outstanding and the number of shares issued and redeemed since the last publication.

The Accounting Currency of the Company is the Euro ("EUR"). The aforesaid reports will comprise consolidated accounts of the Company expressed in EUR as well as individual information on each Sub-Fund expressed in the Reference Currency of each Sub-Fund.

4. Independent auditor

The audit of the Company's accounts and annual reports is entrusted to Deloitte Audit S.à r.l., with address 20 Boulevard de Kockelscheuer, L-1821 Luxembourg.

5. Documents available to the public

The prospectus, copy of the Articles of Incorporation, the last financial annual report as well as the last semi-annual report of the Company are kept free of charge at the disposal of the public at the Company's registered office. The agreements with the Company may also be consulted.

Equity Risk

While equities have historically been a leading choice of long-term investors, the fluctuations in their prices can sometimes be exacerbated in the short-term.

Because equity securities represent ownership in their issuers, prices of these securities can suffer for such reasons as poor management, shrinking product demand and other business risks.

Many factors can affect equity market performance: economic, political and business news can influence market-wide trends, over the short term as well as the long term.

Investment in warrants

It should be noted that the inherent volatility of warrants should not be overlooked and will directly affect the net assets of the Sub-Funds concerned. The reason is that, although the use of warrants may generate higher profits than when investing in conventional shares, it may also lead to heavy losses made worse by leverage.

Investment in Fixed Income Securities

Investment in fixed income securities is subject to interest rate, sector, security and credit risks. Lower-rated securities generally tend to reflect short-term corporate and market developments to a greater extent than higher-rated securities which react primarily to fluctuations in the general level of interest rates. There are fewer investors in lower-rated securities, and it may be harder to buy and sell securities at an optimum time.

The volume of transactions effected in certain European bond markets may be appreciably below that of the world's largest markets, such as the United States. Accordingly, a Sub-Fund's investments in such markets may be less liquid and their prices may be more volatile than comparable investments in securities trading in markets with larger trading volumes. Moreover, the settlement periods in certain markets may be longer than in others which may affect portfolio liquidity.

Investment in Financial Derivative Instruments

a) Credit Default Swaps

Credit default swap transactions may entail particular risks.
These transactions are used in order to eliminate a credit risk in respect of the issuer of a security, they imply that the Company bears a counterparty risk in respect of the protection seller.

This risk is, however, mitigated by the fact that the Company will only enter into credit default swap transactions with highly rated financial institutions.

Credit default swaps may present a risk of liquidity if the position must be liquidated before its maturity for any reason. The Company will mitigate this risk by limiting in an appropriate manner the use of this type of transaction.

Finally, the valuation of credit default swaps may give rise to difficulties which traditionally occur in connection with the valuation of OTC contracts.

b) Futures and Options

The Company may use options and futures on securities, indices and interest rates in order to achieve investment goals. Also, where appropriate, the Company may hedge market and currency risks using futures, options or forward foreign exchange or currency contracts (for the risk related to the use of forward contracts please refer to the section below "Particular Risk of OTC Derivative Transactions").
The Company must comply with the limits set out below under 7. "Investment Restrictions".

Transactions in futures carry a high degree of risk. The amount of the initial margin is small relative to the value of the futures contract so that transactions are "leveraged" or "geared". A relatively small market movement will have a proportionately larger impact which may work for or against the investor. The placing of certain orders which are intended to limit losses to certain amounts may not be effective because market conditions may make it impossible to execute such orders.

Transactions in options also carry a high degree of risk. Selling ("writing" or "granting") an option generally entails considerably greater risk than purchasing options. Although the premium received by the seller is fixed, the seller may sustain a loss well in excess of that amount. The seller will also be exposed to the risk of the purchaser exercising the option and the seller will be obliged either to settle the option in cash or to acquire or deliver the underlying investment. If the option is "covered" by the seller holding a corresponding position in the underlying investment or a future on another option, the risk may be reduced.

c) Particular Risks of OTC Derivative Transactions

Absence of regulation; counterparty default and lack of liquidity

In general, there is less governmental regulation and supervision of transactions in the OTC markets (in which forward and option contracts, credit default swaps, total return swaps and certain options on currencies and other derivative instruments are generally traded) than of transactions entered into on organised stock exchanges. In addition, many of the protections afforded to participants on some organised exchanges, such as the performance guarantee of an exchange clearinghouse, may not be available in connection with OTC transactions. Therefore, the Company entering into OTC transactions will be subject to the risk that its direct counterparty will not perform its obligations under the transactions and that the Company will sustain losses. The Company will only enter into transactions with counterparties which it believes to be creditworthy and may reduce the exposure incurred in connection with such transactions through the receipt of letters of credit or collateral from certain counterparties.

In addition, as the OTC market may be illiquid, it might not be possible to execute a transaction or liquidate a position at an attractive price.

EU Regulation No 648/2012 of 4th July 2012 on OTC derivatives, central counterparties and trade repositories, known as European Market Infrastructure Regulation ("EMIR") was designed to improve the stability of the OTC markets throughout the EU aiming at introducing uniform requirements in respect of OTC derivatives transactions by requiring certain "eligible" OTC derivatives transactions to be submitted for clearing to regulated central clearing counterparties and by mandating the reporting of certain detail of derivatives transactions to trade repositories.

Prospective investors and Shareholders should be aware that the regulatory changes arising from EMIR and similar regulatory regimes may adversely affect the Company's ability to achieve its investment objectives. In addition, the implementation and the compliance with the requirement laid down in EMIR may increase the overall costs borne by the Company as further detailed in the Section "*Fees and Expenses*".

Risk of relating to the use of TRSs

Because it does not involve physically holding the securities, synthetic replication through total return (or unfunded swaps) and fully funded swaps can provide a means to obtain exposure to difficult-to-implement strategies that would otherwise be very costly and difficult to have access to with physical replication. Synthetic replication therefore involves lower costs than physical replication. Synthetic replication however involves **Counterparty risk**. If the Sub-Fund engages in OTC FDI, there is the risk – beyond the general counterparty risk – that the counterparty may default or not be able to meet its obligations in full. Where the Company and any of its Sub-Funds enters into TRSs on a net basis, the two payment streams are netted out, with Company or each Sub-Fund receiving or paying, as the case may be, only the net amount of the two payments. Total return swaps entered into on a net basis do not involve the physical delivery of investments, other underlying assets or principal. Accordingly, it is intended that the risk of loss with respect to TRSs is limited to the net amount of the difference between the total rate of return of a reference investment, index or basket of investments and the fixed or floating payments. If the other party to a TRS defaults, in normal circumstances the Company's or relevant Sub-Fund's risk of loss consists of the net amount of total return payments that the Company or Sub-Fund is contractually entitled to receive.

Collateral Management risk

Counterparty risk arising from OTC FDI is generally mitigated by the transfer of pledge of collateral in favor of the Sub-Fund. However, transactions may not be fully collateralized. Fees and returns due to the Sub-Fund may not be collateralized. If a counterparty default, the Sub-Fund may need to sell non-cash collateral received at prevailing market prices. In such case, the Sub-Fund could realise a loss due to inaccurate pricing or monitoring of the collateral, adverse movements, deterioration in the credit rating of issuers of the collateral may delay or restrict the ability of the Sub-Fund to meet redemption request.
A Sub-Fund may also incur a loss reinvesting cash collateral received, where permitted. Such a loss may arise due to a decline in the value of the investments made. A decline in the value of such investments would reduce the amount of collateral avalaible to be returned by the Sub-Fund to the counterparty as required by the terms of the transactions. The Sub-Fund would be required to cover the difference in value between the collateral originally received and the amount available to be returned to the counterparty, thereby resulting in a loss to the Sub-Fund.

Non-investment grade securities

Furthermore, for Sub-Funds whose policy allows for the investment in securities rated lower than BBB- by Standard & Poors (or Baa3 by Moody's, or its equivalent), investors are warned that these securities are below investment grade and carry more risk, including greater price volatility and a higher default risk on the repayment of principal and the payment of interest than for higher grade securities. Moreover, certain unlisted or undervalued fixed income securities are highly speculative and entail considerable risk and may be disputed when principal and interest payments fall due. Securities with a rating below BBB- by Standard & Poors (or Baa3 by moody's, or its equivalent), or comparable unlisted securities, are considered speculative and may be disputed when principal and interest payments fall due.

Distressed Securities

Distressed securities are securities of issuers in extremely weak financial condition or are perceived to have a deteriorating financial condition that will affect their future ability to meet their financial obligations. Such securities are regarded as predominantly speculative with respect to the issuer's capacity to pay interest and principal or maintain other terms of the offer documents over any long period of time. Whilst such securities are likely to have some quality and protective characteristics, these are outweighed by large uncertainties or major risk exposure to adverse economic conditions. Therefore, a Sub-Fund may lose its entire investment, may be required to accept cash or securities with a value less than its original investment and/or may be required to accept payment over an extended period. Recovery of interest and principal may involve additional cost for the Sub-Fund. Under such circumstances, the returns generated

from the Sub-Fund's investments may not compensate the shareholders adequately for the risks assumed.

Defaulted Securities

Repayment of defaulted securities and obligations of defaulted issuers (including insolvent issuers or issuers in payment or covenant default, in restructuring or in bankruptcy or insolvency proceedings) is subject to significant uncertainties.

Investing in Emerging Markets

Investment in securities issued by issuers situated in or traded on markets situated in emerging markets involves risk factors and special considerations, including those which follow which may not be typically associated with investing in more developed markets. Political or economic change and instability may be more likely to occur and have a greater effect on the economies and markets of emerging markets. Adverse government policies, taxation, restrictions on foreign investment and on currency convertibility and repatriation, currency fluctuations and other developments in the laws and regulations of emerging markets in which investments may be made, including expropriation, nationalisation or other confiscation could result in loss to the Company. By comparison with more developed securities markets, most emerging markets securities markets are comparatively small, less liquid and more volatile. In addition, settlement, clearing and registration procedures may be underdeveloped enhancing the risks of error, fraud or default.
Furthermore, the legal infrastructure and accounting, auditing and reporting standards in emerging markets may not provide the same degree of investor information or protection as would generally apply to major markets.

Interest Rate Risk

Investment in debt securities or money market instruments is subject to interest rate risk.

A fixed income security's value will generally increase in value when interest rates fall and decrease in value when interest rates rise. Interest rate risk is the risk that such movements in interest rates will negatively affect a security's value or, in a Sub-Fund's case, its net asset value. Fixed income securities with longer-term maturities tend to be more sensitive to interest changes than shorter-term securities. As a result, longer-term securities tend to offer higher yields for this added risk.

While changes in interest rates may affect a Sub-Fund's interest income, such changes may positively or negatively affect the net asset value of the Sub-Fund's shares on a daily basis.

Currency Risk

Since the securities held by a Sub-Fund may be denominated in currencies different from its base currency, the Sub-Fund may be affected favorably or unfavorably by changes in the exchange rates between such Reference Currency and other currencies. If the currency in which a security is denominated appreciates against the base currency, the price of the security could increase. Conversely, a decline in the exchange rate of the currency would adversely affect the price of the security.

Although a Sub-Fund may use hedging or other techniques in seeking to minimize its exposure to currency risk, it may not be possible or desirable to hedge against all currency risk exposure, nor is it guaranteed that a hedging technique will perform as anticipated.

Hedged Classes

In the case where shares are hedged against the Reference Currency of a particular Sub-Fund, such hedging may, for technical reasons or due to market movements, not be complete and not cover the entire foreign exchange rate risk. There can be no guarantee that hedging strategies

will be successful. Moreover, in case of hedging, the investors will not take advantage of any possible positive evolution of the foreign exchange rate.

Credit Risk

Credit risk, related to all fixed income securities as well as money market instruments, is the risk that an issuer will fail to make principal and interest payments when due. Issuers with higher credit risk typically offer higher yields for this added risk. Conversely, issuers with lower credit risk typically offer lower yields. Generally, government securities are considered to be the safest in terms of credit risk, while corporate debt, especially those with poorer credit ratings, have the highest credit risk. Changes in the financial condition of an issuer, changes in economic and political conditions in general, or specific to an issuer, are all the factors that may have an adverse impact on an issuer's credit quality and security values.

Counterparty Risk

Also known as "default risk", it is the risk to each party of a contract that the counterparty will not live up to its contractual obligations. Counterparty risk as a risk to both parties and should be considered when evaluating a contract.

The Company is exposed to counterparty risk when entering into Over the Counter ("OTC") derivatives contracts.

Liquidity Risk

This is the risk of losing a certain amount of money when liquidating one or more positions in a portfolio.

The loss is generated by the difference between the price at which the financial asset is marked and the price at which it can be sold.

Liquidity risk arises from situations in which a party interested in trading an asset cannot do it because nobody in the market wants to trade that asset. Liquidity risk becomes particularly important to parties who are about to hold or currently hold an asset, since it affects their ability to trade.

Manifestation of liquidity risk is very different from a drop of price to zero. In case of a drop of an asset's price to zero, the market is saying that the asset is worthless. However, if one party cannot find another party interested in trading the asset, this can potentially be only a problem of the market participants with finding each other. This is why liquidity risk is usually found to be higher in emerging markets or low-volume markets.

Potential Risks associated with investing in Cocos

- Risk related to the trigger threshold: each instrument has its own characteristics. The level of conversion risk may vary, for example depending on the distance between the issuer's Tier 1 ratio and a threshold defined in the terms of issue. The occurrence of the contingent event may result in a conversion into shares or even a temporary or definitive writing off of all or part of the debt.
- Conversion risk: the behavior of this instrument in the event of conversion may be unpredictable. The manager may be required to sell its securities in the event of a conversion into shares in order to comply with the sub-fund's investment policy.
- Impairment risk: the conversion mechanism of certain contingent convertible bonds may result in a total or partial loss of the initial investment.
- Risk of loss of coupon: with certain types of CoCos, the payment of coupons is discretionary and may be cancelled by the issuer at any time and for an indeterminate period.
- Risk of inversion of the capital structure: unlike the conventional capital hierarchy, under certain circumstances investors in CoCos may bear a loss greater than that of the shareholders. This is particularly the case when the trigger threshold is set at a high level.

- Risk of non-exercise of the repayment option by the issuer: As CoCos can be issued as perpetual instruments, investors may not be able to recover their capital on the optional reimbursement dates provided for in the terms of issue.
- Risk of concentration in a single industry: to the extent that contingent convertible bonds are issued by a single category of issuer, adverse events in the industry could affect investments in this type of instrument in a global manner.
- Risk linked to the complexity of the instrument: as these instruments are relatively recent, their behavior during a period of stress and testing of conversion levels may be highly unpredictable.
- Liquidity risk: as with the high yield bond market, the liquidity of contingent convertible bonds may be affected significantly in the event of a period of turmoil in the markets.
- Valuation risk: the attractive return on this type of instrument may not be the only criterion guiding the valuation and the investment decision. It should be viewed as a complexity and risk premium.

Each investment policy for each Sub-Fund will indicate the maximum percentage planned for this type of instrument, if an investment is planned in CoCos.

Potential Risks associated with investing in Asset-Backed Securities ("ABS") and Mortgage-Backed Securities ("MBS")

Certain Sub-Funds may have exposure to ABS and MBS as further detailed in their respective investment policies under *Appendix II - Sub-Funds Details*.

The obligations associated with ABS and MBS may be subject to greater credit, liquidity and interest rate risk compared to other debt securities such as government issued bonds.

In addition, ABS and MBS are often exposed to extension and prepayment risks.

Extension risk: The risk of a security's expected maturity lengthening in duration due to the deceleration of prepayments. Extension risk is mainly the result of rising interest rates. As interest rates may rise due to different economic factors, the likelihood of prepayment decreases as people will be less likely to refinance their real estate investment.

Prepayment risk: The risk associated with the early unscheduled return of principal on a fixed-income security. On a mortgage/asset-backed security, the higher the interest rate relative to current interest rates, the higher the probability that the underlying mortgages will be refinanced. Investors who pay a premium for a callable bond with a high interest rate take on prepayment risk. In addition to being highly correlated with falling interest rates, mortgage prepayments are highly correlated with rising home values, as rising home values provide incentive for borrowers to trade up in homes or use cash-out re-finances, both leading to mortgage prepayments.

Potential Risks associated with specific economical sectors:

Some Sub-Funds may invest in developing companies or in technological sectors of the new economy. Investors should not ignore that the quotation of these securities is volatile and that this will have a direct impact on the net value of these Sub-Funds.

Regulatory and Legal Risks:

The Company must comply with regulatory constraints or changes in the laws affecting it, the Shares, or the investment restrictions, which might require a change in the investment policy and objectives followed by a Compartment. The Compartment's assets, the Underlying Asset and the derivative techniques used to expose the Compartment to the Underlying Assets may also be subject to change in laws or regulations and/or regulatory action which may affect the value of the Shares. The Company is domiciled in Luxembourg and Investors should note that all the regulatory protections provided by their local regulatory authorities may not apply. Investors should consult their financial or other professional adviser for further information in this area.

MiFID 2: impose new regulatory obligations on the Investment Manager. These regulatory obligations may impact on, and constrain the implementation of, the investment approach of the Company and lead to increased compliance obligations upon and accrued expenses for the Investment Manager and/or the Company.

Extension of pre- and post-trade transparency

MiFID 2 introduces wider transparency regimes in respect of trading on EU trading venues and with EU counterparties. MiFID 2 extends the pre- and post-trade transparency regimes from equities traded on a regulated market to cover equity-like instruments, such as depositary receipts, exchange-traded funds and certificates that are traded on regulated trading venues, as well as to cover non-equities, such as bonds, structured finance products, emission allowances and derivatives.

The increased transparency regime under MiFID 2, together with the restrictions on the use of "dark pools" and other non-regulated trading venues, may lead to enhanced price discovery across a wider range of asset classes and instruments which could disadvantage the Company. Such increased transparency and price discovery may have macro effects on trading globally, which may have an adverse effect on the Net Asset Value.

Equities – On-exchange trading

MiFID 2 introduces a new rule that an EU regulated firm may execute certain equities trades only on an EU trading venue (or with a firm which is a systematic internaliser or an equivalent venue in a third country). The instruments in scope for this requirement are any equities admitted to trading on any EU trading venue, including those with only a secondary listing in the EU. The effect of this rule is to introduce a substantial limit on the possibility of trading off-exchange or OTC in EU listed equities with EU counterparties. The overall impact of this rule on the Investment Manager's ability to implement the Company's investment objective and investment approach is uncertain.

OTC derivatives

MiFID 2 requires certain standardised OTC derivatives (including all those subject to a mandatory clearing obligation under EMIR) to be executed on regulated trading venues. In addition, MiFID 2 introduces a new trading venue, the "organised trading facility", which is intended to provide greater price transparency and competition for bilateral trades. The overall impact of such changes on the Company is highly uncertain and it is unclear how the OTC derivatives markets will adapt to this new regulatory regime.

Access to research

MiFID 2 prohibits an EU authorised investment firm from receiving investment research unless it is paid for directly by the firm out of its own resources or from a separate research payment account. EU research providers that are MiFID firms will be obliged to price their research services separately from their execution services. It is uncertain whether these changes will lead to an overall increase in the price of research and/or lead to reduced access to research for the Investment Manager in relation to the Company's investment approach.

Changes to use of direct market access

MiFID 2 introduces new requirements on EU banks and brokers which offer direct market access ("DMA") services to allow their clients to trade on EU trading venues via their trading systems. EU DMA providers will be required to impose trading and credit thresholds on their clients, and to have the benefit of monitoring rights. It will also be necessary for the EU DMA provider to enter into a binding written agreement with its clients, which deals with compliance with MiFID

2 and the trading venue rules. These changes may affect the implementation of the Company's investment approach.

Changes to conduct rules for EU brokers

Historically, certain EU sell-side firms have used IPO and secondary allocations as a way of rewarding their most valued buy-side clients (in terms of trading volumes or commissions) for the business that they have given to the firm previously or to incentivise future business. New MiFID 2 requirements effectively prohibit such behaviour, as MiFID 2 precludes a sell-side firm from allocating issuances to clients either (a) to incentivise the payment of a large amount of fees for unrelated services provided by the EU firm or (b) which is conditional on the receipt of future orders or the purchase of any other service from the EU firm by a client. As a result, the manner in which the Investment Manager is allocated IPOs and secondary issuances by its sell-side service providers is likely to change significantly, which may have an adverse effect on the Investment Manager's ability to implement the Company's investment approach.

Changes to policies and procedures and costs of compliance

MiFID 2 requires significant changes to a number of the Investment Manager's policies and procedures, including with respect to best execution, payment for and access to research, and conflicts of interest, which may adversely affect the Investment Manager's implementation of the Company's investment approach. Compliance with these requirements is likely to result in the Investment Manager incurring significant costs and may also result in increased costs for the Company.

Potential Risks associated with investing in hybrid bonds:

Investment in hybrid bonds may expose the Sub-Funds to different risks such as:

(a) Subordination risk: hybrid bonds are subordinated instruments and have a lower rate of recovery than senior debt;

(b) Reinvestment risk: hybrid bonds include long dated and perpetual bonds embedding a call option, increasing the risk that the bonds' future cash flows will be reinvested at a lower interest rate;

(c) Coupon Deferral: coupon payments of hybrid bonds may be deferred if the issuer is not paying dividends;

(d) Call extension risk: some hybrid bonds are issued as part of the issuer's regulatory requirement as perpetual bonds callable at specific conditions and only with the pre-approval of the competent supervisory authority.

Potential Risks associated with investing in small-capitalization companies

Investments in small capitalization companies (market capitalization under two billion euros) may involve higher risks than for large capitalization companies. Small capitalization securities may be affected by more sudden and unpredictable market trends than larger or more established companies or than the general market average. These companies have limited product lines, markets and resources or may target a relatively limited group. The overall development of these companies requires a substantial period of time.

Furthermore, many small companies trade their securities less frequently and in lower quantities and may therefore be subject to more erratic price trends than more well-established companies. Securities issued by small capitalization companies may also be more sensitive to market trends than those issued by large caps.

Concentration Risk:

A sub-Fund which concentrates in a limited number of type of assets, issuer, sectors, country or region may be adversely affected by the performance of those securities and may be subject to price volatility. Moreover, the Sub-Fund may be more sensitive to any economic, market, political or regulatory events impacting issuer, sectors, country or region.

The Sub-Fund may be more subjected to price volatility than a diversified Sub-Fund, and consequently may be more exposed to a greater risk of loss.

Sustainability risk and application of SFDR:

Sustainability risk is defined as an environmental, social or governance event or condition that, if it occurs, could cause an actual or potential future negative material impact on the value of the investment, including but not limited to, risks originating from climate change, natural resource depletion, environmental degradation, human rights abuses and social and employee matters.

ESG investments are selected either for financial and non-financial reasons, consequently there is no guarantee that a Sub-Fund will perform better than the broader reference market or other funds that do not utilize ESG criteria when selecting investments. An asset sold for ESG related concerns may subsequently perform well contributing to future potential positive fund return, or may not perform well thus limiting future potential fund return. ESG investing involves the Management Company's or the Investment Manager's subjective judgment and there is no guarantee that all investments made by a Sub-Fund will reflect the beliefs or values of any particular investor. Selected companies satisfying ESG requirements could still be exposed to risks that policymakers change the regulatory support for climate change initiatives, including reducing financial support and/or tax incentives at a time when it may have a significant impact on a company's business.

When specified in the section "Investment Policy" of a Sub-Fund, the Management Company or the Investment Manager integrates sustainability risks into the investment decision-making process of the relevant Sub-Fund by excluding from the investible universe of the Sub-Fund corporate issuers involved in at least one of the following socially controversial activities:

- production and sale of civilian firearms;
- development, production, maintenance, use, distribution, storage, transport or sale of controversial weapons;
- production of conventional military weapons, as well as of key parts and services essential for the production and use of conventional military weapons;
- production or distribution of tobacco products;
- direct and indirect promotion of gambling;
- production and sale of alcoholic products being sold without the adoption of marketing practices encouraging the responsible consumption of alcohol.

When a Sub-Fund falls under the scope of **article 8 of SFDR**, the Investment Policy of the Sub-Fund will intentionally promote environmental, social and governance characteristics. In such case, further information on how such characteristics shall be promoted will be described in the section Investment Policy of the relevant Sub-Fund. Sub-Funds which fall under the scope of article 8 of SFDR do not consider principal adverse impacts on sustainability factors in the investment process.

When a Sub-Fund falls under the scope of **article 9 of SFDR**, the Investment Policy of the Sub-Fund will include sustainable investment as its objective. In such case, further information on how such objective shall be attained will be described in the section Investment Policy of the relevant Sub-Fund. Sub-Funds which fall under the scope of article 9 of SFDR consider principal adverse impacts on sustainability factors in the investment process. Principal adverse impacts measure to what extent investments contribute to generating negative effects on the environment and human well-being. As a result, it is deemed essential that financial products that have sustainable investments as their objective and that, accordingly, intentionally pursue

social and/or environmental objectives take into account principal adverse impact indicators in the investment process. Sub-Funds that fall under the scope of article 9 of SFDR consider principal adverse impact indicators in the investment process either by excluding from the investible universe companies that do not comply with minimum impact performance criteria, or by investing in companies that prove to be able or willing to reduce their adverse impacts over time. Principal adverse impact indicators are selected for each Sub-Fund falling under the scope of article 9 of SFDR based on their relevance for each Sub-Fund's social and/or environmental objectives and investment strategy.

Information on principal adverse impacts on sustainability factors specific to each Sub-Fund is disclosed in the periodic reports pursuant to Article 7 of Regulation (EU) 2019/2088.

The Management Company's policy on sustainable finance is available at the following link: https://www.impactsgr.it/informativa-legale/

APPENDIX II – SUB-FUNDS DETAILS

WORLD IMPACT SICAV is currently offering Shares of the following Sub-Funds:

1. WORLD IMPACT SICAV – DIVERSIFIED From March 13th, 2026, the Sub-Fund will merge with Active Balanced
2. WORLD IMPACT SICAV – ACTIVE BALANCED
3. WORLD IMPACT SICAV – SUSTAINABLE GLOBAL CREDIT
4. WORLD IMPACT SICAV – GLOBAL BOND
5. WORLD IMPACT SICAV – IMPATTO GLOBAL EQUITY
6. WORLD IMPACT SICAV – IMPATTO ITALIAN EQUITY

As soon as new Sub-Fund is opened / added for subscription, the Prospectus will be updated.

WORLD IMPACT SICAV – DIVERSIFIED

From March 13th, 2026, the Sub-Fund will merge with Active Balanced and cease to exist.

Information contained therein should be read in conjunction with the full text of the Prospectus.

1. Investment Policy:

The Sub-Fund seeks medium to long term capital growth with an absolute return approach. Depending on market conditions, the Sub-fund will change the weights of each asset class in its portfolio, according to their relative fundamental valuation attractiveness. The Sub-fund will tactically invest in equities instruments and bonds depending on the market conditions. Issuers are picked with a bottom-up approach, based on fundamental valuation parameters, solid issuer's balance sheets and solvency ratios. Liquid issuers with relatively rich yield are preferred. In the choice of its asset allocation, the Sub-Fund will be driven by an assessment of relative attractiveness of asset classes. The most efficient combination of weights for equity and fixed income will be implemented based on expected returns and expected volatility of the asset classes. The strategic asset allocation will also depend on the variation of the correlation between asset classes. Therefore, equities will be increased in parallel to their incremented attractiveness in terms of risk/reward relative to bonds.

To achieve its investment objective, the Sub-Fund may invest in:

- Bonds, including high yield bonds, fixed or floating rates, convertible bonds, zero-coupons, government, treasury bonds, without limits of duration and geographical restriction, and Cocos.
  Money market instruments or liquid assets.
- Directly or indirectly (through derivatives, especially options on stock markets, including sector indexes) in equities and equity-linked instruments (such as warrants for example) and Structured Products as certificates.

In any market conditions, while exposure to equities and equity-linked instruments may be up to 70% of the net assets, exposure to bonds may be up to 100% of the net assets (of which up to 70% in high yield bonds and up to 15% in Cocos).

The Sub-Fund may further achieve its investment objective by investing up to 10% of its total net assets:

- in Target Funds provided that the maximum level of total management fees applying to both the Sub-Fund and the Target Funds shall not exceed 4.5% (four-point-five percent), and/or

- in another sub-fund(s) of the Fund (a "Target Sub-Fund(s)") within the limits and conditions set forth in the section 9. Investment restrictions of the Prospectus. Subscription and redemption fees, if any, will not be charged to the Sub-Fund when investing in a Target Sub-Fund(s).

Investments in Target Funds and Target Sub-Funds combined will not exceed 10% of the total net assets of the Sub-Fund.

The Sub-Fund may also invest in Ancillary Liquid Assets up to 20% of its net assets.

Under exceptional circumstances and in the best interest of the shareholders, the Sub-Fund may invest up to 100% of its net assets in Ancillary Liquid Assets on a temporary basis.

Within the scope of **article 8** of SFDR, the investment strategy of the Sub-Fund promotes environmental, social and governance characteristics by adopting a two-level securities selection

process. Firstly, corporate issuers involved in the following controversial activities are excluded from the Sub-Fund's investible universe:

- the production and sale of civilian firearms:
- development, production, maintenance, use, distribution, storage, transport or sale of controversial weapons;
- production of conventional military weapons, as well as of key parts and services essential for the production and use of conventional military weapons;
- production or distribution of tobacco products:
- direct and indirect promotion of gambling;
- production and sale of alcoholic products being sold without the adoption of marketing practices encouraging the responsible consumption of alcohol.

Residual indirect exposure to the aforementioned sectors may occur from the investment through Target Funds and/or Target Sub-Fund(s).

Secondly, the Sub-Fund's investment strategy intentionally promotes social and environmental characteristics by applying positive ESG screening. Specifically, the Sub-Fund's investment strategy pursues the objective to achieve an average ESG rating for the Sub-Fund's portfolio higher than the average ESG rating of the Sub-Fund's investible universe.

Detailed sustainability-related information of the Sub-Fund is disclosed in the Sustainability-related Disclosure Appendix of the present Prospectus.

The Management Company's policy on sustainable finance is available at the following link: https://www.impactsgr.it/informativa-legale/

Investments within the Sub-Fund do not take into account the EU Taxonomy criteria for environmentally sustainable economic activities.

The Sub-Fund may invest only in Delta 1 certificates which are considered as transferable securities (*valeurs mobilières*) on the basis of the criteria set forth in article 2 of the Grand-ducal Regulation of 8 February 2008.

The Sub-Fund will not directly invest in asset-backed securities ("ABS") or mortgage-backed securities ("MBS"), indirect exposure may occur from the investment through the Target Funds; such indirect exposure to ABS and MBS will not exceed a limit of 10% of the Sub-Fund's assets.

To comply with the investment policy, the Sub-Fund may use financial derivative instruments, dealt in on a regulated market or not, subject to the provisions of the Chapter "Investments policies and restrictions", for the purposes of hedging currency risks, interest rate risk and market risk and for efficient portfolio management, therefore including investment purposes, to meet the sub-fund's investment objective.

Financial derivative instruments used by the Sub-Fund may include, but are not limited to, futures, options, contracts for difference, forward contracts on financial instruments and options on such contracts, credit linked instruments, swap contracts and other fixed income, currency and credit derivatives dealt on a regulated market or OTC ("Over the counter").

The Sub-Fund will, for the time being, not enter into SFTs such as repurchase and reverse repurchase agreements or engage in securities lending transactions or other transactions – including total return swaps - foreseen under SFTR. Should the Board of Directors of the Fund decide to use such techniques and instruments in the future for this Sub-Fund, the Board of Directors of the Fund will update this Prospectus accordingly and will include related requirements of SFTR under this Sub-Fund.

The Sub-Fund is actively managed, meaning that the Management Company has, subject to the stated investment objectives and policy, discretion over its portfolio, with no reference or constraint to any benchmark.

Investors should refer to the *Appendix I - Risk Factors* in the main part of the prospectus.

2. Profile of the Typical Investor:

The investment may be appropriate for investors seeking long-term capital growth through opportunities offered by a combination of different eligible assets equity, bonds (corporate and sovereign) and money market instruments with no geographical restrictions.

3. Issue, conversion and redemption of shares

As further described under sections *14. Issue of shares, subscription and payment procedure*, *15. Conversion of shares* and *16. Redemption of shares* of the Prospectus, applications for subscription, conversion or redemption received by the Transfer and Registrar Agent at the latest at 12:00 noon (Luxembourg time) on the applicable Valuation Day shall be carried out, if accepted, on the basis of the net asset value as dated as of this Valuation Day. Applications notified after this deadline shall be executed on the following Valuation Day.

The subscription price of each share is payable within 3 (three) Luxembourg Bank Business Days following the applicable Valuation Day. In case of an Initial Subscription Period, the subscription price of each share must be paid as of the last day of said Initial Subscription Period.

Any shareholder may request the conversion of all or part of his shares of this Sub-Fund into shares of another share-class of this Sub-Fund.

Any shareholder may also request the conversion of all or part of his shares of this Sub-Fund into shares of another Sub-Fund at a price equal to the respective net values of the shares of the different Sub-Funds.

The conversion shall be carried out on the applicable Valuation Day, provided that (i) the request is notified to the Company in Luxembourg at the latest at 12:00 noon (Luxembourg time) on the applicable Valuation day and (ii) the applicable Valuation day is a common Valuation day for the respective Sub-Funds and that the possibilities to acquire shares of a class towards another class are met.

The conversion shall be made within three Luxembourg Bank Business Days after the applicable Valuation Day.

The payment for shares redeemed shall be made within 3 (three) Luxembourg Bank Business Days following the applicable Valuation Day.

4. Initial Subscription Period

The Sub-Fund has been launched upon decision of the Board of Directors and it is active.

5. Risk Profile:

The risks pertaining to an investment in the Sub-Fund are those related to Structured Products, bonds, funds, portfolio turnover, liquidity and counterparty as further disclosed in Appendix I - Risk Factors.

This fund does not provide you with any guarantee on performance nor on the value of your investment in it. The latter may consequently go up, as well as down.

The following other risks can be significant to the Fund:

- Issuers of bonds or complex financial products may fail to meet their payment obligations. We mitigate this risk by a thorough analysis of their financial condition.

- Investment positions may be relatively focused on one particular economic sector or country.

- The shares, bonds, investment funds and other financial instruments in which we invest can be easily sold under normal market conditions. Exceptional circumstances may lead to situations where those can only be sold at a loss for you.

The Sub-Fund invests in high yield bond which are usually corporate bonds rated below BBB- or Baa3 by established rating agencies – such as Moody's Investors Service, Fitch Ratings and Standard & Poor's Ratings Services, or equivalent credit quality but unrated. While high yield bonds bear a higher yield opportunity than investment grade bonds, they present greater risks with respect to liquidity, volatility and non-payment of principal and interest.

Global Exposure approach used	**Relative benchmark[1]**	**Expected level of leverage (Sum of Notionals)[1]**	**Higher leverage levels (Sum of Notionals)[1]**	**Expected level of leverage (Commitment)**	**Higher leverage levels (Commitment)[1]**
Absolute VaR	N/A	200%	500%		

[1] *If the VaR approach is used. The level of leverage may vary over time. Investors must be aware of the possibility of higher leverage levels under certain circumstances.*

6. Reference Currency:

EUR

7. Share Classes and main features:

Class	Targeted investors	Shares' form	Category	Denomination Currency	Currency Hedged Share Class	NAV Frequency	Initial issue price	Minimum initial subscription[1]	Minimum subsequent subscription[1]	Minimum holding[1]
R	Retail investors	Registered Shares	Capitalisation	EUR	NO	Daily	100	1'000	N/A	1'000
	Retail investors	Registered Shares	Capitalisation	USD	YES	Daily	100	1'000	N/A	1'000
I	Institutional investors	Registered Shares	Capitalisation	EUR	NO	Daily	100	500'000	N/A	50'000
	Institutional investors	Registered Shares	Capitalisation	USD	YES	Daily	100	500'000	N/A	50'000
S	Specific investors authorized by the Board	Registered Shares	Capitalisation	EUR	NO	Daily	100	1'000	1'000	1'000
	Specific investors authorized by the Board	Registered Shares	Capitalisation	USD	YES	Daily	100	1'000	1'000	1'000

[1] *The Board of Directors is authorised to waive any requirements relating to the minimum initial subscription amount, to the subsequent minimum subscription amount or to the minimum holding amount in its reasonable discretion and by taking into consideration the best interest of the Company.*

D	Specific investors authorized by the Board	Registered Shares	Distribution	EUR	NO	Daily	100	1000	N/A	1000
	Specific investors authorized by the Board	Registered Shares	Distribution	USD	YES	Daily	100	1000	N/A	1000

8. Share Classes Fees Schedule:

Class	Denomination Currency	Management Company Fee[1]	Management Fee[2]	Depositary Fee	Administration and Registar and Transfer Agent Fee[3]	Investment Advisory Fee	Performance Fee	Subscription Fee[4 & 5]	Redemption Fee[5]	Conversion Fee[5]
R	EUR	Up to 0.05%	Up to 1.50%	Up to 0.05%	Up to 0.05%	N/A	N/A	N/A	N/A	N/A
	USD	Up to 0.05%	Up to 1.50%	Up to 0.05%	Up to 0.05%	N/A	N/A	N/A	N/A	N/A
I	EUR	Up to 0.05%	Up to 0.70%	Up to 0.05%	Up to 0.05%	N/A	N/A	N/A	N/A	N/A
	USD	Up to 0.05%	Up to 0.70%	Up to 0.05%	Up to 0.05%	N/A	N/A	N/A	N/A	N/A
S	EUR	Up to 0.05%	Up to 1.25%	Up to 0.05%	Up to 0.05%	N/A	N/A	N/A	N/A	N/A
	USD	Up to 0.05%	Up to 1.25%	Up to 0.05%	Up to 0.05%	N/A	N/A	N/A	N/A	N/A

[1] Per annum, payable monthly on the value of the average net assets of the Sub-Fund during the relevant month, with a yearly minimum fee of EUR 10'000 at the Sub-Fund level.

[2] Such fee will also be used to remunerate distributors, and any other financial intermediaries involved in the distribution, placement and marketing of the Shares through a regular agreement.

[3] With a minimum fee of EUR 10'000 per Sub-Fund. The UCI Administrator will also charge transaction fees related to the subscription and redemption of Shares. The UCI Administrator may also charge fees for their additional services (such as, but not limited to calculation of performance fees) as set out in the Central Administration Services Agreement.

[4] Such fee may be used in order to remunerate distributors, and any other financial intermediaries involved in the distribution, placement and marketing of the Shares through a regular agreement.

[5] Percentage of the net asset value of the shares subscribed/redeemed/converted.

D	EUR	Up to 0.05%	Up to 1.25%	Up to 0.05%	Up to 0.05%	N/A	N/A	N/A	N/A	N/A
	USD	Up to 0.05%	Up to 1.25%	Up to 0.05%	Up to 0.05%	N/A	N/A	N/A	N/A	N/A

9. Historical Performance

Investors are invited to refer to the KID of the Sub-Fund where historical performance of the Sub-Fund is disclosed.

Information contained therein should be read in conjunction with the full text of the Prospectus.

1. Investment Policy:

The objective of the Sub-Fund is to achieve medium to long term capital growth by combining different eligible assets.

The Sub-Fund will invest directly or indirectly (through derivatives, futures and options on stock market indexes, including sector indexes) at least 20% and up to 60% of the total assets under management in equities and equity-linked instruments (such as warrants for example) and Structured Products as certificates, according to fundamental valuation analysis.

The aforementioned fundamental valuation analysis aiming to target the selected investments, will be carried out taking in consideration discounted free cash flow and metrics methods such as return on investments, enterprise value (EV) on invested capital and, for specific sectors, dividend sustainability.

To achieve its investment objective, and under normal conditions, the Sub-Fund will be mainly invested in:

- Directly or indirectly (through derivatives) in equities and equity-linked instruments (such as warrants for example) and Structured Products as certificates.
- Bonds, including fixed or floating rates, convertible bonds, zero-coupons, government and treasury bonds, without limits of duration.
- Money market instruments or liquid assets.

The Sub-Fund may further achieve its investment objective by investing up to 10% of its total net assets:

- in Target Funds provided that the maximum level of management fees applying to both the Sub-Fund and the Target Funds shall not exceed 4.5% (four-point-five percent), and/or

- in another sub-fund(s) of the Fund (a "Target Sub-Fund(s)") within the limits and conditions set forth in the section *9. Investment restrictions* of the Prospectus. Subscription and redemption fees, if any, will not be charged to the Sub-Fund when investing in a Target Sub-Fund(s).

Investments in Target Funds and Target Sub-Funds combined will not exceed 10% of the total net assets of the Sub-Fund.

Within the scope of **article 8** of SFDR, the investment strategy of the Sub-Fund promotes environmental, social and governance characteristics by adopting a two-level securities selection process. Firstly, corporate issuers involved in the following controversial activities are excluded from the Sub-Fund's investible universe:

- the production and sale of civilian firearms;
- development, production, maintenance, use, distribution, storage, transport or sale of controversial weapons;
- production of conventional military weapons, as well as of key parts and services essential for the production and use of conventional military weapons;
- production or distribution of tobacco products;
- direct and indirect promotion of gambling;
- production and sale of alcoholic products being sold without the adoption of marketing practices encouraging the responsible consumption of alcohol.

Residual indirect exposure to the aforementioned sectors may occur from the investment through Target Funds and/or Target Sub-Fund(s).

Secondly, the Sub-Fund's investment strategy intentionally promotes social and environmental characteristics by applying a positive ESG screening. Specifically, the Sub-Fund's investment strategy pursues the objective to achieve an average ESG rating for the Sub-Fund's portfolio higher than the average ESG rating of the Sub-Fund's investible universe.

Detailed sustainability-related information of the Sub-Fund is disclosed in the Sustainability-related Disclosure Appendix of the present Prospectus.

The Management Company's policy on sustainable finance is available at the following link: https://www.impactsgr.it/informativa-legale/

Investments within the Sub-Fund do not take into account the EU Taxonomy criteria for environmentally sustainable economic activities.

The Sub-Fund may invest only in Delta 1 certificates, which are considered as transferable securities (*valeurs mobilières*) on the basis of the criteria set forth in article 2 of the Grand-ducal Regulation of 8 February 2008.

The Sub-Fund will not directly invest in asset-backed securities ("ABS"), mortgage-backed securities ("MBS") or contingent convertible capital ("CoCos"), indirect exposure may occur from the investment through the Target Funds; such indirect exposure to ABS and MBS will not exceed a limit of 10% of the Sub-Fund's assets.

The Sub-Fund may also invest in Ancillary Liquid Assets up to 20% of its net asset.

Under exceptional circumstances and in the best interest of the shareholders, the Sub-Fund may be invested up to 100% of its net assets in Ancillary Liquid Assets on a temporary basis.

To comply with the investment policy, the Sub-Fund may use financial derivative instruments, dealt in on a regulated market or not, subject to the provisions of the Chapter "Investments policies and restrictions", for the purposes of hedging currency risks, interest rate risk and market risk and for efficient portfolio management, therefore including investment purposes, to meet the sub-fund's investment objective.

Financial derivative instruments used by the Sub-Fund may include, but are not limited to, futures, options, contracts for difference, forward contracts on financial instruments and options on such contracts, credit linked instruments, swap contracts and other fixed income, currency and credit derivatives dealt on a regulated market or OTC ("Over the counter").

The Sub-Fund will, for the time being, not enter into SFTs such as repurchase and reverse repurchase agreements or engage in securities lending transactions or other transactions – including total return swaps - foreseen under SFTR. Should the Board of Directors of the Fund decide to use such techniques and instruments in the future for this Sub-Fund, the Board of Directors of the Fund will update this Prospectus accordingly and will include related requirements of SFTR under this Sub-Fund.

The Sub-Fund is actively managed, meaning that the Management Company Manager has, subject to the stated investment objectives and policy, discretion over its portfolio, with no reference or constraint to any benchmark.

Investors should refer to the Appendix I - Risk Factors in the main part of the prospectus.

2. Profile of the Typical Investor:

The Sub-Fund is actively managed to give broad market exposure to worldwide equity index mostly through the use of derivatives.

This sub-fund is suitable for Investors who are looking for long-term capital growth potential through a well-diversified global balanced portfolio consisting of different sectors and global index.

3. Issue, conversion and redemption of shares

As further described under sections *14. Issue of shares, subscription and payment procedure*, *15. Conversion of shares* and *16. Redemption of shares* of the Prospectus, applications for subscription, conversion or redemption received by the Transfer and Registrar Agent at the latest at 12:00 noon (Luxembourg time) on the applicable Valuation Day shall be carried out, if accepted, on the basis of the net asset value as dated as of this Valuation Day. Applications notified after this deadline shall be executed on the following Valuation Day.

The subscription price of each share is payable within 3 (three) Luxembourg Bank Business Days following the applicable Valuation Day. In case of an Initial Subscription Period, the subscription price of each share must be paid as of the last day of said Initial Subscription Period.

Any shareholder may request the conversion of all or part of his shares of this Sub-Fund into shares of another share-class of this Sub-Fund.

Any shareholder may also request the conversion of all or part of his shares of this Sub-Fund into shares of another Sub-Fund at a price equal to the respective net values of the shares of the different Sub-Funds.

The conversion shall be carried out on the applicable Valuation Day, provided that (i) the request is notified to the Company in Luxembourg at the latest at 12:00 noon (Luxembourg time) on the applicable Valuation Day and (ii) the applicable Valuation Day is a common Valuation day for the respective Sub-Funds and that the possibilities to acquire shares of a class towards another class are met.

The conversion shall be made within three Luxembourg Bank Business Days after the applicable Valuation Day.

The payment for shares redeemed shall be made within 3 (three) Luxembourg Bank Business Days following the applicable Valuation Day.

4. Initial Subscription Period

The Sub-Fund has been launched upon decision of the Board of Directors and it is active.

5. Risk Profile:

The risks pertaining to an investment in the Sub-Fund are those related to equities, Structured Products, bonds, funds, portfolio turnover, liquidity and counterparties further disclosed in Appendix I - Risk Factors.

This fund does not provide you with any guarantee on performance nor on the value of your investment in it. The latter may consequently go up, as well as down.

The following other risks can be significant to the Fund:

- Issuers of bonds or complex financial products may fail to meet their payment obligations. We mitigate this risk by a thorough analysis of their financial condition.
- Investment positions may be relatively focused on one particular economic sector or country.
- The shares, bonds, investment funds and other financial instruments in which we invest can be easily sold under normal market conditions. Exceptional circumstances may lead to situations where those can only be sold at a loss for you.

Global Exposure approach used	Relative benchmark[1]	Expected level of leverage (Sum of Notionals)[1]	Higher leverage levels (Sum of Notionals)[1]	Expected level of leverage (Commitment)	Higher leverage levels (Commitment)[1]
Absolute VaR	N/A	300%	500%		

6. Reference Currency:

EUR

[1] *If the VaR approach is used. The level of leverage may vary over time. Investors must be aware of the possibility of higher leverage levels under certain circumstances.*

7. Share Classes and main features:

Class	Targeted investors	Shares' form	Category	Denomination Currency	Currency Hedged Share Class	NAV Frequency	Initial issue price	Minimum initial subscription[1]	Minimum subsequent subscription[1]	Minimum holding[1]
R	Retail investors	Registered Shares	Capitalisation	EUR	NO	Daily	100	1'000	N/A	1'000
	Retail investors	Registered Shares	Capitalisation	USD	YES	Daily	100	1'000	N/A	1'000
I	Institutional investors	Registered Shares	Capitalisation	EUR	NO	Daily	100	500'000	N/A	50'000
	Institutional investors	Registered Shares	Capitalisation	USD	YES	Daily	100	500'000	N/A	50'000
S	Specific investors authorized by the Board	Registered Shares	Capitalisation	EUR	NO	Daily	100	1'000	1'000	1'000

[1] *The Board of Directors is authorised to waive any requirements relating to the minimum initial subscription amount, to the subsequent minimum subscription amount or to the minimum holding amount in its reasonable discretion and by taking into consideration the best interest of the Company.*

	Specific investors authorized by the Board	Registered Shares	Capitalisation	USD	YES	Daily	100	1’000	1’000	1’000
D	Specific investors authorized by the Board	Registered Shares	Distribution	EUR	NO	Daily	100	1000	N/A	1000
	Specific investors authorized by the Board	Registered Shares	Distribution	USD	YES	Daily	100	1000	N/A	1000

8. Share Classes Fees Schedule:

Class	Denomination Currency	Management Company Fee[1]	Management Fee[2]	Depositary Fee	Administration and Registar and Transfer Agent Fee[3]	Investment Advisory Fee	Performance Fee	Subscription Fee[4 & 5]	Redemption Fee[5]	Conversion Fee[5]
R	EUR	Up to 0.05%	Up to 1.50%	Up to 0.05%	Up to 0.05%	N/A	N/A	N/A	N/A	N/A
	USD	Up to 0.05%	Up to 1.50%	Up to 0.05%	Up to 0.05%	N/A	N/A	N/A	N/A	N/A
I	EUR	Up to 0.05%	Up to 0.70%	Up to 0.05%	Up to 0.05%	N/A	N/A	N/A	N/A	N/A
	USD	Up to 0.05%	Up to 0.70%	Up to 0.05%	Up to 0.05%	N/A	N/A	N/A	N/A	N/A
S	EUR	Up to 0.05%	Up to 1.25%	Up to 0.05%	Up to 0.05%	N/A	N/A	N/A	N/A	N/A

[1] Per annum, payable monthly on the value of the average net assets of the Sub-Fund during the relevant month, with a yearly minimum fee of EUR 10'000 at the Sub-Fund level.

[2] Such fee will also be used to remunerate distributors, and any other financial intermediaries involved in the distribution, placement and marketing of the Shares through a regular agreement.

[3] With a minimum fee of EUR 10'000 per Sub-Fund. The UCI Administration will also charge transaction fees related to the subscription and redemption of Shares. The UCI Administrator may also charge fees for their additional services (such as, but not limited to calculation of performance fees) as set out in the Central Administration Services Agreement.

[4] Such fee may be used in order to remunerate distributors, and any other financial intermediaries involved in the distribution, placement and marketing of the Shares through a regular agreement.

[5] Percentage of the net asset value of the shares subscribed/redeemed/converted.

	USD	Up to 0.05%	Up to 1.25%	Up to 0.05%	Up to 0.05%	N/A	N/A	N/A	N/A	N/A
D	EUR	Up to 0.05%	Up to 1.25%	Up to 0.05%	Up to 0.05%	N/A	N/A	N/A	N/A	N/A
	USD	Up to 0.05%	Up to 1.25%	Up to 0.05%	Up to 0.05%	N/A	N/A	N/A	N/A	N/A

9. Historical Performance

Investors are invited to refer to the KID of the Sub-Fund where historical performance of the Sub-Fund is disclosed.

Information contained therein should be read in conjunction with the full text of the Prospectus.

1. Investment Policy:

The sustainable investment objective of the Sub-fund is to provide capital appreciation over the mid to long term by investing in a diversified portfolio of debt securities, without any limitation in terms of industry, country and currency exposure, predominantly issued by companies that prove to have either a positive or improving social and environmental impact or decarbonization performance. The Management Company integrates sustainability risks into the investment decision-making process of the relevant Sub-Fund by excluding from the investible universe of the Sub-Fund corporate issuers involved in at least one of socially controversial activities described in section *Risk Factors - Sustainability risk and application of SFDR* of the present Prospectus. The Sub-Fund currently falls within the scope of **article 9** of SFDR and, as such, has sustainable investment as its objective.

The Sub-Fund's investment strategy intentionally pursues its stated sustainable investment objective by predominantly investing in companies with a positive impact performance or that are improving their impact performance over time. The impact performance measurement quantifies and assesses the positive and negative environmental and social effects that a company generates. The overall impact performance of the investment strategy is assessed by netting social and environmental costs and benefits measured at the company level. The impact performance of the Sub-Fund is based on the net impact ratio, a resource efficiency indicator that comprehensively captures investment's impacts on society, knowledge, health, and the environment, considering the scale of both positive and adverse impacts. Therefore, a positive portfolio-level net impact ratio assures that the scale of the adverse impacts is insignificant compared to the scale of the positive impacts. The methodological framework adopted for measuring impact performance is available at the following link: https://www.uprightproject.com/downloads/model-whitepaper-v2.pdf. When assessing the environmental impact performance, a key dimension that is taken into account is the decarbonization trajectory, which needs to be consistent, at the portfolio-level, with the achievement of climate neutrality by 2050.

The analysis of companies is based on a large number of proven fundamental factors relevant to the individual target company (such as company growth potential, cash generation, and financial discipline) as well as on impact and sustainability factors. In the latter case, the Management Company will have regard to such factors as impact opportunity (the opportunity for creating positive change and the potential extent of that change).

The Management Company has discretion to invest in companies with limited exposure to fossil fuel, but which are driving or significantly participating in the transition to a more sustainable economy.

Constant dialogue with the companies in which the Fund invests is fundamental to the investment approach. The objective is to support and influence their contribution to the world's major social and environmental challenges.

Detailed sustainability-related information of the Sub-Fund is disclosed in the Sustainability-related Disclosure Appendix of the present Prospectus.

The Management Company's policy on sustainable finance is available at the following link: https://www.impactsgr.it/informativa-legale/.

The Sub-fund will achieve its investment objective by essentially investing in corporate bonds.

The Sub-fund will invest in high yield bonds not exceeding 70% of the sub-fund assets; part of the high yield issues are subordinated bonds perpetual or long dated with an embedded call. Investment in hybrid bonds will not exceed the threshold of 70% of the sub-fund assets.

The Sub-Fund may invest 10% of its portfolio in distressed bonds (the minimum rating of (i) bonds and (ii) issuers on the day of issuance will be CCC). The Management Company will monitor the portfolio composition of the Sub-Fund and will sell within three (3) months, and in the best interest of the Shareholders, any bond downgraded below CCC.

Subordinated bonds are more likely to suffer a partial or complete loss in the case of any default or bankruptcy of the issuer, because all obligations to holders of senior debt must be satisfied first.

The portfolio construction will combine the Management Company's ongoing assessment of the financial fundamentals of the target issuers with the analysis of the features of each target issue aiming to identify attractive investment opportunities with a solid credit profile and low correlation to interest rates fluctuations.

The Sub-fund's investments in unrated debt securities will not exceed 10% of its net assets.

The Sub-Fund may further achieve its investment objective by investing up to 10% of its total net assets:

- in Target Funds provided that the maximum level of total management fees applying to both the Sub-Fund and the Target Funds shall not exceed 4.5% (four-point-five percent), and/or

- in another sub-fund(s) of the Fund (a "Target Sub-Fund(s)") within the limits and conditions set forth in the section 9. Investment restrictions of the Prospectus. Subscription and redemption fees, if any, will not be charged to the Sub-Fund when investing in a Target Sub-Fund(s).

Investments in Target Funds and Target Sub-Funds combined will not exceed 10% of the total net assets of the Sub-Fund.

The Sub-Fund will not directly invest in asset-backed securities ("ABS"), mortgage-backed securities ("MBS"), indirect exposure may occur from the investment through the Target Funds; such indirect exposure to ABS and MBS will not exceed a limit of 10% of the Sub-Fund's assets. Cocos will not represent more than 15% of the net assets.

The Sub-Fund may also invest in Ancillary Liquid Assets up to 20% of its net assets.

Under exceptional circumstances and in the best interest of the shareholders, the Sub-Fund may invest up to 100% of its net assets in Ancillary Liquid Assets on a temporary basis.

To comply with the investment policy, the Sub-Fund may use financial derivative instruments, dealt in on a regulated market or not, subject to the provisions of the Chapter "Investments policies and restrictions", for the purposes of hedging currency risks, interest rate risk and market risk and for efficient portfolio management, therefore including investment purposes, to meet the sub-fund's investment objective.

Financial derivative instruments used by the Sub-Fund may include, but are not limited to, futures, options, contracts for difference, forward contracts on financial instruments and options on such contracts, credit linked instruments, swap contracts and other fixed income, currency and credit derivatives dealt on a regulated market or OTC ("Over the counter").

The Sub-Fund will, for the time being, not enter into SFTs such as repurchase and reverse repurchase agreements or engage in securities lending transactions or other transactions – including total return swaps - foreseen under SFTR. Should the Board of Directors of the Fund decide to use such techniques and instruments in the future for this Sub-Fund, the Board of

Directors of the Fund will update this Prospectus accordingly and will include related requirements of SFTR under this Sub-Fund.

The reference currency of the Sub-fund is the Euro, but the currency exposure of the Sub-fund may be flexibly managed depending on market conditions. The maximum un-hedged exposure to currencies other than the Euro will not exceed 10% of the Sub-fund net assets.

The Sub-Fund is actively managed, meaning that the Management Company has, subject to the stated investment objectives and policy, discretion over its portfolio, with no reference or constraint to any benchmark.

Investors should refer to the Appendix I - Risk Factors in the main part of the prospectus.

Compliance with Regulation (EU) 2020/852 and subsequent amendments

The Sub Fund pursues the objective of investing in sustainable investments contributing to climate change mitigation and climate change adaptation, as per Regulation (EU) 2020/852 ("EU Taxonomy"), by supporting the achievement of COP 21 Paris Agreement of limiting temperature rise by 1.5°C as compared to pre-industrial levels and the European Commission's climate neutrality objective by 2050.

The Management Company considers that a targeted minimum of **10%** of the underlying investments selected for the Sub Fund's portfolio will be aligned with the first two objectives of the EU Taxonomy, climate change mitigation and climate change adaptation. The Sub-Fund does not commit to a minimum share of investments in transitional and enabling activities; however, these investments may form part of the portfolio. The Sub-Fund pursues its taxonomy alignment objectives primarily through dark green investments.

The Management Company is implementing the appropriate methodology to monitor relevant parameters regarding the Sub-fund's contribution to the objectives of climate change mitigation and adaptation, as per the EU Taxonomy, including those relating to:

- the generation, transmission, distribution and/or use of renewable energy by the companies in the portfolio;
- the increase of the use of environmentally safe carbon capture and utilisation (CCU) technologies that deliver a net reduction in greenhouse gas emissions;
- the production of clean and efficient fuels from renewable or carbon-neutral sources; and
- enabling any activities listed in points (a) to (h) of article 10(1) and, (a) and (b) of article 11(1) of the EU Taxonomy and in compliance with the requirement of enabling other activities to make a substantial contribution to one or more of the EU Taxonomy objectives in accordance with article 16 EU Taxonomy.

Criteria for environmentally sustainable economic activities

In accordance with article 3 of the EU Taxonomy, an economic activity shall qualify as environmentally sustainable when it (a) contributes substantially to one or more of the environmental objectives set out in Article 9 in accordance with Articles 10 to 16; (b) does not significantly harm any of the environmental objectives set out in Article 9 in accordance with Article 17; (c) is carried out in compliance with the minimum safeguards laid down in Article 18; and (d) complies with technical screening criteria that have been established by the Commission in accordance with Article 10 (3), 11(3), 12(2), 13(2), 14(2) or 15(2).

For the purpose of this Sub-Fund, the "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.'

In order to be part of the Sub-Fund's investment universe, corporate issuers must not be involved in any of the socially controversial activities described in section *Risk Factors - Sustainability risk and application of SFDR* of the present Prospectus. Specifically, corporate issuers involved in the following controversial activities are excluded from the Sub-Fund's investible universe:

- the production and sale of civilian firearms;
- development, production, maintenance, use, distribution, storage, transport or sale of controversial weapons;
- production of conventional military weapons, as well as of key parts and services essential for the production and use of conventional military weapons;
- production or distribution of tobacco products;
- direct and indirect promotion of gambling;
- production and sale of alcoholic products being sold without the adoption of marketing practices encouraging the responsible consumption of alcohol.

Residual indirect exposure to the aforementioned sectors may occur from the investment through Target Funds and/or Target Sub-Fund(s).

The investment strategy of the Sub-Fund targets predominantly companies that prove to have either an improving or positive impact performance. The overall company-level impact performance is assessed by netting company-specific social and environmental effects, in order to establish a relationship between a company's positive and negative impact capacity. The measured impact performance aims, thus, to be representative of the real-world social and environmental impacts that a company generates. Furthermore, the investment strategy pursues a decarbonization trajectory consistent with the achievement of Paris Agreement's objectives and of climate neutrality by 2050.

The methodologies adopted by the Management Company for measuring issuer-level impact performance rely both on qualitative and quantitative sustainability and impact data provided by external data providers, as well as proprietarily collected and elaborated from public sources.

2. Profile of the Typical Investor:

The typical investor in the Sub-fund is expected to be an experienced and long-term investor who knows and accepts the risks associated with this type of investment, as set in Section "Risks" of this Prospectus.

The typical investor will be seeking to invest a portion of its overall portfolio in transferable fixed income hybrid bonds issued by corporates, with the goal of obtaining capital appreciation.

3. Issue, conversion and redemption of shares

As further described under sections *14. Issue of shares, subscription and payment procedure*, *15. Conversion of shares* and *16. Redemption of shares* of the Prospectus, applications for subscription, conversion or redemption received by the Transfer and Registrar Agent at the latest at 12:00 noon (Luxembourg time) on the applicable Valuation Day shall be carried out, if accepted, on the basis of the net asset value as dated as of this Valuation Day. Applications notified after this deadline shall be executed on the following Valuation Day.

The subscription price of each share is payable within 3 (three) Luxembourg Bank Business Days following the applicable Valuation Day. In case of an Initial Subscription Period, the subscription price of each share must be paid as of the last day of said Initial Subscription Period.

Any shareholder may request the conversion of all or part of his shares of this Sub-Fund into shares of another share-class of this Sub-Fund.

Any shareholder may also request the conversion of all or part of his shares of this Sub-Fund into shares of another Sub-Fund at a price equal to the respective net values of the shares of the different Sub-Funds.

The conversion shall be carried out on the applicable Valuation Day, provided that (i) the request is notified to the Company in Luxembourg at the latest at 12:00 noon (Luxembourg time) on the applicable Valuation Day and (ii) the applicable Valuation Day is a common Valuation Day for the respective Sub-Funds and that the possibilities to acquire shares of a class towards another class are met.

The conversion shall be made within three Luxembourg Bank Business Days after the applicable Valuation Day.

The payment for shares redeemed shall be made within 3 (three) Luxembourg Bank Business Days following the applicable Valuation Day.

4. Initial Subscription Period

The Sub-Fund has been launched upon decision of the Board of Directors and it is active.

5. Risk Profile:

The risks pertaining to an investment in the Sub-Fund are those related to bonds, funds, portfolio turnover, liquidity and counterparties further disclosed in Appendix I - Risk Factors.

This fund does not provide you with any guarantee on performance nor on the value of your investment in it. The latter may consequently go up, as well as down.

The following other risks can be significant to the Fund:

- Issuers of bonds or complex financial products may fail to meet their payment obligations. We mitigate this risk by a thorough analysis of their financial condition.
- Investment positions may be relatively focused on one particular economic sector or country.
- The shares, bonds, investment funds and other financial instruments in which we invest can be easily sold under normal market conditions. Exceptional circumstances may lead to situations where those can only be sold at a loss for you.

The Sub-Fund invests in high yield bond which are usually corporate bonds rated below BBB- or Baa3 by established rating agencies – such as Moody's Investors Service, Fitch Ratings and Standard & Poor's Ratings Services, or equivalent credit quality but unrated. While high yield bonds bear a higher yield opportunity than investment grade bonds, they present greater risks with respect to liquidity, volatility and non-payment of principal and interest.

Global Exposure approach used	Relative benchmark[1]	Expected level of leverage (Sum of Notionals)[1]	Higher leverage levels (Sum of Notionals)[1]	Expected level of leverage (Commitment)	Higher leverage levels (Commitment)[1]
Absolute VaR	N/A	300%	500%	N/A	N/A

6. Reference Currency:

EUR

[1] *If the VaR approach is used. The level of leverage may vary over time. Investors must be aware of the possibility of higher leverage levels under certain circumstances.*

7. Share Classes and main features:

Class	Targeted investors	Shares' form	Category	Denomination Currency	Currency Hedged Share Class	NAV Frequency	Initial issue price	Minimum initial subscription[1]	Minimum subsequent subscription[1]	Minimum holding[1]
R	Retail investors	Registered Shares	Capitalisation	EUR	NO	Daily	100	1'000	N/A	1'000
	Retail investors	Registered Shares	Capitalisation	USD	YES	Daily	100	1'000	N/A	1'000
I	Institutional investors	Registered Shares	Capitalisation	EUR	NO	Daily	100	500'000	N/A	50'000
	Institutional investors	Registered Shares	Capitalisation	USD	YES	Daily	100	500'000	N/A	50'000
S	Specific investors authorized by the Board	Registered Shares	Capitalisation	EUR	NO	Daily	100	1'000	1'000	1'000
	Specific investors authorized by the Board	Registered Shares	Capitalisation	USD	YES	Daily	100	1'000	1'000	1'000

[1] *The Board of Directors is authorised to waive any requirements relating to the minimum initial subscription amount, to the subsequent minimum subscription amount or to the minimum holding amount in its reasonable discretion and by taking into consideration the best interest of the Company.*

D	Specific investors authorized by the Board	Registered Shares	Distribution	EUR	NO	Daily	100	1000	N/A	1000
	Specific investors authorized by the Board	Registered Shares	Distribution	USD	YES	Daily	100	1000	N/A	1000

8. Share Classes Fees Schedule:

Class	Denomination Currency	Management Company Fee[1]	Management Fee[2]	Depositary Fee	Administration and Registar and Transfer Agent Fee[3]	Investment Advisory Fee	Performance Fee	Subscription Fee[4 & 5]	Redemption Fee[5]	Conversion Fee[5]
R	EUR	Up to 0.05%	Up to 1.50%	Up to 0.05%	Up to 0.05%	N/A	N/A	N/A	N/A	N/A
	USD	Up to 0.05%	Up to 1.50%	Up to 0.05%	Up to 0.05%	N/A	N/A	N/A	N/A	N/A
I	EUR	Up to 0.05%	Up to 0.70%	Up to 0.05%	Up to 0.05%	N/A	N/A	N/A	N/A	N/A
	USD	Up to 0.05%	Up to 0.70%	Up to 0.05%	Up to 0.05%	N/A	N/A	N/A	N/A	N/A
S	EUR	Up to 0.05%	Up to 1.25%	Up to 0.05%	Up to 0.05%	N/A	N/A	N/A	N/A	N/A

[1] Per annum, payable monthly on the value of the average net assets of the Sub-Fund during the relevant month, with a yearly minimum fee of EUR 10'000 at the Sub-Fund level.

[2] Such fee will also be used in order to remunerate distributors, and any other financial intermediaries involved in the distribution, placement and marketing of the Shares through a regular agreement.

[3] With a minimum fee of EUR 10'000 per Sub-Fund. The UCI Administrator will also charge transaction fees related to the subscription and redemption of Shares. The UCI Administrator may also charge fees for their additional services (such as, but not limited to calculation of performance fees) as set out in the Central Administration Services Agreement.

[4] Such fee may be used in order to remunerate distributors, and any other financial intermediaries involved in the distribution, placement and marketing of the Shares through a regular agreement.

[5] Percentage of the net asset value of the shares subscribed/redeemed/converted.

	USD	Up to 0.05%	Up to 1.25%	Up to 0.05%	Up to 0.05%	N/A	N/A	N/A	N/A	N/A
D	EUR	Up to 0.05%	Up to 1.25%	Up to 0.05%	Up to 0.05%	N/A	N/A	N/A	N/A	N/A
	USD	Up to 0.05%	Up to 1.25%	Up to 0.05%	Up to 0.05%	N/A	N/A	N/A	N/A	N/A

9. Historical Performance

Investors are invited to refer to the KID of the Sub-Fund where historical performance of the Sub-Fund is disclosed.

WORLD IMPACT SICAV – GLOBAL BOND

Information contained therein should be read in conjunction with the full text of the Prospectus.

1. Investment Policy:

The Sub-Fund seeks to achieve capital appreciation over the mid to long term by investing in a diversified portfolio of debt securities, without any limitation in terms of industry, country and currency exposure, predominantly issued by companies aligned with environmental and social characteristics.
The investment-level alignment with ESG characteristics is measured by ESG ratings and investments are considered to promote such characteristics if investment-level ESG ratings are at least as high as B on a 7-level scale ranging from AAA to CCC. The Sub-Fund's average ESG portfolio rating needs to be at least equal to or higher than BBB. The Sub Fund pursues the objective of investing in environmentally sustainable investments contributing to climate change mitigation and climate change adaptation, by investing a targeted minimum of 5% in investments aligned with the first two objectives of the EU Taxonomy.

The Management Company integrates sustainability risks into the investment decision-making process of the relevant Sub-Fund by excluding from the investible universe of the Sub-Fund corporate issuers involved in at least one of socially controversial activities described in section *Risk Factors - Sustainability risk and application of SFDR* of the present Prospectus. The Sub-Fund currently falls within the scope of **article 8** of SFDR and, as such, aligns with social and environmental characteristics. The Sub-Fund being actively managed, no index has been designated as reference benchmark.

Within the scope of **article 8** of SFDR, the investment strategy of the Sub-Fund promotes environmental and social characteristics with at least 80% of its investments, of which a minimum of 5% will qualify as environmentally sustainable investments aligned with the EU Taxonomy.

Detailed sustainability-related information of the Sub-Fund is disclosed in the Sustainability-related Disclosure Appendix of the present Prospectus.

The analysis of companies is based on a large number of proven fundamental factors relevant to the individual target company (such as company growth potential, cash generation, and financial discipline) as well as on impact and sustainability factors. In the latter case, the Management Company will have regard to such factors as impact opportunity (the opportunity for creating positive change and the potential extent of that change).

The portfolio construction will combine the Management Company's ongoing assessment of the financial fundamentals of the target issuers with the analysis of the features of each target issue aiming to identify attractive investment opportunities with a solid credit profile and low correlation to interest rates fluctuations.

The Management Company has discretion to invest in companies with limited exposure to fossil fuel, but which are driving or significantly participating in the transition to a more sustainable economy.

The Management Company's policy on sustainable finance is available at the following link: https://www.impactsgr.it/informativa-legale/.

The reference currency of the Sub-Fund is the Euro, but the currency exposure of the Sub-fund may be flexibly managed depending on market conditions. The Sub-Fund's investments in Soft-Currencies will not exceed 10% of the total net assets of the Sub-Fund.

Direct investments in Emerging Markets, as defined in the present Prospectus, will be allowed, and may represent up to 10% of the total net assets of the Sub-Fund, additional and residual indirect exposure to Emerging Markets may occur from the Target Funds and Target Sub-Funds.

The Sub-fund will invest at least 70% of its assets under management in fixed income securities with a duration of less than five years. It may invest in non-investment grade bonds (high yield bonds) not exceeding 15% of the Sub-Fund's net assets.

The Sub-fund's investments in unrated debt securities will not exceed 10% of its net assets.

The Sub-Fund may further achieve its investment objective by investing up to 10% of its total net assets:

- in Target Funds provided that the maximum level of total management fees applying to both the Sub-Fund and the Target Funds shall not exceed 4.5% (four-point-five percent), and/or

- in another sub-fund(s) of the Fund (a "Target Sub-Fund(s)") within the limits and conditions set forth in the section 9. Investment restrictions of the Prospectus. Subscription and redemption fees, if any, will not be charged to the Sub-Fund when investing in a Target Sub-Fund(s).

Investments in Target Funds and Target Sub-Funds combined will not exceed 10% of the total net assets of the Sub-Fund.

The Sub-Fund will not directly invest in asset-backed securities ("ABS"), mortgage-backed securities ("MBS") or contingent convertible capital ("CoCos"), indirect exposure may occur from the investment through the Target Funds; such indirect exposure to ABS and MBS will not exceed a limit of 10% of the Sub-Fund's assets.

The Sub-Fund may also invest in Ancillary Liquid Assets up to 20% of its net asset.

Under exceptional circumstances and in the best interest of the shareholders, the Sub-Fund may be invested up to 100% of its net assets in Ancillary Liquid Assets on a temporary basis.

To comply with the investment policy, the Sub-Fund may use financial derivative instruments, dealt in on a regulated market or not, subject to the provisions of the Chapter "Investments policies and restrictions", for the purposes of hedging currency risks, interest rate risk and market risk and for efficient portfolio management, therefore including investment purposes, to meet the sub-fund's investment objective.

Financial derivative instruments used by the Sub-Fund may include, but are not limited to, futures, options, contracts for difference, forward contracts on financial instruments and options on such contracts, credit linked instruments, swap contracts and other fixed income, currency and credit derivatives dealt on a regulated market or OTC ("Over the counter").

The Sub-Fund will, for the time being, not enter into SFTs such as repurchase and reverse repurchase agreements or engage in securities lending transactions or other transactions – including total return swaps - foreseen under SFTR. Should the Board of Directors of the Fund decide to use such techniques and instruments in the future for this Sub-Fund, the Board of Directors of the Fund will update this Prospectus accordingly and will include related requirements of SFTR under this Sub-Fund.

The Sub-Fund is actively managed, meaning that the Management Company has, subject to the stated investment objectives and policy, discretion over its portfolio, with no reference or constraint to any benchmark.

Investors should refer to the Appendix I - Risk Factors in the main part of the prospectus.

Compliance with Regulation (EU) 2020/852 and subsequent amendments

The Sub Fund pursues the objective of investing in sustainable investments contributing to climate change mitigation and climate change adaptation, as per Regulation (EU) 2020/852 ("EU Taxonomy"), by supporting the achievement of COP 21 Paris Agreement of limiting temperature rise by 1.5°C as compared to pre-industrial levels and the European Commission's climate neutrality objective by 2050.

The Management Company considers that a targeted minimum of **5%** of the underlying investments selected for the Sub Fund's portfolio will be aligned with the first two objectives of the EU Taxonomy, climate change mitigation and climate change adaptation. The Sub-Fund does not commit to a minimum share of investments in transitional and enabling activities; however, these investments may form part of the portfolio. The Sub-Fund pursues its taxonomy alignment objectives primarily through dark green investments.

The Management Company is implementing the appropriate methodology to monitor relevant parameters regarding the Sub-fund's contribution to the objectives of climate change mitigation and adaptation, as per the EU Taxonomy, including those relating to:

- the generation, transmission, distribution and/or use of renewable energy by the companies in the portfolio;
- the increase of the use of environmentally safe carbon capture and utilisation (CCU) technologies that deliver a net reduction in greenhouse gas emissions;
- the production of clean and efficient fuels from renewable or carbon-neutral sources; and
- enabling any activities listed in points (a) to (h) of article 10(1) and, (a) and (b) of article 11(1) of the EU Taxonomy and in compliance with the requirement of enabling other activities to make a substantial contribution to one or more of the EU Taxonomy objectives in accordance with article 16 EU Taxonomy.

Criteria for determining environmentally sustainable economic activities

In accordance with article 3 of the EU Taxonomy, an economic activity shall qualify as environmentally sustainable when it (a) contributes substantially to one or more of the environmental objectives set out in Article 9 in accordance with Articles 10 to 16; (b) does not significantly harm any of the environmental objectives set out in Article 9 in accordance with Article 17; (c) is carried out in compliance with the minimum safeguards laid down in Article 18; and (d) complies with technical screening criteria that have been established by the Commission in accordance with Article 10 (3), 11(3), 12(2), 13(2), 14(2) or 15(2).

For the purpose of this Sub-Fund, the "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.'

In order to be part of the Sub-Fund's investment universe, corporate issuers must not be involved in any of the socially controversial activities described in section *Risk Factors - Sustainability risk and application of SFDR* of the present Prospectus. Specifically, corporate issuers involved in the following controversial activities are excluded from the Sub-Fund's investible universe:

- the production and sale of civilian firearms;
- development, production, maintenance, use, distribution, storage, transport or sale of controversial weapons;
- production of conventional military weapons, as well as of key parts and services essential for the production and use of conventional military weapons;
- production or distribution of tobacco products;
- direct and indirect promotion of gambling;
- production and sale of alcoholic products being sold without the adoption of marketing practices encouraging the responsible consumption of alcohol.

Residual indirect exposure to the aforementioned sectors may occur from the investment through Target Funds and/or Target Sub-Fund(s).

2. Profile of the Typical Investor:

The typical investor in the Sub-fund is expected to be an experienced and long-term investor who knows and accepts the risks associated with this type of investment, as set in Section "Risks" of this Prospectus.

The Sub-fund is suitable for retail and Institutional Investors seeking a combination of capital growth and income by investing in a portfolio of global bonds issued by companies that aim to have a positive societal impact. Suitable investors should appreciate that their capital will be at risk and that the value of their investment and any derived income may fall as well as rise. In each case it is expected that all investors will understand and appreciate the risks associated with investing in Shares of the Sub-fund. The Sub-fund may be suitable for investors who have an investment time horizon of at least five years.

3. Issue, conversion and redemption of shares

As further described under sections *14. Issue of shares, subscription and payment procedure*, *15. Conversion of shares* and *16. Redemption of shares* of the Prospectus, applications for subscription, conversion or redemption received by the Transfer and Registrar Agent at the latest at 12:00 noon (Luxembourg time) on the applicable Valuation Day shall be carried out, if accepted, on the basis of the net asset value as dated as of this Valuation Day. Applications notified after this deadline shall be executed on the following Valuation Day.

The subscription price of each share is payable within 3 (three) Luxembourg Bank Business Days following the applicable Valuation Day. In case of an Initial Subscription Period, the subscription price of each share must be paid as of the last day of said Initial Subscription Period.

Any shareholder may request the conversion of all or part of his shares of this Sub-Fund into shares of another share-class of this Sub-Fund.

Any shareholder may also request the conversion of all or part of his shares of this Sub-Fund into shares of another Sub-Fund at a price equal to the respective net values of the shares of the different Sub-Funds.

The conversion shall be carried out on the applicable Valuation Day, provided that (i) the request is notified to the Company in Luxembourg at the latest at 12:00 noon (Luxembourg time) on the applicable Valuation Day and (ii) the applicable Valuation Day is a common Valuation Day for the respective Sub-Funds and that the possibilities to acquire shares of a class towards another class are met.

The conversion shall be made within three Luxembourg Bank Business Days after the applicable Valuation Day.

The payment for shares redeemed shall be made within 3 (three) Luxembourg Bank Business Days following the applicable Valuation Day.

4. Initial Subscription Period

The Sub-Fund has been launched upon decision of the Board of Directors and it is active.

5. Risk Profile:

The risks pertaining to an investment in the Sub-Fund are those related to equities, bonds, funds, portfolio turnover, liquidity and counterparties further disclosed in Appendix I - Risk Factors.

This fund does not provide you with any guarantee on performance nor on the value of your investment in it. The latter may consequently go up, as well as down.

The following other risks can be significant to the Fund:

- Issuers of bonds or complex financial products may fail to meet their payment obligations. We mitigate this risk by a thorough analysis of their financial condition.
- Investment positions may be relatively focused on one particular economic sector or country.
- The shares, bonds, investment funds and other financial instruments in which we invest can be easily sold under normal market conditions. Exceptional circumstances may lead to situations where those can only be sold at a loss for you.

Global Exposure approach used	Relative benchmark[1]	Expected level of leverage (Sum of Notionals)[1]	Higher leverage levels (Sum of Notionals)[1]	Expected level of leverage (Commitment)	Higher leverage levels (Commitment)[1]
Absolute VaR	N/A	100%	500%	N/A	N/A

6. Reference Currency:

EUR

[1] *If the VaR approach is used. The level of leverage may vary over time. Investors must be aware of the possibility of higher leverage levels under certain circumstances.*

7. Share Classes and main features:

Class	Targeted investors	Shares' form	Category	Denomination Currency	Currency Hedged Share Class	NAV Frequency	Initial issue price	Minimum initial subscription[1]	Minimum subsequent subscription[1]	Minimum holding[1]
R	Retail investors	Registered Shares	Capitalisation	EUR	NO	Daily	100	1'000	1'000	1'000
	Retail investors	Registered Shares	Capitalisation	USD	YES	Daily	100	1'000	1'000	1'000
I	Institutional investors	Registered Shares	Capitalisation	EUR	NO	Daily	100	500'000	N/A	50'000
	Institutional investors	Registered Shares	Capitalisation	USD	YES	Daily	100	500'000	N/A	50'000
S	Specific investors authorized by the Board	Registered Shares	Capitalisation	EUR	NO	Daily	100	1'000	1'000	1'000

[1] *The Board of Directors is authorised to waive any requirements relating to the minimum initial subscription amount, to the subsequent minimum subscription amount or to the minimum holding amount in its reasonable discretion and by taking into consideration the best interest of the Company.*

	Specific investors authorized by the Board	Registered Shares	Capitalisation	USD	YES	Daily	100	1’000	1’000	1’000
D	Specific investors authorized by the Board	Registered Shares	Distribution	EUR	NO	Daily	100	1000	N/A	1000
	Specific investors authorized by the Board	Registered Shares	Distribution	USD	YES	Daily	100	1000	N/A	1000

8. Share Classes Fees Schedule:

Class	Denomination Currency	Management Company Fee[1]	Management Fee[2]	Depositary Fee	Administration and Registar and Transfer Agent Fee[3]	Investment Advisory Fee	Performance Fee	Subscription Fee[4 & 5]	Redemption Fee[5]	Conversion Fee[5]
R	EUR	Up to 0.05%	Up to 0.50%	Up to 0.05%	Up to 0.05%	N/A	N/A	N/A	N/A	N/A
	USD	Up to 0.05%	Up to 0.50%	Up to 0.05%	Up to 0.05%	N/A	N/A	N/A	N/A	N/A
I	EUR	Up to 0.05%	Up to 0.50%	Up to 0.05%	Up to 0.05%	N/A	N/A	N/A	N/A	N/A
	USD	Up to 0.05%	Up to 0.50%	Up to 0.05%	Up to 0.05%	N/A	N/A	N/A	N/A	N/A
S	EUR	Up to 0.05%	Up to 0.5%	Up to 0.05%	Up to 0.05%	N/A	N/A	N/A	N/A	N/A

[1] Per annum, payable monthly on the value of the average net assets of the Sub-Fund during the relevant month, with a yearly minimum fee of EUR 10'000 at the Sub-Fund level.

[2] Such fee will also be used to remunerate distributors, and any other financial intermediaries involved in the distribution, placement and marketing of the Shares through a regular agreement.

[3] With a minimum fee of EUR 10'000 per Sub-Fund. The UCI Administrator will also charge transaction fees related to the subscription and redemption of Shares. The UCI Administrator may also charge fees for their additional services (such as, but not limited to calculation of performance fees) as set out in the Central Administration Services Agreement.

[4] Such fee may be used in order to remunerate distributors, and any other financial intermediaries involved in the distribution, placement and marketing of the Shares through a regular agreement.

[5] Percentage of the net asset value of the shares subscribed/redeemed/converted.

	USD	Up to 0.05%	Up to 0.5%	Up to 0.05%	Up to 0.05%	N/A	N/A	N/A	N/A	N/A
D	EUR	Up to 0.05%	Up to 0.50%	Up to 0.05%	Up to 0.05%	N/A	N/A	N/A	N/A	N/A
	USD	Up to 0.05%	Up to 0.50%	Up to 0.05%	Up to 0.05%	N/A	N/A	N/A	N/A	N/A

9. Historical Performance

Investors are invited to refer to the KID of the Sub-Fund where historical performance of the Sub-Fund is disclosed.

Information contained therein should be read in conjunction with the full text of the Prospectus.

1. Investment Policy:

The sustainable investment objective of the Sub-Fund is specifically that of predominantly investing in companies that prove to have either a positive or improving social and environmental impact or alignment to Sustainable Development Goals (SDGs) (as further described at the following link https://sdgs.un.org/goals). The investment objective of the Sub-Fund is therefore to achieve long term capital appreciation by predominantly investing in worldwide companies that have a positive societal impact through addressing the world's major social and/or environmental challenges. The impact performance of the Sub-Fund is based on the net impact ratio, a resource efficiency indicator that comprehensively captures investment's impacts on society, knowledge, health, and the environment, considering the scale of both positive and adverse impacts. Therefore, a positive portfolio-level net impact ratio assures that the scale of the adverse impacts is insignificant compared to the scale of the positive impacts. The methodological framework adopted for measuring impact performance is available at the following link: https://www.uprightproject.com/downloads/model-whitepaper-v2.pdf.

The Management Company integrates sustainability risks into the investment decision-making process of the relevant Sub-Fund by excluding from the investible universe of the Sub-Fund corporate issuers involved in at least one of socially controversial activities described in section *Risk Factors - Sustainability risk and application of SFDR* of the present Prospectus. The Sub-Fund currently falls within the scope of **article 9** of SFDR and, as such, has sustainable investment as its objective. The Sub-Fund being actively managed, no index has been designated as reference benchmark.

The Management Company intends to create an actively managed portfolio using a disciplined bottom-up stock selection process.

The Sub-Fund's investment strategy intentionally pursues its stated sustainable investment objective by selecting companies which stand to benefit from their investment in the development of solutions and adoption of business behavior practices instrumental in addressing the key social and environmental issues underpinning the pursuit of UN's 17 Sustainable Development Goals (as further described on the following link https://sdgs.un.org/goals). In particular, the Sub-Fund targets companies engaged in developing solutions and adopting business behavior practices addressing issues related to, among others, water shortages, environmental degradation, waste management, climate change, healthcare needs, aging populations, demographic change, barriers to financial inclusion and global inequality. The analysis of companies is based on a large number of proven fundamental factors relevant to the individual target company (such as company growth potential, cash generation, and financial discipline) as well as on impact and sustainability factors. In the latter case, the Management Company will have regard to such factors as impact opportunity (the opportunity for creating positive change and the potential extent of that change).

The Management Company has discretion to invest in companies with limited exposure to fossil fuel but which are driving or significantly participating in the transition to a more sustainable economy.

Dialogue with the companies in which the Fund invests is fundamental to the investment approach. The objective is to support and influence their contribution to the world's major social and environmental challenges.

Detailed sustainability-related information of the Sub-Fund is disclosed in the Sustainability-related Disclosure Appendix of the present Prospectus.

The Management Company's policy on sustainable finance is available at the following link: https://www.impactsgr.it/informativa-legale/

The Sub-Fund will invest at least 70% of its assets under management directly or indirectly (through financial derivative instruments) in the equity securities or equity-linked instruments of companies across any sector (with the exception of sectors deemed incompatible with the above objectives) and market capitalization that are domiciled in any country. The exposure to emerging markets may represent up to 20% of the total net assets of the Sub-Fund. The Sub-Fund's investments in small-capitalization companies may represent up to 30% of the total net assets of the Sub-Fund.

The Sub-Fund may invest up to 10% of its net assets in:

- Bonds, including fixed or floating rates, convertible bonds, zero-coupons, government, treasury bonds, without limits of duration and geographical restriction, mainly rated Investment Grade

The allocation decision between equity and the residual fixed income component depends upon their relative fundamental attractiveness. The investment decisions are taken thanks to a bottom-up stock picking approach, based on fundamental valuation parameters.

The aforementioned fundamental valuation analysis aiming to target the selected investments, will be carried out taking in consideration discounted free cash flow and metrics methods such as return on investments, enterprise value (EV) on invested capital and, for specific sectors, dividend sustainability.

The Sub-Fund may further achieve its investment objective by investing up to 10% of its total net assets:

- in Target Funds provided that the maximum level of total management fees applying to both the Sub-Fund and the Target Funds shall not exceed 4.5% (four-point-five percent), and/or

- in another sub-fund(s) of the Fund (a "Target Sub-Fund(s)") within the limits and conditions set forth in the section 9. Investment restrictions of the Prospectus. Subscription and redemption fees, if any, will not be charged to the Sub-Fund when investing in a Target Sub-Fund(s).

Investments in Target Funds and Target Sub-Funds combined will not exceed 10% of the total net assets of the Sub-Fund.

The Sub-Fund may invest only in Delta 1 certificates which are considered as transferable securities (*valeurs mobilières*) on the basis of the criteria set forth in article 2 of the Grand-ducal Regulation of 8 February 2008.

The Sub-Fund may also invest in Ancillary Liquid Assets up to 20% of its net asset.

Under exceptional circumstances and in the best interest of the shareholders, the Sub-Fund may be invested up to 100% of its net assets in Ancillary Liquid Assets on a temporary basis.

The Sub-Fund will not directly invest in asset-backed securities ("ABS") or mortgage-backed securities ("MBS") and in Contingent Convertible Bonds ("CoCos"). Indirect exposure may occur from the investment through the Target Funds; such indirect exposure will not exceed a limit of 10% of the Sub-Fund's assets.

The reference currency of the Sub-fund is the Euro, but the currency exposure of the Sub-fund may be flexibly managed depending on market conditions.

To comply with the investment policy, the Sub-Fund may use financial derivative instruments, dealt in on a regulated market or not, subject to the provisions of the Chapter "Investments

policies and restrictions", to reduce risk, reduce cost and/or generate additional income or growth consistent with the risk profile of the fund.

Financial derivative instruments used by the Sub-Fund may include, but are not limited to, futures, options, contracts for difference, forward contracts on financial instruments and options on such contracts, credit linked instruments, swap contracts and other fixed income, currency and credit derivatives dealt on a regulated market or OTC ("Over the counter").

The Sub-Fund will, for the time being, not enter into SFTs such as repurchase and reverse repurchase agreements or engage in securities lending transactions or other transactions – including total return swaps - foreseen under SFTR. Should the Board of Directors of the Fund decide to use such techniques and instruments in the future for this Sub-Fund, the Board of Directors of the Fund will update this Prospectus accordingly and will include related requirements of SFTR under this Sub-Fund.

The Sub-Fund is actively managed, meaning that the Investment Manager has, subject to the stated investment objectives and policy, discretion over its portfolio, with no reference or constraint to any benchmark.

Investors should refer to the Appendix I - Risk Factors in the main part of the prospectus.

Compliance with Regulation (EU) 2020/852 and subsequent amendments

The Sub Fund pursues the objective of investing in sustainable investments contributing to climate change mitigation and climate change adaptation, as per Regulation (EU) 2020/852 ("EU Taxonomy"),by supporting the achievement of COP 21 Paris Agreement of limiting temperature rise by 1.5°C as compared to pre-industrial levels and the European Commission's climate neutrality objective by 2050.

The Management Company considers that a targeted minimum of **10%** of the underlying investments selected for the Sub Fund's portfolio will be aligned with the first two objectives of the EU Taxonomy, climate change mitigation and climate change adaptation. The Sub-Fund does not commit to a minimum share of investments in transitional and enabling activities; however, these investments may form part of the portfolio. The Sub-Fund pursues its taxonomy alignment objectives primarily through dark green investments.

The Management Company is implementing the appropriate methodology to monitor relevant parameters regarding the Sub-fund's contribution to the objectives of climate change mitigation and adaptation, as per the EU Taxonomy, including those relating to:

- the generation, transmission, distribution and/or use of renewable energy by the companies in the portfolio;
- the increase of the use of environmentally safe carbon capture and utilisation (CCU) technologies that deliver a net reduction in greenhouse gas emissions;
- the production of clean and efficient fuels from renewable or carbon-neutral sources; and
- enabling any activities listed in points (a) to (h) of article 10(1) and, (a) and (b) of article 11(1) of the EU Taxonomy and in compliance with the requirement of enabling other activities to make a substantial contribution to one or more of the EU Taxonomy objectives in accordance with article 16 EU Taxonomy.

Criteria for determining environmentally sustainable economic activities

In accordance with article 3 of the EU Taxonomy, an economic activity shall qualify as environmentally sustainable when it (a) contributes substantially to one or more of the environmental objectives set out in Article 9 in accordance with Articles 10 to 16; (b) does not significantly harm any of the environmental objectives set out in Article 9 in accordance with Article 17; (c) is carried out in compliance with the minimum safeguards laid down in Article 18;

and (d) complies with technical screening criteria that have been established by the Commission in accordance with Article 10 (3), 11(3), 12(2), 13(2), 14(2) or 15(2).

For the purpose of this Sub-Fund, the "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

In order to be part of the Sub-Fund's investment universe, corporate issuers must not be involved in any of the socially controversial activities described in section *Risk Factors - Sustainability risk and application of SFDR* of the present Prospectus. Specifically, corporate issuers involved in the following controversial activities are excluded from the Sub-Fund's investible universe:

- the production and sale of civilian firearms;
- development, production, maintenance, use, distribution, storage, transport or sale of controversial weapons;
- production of conventional military weapons, as well as of key parts and services essential for the production and use of conventional military weapons;
- production or distribution of tobacco products;
- direct and indirect promotion of gambling;
- production and sale of alcoholic products being sold without the adoption of marketing practices encouraging the responsible consumption of alcohol.

Residual indirect exposure to the aforementioned sectors may occur from the investment through Target Funds and/or Target Sub-Fund(s).

The investment strategy of the Sub-Fund targets predominantly companies that prove to have either an improving or positive impact or SDG alignment performance. The impact performance measurement quantifies and assesses company-level positive and negative environmental and social effects. The measured impact performance aims, thus, to be representative of the real-world social and environmental impacts that a company generates. The SDG alignment performance measures the extent to which each company is contributing to achieving each of the 17 SDGs through both its business practices and products. Furthermore, the investment strategy pursues a decarbonization trajectory consistent with the achievement of Paris Agreement's objectives and of climate neutrality by 2050.

The methodologies adopted by the Management Company for measuring issuer-level impact and SDG alignment performance rely both on qualitative and quantitative sustainability and impact data provided by external data providers, as well as proprietarily collected and elaborated from public sources.

2. Profile of the Typical Investor:

The typical investor in the Sub-fund is expected to be an experienced and long-term investor who knows and accepts the risks associated with this type of investment, as set in Section "Risks" of this Prospectus.

The Sub-fund is suitable for retail and Institutional Investors seeking a combination of capital growth and income by investing in a portfolio of shares of companies that aim to have a positive societal impact. Suitable investors should appreciate that their capital will be at risk and that the value of their investment and any derived income may fall as well as rise. In each case it is expected that all investors will understand and appreciate the risks associated with investing in Shares of the Sub-fund. This Sub-fund may be suitable for investors who have an investment time horizon of at least five years.

3. Issue, conversion and redemption of shares

As further described under sections *14. Issue of shares, subscription and payment procedure*, *15. Conversion of shares* and *16. Redemption of shares* of the Prospectus, applications for subscription, conversion or redemption received by the Transfer and Registrar Agent at the latest at 12:00 noon (Luxembourg time) on the applicable Valuation Day shall be carried out, if accepted, on the basis of the net asset value as dated as of this Valuation Day. Applications notified after this deadline shall be executed on the following Valuation Day.

The subscription price of each share is payable within 3 (three) Luxembourg Bank Business Days following the applicable Valuation Day. In case of an Initial Subscription Period, the subscription price of each share must be paid as of the last day of said Initial Subscription Period.

Any shareholder may request the conversion of all or part of his shares of this Sub-Fund into shares of another share-class of this Sub-Fund.

Any shareholder may also request the conversion of all or part of his shares of this Sub-Fund into shares of another Sub-Fund at a price equal to the respective net values of the shares of the different Sub-Funds.

The conversion shall be carried out on the applicable Valuation Day, provided that (i) the request is notified to the Company in Luxembourg at the latest at 12:00 noon (Luxembourg time) on the applicable Valuation Day and (ii) the applicable Valuation Day is a common Valuation Day for the respective Sub-Funds and that the possibilities to acquire shares of a class towards another class are met.

The conversion shall be made within three Luxembourg Bank Business Days after the applicable Valuation Day.

The payment for shares redeemed shall be made within 3 (three) Luxembourg Bank Business Days following the applicable Valuation Day.

4. Initial Subscription Period

The Sub-Fund has been launched upon decision of the Board of Directors and it is active.

5. Risk Profile:

The risks pertaining to an investment in the Sub-Fund are those related to equities, bonds, funds, portfolio turnover, liquidity and counterparties further disclosed in Appendix I - Risk Factors.

This fund does not provide you with any guarantee on performance nor on the value of your investment in it. The latter may consequently go up, as well as down.

The following other risks can be significant to the Fund:

- Issuers of bonds or complex financial products may fail to meet their payment obligations. We mitigate this risk by a thorough analysis of their financial condition.
- Investment positions may be relatively focused on one particular economic sector or country.
- The shares, bonds, investment funds and other financial instruments in which we invest can be easily sold under normal market conditions. Exceptional circumstances may lead to situations where those can only be sold at a loss for you.

The Sub-Fund may invest in securities issued by issuers situated in or traded on markets situated in emerging markets generally presenting a higher degree of risk compared to investing in more developed markets. Political or economic instability, adverse government policies, taxation, restrictions on foreign investment and on currency convertibility and repatriation, currency fluctuations, less liquidity and high volatility associate to emerging markets, and other developments in the laws and regulations of emerging markets, including expropriation, could result in loss to the Sub-Fund. Settlement, clearing and registration procedures may be underdeveloped enhancing the risks of error, fraud or default. Furthermore, the legal infrastructure and accounting, auditing and reporting standards in emerging markets may not provide the same degree of investor information or protection as would generally apply to major markets.

Global Exposure approach used	**Relative benchmark[1]**	**Expected level of leverage (Sum of Notionals)[1]**	**Higher leverage levels (Sum of Notionals)[1]**	**Expected level of leverage (Commitment)**	**Higher leverage levels (Commitment)[1]**
Absolute VaR	N/A	150%	500%	N/A	N/A

[1] *If the VaR approach is used. The level of leverage may vary over time. Investors must be aware of the possibility of higher leverage levels under certain circumstances.*

6. Reference Currency:

EUR

7. Share Classes and main features:

Class	Targeted investors	Shares' form	Category	Denomination Currency	Currency Hedged Share Class	NAV Frequency	Initial issue price	Minimum initial subscription[1]	Minimum subsequent subscription[1]	Minimum holding[1]
R	Retail investors	Registered Shares	Capitalisation	EUR	NO	Daily	100	1'000	1'000	1'000
	Retail investors	Registered Shares	Capitalisation	USD	YES	Daily	100	1'000	1'000	1'000
I	Institutional investors	Registered Shares	Capitalisation	EUR	NO	Daily	100	500'000	N/A	50'000
	Institutional investors	Registered Shares	Capitalisation	USD	YES	Daily	100	500'000	N/A	50'000
S	Specific investors authorized by the Board	Registered Shares	Capitalisation	EUR	NO	Daily	100	1'000	1'000	1'000

[1] *The Board of Directors is authorised to waive any requirements relating to the minimum initial subscription amount, to the subsequent minimum subscription amount or to the minimum holding amount in its reasonable discretion and by taking into consideration the best interest of the Company.*

	Specific investors authorized by the Board	Registered Shares	Capitalisation	USD	YES	Daily	100	1’000	1’000	1’000
D	Specific investors authorized by the Board	Registered Shares	Distribution	EUR	NO	Daily	100	1000	N/A	1000
	Specific investors authorized by the Board	Registered Shares	Distribution	USD	YES	Daily	100	1000	N/A	1000

8. Share Classes Fees Schedule:

Class	Denomination Currency	Management Company Fee[1]	Management Fee[2]	Depositary Fee	Administration and Registar and Transfer Agent Fee[3]	Investment Advisory Fee	Performance Fee	Subscription Fee[4 & 5]	Redemption Fee[5]	Conversion Fee[5]
R	EUR	Up to 0.05%	Up to 1.50%	Up to 0.05%	Up to 0.05%	N/A	N/A	N/A	N/A	N/A
	USD	Up to 0.05%	Up to 1.50%	Up to 0.05%	Up to 0.05%	N/A	N/A	N/A	N/A	N/A
I	EUR	Up to 0.05%	Up to 0.85%	Up to 0.05%	Up to 0.05%	N/A	N/A	N/A	N/A	N/A
	USD	Up to 0.05%	Up to 0.85%	Up to 0.05%	Up to 0.05%	N/A	N/A	N/A	N/A	N/A

[1] Per annum, payable monthly on the value of the average net assets of the Sub-Fund during the relevant month, with a yearly minimum fee of EUR 10'000 at the Sub-Fund level.

[2] Such fee will also be used in order to remunerate distributors, and any other financial intermediaries involved in the distribution, placement and marketing of the Shares through a regular agreement.

[3] With a minimum fee of EUR 10'000 per Sub-Fund. The UCI Administrator will also charge transaction fees related to the subscription and redemption of Shares. The UCI Administrator may also charge fees for their additional services (such as, -but not limited to calculation of performance fees) as set out in the Central Administration Services Agreement.

[4] Such fee may be used in order to remunerate distributors, and any other financial intermediaries involved in the distribution, placement and marketing of the Shares through a regular agreement.

[5] Percentage of the net asset value of the shares subscribed/redeemed/converted.

S	EUR	Up to 0.05%	Up to 1.40%	Up to 0.05%	Up to 0.05%	N/A	N/A	N/A	N/A	N/A
	USD	Up to 0.05%	Up to 1.40%	Up to 0.05%	Up to 0.05%	N/A	N/A	N/A	N/A	N/A
D	EUR	Up to 0.05%	Up to 1.40%	Up to 0.05%	Up to 0.05%	N/A	N/A	N/A	N/A	N/A
	USD	Up to 0.05%	Up to 1.40%	Up to 0.05%	Up to 0.05%	N/A	N/A	N/A	N/A	N/A

9. Historical Performance

Investors are invited to refer to the KID of the Sub-Fund where historical performance of the Sub-Fund is disclosed.

Information contained therein should be read in conjunction with the full text of the Prospectus.

1. Investment Policy:

The sustainable investment objective of the Sub-Fund is specifically that of predominantly investing in companies that prove to have either an improving or positive social and environmental impact or alignment to Sustainable Development Goals (SDGs) (as further described at the following link https://sdgs.un.org/goals). The impact performance of the Sub-Fund is based on the net impact ratio, a resource efficiency indicator that comprehensively captures investment's impacts on society, knowledge, health, and the environment, considering the scale of both positive and adverse impacts. Therefore, a positive portfolio-level net impact ratio assures that the scale of the adverse impacts is insignificant compared to the scale of the positive impacts. The methodological framework adopted for measuring impact performance is available at the following link: https://www.uprightproject.com/downloads/model-whitepaper-v2.pdf.

The Management Company integrates sustainability risks into the investment decision-making process of the relevant Sub-Fund by excluding from the investible universe of the Sub-Fund corporate issuers involved in at least one of socially controversial activities described in section *Risk Factors - Sustainability risk and application of SFDR* of the present Prospectus. The Sub-Fund currently falls within the scope of **article 9** of SFDR and, as such, has sustainable investment as its objective. The Sub-Fund being actively managed, no index has been designated as reference benchmark.

The Sub-Fund aims to generate capital growth over the long term by predominantly investing in Italian listed equities of companies with a positive or improving social and environmental impact performance. Furthermore, target corporate issuers must be engaging in the development of solutions and adoption of business behaviour practices instrumental in addressing the key social and environmental issues underpinning the pursuit of UN's 17 Sustainable Development Goals.

The Management Company has discretion to invest in companies with limited exposure to fossil fuel, but which are driving or significantly participating in the transition to a more sustainable economy.

Constant dialogue with the companies in which the Fund invests is fundamental to the investment approach. The objective is to support and influence their contribution to the world's major social and environmental challenges.

Detailed sustainability-related information of the Sub-Fund is disclosed in the Sustainability-related Disclosure Appendix of the present Prospectus.

The Management Company's policy on sustainable finance is available at the following link: https://www.impactsgr.it/informativa-legale/

The Sub-Fund will invest at least 70% of its net assets directly or indirectly (through financial derivative instruments) in equities and equity-linked securities of companies listed, incorporated, domiciliated, or that exercise a significant part of their economic activity in Italy, without any sectorial restrictions.

The Sub-Fund may invest up to 20% of its net assets in:

- Bonds, including fixed or floating rates, convertible bonds, zero-coupons, government, treasury bonds, without limits of duration and geographical restriction, mainly rated Investment Grade.

The allocation decision between equity and the residual fixed income component depends upon their relative attractiveness. The investment decisions are taken thanks to a bottom-up stock picking approach, based on fundamental valuation parameters. The target investment universe is made of quality companies with high return on invested capital and high free cashflow conversion, which also respect the aforementioned positive impact criteria.

As far as fundamental valuation analysis is concerned, it will be carried out by taking into consideration discounted free cash flow and metrics methods such as multiple analysis and, for specific sectors, dividend sustainability, with the final goal to target the selected investments.

The Sub-Fund may further achieve its investment objective by investing up to 10% of its total net assets:

- in Target Funds provided that the maximum level of total management fees applying to both the Sub-Fund and the Target Funds shall not exceed 4.5% (four-point-five percent), and/or

- in another sub-fund(s) of the Fund (a "Target Sub-Fund(s)") within the limits and conditions set forth in the section 9. Investment restrictions of the Prospectus. Subscription and redemption fees, if any, will not be charged to the Sub-Fund when investing in a Target Sub-Fund(s).

Investments in Target Funds and Target Sub-Funds combined will not exceed 10% of the total net assets of the Sub-Fund.

The Sub-Fund may invest only in Delta 1 certificates which are considered as transferable securities (*valeurs mobilières*) on the basis of the criteria set forth in article 2 of the Grand-ducal Regulation of 8 February 2008.

The Sub-Fund may also invest in Ancillary Liquid Assets up to 20% of its net asset.

Under exceptional circumstances and in the best interest of the shareholders, the Sub-Fund may be invested up to 100% of its net assets in Ancillary Liquid Assets on a temporary basis.

The Sub-Fund will not directly invest in asset-backed securities ("ABS") or mortgage-backed securities ("MBS") and in Contingent Convertible Bonds ("CoCos"). Indirect exposure may occur from the investment through the Target Funds; such indirect exposure will not exceed a limit of 10% of the Sub-Fund's assets.

To comply with the investment policy, the Sub-Fund may use financial derivative instruments, dealt in on a regulated market or not, subject to the provisions of the Chapter "Investments policies and restrictions", to reduce risk, reduce cost and/or generate additional income or growth consistent with the risk profile of the Fund.

Financial derivative instruments used by the Sub-Fund may include, but are not limited to, futures, options, contracts for difference, forward contracts on financial instruments and options on such contracts, credit-linked instruments, swap contracts and other fixed income, currency and credit derivatives dealt on a regulated market or OTC ("Over the counter").

The Sub-Fund will, for the time being, not enter into SFTs such as repurchase and reverse repurchase agreements or engage in securities lending transactions or other transactions – including total return swaps - foreseen under SFTR. Should the Board of Directors of the Fund decide to use such techniques and instruments in the future for this Sub-Fund, the Board of Directors of the Fund will update this Prospectus accordingly and will include related requirements of SFTR under this Sub-Fund.

The Sub-Fund is actively managed, meaning that the Management Company has, subject to the stated investment objectives and policy, discretion over its portfolio, with no reference or constraint to any benchmark.

Investors should refer to the Appendix I - Risk Factors in the main part of the Prospectus.

Compliance with Regulation (EU) 2020/852 and subsequent amendments

The Sub Fund pursues the objective of investing in sustainable investments contributing to climate change mitigation and climate change adaptation, as per Regulation (EU) 2020/852 ("EU Taxonomy"), by supporting the achievement of COP 21 Paris Agreement of limiting temperature rise by 1.5°C as compared to pre-industrial levels and the European Commission's climate neutrality objective by 2050.

The Management Company considers that a targeted minimum of **10%** of the underlying investments selected for the Sub Fund's portfolio will be aligned with the first two objectives of the EU Taxonomy, climate change mitigation and climate change adaptation. The Sub-Fund does not commit to a minimum share of investments in transitional and enabling activities; however, these investments may form part of the portfolio. The Sub-Fund pursues its taxonomy alignment objectives primarily through dark green investments.

The Management Company is implementing the appropriate methodology to monitor relevant parameters regarding the Sub-fund's contribution to the objectives of climate change mitigation and adaptation, as per the EU Taxonomy, including those relating to:

- the generation, transmission, distribution and/or use of renewable energy by the companies in the portfolio;
- the increase of the use of environmentally safe carbon capture and utilisation (CCU) technologies that deliver a net reduction in greenhouse gas emissions;
- the production of clean and efficient fuels from renewable or carbon-neutral sources; and
- enabling any activities listed in points (a) to (h) of article 10(1) and, (a) and (b) of article 11(1) of the EU Taxonomy and in compliance with the requirement of enabling other activities to make a substantial contribution to one or more of the EU Taxonomy objectives in accordance with article 16 EU Taxonomy.

Criteria for determining environmentally sustainable economic activities

In accordance with article 3 of the EU Taxonomy, an economic activity shall qualify as environmentally sustainable when it (a) contributes substantially to one or more of the environmental objectives set out in Article 9 in accordance with Articles 10 to 16; (b) does not significantly harm any of the environmental objectives set out in Article 9 in accordance with Article 17; (c) is carried out in compliance with the minimum safeguards laid down in Article 18; and (d) complies with technical screening criteria that have been established by the Commission in accordance with Article 10 (3), 11(3), 12(2), 13(2), 14(2) or 15(2).

For the purpose of this Sub-Fund, the "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

In order to be part of the Sub-Fund's investment universe, corporate issuers must not be involved in any of the socially controversial activities described in section *Risk Factors - Sustainability risk* and application of SFDR of the present Prospectus.
Specifically, corporate issuers involved in the following controversial activities are excluded from the Sub-Fund's investible universe:

- the production and sale of civilian firearms;
- development, production, maintenance, use, distribution, storage, transport or sale of controversial weapons;
- production of conventional military weapons, as well as of key parts and services essential for the production and use of conventional military weapons;
- production or distribution of tobacco products;

- direct and indirect promotion of gambling;
- production and sale of alcoholic products being sold without the adoption of marketing practices encouraging the responsible consumption of alcohol.

Residual indirect exposure to the aforementioned sectors may occur from the investment through Target Funds and/or Target Sub-Fund(s).

The investment strategy of the Sub-Fund targets predominantly companies with either an improving or positive impact or SDG alignment performance. The impact performance measurement quantifies and assesses company-level positive and negative environmental and social effects. The measured impact performance aims, thus, to be representative of the real-world social and environmental impacts that a company generates. The SDG alignment performance measures the extent to which each company is contributing to achieving each of the 17 SDGs through both its business practices and products. Furthermore, the investment strategy pursues a decarbonization trajectory consistent with the achievement of Paris Agreement's objectives and of climate neutrality by 2050.

The methodologies adopted by the Management Company for measuring issuer-level impact and SDG alignment performance rely both on qualitative and quantitative sustainability and impact data provided by external data providers, as well as proprietarily collected and elaborated from public sources.

2. Profile of the Typical Investor:

The typical investor in the Sub-fund is expected to be an experienced and long-term investor who knows and accepts the risks associated with this type of investment, as set in Section "Risks" of this Prospectus.

The Sub-fund is suitable for retail and Institutional Investors seeking a combination of capital growth and income by investing in a portfolio of shares of Italian companies that aim to have a positive societal impact. Suitable investors should appreciate that their capital will be at risk and that the value of their investment and any derived income may fall as well as rise. In each case it is expected that all investors will understand and appreciate the risks associated with investing in Shares of the Sub-fund. This Sub-fund may be suitable for investors who have an investment time horizon of at least five years.

3. Issue, conversion and redemption of shares

As further described under sections *14. Issue of shares, subscription and payment procedure*, *15. Conversion of shares* and *16. Redemption of shares* of the Prospectus, applications for subscription, conversion or redemption received by the Transfer and Registrar Agent at the latest at 12:00 noon (Luxembourg time) on the applicable Valuation Day shall be carried out, if accepted, on the basis of the net asset value as dated as of this Valuation Day. Applications notified after this deadline shall be executed on the following Valuation Day.

The subscription price of each share is payable within 3 (three) Luxembourg Bank Business Days following the applicable Valuation Day. In case of an Initial Subscription Period, the subscription price of each share must be paid as of the last day of said Initial Subscription Period.

Any shareholder may request the conversion of all or part of his shares of this Sub-Fund into shares of another share-class of this Sub-Fund.

Any shareholder may also request the conversion of all or part of his shares of this Sub-Fund into shares of another Sub-Fund at a price equal to the respective net values of the shares of the different Sub-Funds.

The conversion shall be carried out on the applicable Valuation Day, provided that (i) the request is notified to the Company in Luxembourg at the latest at 12:00 noon (Luxembourg time) on the applicable Valuation Day and (ii) the applicable Valuation Day is a common Valuation Day for the respective Sub-Funds and that the possibilities to acquire shares of a class towards another class are met.

The conversion shall be made within three Luxembourg Bank Business Days after the applicable Valuation Day.

The payment for shares redeemed shall be made within 3 (three) Luxembourg Bank Business Days following the applicable Valuation Day.

4. Initial Subscription Period

The Sub-Fund has been launched upon decision of the Board of Directors and it is active.

5. Risk Profile:

The risks pertaining to an investment in the Sub-Fund are those related to equities, bonds, funds, portfolio turnover, liquidity, counterparties and concentration further disclosed in Appendix I - Risk Factors.

This fund does not provide you with any guarantee on performance nor on the value of your investment in it. The latter may consequently go up, as well as down.

The following other risks can be significant to the Fund:

- Issuers of bonds or complex financial products may fail to meet their payment obligations. We mitigate this risk by a thorough analysis of their financial condition.
- Investment positions may be relatively focused on one particular economic sector or country.
- The shares, bonds, investment funds and other financial instruments in which we invest can be easily sold under normal market conditions. Exceptional circumstances may lead to situations where those can only be sold at a loss for you.

Global Exposure approach used	Relative benchmark[1]	Expected level of leverage (Sum of Notionals)[1]	Higher leverage levels (Sum of Notionals)[1]	Expected level of leverage (Commitment)	Higher leverage levels (Commitment)[1]
Absolute VaR	N/A	150%	500%	N/A	N/A

6. Reference Currency:

EUR

[1] *If the VaR approach is used. The level of leverage may vary over time. Investors must be aware of the possibility of higher leverage levels under certain circumstances.*

7. Share Classes and main features:

Class	Targeted investors	Shares' form	Category	Denomination Currency	Currency Hedged Share Class	NAV Frequency	Initial issue price	Minimum initial subscription[1]	Minimum subsequent subscription[1]	Minimum holding[1]
R	Retail investors	Registered Shares	Capitalisation	EUR	NO	Daily	100	1'000	1'000	1'000
	Retail investors	Registered Shares	Capitalisation	USD	YES	Daily	100	1'000	1'000	1'000
I	Institutional investors	Registered Shares	Capitalisation	EUR	NO	Daily	100	500'000	N/A	50'000
	Institutional investors	Registered Shares	Capitalisation	USD	YES	Daily	100	500'000	N/A	50'000
S	Specific investors authorized by the Board	Registered Shares	Capitalisation	EUR	NO	Daily	100	1'000	1'000	1'000

[1] *The Board of Directors is authorised to waive any requirements relating to the minimum initial subscription amount, to the subsequent minimum subscription amount or to the minimum holding amount in its reasonable discretion and by taking into consideration the best interest of the Company.*

	Specific investors authorized by the Board	Registered Shares	Capitalisation	USD	YES	Daily	100	1’000	1’000	1’000
D	Specific investors authorized by the Board	Registered Shares	Distribution	EUR	NO	Daily	100	1000	N/A	1’000
	Specific investors authorized by the Board	Registered Shares	Distribution	USD	YES	Daily	100	1000	N/A	1’000

8. Share Classes Fees Schedule:

Class	Denomination Currency	Management Company Fee[1]	Management Fee[2]	Depositary Fee	Administration and Registar and Transfer Agent Fee[3]	Investment Advisory Fee	Performance Fee	Subscription Fee[4 & 5]	Redemption Fee[5]	Conversion Fee[5]
R	EUR	Up to 0.05%	Up to 1.50%	Up to 0.05%	Up to 0.05%	N/A	N/A	N/A	N/A	N/A
	USD	Up to 0.05%	Up to 1.50%	Up to 0.05%	Up to 0.05%	N/A	N/A	N/A	N/A	N/A
I	EUR	Up to 0.05%	Up to 0.85%	Up to 0.05%	Up to 0.05%	N/A	N/A	N/A	N/A	N/A
	USD	Up to 0.05%	Up to 0.85%	Up to 0.05%	Up to 0.05%	N/A	N/A	N/A	N/A	N/A
S	EUR	Up to 0.05%	Up to 1.40%	Up to 0.05%	Up to 0.05%	N/A	N/A	N/A	N/A	N/A

[1] Per annum, payable monthly on the value of the average net assets of the Sub-Fund during the relevant month, with a yearly minimum fee of EUR 10'000 at the Sub-Fund level.

[2] Such fee will also be used to remunerate distributors, and any other financial intermediaries involved in the distribution, placement and marketing of the Shares through a regular agreement.

[3] With a minimum fee of EUR 10'000 per Sub-Fund. The UCI Administrator will also charge transaction fees related to the subscription and redemption of Shares. The UCI Administrator may also charge fees for their additional services (such as, but not limited to calculation of performance fees) as set out in the Central Administration Services Agreement.

[4] Such fee may be used in order to remunerate distributors, and any other financial intermediaries involved in the distribution, placement and marketing of the Shares through a regular agreement.

[5] Percentage of the net asset value of the shares subscribed/redeemed/converted.

	USD	Up to 0.05%	Up to 1.40%	Up to 0.05%	Up to 0.05%	N/A	N/A	N/A	N/A	N/A
D	EUR	Up to 0.05%	Up to 1.40%	Up to 0.05%	Up to 0.05%	N/A	N/A	N/A	N/A	N/A
	USD	Up to 0.05%	Up to 1.40%	Up to 0.05%	Up to 0.05%	N/A	N/A	N/A	N/A	N/A

9. Historical Performance

Investors are invited to refer to the KID of the Sub-Fund where historical performance of the Sub-Fund is disclosed.

SUSTAINABILITY-RELATED DISCLOSURE APPENDIX

Pre-contractual disclosure information in relation to sustainability indicators and adverse sustainability impacts, promotion of environmental or social characteristics and sustainable investment objectives of the following Sub-Funds:

WORLD IMPACT SICAV – DIVERSIFIED (article 8 SFDR) - From March 13th, 2026, the sub-fund will merge with Active Balanced and cease to exist.

WORLD IMPACT SICAV – ACTIVE BALANCED (article 8 SFDR)

WORLD IMPACT SICAV – SUSTAINABLE GLOBAL CREDIT (article 9 SFDR)

WORLD IMPACT SICAV –GLOBAL BOND (article 8 SFDR)

WORLD IMPACT SICAV – IMPATTO GLOBAL EQUITY (article 9 SFDR)

WORLD IMPACT SICAV – IMPATTO ITALIAN EQUITY (article 9 SFDR)

ANNEX II

Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

FROM March 13th, 2026, THE SUB-FUND WILL MERGE WITH ACTIVE BALANCED AND CEASE TO EXIST

Product name: DIVERSIFIED **Legal entity identifier:** 549300OYPYQ483D2CD07

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

☐ **Yes**	☒ **No**
☐ It will make a minimum of **sustainable investments with an environmental objective:** ___%	☐ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of ___% of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☐ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective:** ___%	☒ It promotes E/S characteristics, but **will not make any sustainable investments**

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

What environmental and/or social characteristics are promoted by this financial product?

Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.

The investment strategy of the Sub-Fund promotes environmental, social and governance practices by adopting a two-layer selection process: the first layer is determined by the definition of the Sub-Fund's investable universe by means of criteria of exclusion on the securities selection process. The second layer is represented by an active asset selection by the Investment Manager seeking to invest mainly in companies and countries which are deemed to have good or improving ESG characteristics and good governance practices as defined by SFDR.

The Sub-Fund's portfolio invests at least 80% of its assets, net of cash, ancillary liquid assets and derivatives, in companies and countries with an ESG rating equal to or higher than B. The

weighted average ESG rating of the portfolio, net of cash, ancillary liquid assets and derivatives, cannot be lower than BBB. The Sub-Fund's portfolio does not invest in companies and countries with ESG rating below B.
The ESG ratings measure the company-level capacity to manage environmental and social risks and opportunities that could materially impact business performance, positively or negatively.

The ESG ratings are attributed at the investment-level and then aggregated at the portfolio-level. For the attribution of the ESG ratings seven different levels are used, from the best rating of AAA to the worst rating of CCC, which are derived from a normalized ESG score, which ranges from 0 (worst performance) to 10 (best performance).

- ***What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?***

  The Sub-Fund promotes environmental, social and governance practices by adopting a two-layer selection process: the first layer is determined by the identification of the Sub-Fund's investable universe by means of criteria of exclusion on the securities selection process. The second layer is represented by an active asset selection seeking to invest mainly in companies and countries which are deemed to have good or improving ESG characteristics and good governance practices as defined by SFDR.

  The Sub-Fund's portfolio invests at least 80% of its assets, net of cash, ancillary liquid assets and derivatives, in companies and countries with an ESG rating equal to or higher than B. The weighted average ESG rating of the portfolio, net of cash, ancillary liquid assets and derivatives, cannot be lower than BBB. The Sub-Fund's portfolio does not invest in companies and countries with ESG rating below B.

  The ESG ratings measure the company-level capacity to manage environmental and social risks and opportunities that could materially impact business performance, positively or negatively.

  The ESG ratings are attributed at the investment-level and then aggregated at the portfolio-level. For the attribution of the ESG ratings seven different levels are used, from the best rating of AAA to the worst rating of CCC, which are derived from a normalized ESG score, which ranges from 0 (worst performance) to 10 (best performance).

  Involvement of companies in environmental, social and governance controversies: The Sub-Fund's portfolio does not invest in companies involved in very severe environmental, social and governance controversies, which correspond to a 0 score.

  Involvement of companies in socially controversially activities: it is assessed by the share of company revenues generated by the following socially controversial activities: civilian and military weapons, controversial weapons, tobacco, gambling, and non-responsible alcohol. The Sub-Fund's portfolio does not invest in companies with a revenue share equal to or greater than 5% being generated by such activities, except for controversial activities, with respect to which any revenue-based involvement leads to exclusion from the Sub-Fund's portfolio.

  Democratic level of countries: it is assessed by the PAI indicator "average rule of law score". A low democratic level corresponds to a country-level performance with respect to the average rule of law score below the 50th percentile of all countries for which data are available. The Sub-Fund's portfolio does not invest in countries with a low democratic level.

  Sustainability data are provided by external sustainability data providers.

What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

Not applicable

How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?

Not applicable

How have the indicators for adverse impacts on sustainability factors been taken into account?

Not applicable

How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

Not applicable

Does this financial product consider principal adverse impacts on sustainability factors?

☒ Yes

☐ No

The PAI integration in the investment process regards only the PAI indicator "average rule of law". The Sub-Fund's portfolio does not invest in countries with a low democratic level.

What investment strategy does this financial product follow?

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

The Sub-Fund seeks medium- to long-term capital growth with an absolute return approach. Depending on market conditions, the Sub-fund will change the weights of each asset class in its portfolio, according to their relative fundamental valuation attractiveness. The Sub-fund will tactically invest in equities instruments and bonds depending on the market conditions. Issuers are picked with a bottom-up approach, based on fundamental valuation parameters, solid issuer's balance sheets and solvency ratios. Liquid issuers with relatively rich yield are preferred. To achieve its investment objective, and under normal conditions, the Sub-Fund may invests in:

- Bonds, including high yield bonds, fixed or floating rates, convertible bonds, zero-coupons, government, treasury bonds, without limits of duration and geographical restriction, and Cocos.
- Money market instruments or liquid assets.
- Directly or indirectly (through derivatives, especially options on stock markets, including sector indexes) in equities and equity-linked instruments (such as warrants for example), and Structured Products as certificates.

In any market conditions, while exposure to equities and equity-linked instruments may be up to 70% of the net assets, exposure to bonds may be up to 100% of the net assets (of which up to 70% in high yield bonds and up to 15% in Cocos).

The Sub-Fund may further achieve its investment objective by investing up to 10% of its total net assets:

- in Target Funds provided that the maximum level of total management fees applying to both the Sub-Fund and the Target Funds shall not exceed 4.5% (four-point-five percent), and/or

- in another sub-fund(s) of the Fund (a "Target Sub-Fund(s)") within the limits and conditions set forth in the section 9. Investment restrictions of the Prospectus. Subscription and redemption fees, if any, will not be charged to the Sub-Fund when investing in a Target Sub-Fund(s).

Investments in Target Funds and Target Sub-Funds combined will not exceed 10% of the total net assets of the Sub-Fund.

The Sub-Fund's portfolio invests at least 80% of its assets, net of cash, ancillary liquid assets and derivatives, in companies and countries with an ESG rating equal to or higher than B. The weighted average ESG rating of the portfolio, net of cash, ancillary liquid assets and derivatives, cannot be lower than BBB.

For further information on the investment strategy of the financial product, please refer to the Sub-Fund's Investment Policy section of the present Prospectus.

- ***What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?***

  The investment strategy ensures compliance with the environmental/social characteristics promoted by the fund through the following:

  - The Sub-Fund's average ESG portfolio rating needs to be at least equal to or higher than BBB.
  - The Sub-Fund invests at least 80% of its assets in companies and countries with an ESG equal to or higher than B.

- Exclusion from the investible universe of countries with a low democratic level, as measured by the PAI indicator average rule of law score. A low democratic level corresponds to a performance with respect to average rule of law score below the 50th percentile of all countries for which data are available.
- Exclusion from the investible universe of companies involved in the following socially controversial activities: civilian and military weapons, controversial weapons, tobacco, gambling, and non-responsible alcohol.

- Exclusion from the investable universe of companies involved in very severe environmental, social and governance controversies.

Sustainability data are provided by external sustainability data providers.

What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

There is no committed minimum rate to reduce the investible universe of the Sub-Fund. The combination of an exclusionary approach with an approach establishing portfolio-level ESG performance limits, is adopted for the investment strategy of the Sub-Fund in order to optimize financial efficiency while promoting social and environmental characteristics.

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

What is the policy to assess good governance practices of the investee companies?

The Management Company has adopted an approach for assessing good governance of the investee companies based on their involvement in controversies related to governance issues. Involvement of investee companies in governance-related controversies is assessed on a weekly basis. Monitoring of involvement of investee companies in governance-related controversies is conducted ex post on a weekly basis. Owing to current limited availability of technical solutions, ex ante monitoring of compliance with sustainability-related portfolio limits is not applicable. Governance-related controversies involvement is assessed on a 0-10 scale, with 0 corresponding to involvement in very severe controversies and 10 corresponding to no involvement in controversies. Accordingly, involvement in very severe governance-related controversies corresponds to a 0 score. Investee companies that are or become involved in very severe governance-related controversies, which correspond to a 0 score, are excluded from the investible universe and portfolio, respectively, within the shortest possible time span in a way consistent with protecting investors' best interests. Governance-related controversies involvement is assessed by using controversies involvement data provided by external sustainability data providers.

What is the asset allocation planned for this financial product?

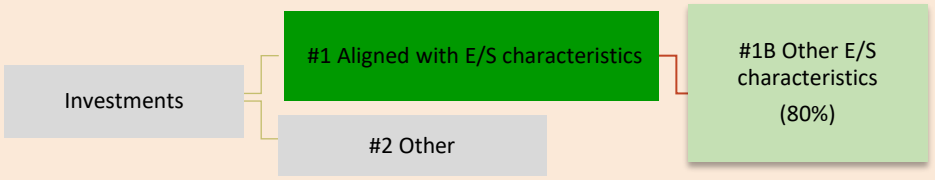
Asset allocation describes the share of investments in specific assets.

The Sub-Fund has at least 80% of its exposure, net of cash, ancillary liquid assets and derivatives, to corporate and sovereign securities with an ESG rating equal to or higher than B. The Sub-Fund's average ESG portfolio rating, net of cash, ancillary liquid assets and derivatives, needs to be at least equal to or higher than BBB.

For the remaining proportion of direct and indirect investments in corporate and sovereign securities without an ESG rating, minimum social and environmental safeguards apply insofar as company-level sustainability data are available. Companies need to be compliant with the UNGC principles or OECD Guidelines for Multinational Enterprises and not involved in very severe controversies regarding environmental, social or governance issues or in aforementioned socially controversial activities. With respect to any sovereign exposure, the Sub-Fund will only invest in securities issued by countries with a high democratic level.

Only direct or indirect investments in companies, countries and economic activities have been considered for the scope of the reporting and assets which do not directly or indirectly invest in companies, countries and economic activities, such as cash, ancillary liquid assets, derivatives and sovereign securities, are not in scope of the reporting.

Taxonomy-aligned activities are expressed as a share of:
- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:
- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

○ ***How does the use of derivatives attain the environmental or social characteristics promoted by the financial product*?**

The Sub-Fund's portfolio does not use derivatives to attain the environmental or social characteristics promoted by the financial product.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.
Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.
Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

Not applicable

○ **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[43]?**

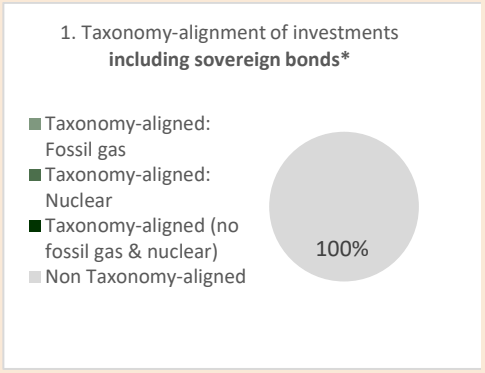
☐ Yes:

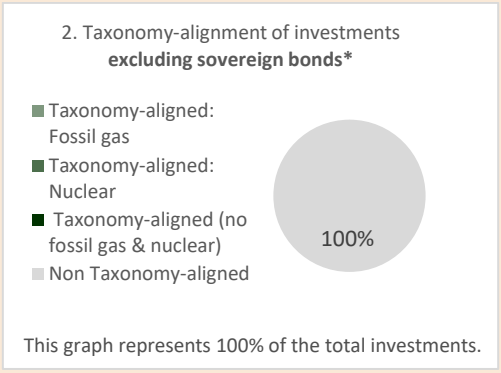
☐ In fossil gas ☐ In nuclear energy

☒ No

[43] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.





** For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.*

What is the minimum share of investments in transitional and enabling activities?

Not applicable

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentaly sustainable economic activities under the EU

What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

Not applicable

What is the minimum share of socially sustainable investments?

Not applicable

What investments are included under "#2 Other", what is their purpose and are there any minimum environmental or social safeguards?

In accordance with the investment policy of the Sub-Fund, investments included in #2 Other are instrumental in optimizing exposure to concentration, market and liquidity risks, thus contributing to the efficient portfolio management of the Sub-Fund. The category #2 Other includes cash, cash equivalents, derivatives and investments of the financial product that are neither aligned with environmental or social characteristics nor qualify as sustainable investments, mainly corporate and sovereign securities (both equity and debt instruments), which may represent up to 20% of Sub-Fund's net assets.

For the category #2 Other, minimum social and environmental safeguards apply, insofar as investment-level sustainability data are available. Companies need to be compliant with the UNGC principles or OECD Guidelines for Multinational Enterprises and not involved in very severe controversies regarding environmental, social or governance issues or in aforementioned socially controversial activities. With respect to any sovereign exposure, the Sub-Fund will only invest in securities issued by countries with a high democratic level.

Reference benchmarks are indexes to measure whether the financial product attains the sustainable investment objective.

Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

Not applicable

- ***How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?***

  Not applicable

- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

  Not applicable

- ***How does the designated index differ from a relevant broad market index?***

  Not applicable

- ***Where can the methodology used for the calculation of the designated index be found?***

  Not applicable

Where can I find more product specific information online?

More product-specific information can be found on the website:
https://www.impactsgr.it/informativa-sulla-sostenibilita/?lang=en&area=6182&sez=6183

ANNEX II

Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

Product name: ACTIVE BALANCED **Legal entity identifier:** 549300VJ2ZMS0BZB3P52

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

☐ **Yes**	☒ **No**
☐ It will make a minimum of **sustainable investments with an environmental objective:** ___%	☐ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of ___% of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☐ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective:** ___%	☒ It promotes E/S characteristics, but **will not make any sustainable investments**

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

What environmental and/or social characteristics are promoted by this financial product?

The Sub-Fund promotes a range of environmental and social characteristics by integrating environmental, social and governance ('ESG') criteria into the investment process. The Sub-Fund undertakes to promote, both directly and indirectly through equity derivatives, investments aimed at reducing the negative impacts on society and the environment, by allocating capital in favour of companies and countries that adequately manage and intentionally reduce their negative effects on the environment and on human health and well-being. In the selection criteria key elements of attention are climate change, water stress and biodiversity, pollution, waste and resource efficiency, and from the social performance end, human well-being, product quality and safety, and human rights.

Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.

The Sub-Fund's portfolio promotes social and environmental characteristics by predominantly allocating capital in favour of companies and countries able to adequately manage ESG risks and opportunities, as measured by their ESG ratings.

- ***What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?***

  The Sub-Fund promotes environmental, social and governance practices by adopting a two-layer selection process: the first layer is determined by the identification of the Sub-Fund's investable universe by means of criteria of exclusion on the securities selection process. The second layer is represented by an active asset selection seeking to invest mainly in companies and countries which deem to have good or improving ESG characteristics and good governance practices as defined by SFDR.

  The Sub-Fund's portfolio invests, directly and indirectly through equity derivatives, at least 80% of its assets, net of cash and ancillary liquid assets, in companies and countries with an ESG rating equal to or higher than B. The weighted average ESG rating of the portfolio, net of cash and ancillary liquid assets, cannot be lower than BBB. The Sub-Fund's portfolio does not invest in companies and countries with ESG rating below B. Equity exposure gained through derivatives is considered on a net basis for ESG rating attribution. Equity indices to which the Sub-Fund's portfolio gains exposure through derivatives need to have an average ESG rating at least equal to or greater than BBB.

  The ESG ratings measure the investment-level capacity to manage environmental and social risks and opportunities that could materially impact business performance, positively or negatively.

  The ESG ratings are attributed at the investment-level and then aggregated at the portfolio-level. For the attribution of the ESG ratings seven different levels are used, from the best rating of AAA to the worst rating of CCC, which are derived from a normalized ESG score, which ranges from 0 (worst performance) to 10 (best performance).

  Involvement of companies in environmental, social and governance controversies: it is assessed on a 0-10 scale, with 0 corresponding to an involvement in very severe controversies and 10 corresponding to no involvement in environmental, social and governance controversies. The Sub-Fund's portfolio does not directly invest in companies involved in very severe environmental, social and governance controversies, which correspond to a 0 score.

  Involvement of companies in socially controversially activities: it is assessed by the share of company revenues generated by the following socially controversial activities: civilian and military weapons, controversial weapons, tobacco, gambling, and non-responsible alcohol. The Sub-Fund's portfolio does not directly invest in companies with a revenue share equal to or greater than 5% being generated by such activities, except for controversial activities, with respect to which any revenue-based involvement leads to exclusion from the Sub-Fund's portfolio.

  Democratic level of countries: it is assessed by the PAI indicator "average rule of law score". A low democratic level corresponds to a country-level performance with respect to the average rule of law score below the 50th percentile of all countries for which data are available. The Sub-Fund's portfolio does not invest in countries with a low democratic level.

  Sustainability data are provided by external sustainability data providers.

What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

Not applicable

How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?

Not applicable

How have the indicators for adverse impacts on sustainability factors been taken into account?

Not applicable

How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

Not applicable

Does this financial product consider principal adverse impacts on sustainability factors?

- [x] Yes
- [ ] No

The PAI integration in the investment process regards only the PAI indicator "average rule of law". The Sub-Fund's portfolio does not invest in countries with a low democratic level.

What investment strategy does this financial product follow?

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

The objective of the Sub-Fund is to achieve medium to long term capital growth by combining different eligible assets.

The Sub-Fund will invest directly or indirectly (through derivatives, futures and options on stock market indexes, including sector indexes) at least 20% and up to 60% of the total assets under management in equities and equity-linked instruments (such as warrants for example) and Structured Products as certificates, according to fundamental valuation analysis.

The aforementioned fundamental valuation analysis aiming to target the selected investments, will be carried out taking in consideration discounted free cash flow and metrics methods such as return on investments, enterprise value (EV) on invested capital and, for specific sectors, dividend sustainability.

To achieve its investment objective, and under normal conditions, the Sub-Fund will be mainly invested in:

- Directly or indirectly (through derivatives) in equities and equity-linked instruments (such as warrants for example) and Structured Products as certificates.
- Bonds, including fixed or floating rates, convertible bonds, zero-coupons, government and treasury bonds, without limits of duration.
- Money market instruments or liquid assets.

The Sub-Fund's portfolio invests, directly and indirectly, at least 80% of its assets, net of cash and ancillary liquid assets, in companies and countries with an ESG rating equal to or higher than B. The weighted average ESG rating of the portfolio, net of cash and ancillary liquid assets, cannot be lower than BBB. The Sub-Fund's portfolio does not invest in companies with ESG rating below B. Equity exposure gained through derivatives is considered on a net basis for ESG rating attribution. Equity indices to which the Sub-Fund's portfolio gains exposure through derivatives need to have an average ESG rating at least equal to or greater than BBB.

For further information on the investment strategy of the financial product, please refer to the Sub-Fund's Investment Policy section of the present Prospectus.

- ***What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?***

  The investment strategy ensures compliance with the environmental/social characteristics promoted by the fund through the following:

  - The Sub-Fund's average ESG portfolio rating needs to be at least equal to or higher than BBB. Equity exposure gained through derivatives is considered on a net basis for ESG rating attribution. Equity indices to which the Sub-Fund's portfolio gains exposure through derivatives need to have an average ESG rating at least equal to or greater than BBB.

  - The Sub-Fund invests at least 80% of its assets in companies and countries with an ESG equal to or higher than B.

  - Exclusion from the investible universe of countries with a low democratic level, as measured by the PAI indicator average rule of law score. A low democratic level corresponds to a performance with respect to average rule of law score below the 50th percentile of all countries for which data are available.

  - Exclusion from the investible universe of companies involved in the following socially controversial activities: civilian and military weapons, controversial weapons, tobacco, gambling, and non-responsible alcohol.

  - Exclusion from the investible universe of companies involved in very severe environmental, social and governance controversies.

- ***What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?***

There is no committed minimum rate to reduce the investible universe of the Sub-Fund. The combination of an exclusionary approach with an approach establishing portfolio-level ESG performance limits, which needs to be higher than that of the investible universe, is adopted for the investment strategy of the Sub-Fund in order to optimize financial efficiency while promoting social and environmental characteristics.

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

What is the policy to assess good governance practices of the investee companies?

The Management Company has adopted an approach for assessing good governance of the investee companies based on their involvement in controversies related to governance issues. Involvement of investee companies in governance-related controversies is assessed on a weekly basis. Monitoring of involvement of investee companies in governance-related controversies is conducted ex post on a weekly basis. Owing to current limited availability of technical solutions, ex ante monitoring of compliance with sustainability-related portfolio limits is not applicable. Governance-related controversies involvement is assessed on a 0-10 scale, with 0 corresponding to involvement in very severe controversies and 10 corresponding to no involvement in controversies.

Accordingly, involvement in very severe governance-related controversies corresponds to a 0 score. Investee companies that are or become involved in very severe governance-related controversies, which correspond to a 0 score, are excluded from the investible universe and portfolio, respectively, within the shortest possible time span in a way consistent with protecting investors' best interests. Governance-related controversies involvement is assessed by using controversies involvement data provided by external sustainability data providers.

What is the asset allocation planned for this financial product?

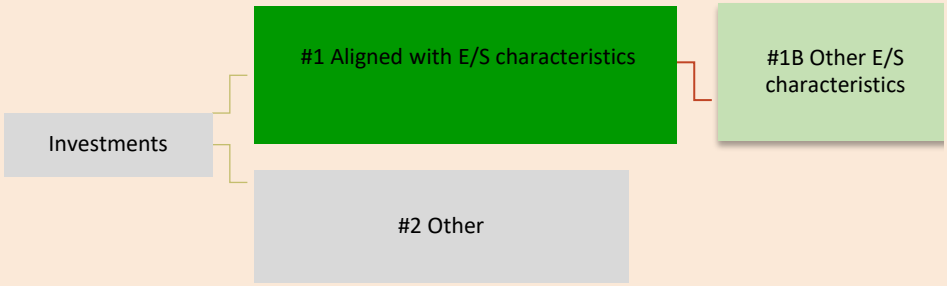
Asset allocation describes the share of investments in specific assets.

The Sub-Fund has at least 80% of its exposure, net of cash and liquidity assets, to corporate and sovereign securities with an ESG rating equal to or higher than B. The Sub-Fund's average ESG portfolio rating, net of cash and ancillary liquid assets, needs to be at least equal to or higher than BBB. Equity exposure gained through derivatives is considered on a net basis for ESG rating attribution. Equity indices to which the Sub-Fund's portfolio gains exposure through derivatives need to have an average ESG rating at least equal to or greater than BBB.

For the remaining proportion of direct investments in corporate and sovereign securities without an ESG rating, minimum social and environmental safeguards apply insofar as company-level sustainability data are available. Companies need to be compliant with the UNGC principles or OECD Guidelines for Multinational Enterprises and not involved in very severe controversies regarding environmental, social or governance issues or in aforementioned socially controversial activities. With respect to any sovereign exposure, the Sub-Fund will only invest in securities issued by countries with a high democratic level.

Only direct or indirect investments in companies, issuers and economic activities have been considered for the scope of the reporting and assets which do not directly or indirectly invest in companies, issuers and economic activities, such as cash, ancillary liquid assets, derivatives and sovereign securities, are not in scope of the reporting.

Taxonomy-aligned activities are expressed as a share of:
- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:
- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

○ ***How does the use of derivatives attain the environmental or social characteristics promoted by the financial product*?**

In light of the characterizing elements of its investment policy, the Sub-Fund actively promotes environmental and social characteristics also by gaining indirect equity exposure through derivatives. Equity exposure gained through derivatives is considered on a net basis for ESG rating attribution. Equity indices to which the Sub-Fund's portfolio gains exposure through derivatives need to have an average ESG rating at least equal to or greater than BBB.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.
Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.
Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

Not applicable

○ **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[44]?**

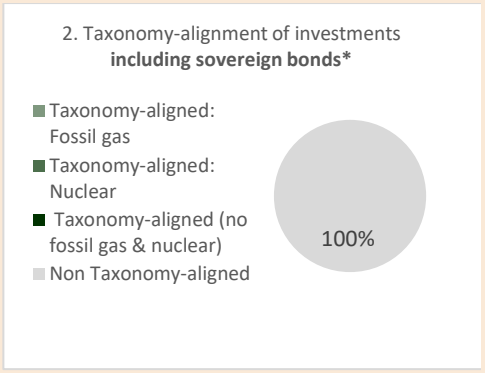
☐ Yes:

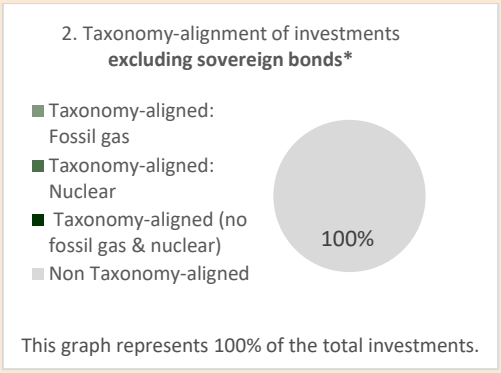
☐ In fossil gas ☐ In nuclear energy

☒ No

[44] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.





****For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.***

What is the minimum share of investments in transitional and enabling activities?

Not applicable

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentaly sustainable economic activities under the EU

What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

Not applicable

What is the minimum share of socially sustainable investments?

Not applicable

What investments are included under "#2 Other", what is their purpose and are there any minimum environmental or social safeguards?

In accordance with the investment policy of the Sub-Fund, investments included in #2 Other are instrumental in optimizing exposure to concentration, market and liquidity risks, thus contributing to the efficient portfolio management of the Sub-Fund. The category #2 Other includes cash, cash equivalents, derivatives and investments of the financial product that are neither aligned with environmental or social characteristics nor qualify as sustainable investments, mainly corporate and sovereign securities (both equity and debt instruments), which may represent up to 20% of the Sub-Fund's net assets.

For the category #2 Other, minimum social and environmental safeguards apply, insofar as investment-level sustainability data are available. Companies need to be compliant with the UNGC principles or OECD Guidelines for Multinational Enterprises and not involved in very severe controversies regarding environmental, social or governance issues or in aforementioned socially controversial activities. With respect to any sovereign exposure, the Sub-Fund will only invest in securities issued by countries with a high democratic level.

Reference benchmarks are indexes to measure whether the financial product attains the sustainable investment objective.

Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

Not applicable

- ***How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?***

  Not applicable

- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

  Not applicable

- ***How does the designated index differ from a relevant broad market index?***

  Not applicable

- ***Where can the methodology used for the calculation of the designated index be found?***

  Not applicable

Where can I find more product specific information online?

More product-specific information can be found on the website:
https://www.impactsgr.it/informativa-sulla-sostenibilita/?lang=en&area=6182&sez=6183

ANNEX II

Template pre-contractual disclosure for the financial products referred to in Article 9, paragraphs 1 to 4a, of Regulation (EU) 2019/2088 and Article 5, first paragraph, of Regulation (EU) 2020/852

Product name: SUSTAINABLE GLOBAL CREDIT **Legal entity identifier:** 549300UZ04XL93DVN206

Sustainable investment objective

Does this financial product have a sustainable investment objective?

☒ **Yes**	☐ **No**
☒ It will make a minimum of **sustainable investments with an environmental objective: 30%**	☐ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of ___% of sustainable investments
☒ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☒ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☐ with a social objective
☒ It will make a minimum of **sustainable investments with a social objective: 10%**	☐ It promotes E/S characteristics, but **will not make any sustainable investments**

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

What is the sustainable investment objective of this financial product?

The sustainable investment objective of the Sub-Fund is to invest 100% of its net assets, net of cash, ancillary liquid assets and derivatives, in socially and environmentally sustainable investments, by allocating capital in favour of companies that prove to have either a positive or improving social and environmental impact or alignment to Sustainable Development Goals (SDGs).

The overall portfolio-level net impact performance needs to be positive.

The Sub-Fund will invest a minimum share of 10% in sustainable investments with a social objective and a minimum share of 30% in sustainable investments with an environmental objective.

Sustainability indicators measure how the sustainable objectives of this financial product are attained.

The remaining 60% will be allocated between sustainable investments with either a social or environmental objective, with no fixed allocation, as this will depend on the availability of socially and environmentally sustainable investments and the fact that some investments could contribute to both environmental and social objectives.

The Sub-Fund pursues its socially sustainable investment objective by investing in companies with a positive impact on human health.

The Sub Fund pursues the objective of investing in sustainable investments contributing to climate change mitigation and climate change adaptation, as per Regulation (EU) 2020/852 ("EU Taxonomy"), by supporting the achievement of COP 21 Paris Agreement of limiting temperature rise to 1.5°C as compared to pre-industrial levels and the European Commission's climate neutrality objective by 2050. The Management Company considers that a targeted minimum of 10% of the underlying investments selected for the Sub Fund's portfolio, net of cash, ancillary liquid assets and derivatives, will be aligned with the first two objectives of the EU Taxonomy, climate change mitigation and climate change adaptation. The Sub-Fund does not commit to a minimum share of investments in transitional and enabling activities; however, these investments may form part of the portfolio.

Furthermore, the investment strategy also pursues the objective of contributing to reduce carbon emissions, on a continuous basis, by investing at least 20% of its net assets, net of cash, ancillary liquid assets and derivatives, in companies with a decarbonisation trajectory consistent with the achievement of Paris Agreement's objectives and of climate neutrality by 2050. The financial product complies with the methodological requirements set out in Commission Delegated Regulation (EU) 2020/1818 for the calculation of the investment- and portfolio-level decarbonisation trajectory necessary to achieve Paris Agreements' objectives and carbon neutrality by 2050. No EU Climate Transition Benchmark nor EU Paris-aligned Benchmark is available for the investment strategy of the Sub-Fund.
The Management Company has discretion to invest in companies with limited exposure to fossil fuels, but which are driving or significantly participating in the transition to a more sustainable economy.

- ***What sustainability indicators are used to measure the attainment of the sustainable investment objective of this financial product?***

  The attainment of the sustainable investment objective of the investment strategy is measured by the following sustainability indicators:

  - **Net impact ratio (NIR) indicator:** Net impact ratio is a resource efficiency indicator that comprehensively captures investment's impacts on society, knowledge, health, and the environment, considering both positive and adverse impacts. An investment with an improving net impact ratio indicator thus assures that adverse impacts are being reduced in relation to positive impacts, while an investment with a positive net impact ratio indicator assures that the scale of adverse impacts is insignificant compared to the scale of positive impacts. Net Impact Ratio data are provided by the specialised impact data provider The Upright Project. The Upright's methodology for attributing company-level net impact performance is available at the following link: https://www.uprightproject.com/downloads/model-whitepaper-v2.pdf

  - **SDG performance indicator:** the SDG performance indicator aggregates third-party data measuring product and operational contribution at company-level to the attainment of each SDG and is expressed as a percentage ranging from -100%, corresponding to a company that is exclusively contributing negatively to all SDGs, to +100%, corresponding to a company that is exclusively contributing positively to all SDGs. As for net impact ratio, the SDG performance indicator captures both positive and adverse impacts with respect to the attainment of SDGs. An investment with an improving SDG performance indicator thus assures that

adverse impacts are being reduced in relation to positive impacts, while an investment with a positive SDG performance indicator assures that the scale of adverse impacts is insignificant compared to the scale of positive impacts thematically relevant for attaining SDGs. Disaggregated SDG contribution data are provided by external sustainability data providers.

- **Health impact performance indicator:** for a given investment to qualify as sustainable with a social objective, its health impact performance indicator needs to be positive. The health impact performance indicator, which is one of the impact dimensions of Upright's Net Impact Framework, measures the real-world effects that a given investee company generates on human health directly, through its products and operations, or indirectly, through its suppliers' operations or when its products are used by customers. The Upright's methodology for attributing company-level health impact performance is available at the following link: https://www.uprightproject.com/downloads/model-whitepaper-v2.pdf. The health impact performance indicator is articulated in the following five health-related impact categories:

  - Physical diseases
  - Mental diseases
  - Nutrition
  - Relationships
  - Meaning & Joy

  Health impact performance data are provided by the specialised impact data provider The Upright Project.

- **Taxonomy alignment indicator**: the Sub-Fund pursues the objective of investing in sustainable investments contributing to climate change mitigation and climate change adaptation, as per Regulation (EU) 2020/852 ("EU Taxonomy"), by supporting the achievement of COP 21 Paris Agreement of limiting temperature rise to 1.5°C as compared to pre-industrial levels and the European Commission's climate neutrality objective by 2050. The Management Company considers that a targeted minimum of 10% of the underlying investments selected for the Sub Fund's portfolio, net of cash, ancillary liquid assets and derivatives, will be aligned with the first two objectives of the EU Taxonomy, climate change mitigation and climate change adaptation. The Sub-Fund does not commit to a minimum share of investments in transitional and enabling activities; however, these investments may form part of the portfolio. The degree of EU Taxonomy alignment of a given investment is measured according to the EU Regulations 2020/852 and 2022/1288. Actual and estimated Taxonomy alignment data are provided by external sustainability data providers. Owing to current limited availability of standardised EU Taxonomy alignment data, both actual and estimated data will be used to measure investment-level EU Taxonomy alignment. Estimated EU Taxonomy alignment can be subject to a certain degree of uncertainty, which is expected to decrease over time, mainly due to an evolving regulatory framework and limited corporate disclosure on EU Taxonomy alignment. EU Taxonomy alignment data are calculated on a revenue basis. Whenever available, actual EU Taxonomy data are preferred.

- **Decarbonisation trajectory indicator:** For an investment to qualify as sustainable with an environmental objective without being EU Taxonomy aligned, its decarbonisation trajectory needs to be consistent with limiting the temperature rise to 1.5°C as compared to pre-industrial levels and achieving the European Commission's climate neutrality objective by 2050. The calculation of the investment-level decarbonisation trajectory indicator complies with the methodological requirements set out in Commission Delegated Regulation (EU) 2020/1818 for the calculation of the decarbonisation trajectory necessary to achieve Paris Agreement's objectives and carbon neutrality by 2050.

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

How do sustainable investments not cause significant harm to any environmental or social sustainable investment objective?

The sustainable investments of the Sub-Fund respect the "do no significant harm principle" by abiding to the following negative screening criteria:

- Exclusion from the investible universe of companies not compliant with Paris-aligned Benchmark (PAB) exclusionary criteria, as defined in the Regulation UE 2020/1818, which are the following:
  - companies involved in any activities related to controversial weapons;
  - companies involved in the cultivation and production of tobacco;
  - companies involved in violation of the United Nations Global Compact (UNGC) principles or the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises;
  - companies that derive 1% or more of their revenues from the exploration, mining, extraction, distribution or refining of hard coal and lignite;
  - companies that derive 10% or more of their revenues from the exploration, extraction, distribution or refining of oil fuels;
  - companies that derive 50% or more of their revenues from the exploration, extraction, manufacturing or distribution of gaseous fuels;companies that derive 50% or more of their revenues from electricity generation with a GHG intensity of more than 100 gCO2e/kWh.
- Exclusion from the investible universe of the Sub-Fund of all investments in companies involved in socially controversial activities (tobacco, gambling, civilian and military weapons, controversial weapons and non-responsible alcohol).

- Exclusion from the investible universe of the Sub-Fund of countries with low democratic levels, as measured by the PAI indicator average rule of law score. A low democratic level corresponds to a performance with respect to average rule of law score below the 50th percentile of all countries for which data are available. Data on average rule of law score are provided by external sustainability data providers.

- Exclusion from the investible universe of the Sub-Fund of companies involved in either violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises or in very severe controversies regarding environmental, social or governance issues. If an investee company gets involved in violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises or in very severe controversies regarding environmental, social or governance issues, it loses its sustainable investment qualification, in that such involvements are deemed inconsistent with the respect of the DNSH principle. As a result, the Sub-Fund will divest from such an investee company within the shortest possible time span and in a way consistent with protecting investors' best interests.

- Exclusion from the investible universe of the Sub-Fund of companies not meeting at least one of the following criteria:

  - a positive or improving impact performance, as measured by either the net impact ratio or the SDG performance indicator
  - EU Taxonomy alignment
  - a positive health impact performance
  - a decarbonisation trajectory, calculated according to the methodological requirements set out in Commission Delegated Regulation (EU) 2020/1818, consistent with the achievement of Paris Agreement's objectives and carbon neutrality by 2050

Sustainability and impact data used for the aforementioned positive and negative screenings are provided by external sustainability data providers.

How have the indicators for adverse impacts on sustainability factors been taken into account?

For each existing and new sustainable investment of the portfolio a quarterly assessment of the principal adverse impact indicators described in Table 1 of Annex I of Regulation (EU) 2022/1288 is conducted, with the aim to improve over time the portfolio-level PAI performance.

In the investment process of the Sub-Fund, the following Principal adverse impact (PAI) indicators are considered at the investment- and portfolio-level, owing to their relevance for the investment strategy:

- GHG emissions (1) – trajectory improvement
- GHG intensity of investee companies (3) – trajectory improvement
- Violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises (10) – exclusion from investible universe
- Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises (11) – exclusion from investible universe
- Exposure to controversial weapons (14) – exclusion from the investible universe
- GHG intensity of investee countries (15) – trajectory improvement
- Average rule of law score (24) – Table 3 – exclusion from the investible universe

If an investee company gets involved in violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises or in very severe controversies regarding environmental, social or governance issues, it loses its sustainable investment qualification, in that such involvements are deemed inconsistent with the respect of the DNSH principle. As a result, the Sub-Fund will divest from such an investee company in a way consistent with protecting investors' best interests.

How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?

Known severe breaches in minimum behavioural norms detailed in the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights, are a reason for exclusion from the Sub-Fund's investment universe. Breach monitoring is conducted both for new and existing investments on a weekly basis. Sustainability data used for assessing company-level involvement in violations of the aforementioned behavioural principles are provided by external sustainability data providers. Data are mainly available for mid- and large-cap companies. Involvement of small-cap companies in such breaches is monitored and assessed on a best-effort basis, with best-effort implying that the Management Company directly gathers data from public and corporate sources in order to assess whether a given investee for which no third-party data are available can be deemed involved in violations of aforementioned behavioural principles.

Does this financial product consider principal adverse impacts on sustainability factors?

✖ Yes, for each existing and new sustainable investment of the portfolio a quarterly assessment of the principal adverse impact indicators described in Table 1 of Annex I of Regulation (EU) 2022/1288 is conducted, with the aim to improve over time the portfolio-level PAI performance.

In the investment process of the Sub-Fund, the following Principal adverse impact (PAI) indicators are considered at the investment- and portfolio-level, owing to their relevance for the investment strategy:

- GHG emissions (1) – trajectory improvement
- GHG intensity of investee companies (3) – trajectory improvement
- Violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises (10) – exclusion from investible universe
- Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises (11) – exclusion from investible universe
- Exposure to controversial weapons (14) – exclusion from the investible universe
- GHG intensity of investee countries (15) – trajectory improvement
- Average rule of law score (24) – Table 3 – exclusion from investible universe

If an investee company gets involved in violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises or in very severe controversies regarding environmental, social or governance issues, it loses its sustainable investment qualification, in that such involvements are deemed inconsistent with the respect of the DNSH principle. As a result, the Sub-Fund will divest from such an investee company within the shortest possible time span and in a way consistent with protecting investors' best interests.

Furthermore, the attainment of the sustainable investment objective of the Sub-Fund is also assured primarily by adopting an impact performance measurement and management system which allows for measuring and managing both adverse and positive impacts attributable to the sustainable investments of the Sub-Fund. Investing in companies with either a positive or improving social or environmental impact performance assures that adverse impacts are consistently reduced over time both at the investment- and portfolio-level.

☐ No

What investment strategy does this financial product follow?

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

The Sub-fund will achieve its investment objective by essentially investing in corporate bonds.

The Sub-fund will invest in high yield bonds not exceeding 70% of the sub-fund assets; part of the high yield issues are subordinated bonds perpetual or long dated with an embedded call.

The minimum possible rating of both the target bonds and the issuers on the day of issuance will be CCC.

Subordinated bonds are more likely to suffer a partial or complete loss in the case of any default or bankruptcy of the issuer, because all obligations to holders of senior debt must be satisfied first.

The portfolio construction will combine the Management Company's ongoing assessment of the financial fundamentals of the target issuers with the analysis of the features of each target issue aiming to identify attractive investment opportunities with a solid credit profile and low correlation to interest rates fluctuations.

The Sub-fund's investments in unrated debt securities will not exceed 10% of its net assets.

The Sub-Fund may further achieve its investment objective by investing up to 10% of its total net assets:

- in Target Funds provided that the maximum level of total management fees applying to both the Sub-Fund and the Target Funds shall not exceed 4.5% (four-point-five percent), and/or

- in another sub-fund(s) of the Fund (a "Target Sub-Fund(s)") within the limits and conditions set forth in the section 9. Investment restrictions of the Prospectus. Subscription and redemption fees, if any, will not be charged to the Sub-Fund when investing in a Target Sub-Fund(s).

Investments in Target Funds and Target Sub-Funds combined will not exceed 10% of the total net assets of the Sub-Fund.

The Sub-Fund will not directly invest in asset-backed securities ("ABS"), mortgage-backed securities ("MBS"), indirect exposure may occur from the investment through the Target Funds; such indirect exposure to ABS and MBS will not exceed a limit of 10% of the Sub-Fund's assets. Cocos will not represent more than 15% of the net assets.

For further information on the investment strategy, please refer to the Sub-Fund's Investment Policy section of the present Prospectus.

In order to achieve its sustainable investment and financial objectives, the Sub-Fund has adopted the following investment process:

- Definition of an investible universe composed of:

  - companies not involved in specific socially controversial activities (gambling, tobacco, civilian and military weapons, controversial weapons, and non-responsible alcohol)
  - companies not involved in violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises or in very severe controversies regarding environmental, social or governance issues

  - companies meeting at least one of the following criteria:

    - a positive or improving impact performance, as measured by either the net impact ratio or the SDG performance indicator
    - EU Taxonomy alignment
    - a positive health impact performance
    - a decarbonisation trajectory, calculated according to the methodological requirements set out in Commission Delegated Regulation (EU) 2020/1818, consistent with the achievement of Paris Agreement's objectives and carbon neutrality by 2050

  - countries with at least a medium or high level of democratic level

- Compliance with the following portfolio-level impact performance limits:

  - Positive net impact ratio (NIR)
  - Minimum 10% invested in sustainable investments, net of cash, ancillary liquid assets and derivatives, with a positive health impact performance
  - Minimum of 10% invested in EU Taxonomy-aligned sustainable investments, net of cash, ancillary liquid assets and derivatives
  - Minimum of 20% invested in sustainable investments, net of cash, ancillary liquid assets and derivatives, with a decarbonisation trajectory, calculated according to the methodological requirements set out in Commission Delegated Regulation (EU)

2020/1818, consistent with the achievement of Paris Agreement's objectives and carbon neutrality by 2050

- Active stock selection based on application of both investment- and portfolio-level impact performance and financial limits; portfolio-level impact performance needs to be positive

- Optimisation of the portfolio's risk-return-impact profile in accordance with portfolio-level financial, liquidity, concentration, and impact performance limits

What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?

The investment strategy ensures compliance with the sustainable objective of the Sub-Fund through the following binding elements:

- Exclusion from the investible universe of companies not compliant with Paris-aligned Benchmark (PAB) exclusionary criteria, as defined in the Regulation UE 2020/1818, which are the following:
  - companies involved in any activities related to controversial weapons
  - companies involved in the cultivation and production of tobacco
  - companies involved in violation of the United Nations Global Compact (UNGC) principles or the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises
  - companies that derive 1% or more of their revenues from the exploration, mining, extraction, distribution or refining of hard coal and lignite
  - companies that derive 10% or more of their revenues from the exploration, extraction, distribution or refining of oil fuels
  - companies that derive 50% or more of their revenues from the exploration, extraction, manufacturing or distribution of gaseous fuels
  - companies that derive 50% or more of their revenues from electricity generation with a GHG intensity of more than 100 gCO2e/kWh
- Exclusion from the investible universe of companies involved in specific socially controversial activities (gambling, tobacco, civilian and military weapons, controversial weapons, and non-responsible alcohol)
- Exclusion from the investible universe of companies involved in very severe controversies regarding environmental, social or governance issues or in violations of UNGC Principles and OECD Guidelines for Multinational Enterprises
- Exclusion from the investible universe of countries with a low democratic level

Exclusion from the investible universe of companies not meeting at least one of the following criteria:

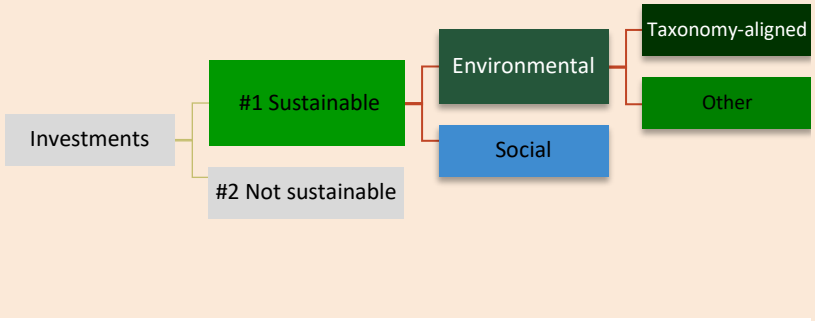
- positive or improving impact performance, as measured by either the net impact ratio or the SDG performance indicator
- EU Taxonomy alignment
- a positive health impact performance
- Portfolio-level limit imposing a minimum of 10% of sustainable investments, net of cash, ancillary liquid assets and derivatives, with a positive health impact performance (sustainable investments with a social objective)
  Portfolio-level limit imposing a minimum of 10% of EU Taxonomy-aligned sustainable investments, net of cash, ancillary liquid asset and derivatives (sustainable investments with an environmental objective - EU Taxonomy aligned)
- Portfolio-level limit imposing a minimum of 20% of sustainable investments, net of cash, ancillary liquid assets and derivatives, with a decarbonisation trajectory, calculated according to the methodological requirements set out in Commission Delegated Regulation (EU) 2020/1818, consistent with the achievement of Paris Agreement's objectives and carbon neutrality by 2050 (sustainable investments with an environmental objective – Not EU Taxonomy aligned)

Taxonomy-aligned activities are expressed as a share of:
- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

What is the policy to assess good governance practices of the investee companies?

The Management Company has adopted an approach for assessing good governance practices of the investee companies based on their involvement in controversies related to governance issues. Involvement of investee companies in governance-related controversies is assessed on a weekly basis. Monitoring of involvement of investee companies in governance-related controversies is conducted ex post on a weekly basis. Owing to current limited availability of technical solutions, ex ante monitoring of compliance with sustainability-related portfolio limits is not applicable. Investee companies that are or become involved in very severe governance-related controversies are excluded from the investible universe and portfolio, respectively, within the shortest possible time span in a way consistent with protecting investors' best interests. Governance-related controversies involvement is assessed by using controversies involvement data provided by external sustainability data providers. Governance-related controversies involvement is assessed on a 0-10 scale, with 0 corresponding to involvement in very severe controversies and 10 corresponding to no involvement in controversies. Accordingly, involvement in very severe governance-related controversies corresponds to a 0 score.

What is the asset allocation and the minimum share of sustainable investments?



#1 Sustainable covers sustainable investments with environmental or social objectives.
#2 Not sustainable includes investments which do not qualify as sustainable investments.

Asset allocation describes the share of investments in specific assets.

The Sub-Fund invests 100% of its net assets, net of cash, ancillary liquid assets and derivatives, in sustainable investments, with a minimum share of 10% in sustainable investments with a social objective and a minimum of 30% in sustainable investments with an environmental objective. For an investment to qualify as sustainable with a social objective, the investment-level impact on human health needs to be positive. For an investment to qualify as sustainable with an environmental objective, the investment needs either to be EU Taxonomy-aligned or its decarbonisation trajectory, calculated according to the methodological requirements set out in Commission Delegated Regulation (EU) 2020/1818, needs to be consistent with the achievement of Paris Agreement's objectives and carbon neutrality by 2050. A targeted minimum of 10% of the underlying investments selected for the Sub Fund's portfolio, net of cash, ancillary liquid assets and derivatives, will be aligned with the first two objectives of the EU Taxonomy, climate change mitigation and climate change adaptation. A minimum of 20% of investments will be invested in companies with a decarbonisation trajectory, calculated according to the methodological requirements set out in Commission Delegated Regulation (EU) 2020/1818, consistent with the achievement of Paris Agreement's objectives and carbon neutrality by 2050. Targeting a minimum investment-level yearly reduction rate of the carbon intensity consistent with achieving carbon neutrality by 2050 allows the investment strategy to allocate capital also in favour of companies consistently making significant efforts to reduce GHG emissions, thus playing a crucial role in contributing to absolute GHG emissions reduction objectives, despite not

contributing per se to EU Taxonomy environmental objectives, with investee companies operating in carbon-intensive sectors being particularly relevant in this respect. The portfolio-level net impact ratio needs to be positive.

For an investment to qualify as sustainable for the Sub-Fund, it needs to meet at least one of the following screening criteria:

- a positive or improving impact performance, as measured by either the net impact ratio or the SDG performance indicator
- EU Taxonomy alignment
- a positive health impact performance
- a decarbonisation trajectory, calculated according to the methodological requirements set out in Commission Delegated Regulation (EU) 2020/1818, consistent with the achievement of Paris Agreement's objectives and carbon neutrality by 2050

Companies involved in specific controversial activities (civilian and military weapons, controversial weapons, gambling, tobacco and non-responsible alcohol) or involved in in violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises or in very severe controversies regarding environmental, social or governance issues, as well as countries with low democratic levels, are excluded from the investible universe of the Sub-Fund. Monitoring of compliance with aforementioned sustainable investment portfolio limits is conducted ex post on a weekly basis. Owing to current limited availability of technical solutions, ex ante monitoring of compliance with sustainability-related portfolio limits is not applicable. In case of breach detection of such limits, the Management Company will divest accordingly, so as to assure portfolio limit compliance, within the shortest possible time span and in a way consistent with protecting investors' best interests.

Only direct or indirect investments in companies, issuers and economic activities have been considered for the scope of the reporting and assets which do not directly or indirectly invest in companies, issuers and economic activities, such as cash, ancillary liquid assets and derivatives, are not in scope of the reporting.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.
Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.
Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission leels corresponding to the best performance.

How does the use of derivatives attain the sustainable investment objective?

The Sub-Fund uses derivatives to optimize portfolio risk exposure, but not to attain the sustainable investment objective.

To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The Sub Fund pursues the objective of investing in sustainable investments contributing to climate change mitigation and climate change adaptation, as per Regulation (EU) 2020/852 ("EU Taxonomy"), by supporting the achievement of COP 21 Paris Agreement of limiting temperature rise to 1.5°C as compared to pre-industrial levels and the European Commission's climate neutrality objective by 2050. The Management Company considers that a targeted minimum of 10% of the underlying investments selected for the Sub Fund's portfolio, net of cash, ancillary liquid assets and derivatives, will be aligned with the first two objectives of the EU Taxonomy, climate change mitigation and climate change adaptation. EU Taxonomy alignment is achieved essentially by investing in corporate hybrid bonds. The investment strategy also invests in sustainable investments with an environmental objective not aligned with EU Taxonomy by targeting a minimum of 20% of investments, net of cash, ancillary liquid assets and derivatives, in investee companies with a decarbonisation trajectory, calculated according to the methodological requirements set out in Commission Delegated Regulation (EU) 2020/1818, consistent with the achievement of Paris Agreement's objectives and carbon neutrality by 2050. Targeting a minimum investment-level yearly reduction rate of the carbon intensity consistent with achieving carbon neutrality by 2050 allows the investment strategy to allocate capital also in favour of companies whose activities play a crucial role in contributing to absolute GHG emissions reduction objectives, despite not contributing per se to EU Taxonomy environmental objectives, with investee companies operating in

carbon-intensive sectors being particularly relevant in this respect. Estimated EU Taxonomy alignment can be subject to a certain degree of uncertainty, which is expected to decrease over time, mainly due to an evolving regulatory framework and limited corporate disclosure on EU Taxonomy alignment. EU Taxonomy alignment data are calculated on a revenue basis. Whenever available, actual EU Taxonomy data are preferred. EU Taxonomy alignment data are not audited.

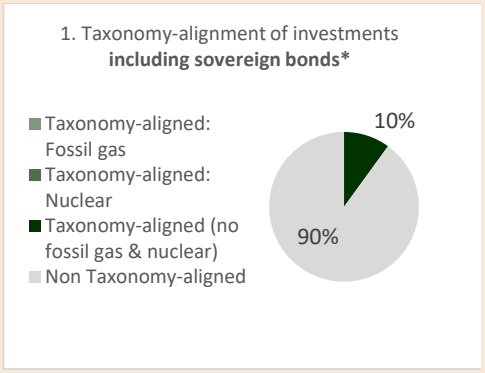
Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[45]?

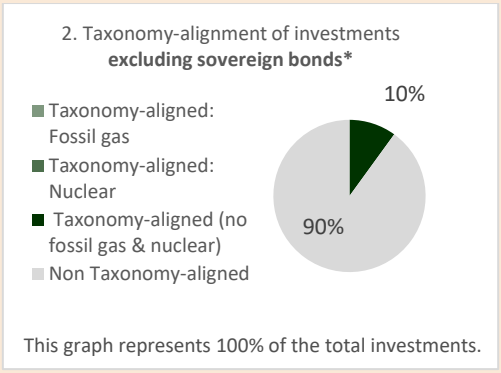
☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.





** For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.*

What is the minimum share of investments in transitional and enabling activities?

The Sub-Fund does not commit to a minimum share of investments in transitional and enabling activities; however, these investments may form part of the portfolio.

What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

The minimum share of sustainable investments, net of cash, ancillary liquid assets and derivatives, with an environmental objective not aligned with the EU Taxonomy for the Sub-Fund is 20%. For an investment to qualify as sustainable with an environmental objective not aligned with the EU Taxonomy its yearly decarbonisation trajectory, calculated according to the methodological requirements set out in Commission Delegated Regulation (EU) 2020/1818, needs to be consistent with the achievement of Paris Agreement's objectives and carbon neutrality by 2050. Targeting a minimum

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentaly sustainable economic activities under the EU Taxonomy.

[45] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

investment-level yearly reduction rate of the carbon intensity consistent with achieving carbon neutrality by 2050 allows the investment strategy to allocate capital in favour of companies consistently making significant efforts to reduce GHG emissions, thus playing a crucial role in contributing to absolute GHG emissions reduction objectives, despite not contributing per se to EU Taxonomy environmental objectives, with investee companies operating in carbon-intensive sectors being particularly relevant in this respect.

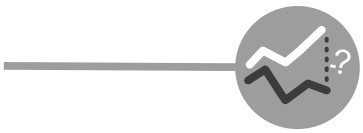
What is the minimum share of sustainable investments with a social objective?

The investment strategy invests a minimum share of 10% in sustainable investments with a social objective, net of cash, ancillary liquid assets and derivatives. For an investment to qualify as sustainable with a social objective, it needs to have a positive health impact performance.

What investments are included under "#2 Not sustainable", what is their purpose and are there any minimum environmental or social safeguards?

Other investments (#2 Not sustainable) are limited to 20% of the Sub-Fund's net assets and may include derivatives, cash and cash equivalents. The use of such investments does not affect the delivery of the sustainable investment objectives of the Sub-Fund, as these investments are used for the purposes of liquidity management, hedging and efficient portfolio management.

Whilst these investments may not be aligned with the sustainable investment objective of the Fund, they will, insofar as investment-level sustainability data allows, still be subject to the abovementioned minimum environmental and social safeguards.



Is a specific index designated as a reference benchmark to meet the sustainable investment objective?

Not applicable

- ***How does the reference benchmark take into account sustainability factors in a way that is continuously aligned with the sustainable investment objective?***

  Not applicable

- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

  Not applicable

- ***How does the designated index differ from a relevant broad market index*?**

  Not applicable

- ***Where can the methodology used for the calculation of the designated index be found?***

  Not applicable

Reference benchmarks are indexes to measure whether the financial product attains the sustainable investment objective.

Where can I find more product specific information online?

More product-specific information can be found on the website:
https://www.impactsgr.it/informativa-sulla-sostenibilita/?lang=en&area=6055&sez=6056

ANNEX II

Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Product name: GLOBAL BOND **Legal entity identifier:** 5493002NCOTWYWWK8Y94

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

☐ **Yes**	☒ **No**
☐ It will make a minimum of **sustainable investments with an environmental objective:** ___%	☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 5% of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☒ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☐ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective:** ___%	☐ It promotes E/S characteristics, but **will not make any sustainable investments**

What environmental and/or social characteristics are promoted by this financial product?

Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.

The Sub-Fund promotes a range of environmental and social characteristics by integrating environmental, social and governance ('ESG') criteria into the investment process. The Sub-Fund undertakes to promote, through the implementation of specific criteria of selection and the application of exclusion lists, investments aimed at reducing the negative impacts on society and the environment, by allocating capital in favour of companies and countries that adequately manage and intentionally reduce their negative effects on the environment and on human health and well-being. In the selection criteria key elements of attention are climate change, water stress and biodiversity, pollution, waste and resource efficiency, and from the social performance end, human well-being, product quality and safety, and human rights.

The Sub-Fund's portfolio promotes social and environmental characteristics by predominantly allocating capital in favour of companies and countries able to adequately manage ESG risks and opportunities, as measured by their ESG ratings.

The Sub Fund pursues the objective of investing in sustainable investments contributing to climate change mitigation and climate change adaptation, as per Regulation (EU) 2020/852 ("EU Taxonomy. The Management Company considers that a targeted minimum of 5% of the underlying investments selected for the Sub Fund's portfolio will be aligned with the first two objectives of the EU Taxonomy, climate change mitigation and climate change adaptation. The Sub-Fund does not commit to a minimum share of investments in transitional and enabling activities; however, these investments may form part of the portfolio.

- ***What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?***

  The Sub-Fund promotes environmental, social and governance practices by adopting a two-layer selection process: the first layer is determined by the identification of the Sub-Fund's investable universe by means of criteria of exclusion on the securities selection process. The second layer is represented by an active asset selection seeking to invest mainly in companies which deem to have good or improving ESG characteristics and good governance practices as defined by SFDR.

  The Sub-Fund's portfolio invests at least 80% of its assets, net of cash, ancillary liquid assets and derivatives, in companies and countries with an ESG rating equal to or higher than B. The weighted average ESG rating of the portfolio cannot be lower than BBB. The Sub-Fund's portfolio does not invest in companies and countries with ESG rating below B.

  The ESG ratings measure the company-level capacity to manage environmental and social risks and opportunities that could materially impact business performance, positively or negatively.

  The ESG ratings are attributed at the investment level and then aggregated at the portfolio level. For the attribution of the ESG ratings seven different levels are used, from the best rating of AAA to the worst rating of CCC, which are derived from a normalized ESG score, which ranges from 0 (worst performance) to 10 (best performance).

  Involvement of companies in environmental, social and governance controversies: The Sub-Fund's portfolio does not invest in companies involved in very severe environmental, social and governance controversies, which correspond to a 0 score.

  Involvement of companies in socially controversially activities: it is assessed by the share of company revenues generated by the following socially controversial activities: civilian and military weapons, controversial weapons, tobacco, gambling, and non-responsible alcohol. The Sub-Fund's portfolio does not invest in companies with a revenue share equal to or greater than 5% being generated by such activities, except for controversial activities, with respect to which any revenue-based involvement leads to exclusion from the Sub-Fund's portfolio.

  Democratic level of countries: it is assessed by the PAI indicator "average rule of law score". A low democratic level corresponds to a country-level performance with respect to the average rule of law score below the 50th percentile of all countries for which data are available. The Sub-Fund's portfolio does not invest in countries with a low democratic level.

  Taxonomy alignment indicator: the Sub-Fund pursues the objective of investing in sustainable investments contributing to climate change mitigation and climate change adaptation, as per Regulation (EU) 2020/852 ("EU Taxonomy"). The Management

Company considers that a targeted minimum of 10% of the underlying investments selected for the Sub Fund's portfolio, net of cash, ancillary liquid assets and derivatives, will be aligned with the first two objectives of the EU Taxonomy, climate change mitigation and climate change adaptation. The Sub-Fund does not commit to a minimum share of investments in transitional and enabling activities; however, these investments may form part of the portfolio. The degree of EU Taxonomy alignment of a given investment is measured according to the EU Regulations 2020/852 and 2022/1288. Actual and estimated Taxonomy alignment data are provided by external sustainability data providers. Owing to current limited availability of standardised EU Taxonomy alignment data, both actual and estimated data will be used to measure investment-level EU Taxonomy alignment. Estimated EU Taxonomy alignment can be subject to a certain degree of uncertainty, which is expected to decrease over time, mainly due to an evolving regulatory framework and limited corporate disclosure on EU Taxonomy alignment. EU Taxonomy alignment data are calculated on a revenue basis. Whenever available, actual EU Taxonomy data are preferred.

Sustainability data are provided by external sustainability data providers.

What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

The Sub Fund pursues the objective of investing in sustainable investments contributing to climate change mitigation and climate change adaptation, as per Regulation (EU) 2020/852 ("EU Taxonomy. The Management Company considers that a targeted minimum of 5% of the underlying investments selected for the Sub Fund's portfolio will be aligned with the first two objectives of the EU Taxonomy, climate change mitigation and climate change adaptation. The Sub-Fund does not commit to a minimum share of investments in transitional and enabling activities; however, these investments may form part of the portfolio.

How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

The Sub-Fund's proportion of environmentally sustainable investments is compliant with technical screening criteria and the "Do No Significant Harm (DNSH) criteria established in Regulation 2020/852 for environmentally sustainable investments. The "Do No Significant Harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

How have the indicators for adverse impacts on sustainability factors been taken into account?

The Sub-Fund's proportion of investments with a positive taxonomy alignment to climate change mitigation and climate change adaptation will take into account Principal Adverse Impact (PAI) indicators.

In the investment process of the Sub-Fund, the following Principal adverse impact (PAI) indicators are considered at the investment level:

- GHG emissions (1) – trajectory improvement
- GHG intensity of investee companies (3) – trajectory improvement
- Violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises (10) – exclusion from investible universe

- Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises (11) – exclusion from investible universe
- Exposure to controversial weapons (14) – exclusion from the investible universe
- GHG intensity of investee countries (15) – trajectory improvement
- Average rule of law score (24) – Table 3 – exclusion from the investible universe

If an investee company gets involved in violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises or in very severe controversies regarding environmental, social or governance issues, it loses its sustainable investment qualification, in that such involvements are deemed inconsistent with the respect of the SFDR DNSH principle. As a result, the Sub-Fund will divest from such an investee company in a way consistent with protecting investors' best interests.

How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:

Known severe breaches in minimum behavioural norms detailed in the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights, are a reason for exclusion from the Sub-Fund's investment universe. Breach monitoring is conducted both for new and existing investments on a weekly basis. Sustainability data used for assessing company-level involvement in violations of the aforementioned behavioural principles are provided by external sustainability data providers. Data are mainly available for mid- and large-cap companies. Involvement of small-cap companies in such breaches is monitored and assessed on a best-effort basis, with best-effort implying that the Management Company directly gathers data from public and corporate sources in order to assess whether a given investee for which no third-party data are available can be deemed involved in violations of aforementioned behavioural principles.

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

Does this financial product consider principal adverse impacts on sustainability factors?

☒ Yes, the Sub-Fund's proportion of investments with a positive taxonomy alignment to the first two objectives, climate change mitigation and climate change adaptation, will take into account Principal Adverse Impact (PAI) indicators.

In the investment process of the Sub-Fund, the following Principal adverse impact (PAI) indicators are considered at the investment level, owing to their relevance for the investment strategy:

- GHG emissions (1) – trajectory improvement
- GHG intensity of investee companies (3) – trajectory improvement
- Violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises (10) – exclusion from investible universe
- Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises (11) – exclusion from investible universe
- Exposure to controversial weapons (14) – exclusion from the investible universe
- GHG intensity of investee countries (15) – trajectory improvement
- Average rule of law score (24) – Table 3 – exclusion from the investible universe

If an investee company gets involved in violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises or in very severe controversies regarding environmental, social or governance issues, it loses its sustainable investment qualification, in that such involvements are deemed inconsistent with the respect of the SFDR DNSH principle. As a result, the Sub-Fund will divest from such an investee company in a way consistent with protecting investors' best interests.

☐ No

What investment strategy does this financial product follow?

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

The Sub-fund will invest at least 70% of its assets under management in fixed income securities with a duration of less than five years. It may invest in non-investment grade bonds (high yield bonds) not exceeding 15% of the Sub-Fund's net assets.

The Sub-fund's investments in unrated debt securities will not exceed 10% of its net assets.

The Sub-Fund may further achieve its investment objective by investing up to 10% of its total net assets:

- in Target Funds provided that the maximum level of total management fees applying to both the Sub-Fund and the Target Funds shall not exceed 4.5% (four-point-five percent), and/or
- in another sub-fund(s) of the Fund (a "Target Sub-Fund(s)") within the limits and conditions set forth in the section 9. Investment restrictions of the Prospectus. Subscription and redemption fees, if any, will not be charged to the Sub-Fund when investing in a Target Sub-Fund(s).

Investments in Target Funds and Target Sub-Funds combined will not exceed 10% of the total net assets of the Sub-Fund.

The Sub-Fund will not directly invest in asset-backed securities ("ABS"), mortgage-backed securities ("MBS") or contingent convertible capital ("CoCos"), indirect exposure may occur from the investment through the Target Funds; such indirect exposure to ABS and MBS will not exceed a limit of 10% of the Sub-Fund's assets.

The Sub-Fund may also invest in Ancillary Liquid Assets up to 20% of its net asset.

Under exceptional circumstances and in the best interest of the shareholders, the Sub-Fund may be invested up to 100% of its net assets in Ancillary Liquid Assets on a temporary basis.

The Sub-Fund's portfolio invests, directly and indirectly, at least 80% of its assets, net of cash and ancillary liquid assets, in companies and countries with an ESG rating equal to or higher than B. The weighted average ESG rating of the portfolio, net of cash and ancillary liquid assets, cannot be lower than BBB. The Sub-Fund's portfolio does not invest in companies with ESG rating below B.

Within the 80% of the Sub-fund allocated to companies and countries aligned with environmental and social characteristics, 5% will be in environmentally sustainable investments aligned with the first two objectives of the EU taxonomy, climate change mitigation and climate change adaptation.

For further information on the investment strategy, please refer to the Sub-Fund's Investment Policy section of the present Prospectus.

- ***What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?***

  - Exclusion from the investible universe of companies involved in specific socially controversial activities (gambling, tobacco, civilian and military weapons, controversial weapons, and non-responsible alcohol)
  - Exclusion from the investible universe of companies involved in very severe controversies regarding environmental, social or governance issues or in violations of UNGC Principles and OECD Guidelines for Multinational Enterprises
  - Exclusion from the investible universe of countries with a low democratic level
  - ESG ratings equal to or higher than B for at least 80% of Sub-Fund's net assets
  - average ESG portfolio rating at least equal to or higher than BBB
  - a minimum of 5% invested in environmentally sustainable investments aligned with the first two objectives of the EU Taxonomy, climate change mitigation and adaptation.

What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

There is no committed minimum rate to reduce the investible universe of the Sub-Fund

- ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

The Management Company has adopted an approach for assessing good governance of the investee companies based on their involvement in controversies related to governance issues. Involvement of investee companies in governance-related controversies is assessed on a weekly basis. Monitoring of involvement of investee companies in governance-related controversies is conducted ex post on a weekly basis. Owing to current limited availability of technical solutions, ex ante monitoring of compliance with sustainability-related portfolio limits is not applicable. Governance-

related controversies involvement is assessed on a 0-10 scale, with 0 corresponding to involvement in very severe controversies and 10 corresponding to no involvement in controversies.

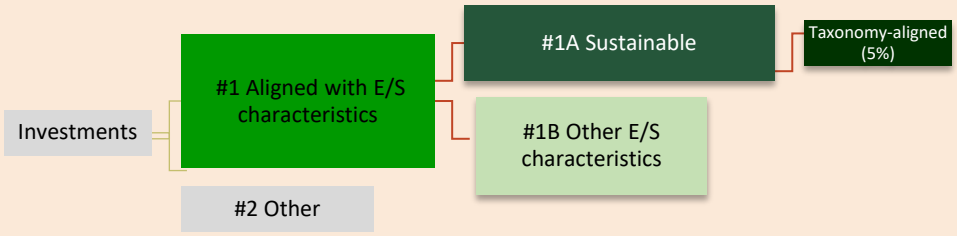
Accordingly, involvement in very severe governance-related controversies corresponds to a 0 score. Investee companies that are or become involved in very severe governance-related controversies, which correspond to a 0 score, are excluded from the investible universe and portfolio, respectively, within the shortest possible time span in a way consistent with protecting investors' best interests. Governance-related controversies involvement is assessed by using controversies involvement data provided by external sustainability data providers.

What is the asset allocation planned for this financial product?

The Sub-Fund invests at least 80% of its net assets in corporate and sovereign securities with an ESG rating equal to or higher than B. The Sub-Fund's average ESG portfolio rating needs to be at least equal to or higher than BBB. Within the 80% of net assets aligned with environmental and social characteristics, at least 5% will be in environmentally sustainable investments aligned with the first two objectives of the taxonomy, climate change mitigation and adaptation.

Asset allocation describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:
- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:
- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The Sub-Fund's portfolio does not use derivatives to attain the environmental or social characteristics or to pursue sustainable investment objectives.

To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The minimum proportion of sustainable investments with an environmental objective aligned with the EU taxonomy is 5%.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.
Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.
Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

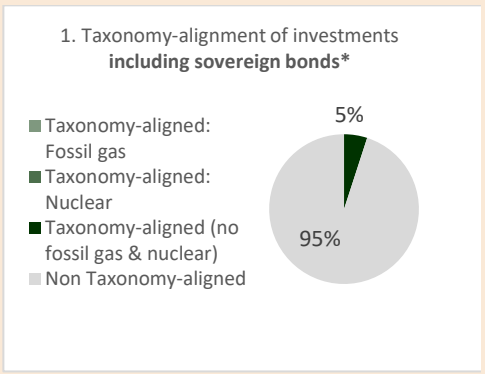
- **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[46]?**

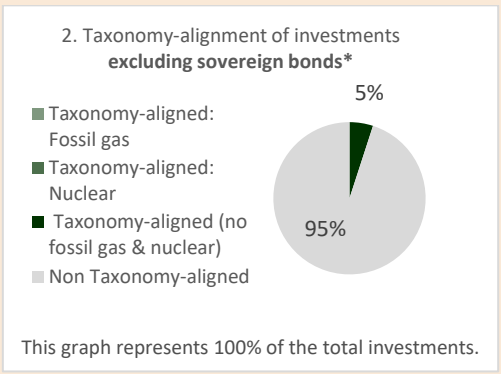
  ☐ Yes:

  ☐ In fossil gas ☐ In nuclear energy

  ☒ No

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.





For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.

- ***What is the minimum share of investments in transitional and enabling activities?***

The Sub-Fund does not commit to a minimum share of investments in transitional and enabling activities; however, these investments may form part of the portfolio.

What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

The Sub-Fund does not commit to a minimum share of investments with an environmental objective not aligned with the EU Taxonomy; however, these investments may form part of the portfolio.

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentaly sustainable economic activities under the EU

What is the minimum share of socially sustainable investments?

The Sub-Fund does not commit to a minimum share of socially sustainable investments; however, these investments may form part of the portfolio.

[46] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

What investments are included under "#2 Other", what is their purpose and are there any minimum environmental or social safeguards?

Other investments (#2 Not sustainable) are limited to 20% and may include derivatives, cash and cash equivalents. The use of such investments does not affect the promotion of social and environmental characteristics and the attainment of the sustainable investment objective of the Sub-Fund, as these investments are used for the purposes of liquidity management, hedging and efficient portfolio management.

Whilst these investments may not be aligned with social and environmental characteristics, they will, insofar as investment-level sustainability data allows, still be subject to the abovementioned minimum environmental and social safeguards.

Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

Not applicable

Reference benchmarks are indexes to measure whether the financial product attains the sustainable investment objective.

- ***How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?***

  Not applicable

- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

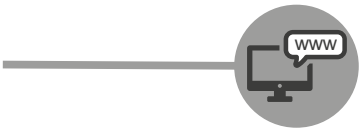
  Not applicable

- ***How does the designated index differ from a relevant broad market index?***

  Not applicable

- ***Where can the methodology used for the calculation of the designated index be found?***

  Not applicable



Where can I find more product specific information online?

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https://www.impactsgr.it/informativa-sulla-sostenibilita/?lang=en&area=6107&sez=6108

ANNEX II

Template pre-contractual disclosure for the financial products referred to in Article 9, paragraphs 1 to 4a, of Regulation (EU) 2019/2088 and Article 5, first paragraph, of Regulation (EU) 2020/852

Product name: IMPATTO GLOBAL EQUITY **Legal entity identifier:** 5493001E0KGYFEVA2C24

Sustainable investment objective

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?

☒ **Yes**	☐ **No**
☒ It will make a minimum of **sustainable investments with an environmental objective: 30%**	☐ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of ___% of sustainable investments
☒ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☒ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☐ with a social objective
☒ It will make a minimum of **sustainable investments with a social objective: 20%**	☐ It promotes E/S characteristics, but **will not make any sustainable investments**

Sustainability indicators measure how the sustainable objectives of this financial product are attained.

What is the sustainable investment objective of this financial product?

The sustainable investment objective of the Sub-Fund is that of investing 100% of its portfolio, net of cash, ancillary liquid assets and derivatives, in social or environmental sustainable investments, by allocating capital in favour of companies that prove to have either a positive or improving social and environmental impact or alignment to Sustainable Development Goals (SDGs).

The overall portfolio-level net impact performance needs to be positive.

The Sub-Fund will invest a minimum share of 20% in sustainable investments with a social objective and a minimum share of 30% in sustainable investments with an environmental objective.

The remaining 50% will be allocated between sustainable investments with either a social or environmental objective, with no fixed allocation, as this will depend on the availability of socially and environmentally sustainable investments and the fact that some investments could contribute to both environmental and social objectives.

The Sub-Fund pursues its socially sustainable investment objective by investing in companies with a positive impact on human health.

The Sub Fund pursues the objective of investing in sustainable investments contributing to climate change mitigation and climate change adaptation, as per Regulation (EU) 2020/852 ("EU Taxonomy")., by supporting the achievement of COP 21 Paris Agreement of limiting temperature rise to 1.5°C as compared to pre-industrial levels and the European Commission's climate neutrality objective by 2050. The Management Company considers that a targeted minimum of 10% of the underlying investments selected for the Sub Fund's portfolio, net of cash, ancillary liquid assets and derivatives, will be aligned with the first two objectives of the EU Taxonomy, climate change mitigation and climate change adaptation. The Sub-Fund does not commit to a minimum share of investments in transitional and enabling activities; however, these investments may form part of the portfolio.

Furthermore, the investment strategy also pursues the objective of contributing to reduce carbon emissions on a continuous basis by investing at least 20% of its net assets, net of cash, ancillary liquid assets and derivatives, in companies with a decarbonisation trajectory consistent with the achievement of Paris Agreement's objectives and of climate neutrality by 2050. The financial product complies with the methodological requirements set out in Commission Delegated Regulation (EU) 2020/1818 for the calculation of the investment- and portfolio-level decarbonisation trajectory necessary to achieve Paris Agreements' objectives and carbon neutrality by 2050. No EU Climate Transition Benchmark nor EU Paris-aligned Benchmark is available for the investment strategy of the Sub-Fund.

The Management Company has discretion to invest in companies with limited exposure to fossil fuels, but which are driving or significantly participating in the transition to a more sustainable economy.

- ***What sustainability indicators are used to measure the attainment of the sustainable investment objective of this financial product?***

  The attainment of the sustainable investment objective of the investment strategy is measured by the following sustainability indicators:

  - Net impact ratio (NIR) indicator: Net Impact Ratio is a resource efficiency indicator that comprehensively captures investment's impacts on society, knowledge, health, and the environment, considering both positive and adverse impacts. An investment with an improving net impact ratio indicator, thus, assures that adverse impacts are being reduced in relation to positive impacts, while an investment with a positive net impact ratio indicator assures that the scale of adverse impacts is insignificant compared to the scale of positive impacts. Net Impact Ratio data are provided by the specialized impact data provider The Upright Project. The Upright's methodology for attributing company-level net impact performance is available at the following link: https://www.uprightproject.com/downloads/model-whitepaper-v2.pdf.

  - SDG performance indicator: the SDG performance indicator aggregates third-party data measuring product and operational contribution at company-level to the attainment of each SDG and is expressed as a percentage ranging from -100%, corresponding to a company that is exclusively contributing negatively to all SDGs, to +100%, corresponding to a company that is exclusively contributing positively to all SDGs. As for net impact ratio, the SDG performance indicator captures both positive and adverse impacts with respect to the attainment of SDGs. An

investment with an improving SDG performance indicator thus assures that adverse impacts are being reduced in relation to positive impacts, while an investment with a positive SDG performance indicator assures that the scale of adverse impacts is insignificant compared to the scale of positive impacts thematically relevant for attaining SDGs. Disaggregated SDG contribution data are provided by external impact data providers.

- **Health impact performance indicator:** for a given investment to qualify as sustainable with a social objective, its health impact performance indicator needs to be positive. The health impact performance indicator, which is one of the impact dimensions of Upright's Net Impact Framework, measures the real-world effects that a given investee company generates on human health directly, through its products and operations, or indirectly, through its suppliers' operations or when its products are used by customers. The Upright's methodology for attributing company-level health impact performance is available at the following link: https://www.uprightproject.com/downloads/model-whitepaper-v2.pdf. The health impact performance indicator is articulated in the following five health-related impact categories:
  - Physical diseases
  - Mental diseases
  - Nutrition
  - Relationships
  - Meaning & Joy

Health impact performance data are provided by the specialized impact data provider The Upright Project.

- **Taxonomy alignment indicator**: the Sub-Fund pursues the objective of investing in sustainable investments contributing to climate change mitigation and climate change adaptation, as per Regulation (EU) 2020/852 ("EU Taxonomy")., by supporting the achievement of COP 21 Paris Agreement of limiting temperature rise to 1.5°C as compared to pre-industrial levels and the European Commission's climate neutrality objective by 2050. The Management Company considers that a targeted minimum of 10% of the underlying investments selected for the Sub Fund's portfolio, net of cash, ancillary liquid assets and derivatives, will be aligned with the first two objectives of the EU Taxonomy, climate change mitigation and climate change adaptation. The Sub-Fund does not commit to a minimum share of investments in transitional and enabling activities; however, these investments may form part of the portfolio. The degree of EU Taxonomy alignment of a given investment is measured according to the EU Regulations 2020/852 and 2022/1288. Actual and estimated Taxonomy alignment data are provided by external sustainability data providers. Owing to current limited availability of standardized EU Taxonomy alignment data, both actual and estimated data will be used to measure investment-level EU Taxonomy alignment. Estimated EU Taxonomy alignment can be subject to a certain degree of uncertainty, which is expected to decrease over time, mainly due to an evolving regulatory framework and limited corporate disclosure on EU Taxonomy alignment. EU Taxonomy alignment data are calculated on a revenue basis. Whenever available, actual EU Taxonomy data are preferred.

- **Decarbonisation trajectory indicator:** for an investment to qualify as sustainable with an environmental objective without being EU Taxonomy aligned, its decarbonisation trajectory needs to be consistent with limiting the temperature rise to 1.5°C as compared to pre-industrial levels and achieving the European Commission's climate neutrality objective by 2050. The calculation of the investment-level decarbonisation trajectory indicator complies with the methodological requirements set out in Commission Delegated Regulation (EU) 2020/1818 for the calculation of the decarbonisation trajectory necessary to achieve Paris Agreement's objectives and carbon neutrality by 2050. Decarbonisation trajectory data are provided by external sustainability data

providers.

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

How do sustainable investments not cause significant harm to any environmental or social sustainable investment objective?

The sustainable investments of the Sub-Fund respect the "do no significant harm principle" by abiding to the following negative screening criteria:

- Exclusion from the investible universe of companies not compliant with Paris-aligned Benchmark (PAB) exclusionary criteria, as defined in the Regulation UE 2020/1818, which are the following:
  - companies involved in any activities related to controversial weapons;
  - companies involved in the cultivation and production of tobacco;
  - companies involved in violation of the United Nations Global Compact (UNGC) principles or the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises;
  - companies that derive 1% or more of their revenues from the exploration, mining, extraction, distribution or refining of hard coal and lignite;
  - companies that derive 10% or more of their revenues from the exploration, extraction, distribution or refining of oil fuels;
  - companies that derive 50% or more of their revenues from the exploration, extraction, manufacturing or distribution of gaseous fuels;
  - companies that derive 50% or more of their revenues from electricity generation with a GHG intensity of more than 100 gCO2e/kWh.

- Exclusion from the investible universe of the Sub-Fund of all investments in companies involved in socially controversial activities (tobacco, gambling, civilian and military weapons, controversial weapons and non-responsible alcohol).

- Exclusion from the investible universe of the Sub-Fund of countries with low democratic levels, as measured by the PAI indicator average rule of law score. A low democratic level corresponds to a performance with respect to average rule of law score below the 50th percentile of all countries for which data are available. Data on average rule of law score are provided by external sustainability data providers.

- Exclusion from the investible universe of the Sub-Fund of companies involved in either violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises or in very severe controversies regarding environmental, social or governance issues. If an investee company gets involved in violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises or in very severe controversies regarding environmental, social or governance issues, it loses its sustainable investment qualification, in that such involvements are deemed inconsistent with the respect of the DNSH principle. As a result, the Sub-Fund will divest from such an investee company within the shortest possible time span and in a way consistent with protecting investors' best interests.

- Exclusion from the investible universe of the Sub-Fund of companies not meeting at least one of the following criteria:

  - a positive or improving impact performance, as measured by either the net impact ratio or the SDG performance indicator
  - EU Taxonomy alignment
  - a positive health impact performance
  - a decarbonisation trajectory, calculated according to the methodological requirements set out in Commission Delegated Regulation (EU) 2020/1818, consistent with the achievement of Paris Agreement's objectives and carbon neutrality by 2050

Sustainability and impact data used for the aforementioned positive and negative screenings are provided by external sustainability data providers.

How have the indicators for adverse impacts on sustainability factors been taken into account?

For each existing and new sustainable investment of the portfolio a quarterly assessment of the principal adverse impact indicators described in Table 1 of Annex I of Regulation (EU) 2022/1288 is conducted, with the aim to improve over time the portfolio-level PAI performance.
In the investment process of the Sub-Fund, the following Principal adverse impact (PAI) indicators are considered at the investment- and portfolio-level, owing to their relevance for the investment strategy:

- GHG emissions (1) – trajectory improvement
- GHG intensity of investee companies (3) – trajectory improvement
- Violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises (10) – exclusion from investible universe
- Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises (11) – exclusion from investible universe
- Exposure to controversial weapons (14) – exclusion from the investible universe
- GHG intensity of investee countries (15) – trajectory improvement
- Average rule of law score (24) – Table 3 – exclusion from the investible universe

If an investee company gets involved in violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises or in very severe controversies regarding environmental, social or governance issues, it loses its sustainable investment qualification, in that such involvements are deemed inconsistent with the respect of the DNSH principle. As a result, the Sub-Fund will divest from such an investee company within the shortest possible time span and in a way consistent with protecting investors' best interests.

How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?

Known severe breaches in minimum behavioural norms detailed in the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organization on Fundamental Principles and Rights at Work and the International Bill of Human Rights, are a reason for exclusion from the Sub-Fund's investment universe. Breach monitoring is conducted both for new and existing investments on a weekly basis. Sustainability data used for assessing company-level involvement in violations of the aforementioned behavioural principles are provided by external sustainability data providers. Data are mainly available for mid- and large-cap companies. Involvement of small-cap companies in such breaches is monitored and assessed on a best-effort basis, with best-effort implying that the Management Company directly gathers data from public and corporate sources in order to assess whether a given investee for which no third-party data are available can be deemed involved in violations of aforementioned behavioural principles.

Does this financial product consider principal adverse impacts on sustainability factors?

✖ Yes, for each existing and new sustainable investment of the portfolio quarterly assessment of the principal adverse impact indicators described in Table 1 of Annex I of Regulation (EU) 2022/1288 is conducted, with the aim to improve over time the portfolio-level PAI performance.

In the investment process of the Sub-Fund, the following Principal adverse impact (PAI) indicators are considered at the investment- and portfolio-level, owing to their relevance for the investment strategy:

- GHG emissions (1) – trajectory improvement
- GHG intensity of investee companies (3) – trajectory improvement
- Violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises (10) – exclusion from investible universe
- Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises (11) – exclusion from investible universe
- Exposure to controversial weapons (14) – exclusion from the investible universe
- GHG intensity of investee countries (15) – trajectory improvement
- Average rule of law score (24) – Table 3 – exclusion from investible universe

For each existing and new sustainable investment of the portfolio, a periodic assessment of the PAI performance is conducted, with the aim to improve over time the portfolio-level PAI performance, in particular with respect to the aforementioned PAIs.

If an investee company gets involved in violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises or in very severe controversies regarding environmental, social or governance issues, it loses its sustainable investment qualification, in that such involvements are deemed inconsistent with the respect of the DNSH principle. As a result, the Sub-Fund will divest from such an investee company in a way consistent with protecting investors' best interests.

Furthermore, the attainment of the sustainable investment objective of the Sub-Fund is also assured primarily by adopting an impact performance measurement and management system which allows for measuring and managing both adverse and positive impacts attributable to the sustainable investments of the Sub-Fund. Investing in companies with either a positive or improving social or environmental impact performance assures that adverse impacts are consistently reduced over time both at the investment- and portfolio-level.

☐ No

What investment strategy does this financial product follow?

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

The investment objective of the Sub-Fund is to achieve long-term capital appreciation by predominantly investing in worldwide companies that have a positive or improving social or environmental impact. The portfolio of the Sub-Fund will mainly be invested in the equity securities or equity-linked instruments (including financial derivative instruments) of companies across any sector and market capitalization that are domiciled in any country. The exposure to emerging markets may represent up to 20% of the total net assets of the Sub-Fund. The Sub-Fund's investments in small-capitalization companies may represent up to 30% of the total net assets of the Sub-Fund. The Management Company has discretion to invest in companies with limited exposure to fossil fuels, but which are driving or significantly participating in the transition to a more sustainable economy.

For further information on the investment strategy, please refer to the Sub-Fund's Investment Policy section of the present Prospectus.

In order to achieve its sustainable investment and financial objectives, the Sub-Fund has adopted the following investment process:

- Definition of an investible universe composed of:

  - companies not involved in specific socially controversial activities (gambling, tobacco, civilian and military weapons, controversial weapons, and non-responsible alcohol)
  - companies not involved in violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises or in very severe controversies regarding environmental, social or governance issues

  - companies meeting at least one of the following criteria:

    - positive or improving impact performance, as measured by either the net impact ratio or the SDG performance indicator
    - EU Taxonomy alignment
    - a positive health impact performance
    - a decarbonisation trajectory, calculated according to the methodological requirements set out in Commission Delegated Regulation (EU) 2020/1818, consistent with the achievement of Paris Agreement's objectives and carbon neutrality by 2050

  - countries with at least a medium or high level of democratic level

- Compliance with the following portfolio-level impact performance limits:

  - Positive net impact ratio (NIR)
  - Minimum of 20% invested in sustainable investments net of cash, ancillary liquid assets and derivatives, with a positive health impact performance
  - Minimum of 10% invested in EU Taxonomy-aligned sustainable investments, net of cash, ancillary liquid assets and derivatives
  - Minimum of 20% invested in sustainable investments, net of cash, ancillary liquid asset and derivatives, with a decarbonisation trajectory, calculated according to the methodological requirements set out in Commission Delegated Regulation (EU) 2020/1818, consistent with the achievement of Paris Agreement's objectives and carbon neutrality by 2050

- Active stock selection based on application of both investment- and portfolio-level impact performance and financial limits; portfolio-level impact performance needs to be positive

- Optimization of the portfolio's risk-return-impact profile consistently with portfolio-level financial, liquidity, concentration, and impact performance limits

What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?

The investment strategy ensures compliance with the sustainable objective of the Sub-Fund through the following binding elements:

- Exclusion from the investible universe of companies not compliant with Paris-aligned Benchmark (PAB) exclusionary criteria, as defined in the Regulation UE 2020/1818, which are the following:
  - companies involved in any activities related to controversial weapons;
  - companies involved in the cultivation and production of tobacco;
  - companies involved in violation of the United Nations Global Compact (UNGC) principles or the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises;

  - companies that derive 1% or more of their revenues from the exploration, mining, extraction, distribution or refining of hard coal and lignite;
  - companies that derive 10% or more of their revenues from the exploration, extraction, distribution or refining of oil fuels;
  - companies that derive 50% or more of their revenues from the exploration, extraction, manufacturing or distribution of gaseous fuels;
  - companies that derive 50% or more of their revenues from electricity generation with a GHG intensity of more than 100 gCO2e/kWh;
- Exclusion from the investible universe of companies involved in specific socially controversial activities (gambling, tobacco, civilian and military weapons, controversial weapons, and non-responsible alcohol);
- Exclusion from the investible universe of companies involved in very severe controversies regarding environmental, social or governance issues or in violations of UNGC Principles and OECD Guidelines for Multinational Enterprises;
- Exclusion from the investible universe of countries with a low democratic level;
- Exclusion from the investible universe of companies not meeting at least one of the following criteria:

  - a positive or improving impact performance, as measured by either the net impact ratio or the SDG performance indicator
  - EU Taxonomy alignment
  - a positive health impact performance
  - a decarbonisation trajectory, calculated according to the methodological requirements set out in Commission Delegated Regulation (EU) 2020/1818, consistent with the achievement of Paris Agreement's objectives and carbon neutrality by 2050

- Portfolio-level limit imposing a positive portfolio-level net impact ratio
- Portfolio-level limit imposing a minimum of 20% of sustainable investments, net of cash, ancillary liquid assets and derivatives, with a positive health impact performance (sustainable investments with a social objective)
- Portfolio-level limit imposing a minimum of 10% of EU Taxonomy-aligned sustainable investments (sustainable investments with an environmental objective - EU Taxonomy aligned), net of cash, ancillary liquid assets and derivatives
- Portfolio-level limit imposing a minimum of 20% of sustainable investments, net of cash, ancillary liquid assets and derivatives, with a decarbonisation trajectory, calculated according to the methodological requirements set out in Commission Delegated Regulation (EU) 2020/1818, consistent with the achievement of Paris Agreement's objectives and carbon neutrality by 2050 (sustainable investments with an environmental objective – Not EU Taxonomy aligned)

Monitoring of compliance with aforementioned sustainable investment portfolio limits is conducted ex post on a weekly basis. Owing to current limited availability of technical solutions, ex ante monitoring of compliance with sustainability-related portfolio limits is not applicable. In case of breach detection of such limits, the Management Company will divest accordingly, to assure portfolio limit compliance, within the shortest possible time span and in a way consistent with protecting investors' best interests.

What is the policy to assess good governance practices of the investee companies?

The Management Company has adopted an approach for assessing good governance practices of the investee companies based on their involvement in controversies related to governance issues. Involvement of investee companies in governance-related controversies is assessed on a weekly basis. Monitoring of involvement of investee companies in governance-related controversies is conducted ex post on a weekly basis. Owing to current limited availability of technical solutions, ex ante monitoring of compliance with sustainability-related portfolio limits is not applicable.

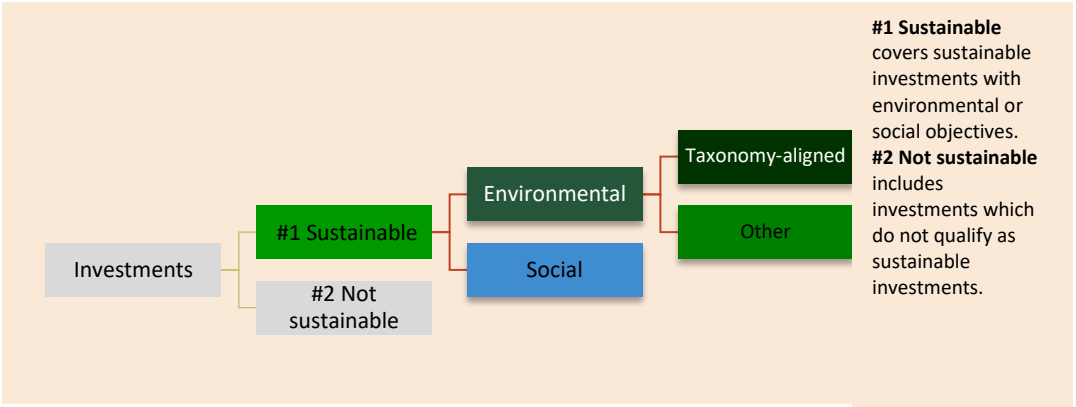
Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.
Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.
Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission leels corresponding to the best performance.

by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

Investee companies that are or become involved in very severe governance-related controversies are excluded from the investible universe and portfolio, respectively, within the shortest possible time span in a way consistent with protecting investors' best interests. Governance-related controversies involvement is assessed by using controversies involvement data provided by external sustainability data providers.. Governance-related controversies involvement is assessed on a 0-10 scale, with 0 corresponding to involvement in very severe controversies and 10 corresponding to no involvement in controversies. Accordingly, involvement in very severe governance-related controversies corresponds to a 0 score.

What is the asset allocation and the minimum share of sustainable investments?



The Sub-Fund invests 100% of its net assets, net of cash, ancillary liquid assets and derivatives, in sustainable investments, with a minimum share of 20% in sustainable investments with a social objective and a 30% in sustainable investments with an environmental objective. For an investment to qualify as sustainable with a social objective, the investment-level impact on human health needs to be positive. For an investment to qualify as sustainable with an environmental objective, the investment needs either to be EU Taxonomy-aligned or its decarbonisation trajectory, calculated according to the methodological requirements set out in Commission Delegated Regulation (EU) 2020/1818, needs to be consistent with the achievement of Paris Agreement's objectives and carbon neutrality by 2050. A targeted minimum of 10% of the underlying investments selected for the Sub Fund's portfolio will be aligned with the first two objectives of the EU Taxonomy, climate change mitigation and climate change adaptation. A minimum of 20% of investments will be invested in companies with a decarbonisation trajectory, calculated according to the methodological requirements set out in Commission Delegated Regulation (EU) 2020/1818, consistent with the achievement of Paris Agreement's objectives and carbon neutrality by 2050. Targeting a minimum investment-level yearly reduction rate of the carbon intensity consistent with achieving carbon neutrality by 2050 allows the investment strategy to allocate capital also in favour of companies consistently making significant efforts to reduce GHG emissions, thus playing a crucial role in contributing to absolute GHG emissions reduction objectives, despite not contributing per se to EU Taxonomy environmental objectives, with investee companies operating in carbon-intensive sectors being particularly relevant in this respect. For an investment to qualify as sustainable for the Sub-Fund, it needs to meet at least one of the following screening criteria:

- a positive or improving impact performance, as measured by either the net impact ratio or the SDG performance indicator;
- EU Taxonomy alignment;
- a positive health impact performance;
- a decarbonisation trajectory, calculated according to the methodological requirements set out in Commission Delegated Regulation (EU) 2020/1818, consistent with the achievement of Paris Agreement's objectives and carbon neutrality by 2050.

Companies involved in specific controversial activities (civilian and military weapons,

controversial weapons, gambling, tobacco and non-responsible alcohol) or involved in in violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises or in very severe controversies regarding environmental, social or governance issues, as well as countries with low democratic levels, are excluded from the investible universe of the Sub-Fund.
Monitoring of compliance with aforementioned sustainable investment portfolio limits is conducted ex post on a weekly basis. Owing to current limited availability of technical solutions, ex ante monitoring of compliance with sustainability-related portfolio limits is not applicable. In case of breach detection of such limits, the Management Company will divest accordingly, so as to assure portfolio limit compliance, within the shortest possible time span and in a way consistent with protecting investors' best interests.

Only direct or indirect investments in companies, issuers and economic activities have been considered for the scope of the reporting and assets which do not directly or indirectly invest in companies, issuers and economic activities, such as cash, ancillary liquid assets, derivatives and sovereign securities, are not in scope of the reporting.

- ***How does the use of derivatives attain the sustainable investment objective?***

  The Sub-Fund uses derivatives to optimize portfolio risk exposure and to attain the sustainable investment objective through CFD and futures exposure.

To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The Sub Fund pursues the objective of investing in sustainable investments contributing to climate change mitigation and climate change adaptation, as per Regulation (EU) 2020/852 ("EU Taxonomy")., by supporting the achievement of COP 21 Paris Agreement of limiting temperature rise to 1.5°C as compared to pre-industrial levels and the European Commission's climate neutrality objective by 2050. The Management Company considers that a targeted minimum of 10% of the underlying investments selected for the Sub Fund's portfolio, net of cash, ancillary liquid assets and derivatives, will be aligned with the first two objectives of the EU Taxonomy, climate change mitigation and climate change adaptation. EU Taxonomy alignment is achieved essentially by investing directly and indirectly in equity securities. The investment strategy also invests in sustainable investments with an environmental objective not aligned with EU Taxonomy by targeting a minimum of 20% of investments, net of cash, ancillary liquid assets and derivatives, in investee companies with a decarbonisation trajectory, calculated according to the methodological requirements set out in Commission Delegated Regulation (EU) 2020/1818, consistent with the achievement of Paris Agreement's objectives and carbon neutrality by 2050. Targeting a minimum investment-level yearly reduction rate of the carbon intensity consistent with achieving carbon neutrality by 2050 allows the investment strategy to allocate capital also in favour of companies consistently making significant efforts to reduce GHG emissions, thus playing a crucial role in contributing to absolute GHG emissions reduction objectives, despite not contributing per se to EU Taxonomy environmental objectives, with investee companies operating in carbon-intensive sectors being particularly relevant in this respect. The investment policy of the Sub-Fund allows for a maximum share of investments of 10% in bonds, including sovereign bonds. Any residual sovereign exposure of the Sub-Fund is justified for its instrumental role in optimizing exposure to concentration, market and liquidity risks, thus contributing to the efficient portfolio management of the Sub-Fund. Owing to current limited availability of standardized EU Taxonomy alignment data, both actual and estimated data will be used to measure investment-level EU Taxonomy alignment. Estimated EU Taxonomy alignment can be subject to a certain degree of uncertainty, which is expected to decrease over time, mainly due to an evolving regulatory framework and limited corporate disclosure on EU Taxonomy alignment. EU Taxonomy alignment data are calculated on a revenue basis. Whenever available, actual EU Taxonomy data are preferred. EU Taxonomy alignment data are not audited.

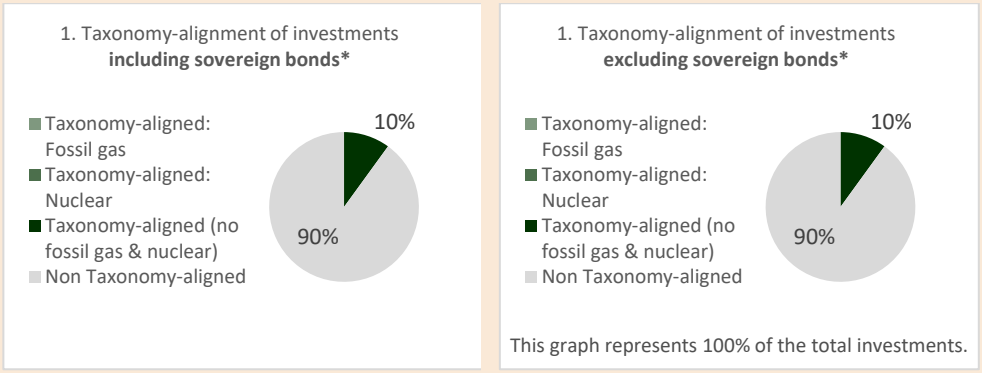
Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?

☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



**** For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.***

What is the minimum share of investments in transitional and enabling activities?

The Sub-Fund does not commit to a minimum share of investments in transitional and enabling activities; however, these investments may form part of the portfolio.

What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

The minimum share of sustainable investments with an environmental objective not aligned with the EU Taxonomy for the Sub-Fund is 20%, net of cash, ancillary liquid assets and derivatives. For an investment to qualify as sustainable with an environmental objective not aligned with the EU Taxonomy its decarbonisation trajectory, calculated according to the methodological requirements set out in Commission Delegated Regulation (EU) 2020/1818, needs to be consistent with the achievement of Paris Agreement's objectives and carbon neutrality by 2050. Targeting a minimum investment-level yearly reduction rate of the carbon intensity consistent with achieving carbon neutrality by 2050 allows the investment strategy to allocate capital also in favour of companies playing a crucial role in contributing to absolute GHG emissions reduction objectives, despite not contributing per se to EU Taxonomy environmental objectives, with

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentaly sustainable economic activities under the EU Taxonomy.

[47] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

investee companies operating in carbon-intensive sectors being particularly relevant in this respect.

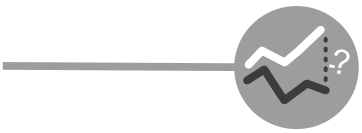
What is the minimum share of sustainable investments with a social objective?

The investment strategy invests a minimum share of 20% in sustainable investments with a social objective, net of cash, ancillary liquid assets and derivatives. For an investment to qualify as sustainable with a social objective, it needs to have a positive health impact performance.

What investments are included under "#2 Not sustainable", what is their purpose and are there any minimum environmental or social safeguards?

Other investments (#2 Not sustainable) are limited to 20% of the Sub-Fund's net assets and may include derivatives, cash and cash equivalents. The use of such investments does not affect the delivery of the sustainable investment objectives of the Sub-Fund, as these investments are used for the purposes of liquidity management, hedging and efficient portfolio management.

Whilst these investments may not be aligned with the sustainable investment objective of the Fund, they will, insofar as investment-level sustainability data allows, still be subject to the abovementioned minimum environmental and social safeguards.



Is a specific index designated as a reference benchmark to meet the sustainable investment objective?

Not applicable

- ***How does the reference benchmark take into account sustainability factors in a way that is continuously aligned with the sustainable investment objective?***

  Not applicable

- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

  Not applicable

- ***How does the designated index differ from a relevant broad market index*?**

  Not applicable

- ***Where can the methodology used for the calculation of the designated index be found?***

  Not applicable

Reference benchmarks are indexes to measure whether the financial product attains the sustainable investment objective.

Where can I find more product specific information online?

More product-specific information can be found on the website:
https://www.impactsgr.it/informativa-sulla-sostenibilita/?lang=en&area=6083&sez=6084

ANNEX III

Template pre-contractual disclosure for the financial products referred to in Article 9, paragraphs 1 to 4a, of Regulation (EU) 2019/2088 and Article 5, first paragraph, of Regulation (EU) 2020/852

Product name: IMPATTO ITALIAN EQUITY **Legal entity identifier:** 549300DD54TW7ANAOV83

Sustainable investment objective

Does this financial product have a sustainable investment objective?

☒ **Yes**	☐ **No**
☒ It will make a minimum of **sustainable investments with an environmental objective: 30%**	☐ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of ___% of sustainable investments
☒ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☒ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☐ with a social objective
☒ It will make a minimum of **sustainable investments with a social objective: 20%**	☐ It promotes E/S characteristics, but **will not make any sustainable investments**

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Sustainability indicators measure how the sustainable objectives of this financial product are attained.

What is the sustainable investment objective of this financial product?

The sustainable investment objective of the Sub-Fund is that of investing 100% of its net assets, net of cash, ancillary liquid assets and derivatives, in social or environmental sustainable investments by allocating capital in favour of companies that prove to have either a positive or improving social and environmental impact or alignment to Sustainable Development Goals (SDGs).

The overall portfolio-level net impact performance needs to be positive.

The Sub-Fund will invest a minimum share of 20% in sustainable investments with a social objective and a minimum share of 30% in sustainable investments with an environmental objective.

The remaining 50% will be allocated between sustainable investments with either a social or environmental objective, with no fixed allocation, as this will depend on the availability of

socially and environmentally sustainable investments and the fact that some investments could contribute to both environmental and social objectives.

The Sub-Fund pursues its socially sustainable investment objective by investing in companies with a positive impact on human health.

The Sub Fund pursues the objective of investing in sustainable investments contributing to climate change mitigation and climate change adaptation, as per Regulation (EU) 2020/852 ("EU Taxonomy"), by supporting the achievement of COP 21 Paris Agreement of limiting temperature rise to 1.5°C as compared to pre-industrial levels and the European Commission's climate neutrality objective by 2050. The Management Company considers that a targeted minimum of 10% of the underlying investments selected for the Sub Fund's portfolio, net of cash, ancillary liquid assets and derivatives, will be aligned with the first two objectives of the EU Taxonomy, climate change mitigation and climate change adaptation. The Sub-Fund does not commit to a minimum share of investments in transitional and enabling activities; however, these investments may form part of the portfolio.

Furthermore, the investment strategy also pursues the objective of contributing to reduce carbon emissions on a continuous basis by investing at least 20% of its net assets, net of cash, ancillary liquid assets and derivatives, in companies with a decarbonisation trajectory consistent with the achievement of Paris Agreement's objectives and of climate neutrality by 2050. The financial product complies with the methodological requirements set out in Commission Delegated Regulation (EU) 2020/1818 for the calculation of the investment- and portfolio-level decarbonisation trajectory necessary to achieve Paris Agreements' objectives and carbon neutrality by 2050. No EU Climate Transition Benchmark nor EU Paris-aligned Benchmark is available for the investment strategy of the Sub-Fund.

The Management Company has discretion to invest in companies with limited exposure to fossil fuels, but which are driving or significantly participating in the transition to a more sustainable economy.

What sustainability indicators are used to measure the attainment of the sustainable investment objective of this financial product?

The attainment of the sustainable investment objective of the investment strategy is measured by the following sustainability indicators:

- Net impact ratio (NIR) indicator: Net Impact Ratio is a resource efficiency indicator that comprehensively captures investment's impacts on society, knowledge, health, and the environment, considering both positive and adverse impacts. An investment with an improving net impact ratio indicator, thus, assures that adverse impacts are being reduced in relation to positive impacts, while an investment with a positive net impact ratio indicator assures that the scale of adverse impacts is insignificant compared to the scale of positive impacts. Net Impact Ratio data are provided by the specialized impact data provider The Upright Project. The Upright's methodology for attributing company-level net impact performance is available at the following link: https://www.uprightproject.com/downloads/model-whitepaper-v2.pdf.

- SDG performance indicator: the SDG performance indicator aggregates third-party data measuring product and operational contribution at company-level to the attainment of each SDG and is expressed as a percentage ranging from -100%, corresponding to a company that is exclusively contributing negatively to all SDGs, to +100%, corresponding to a company that is exclusively contributing positively to all SDGs. As for net impact ratio, the SDG performance indicator captures both positive and adverse impacts with respect to the attainment of SDGs. An investment with an improving SDG performance indicator thus assures that adverse impacts are being reduced in relation to positive impacts, while an

investment with a positive SDG performance indicator assures that the scale of adverse impacts is insignificant compared to the scale of positive impacts thematically relevant for attaining SDGs. Disaggregated SDG contribution data are provided by external impact data providers.

- **Health impact performance indicator:** for a given investment to qualify as sustainable with a social objective, its health impact performance indicator needs to be positive. The health impact performance indicator, which is one of the impact dimensions of Upright's Net Impact Framework, measures the real-world effects that a given investee company generates on human health directly, through its products and operations, or indirectly, through its suppliers' operations or when its products are used by customers. The Upright's methodology for attributing company-level health impact performance is available at the following link: https://www.uprightproject.com/downloads/model-whitepaper-v2.pdf. The health impact performance indicator is articulated in the following five health-related impact categories:
    - Physical diseases
    - Mental diseases
    - Nutrition
    - Relationships
    - Meaning & Joy

Health impact performance data are provided by the specialized impact data provider The Upright Project.

- **Taxonomy alignment indicator**: the Sub-Fund pursues the objective of investing in sustainable investments contributing to climate change mitigation and climate change adaptation, as per Regulation (EU) 2020/852 ("EU Taxonomy"), by supporting the achievement of COP 21 Paris Agreement of limiting temperature rise to 1.5°C as compared to pre-industrial levels and the European Commission's climate neutrality objective by 2050. The Management Company considers that a targeted minimum of 10% of the underlying investments selected for the Sub Fund's portfolio, net of cash, ancillary liquid assets and derivatives, will be aligned with the first two objectives of the EU Taxonomy, climate change mitigation and climate change adaptation. The Sub-Fund does not commit to a minimum share of investments in transitional and enabling activities; however, these investments may form part of the portfolio. The degree of EU Taxonomy alignment of a given investment is measured according to the EU Regulations 2020/852 and 2022/1288. Actual and estimated Taxonomy alignment data are provided by external sustainability data providers. Owing to current limited availability of standardized EU Taxonomy alignment data, both actual and estimated data will be used to measure investment-level EU Taxonomy alignment. Estimated EU Taxonomy alignment can be subject to a certain degree of uncertainty, which is expected to decrease over time, mainly due to an evolving regulatory framework and limited corporate disclosure on EU Taxonomy alignment. EU Taxonomy alignment data are calculated on a revenue basis. Whenever available, actual EU Taxonomy data are preferred.

- **Decarbonisation trajectory indicator:** for an investment to qualify as sustainable with an environmental objective without being EU Taxonomy aligned, its decarbonisation trajectory needs to be consistent with limiting the temperature rise to 1.5°C as compared to pre-industrial levels and achieving the European Commission's climate neutrality objective by 2050. The calculation of the investment-level decarbonisation trajectory indicator complies with the methodological requirements set out in Commission Delegated Regulation (EU) 2020/1818 for the calculation of the decarbonisation trajectory necessary to achieve Paris Agreement's objectives and carbon neutrality by 2050. Decarbonisation trajectory data are provided by external sustainability data providers.

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

How do sustainable investments not cause significant harm to any environmental or social sustainable investment objective?

The sustainable investments of the Sub-Fund respect the "do no significant harm principle" by abiding to the following negative screening criteria:

- Exclusion from the investible universe of companies not compliant with Paris-aligned Benchmark (PAB) exclusionary criteria, as defined in the Regulation UE 2020/1818, which are the following:
  - companies involved in any activities related to controversial weapons;
  - companies involved in the cultivation and production of tobacco;
  - companies involved in violation of the United Nations Global Compact (UNGC) principles or the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises;
  - companies that derive 1% or more of their revenues from the exploration, mining, extraction, distribution or refining of hard coal and lignite;
  - companies that derive 10% or more of their revenues from the exploration, extraction, distribution or refining of oil fuels;
  - companies that derive 50% or more of their revenues from the exploration, extraction, manufacturing or distribution of gaseous fuels;
  - companies that derive 50% or more of their revenues from electricity generation with a GHG intensity of more than 100 gCO2e/kWh.

- Exclusion from the investible universe of the Sub-Fund of all investments in companies involved in socially controversial activities (tobacco, gambling, civilian and military weapons, controversial weapons and non-responsible alcohol).

- Exclusion from the investible universe of the Sub-Fund of countries with low democratic levels, as measured by the PAI indicator average rule of law score. A low democratic level corresponds to a performance with respect to average rule of law score below the 50th percentile of all countries for which data are available. Data on average rule of law score are provided by external sustainability data providers.

- Exclusion from the investible universe of the Sub-Fund of companies involved in either violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises or in very severe controversies regarding environmental, social or governance issues. If an investee company gets involved in violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises or in very severe controversies regarding environmental, social or governance issues, it loses its sustainable investment qualification, in that such involvements are deemed inconsistent with the respect of the DNSH principle. As a result, the Sub-Fund will divest from such an investee company within the shortest possible time span and in a way consistent with protecting investors' best interests.

- Exclusion from the investible universe of the Sub-Fund of companies not meeting at least one of the following criteria:

  - a positive or improving impact performance, as measured by either the net impact ratio or the SDG performance indicator
  - EU Taxonomy alignment
  - a positive health impact performance
  - a decarbonisation trajectory, calculated according to the methodological requirements set out in Commission Delegated Regulation (EU) 2020/1818, consistent with the achievement of Paris Agreement's objectives and carbon neutrality by 2050.

Sustainability and impact data used for the aforementioned positive and negative screenings are provided by external sustainability data providers.

How have the indicators for adverse impacts on sustainability factors been taken into account?

For each existing and new sustainable investment of the portfolio a quarterly assessment of the principal adverse impact indicators described in Table 1 of Annex I of Regulation (EU) 2022/1288 is conducted, with the aim to improve over time the portfolio-level PAI performance.
In the investment process of the Sub-Fund, the following Principal adverse impact (PAI) indicators are considered at the investment- and portfolio-level, owing to their relevance for the investment strategy:

- GHG emissions (1) – trajectory improvement
- GHG intensity of investee companies (3) – trajectory improvement
- Violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises (10) – exclusion from investible universe
- Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises (11) – exclusion from investible universe
- Exposure to controversial weapons (14) – exclusion from investible universe
- GHG intensity of investee countries (15) – trajectory improvement
- Average rule of law score (24) – Table 3 – exclusion from investible universe

If an investee company gets involved in violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises or in very severe controversies regarding environmental, social or governance issues, it loses its sustainable investment qualification, in that such involvements are deemed inconsistent with the respect of the DNSH principle. As a result, the Sub-Fund will divest from such an investee company within the shortest possible time span and in a way consistent with protecting investors' best interests.

How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?

Known severe breaches in minimum behavioural norms detailed in the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organization on Fundamental Principles and Rights at Work and the International Bill of Human Rights, are a reason for exclusion from the Sub-Fund's investment universe. Breach monitoring is conducted both for new and existing investments on a weekly basis. Sustainability data used for assessing company-level involvement in violations of the aforementioned behavioural principles are provided by external sustainability data providers. Data are mainly available for mid- and large-cap companies. Involvement of small-cap companies in such breaches is monitored and assessed on a best-effort basis, with best-effort implying that the Management Company directly gathers data from public and corporate sources in order to assess whether a given investee for which no third-party data are available can be deemed involved in violations of aforementioned behavioural principles.

Does this financial product consider principal adverse impacts on sustainability factors?

✖ Yes, for each existing and new sustainable investment of the portfolio quarterly assessment of the principal adverse impact indicators described in Table 1 of Annex I

of Regulation (EU) 2022/1288 is conducted, with the aim to improve over time the portfolio-level PAI performance.

In the investment process of the Sub-Fund, the following Principal adverse impact (PAI) indicators are considered at the investment- and portfolio-level, owing to their relevance for the investment strategy:

- GHG emissions (1) – trajectory improvement
- GHG intensity of investee companies (3) – trajectory improvement
- Violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises (10) – exclusion from investible universe
- Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises (11) – exclusion from investible universe
- Exposure to controversial weapons (14) – exclusion from investible universe
- GHG intensity of investee countries (15) – trajectory improvement
- Average rule of law score (24) – Table 3 – exclusion from investible universe

For each existing and new sustainable investment of the portfolio, a periodic assessment of the PAI performance is conducted, with the aim to improve over time the portfolio-level PAI performance, in particular with respect to the aforementioned PAIs.

If an investee company gets involved in violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises or in very severe controversies regarding environmental, social or governance issues, it loses its sustainable investment qualification, in that such involvements are deemed inconsistent with the respect of the DNSH principle. As a result, the Sub-Fund will divest from such an investee company in a way consistent with protecting investors' best interests.

Furthermore, the attainment of the sustainable investment objective of the Sub-Fund is also assured primarily by adopting an impact performance measurement and management system which allows for measuring and managing both adverse and positive impacts attributable to the sustainable investments of the Sub-Fund. Investing in companies with either a positive or improving social or environmental impact performance assures that adverse impacts are consistently reduced over time both at the investment- and portfolio-level.

☐ No

What investment strategy does this financial product follow?

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

The Sub-Fund aims to generate capital growth over the long term by predominantly investing in Italian listed equities of companies with a positive or improving social and environmental impact performance. The Management Company has discretion to invest in companies with limited exposure to fossil fuels, but which are driving or significantly participating in the transition to a more sustainable economy.

For further information on the investment strategy, please refer to the Sub-Fund's Investment Policy section of the present Prospectus.

In order to achieve its sustainable investment and financial objectives, the Sub-Fund has adopted the following investment process:

- Definition of an investible universe composed of:
    - companies not involved in specific socially controversial activities (gambling, tobacco, civilian and military weapons, controversial weapons, and non-responsible alcohol)

- companies not involved in violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises or in very severe controversies regarding environmental, social or governance issues
- companies meeting at least one of the following criteria:

  - positive or improving impact performance, as measured by either the net impact ratio or the SDG performance indicator
  - EU Taxonomy alignment
  - a positive health impact performance
  - a decarbonisation trajectory, calculated according to the methodological requirements set out in Commission Delegated Regulation (EU) 2020/1818, consistent with the achievement of Paris Agreement's objectives and carbon neutrality by 2050

- countries with at least a medium or high level of democratic level

- Compliance with the following portfolio-level impact performance limits:

  - Positive net impact ratio (NIR)
  - Minimum of 20% invested in sustainable investments, net of cash, ancillary liquid assets and derivatives, with a positive health impact performance
  - Minimum of 10% invested in EU Taxonomy-aligned sustainable investments, net of cash, ancillary liquid assets and derivatives
  - Minimum of 20% invested in sustainable investments, net of cash, ancillary liquid assets and derivatives, with a decarbonisation trajectory, calculated according to the methodological requirements set out in Commission Delegated Regulation (EU) 2020/1818, consistent with the achievement of Paris Agreement's objectives and carbon neutrality by 2050

- Active stock selection based on application of both investment- and portfolio-level impact performance and financial limits; portfolio-level impact performance needs to be positive

- Optimization of the portfolio's risk-return-impact profile consistently with portfolio-level financial, liquidity, concentration, and impact performance limits

What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?

The investment strategy ensures compliance with the sustainable objective of the Sub-Fund through the following binding elements:

- Exclusion from the investible universe of companies not compliant with Paris-aligned Benchmark (PAB) exclusionary criteria, as defined in the Regulation UE 2020/1818, which are the following:
  - companies involved in any activities related to controversial weapons
  - companies involved in the cultivation and production of tobacco
  - companies involved in violation of the United Nations Global Compact (UNGC) principles or the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises
  - companies that derive 1% or more of their revenues from the exploration, mining, extraction, distribution or refining of hard coal and lignite
  - companies that derive 10% or more of their revenues from the exploration, extraction, distribution or refining of oil fuels
  - companies that derive 50% or more of their revenues from the exploration, extraction, manufacturing or distribution of gaseous fuels
  - companies that derive 50% or more of their revenues from electricity generation with a GHG intensity of more than 100 gCO2e/kWh

- Exclusion from the investible universe of companies involved in specific socially controversial activities (gambling, tobacco, civilian and military weapons, controversial weapons, and non-responsible alcohol)
- Exclusion from the investible universe of companies involved in very severe controversies regarding environmental, social or governance issues or in violations of UNGC Principles and OECD Guidelines for Multinational Enterprises
- Exclusion from the investible universe of countries with a low democratic level
- Exclusion from the investible universe of companies not meeting at least one of the following criteria:

    - a positive or improving impact performance, as measured by either the net impact ratio or the SDG performance indicator
    - EU Taxonomy alignment
    - a positive health impact performance
    - a decarbonisation trajectory, calculated according to the methodological requirements set out in Commission Delegated Regulation (EU) 2020/1818, consistent with the achievement of Paris Agreement's objectives and carbon neutrality by 2050

- Portfolio-level limit imposing a positive portfolio-level net impact ratio
- Portfolio-level limit imposing a minimum of 20% of sustainable investments, net of cash, ancillary liquid assets and derivatives, with a positive health impact performance (sustainable investments with a social objective)
- Portfolio-level limit imposing a minimum of 10% of EU Taxonomy-aligned sustainable investments (sustainable investments with an environmental objective - EU Taxonomy aligned), net of cash, ancillary liquid assets and derivatives
- Portfolio-level limit imposing a minimum of 20% of sustainable investments, net of cash, ancillary liquid assets and derivatives, with a decarbonisation trajectory, calculated according to the methodological requirements set out in Commission Delegated Regulation (EU) 2020/1818, consistent with the achievement of Paris Agreement's objectives and carbon neutrality by 2050 (sustainable investments with an environmental objective – Not EU Taxonomy aligned)

Monitoring of compliance with aforementioned sustainable investment portfolio limits is conducted ex post on a weekly basis. Owing to current limited availability of technical solutions, ex ante monitoring of compliance with sustainability-related portfolio limits is not applicable. In case of breach detection of such limits, the Management Company will divest accordingly, to assure portfolio limit compliance, within the shortest possible time span and in a way consistent with protecting investors' best interests.

What is the policy to assess good governance practices of the investee companies?

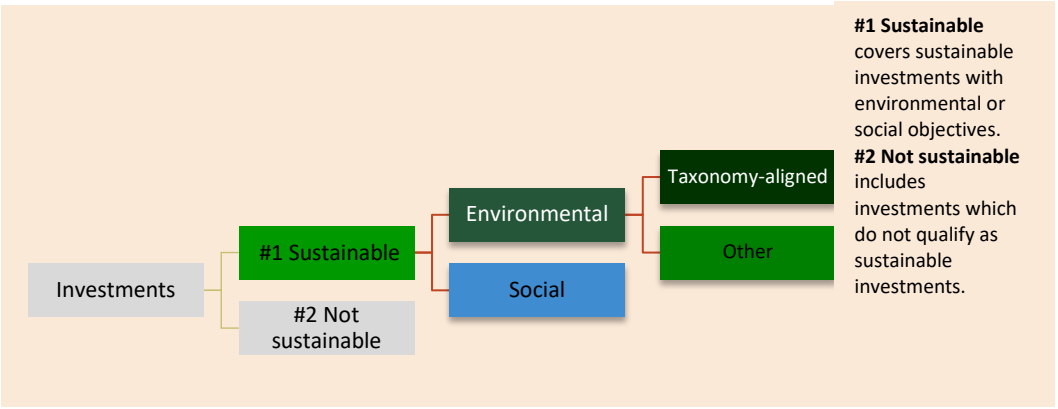
Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

The Management Company has adopted an approach for assessing good governance practices of the investee companies based on their involvement in controversies related to governance issues. Involvement of investee companies in governance-related controversies is assessed on a weekly basis. Monitoring of involvement of investee companies in governance-related controversies is conducted ex post on a weekly basis. Owing to current limited availability of technical solutions, ex ante monitoring of compliance with sustainability-related portfolio limits is not applicable. Investee companies that are or become involved in very severe governance-related controversies are excluded from the investible universe and portfolio, respectively, within the shortest possible time span in a way consistent with protecting investors' best interests. Governance-related controversies involvement is assessed by using controversies involvement data provided by external sustainability data providers.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.
Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.
Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

Governance-related controversies involvement is assessed on a 0-10 scale, with 0 corresponding to involvement in very severe controversies and 10 corresponding to no involvement in controversies. Accordingly, involvement in very severe governance-related controversies corresponds to a 0 score.

What is the asset allocation and the minimum share of sustainable investments?



The Sub-Fund invests 100% of its net assets, net of cash, ancillary liquid assets and derivatives, in sustainable investments, with a minimum share of 20% in sustainable investments with a social objective and a 30% in sustainable investments with an environmental objective. For an investment to qualify as sustainable with a social objective, the investment-level impact on human health needs to be positive. For an investment to qualify as sustainable with an environmental objective, the investment needs either to be EU Taxonomy-aligned or its decarbonisation trajectory, calculated according to the methodological requirements set out in Commission Delegated Regulation (EU) 2020/1818, needs to be consistent with the achievement of Paris Agreement's objectives and carbon neutrality by 2050. A targeted minimum of 10% of the underlying investments selected for the Sub Fund's portfolio will be aligned with the first two objectives of the EU Taxonomy, climate change mitigation and climate change adaptation. A minimum of 20% of investments, will be invested in companies with a decarbonisation trajectory, calculated according to the methodological requirements set out in Commission Delegated Regulation (EU) 2020/1818, consistent with the achievement of Paris Agreement's objectives and carbon neutrality by 2050. Targeting a minimum investment-level yearly reduction rate of the carbon intensity consistent with achieving carbon neutrality by 2050 allows the investment strategy to allocate capital also in favour of companies consistently making significant efforts to reduce GHG emissions, thus playing a crucial role in contributing to absolute GHG emissions reduction objectives, despite not contributing per se to EU Taxonomy environmental objectives, with investee companies operating in carbon-intensive sectors being particularly relevant in this respect. The portfolio-level net impact ratio needs to be positive. For an investment to qualify as sustainable for the Sub-Fund, it needs to meet at least one of the following screening criteria:

- a positive or improving impact performance, as measured by either the net impact ratio or the SDG performance indicator
- EU Taxonomy alignment
- a positive health impact performance
- a decarbonisation trajectory, calculated according to the methodological requirements set out in Commission Delegated Regulation (EU) 2020/1818, consistent with the achievement of Paris Agreement's objectives and carbon neutrality by 2050

Companies involved in specific controversial activities (civilian and military weapons, controversial weapons, gambling, tobacco and non-responsible alcohol) or involved in in

by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises or in very severe controversies regarding environmental, social or governance issues, as well as countries with low democratic levels, are excluded from the investible universe of the Sub-Fund.
Monitoring of compliance with aforementioned sustainable investment portfolio limits is conducted ex post on a weekly basis. Owing to current limited availability of technical solutions, ex ante monitoring of compliance with sustainability-related portfolio limits is not applicable. In case of breach detection of such limits, the Management Company will divest accordingly, so as to assure portfolio limit compliance, within the shortest possible time span and in a way consistent with protecting investors' best interests.

Only direct or indirect investments in companies, issuers and economic activities have been considered for the scope of the reporting and assets which do not directly or indirectly invest in companies, issuers and economic activities, such as cash, ancillary liquid assets, derivatives and sovereign securities, are not in scope of the reporting.

How does the use of derivatives attain the sustainable investment objective?

The Sub-Fund uses derivatives to optimize portfolio risk exposure and to attain the sustainable investment objective through CFD and futures exposure.

To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The Sub Fund pursues the objective of investing in sustainable investments contributing to climate change mitigation and climate change adaptation, as per Regulation (EU) 2020/852 ("EU Taxonomy"), by supporting the achievement of COP 21 Paris Agreement of limiting temperature rise to 1.5°C as compared to pre-industrial levels and the European Commission's climate neutrality objective by 2050. The Management Company considers that a targeted minimum of 10% of the underlying investments selected for the Sub Fund's portfolio, net of cash, ancillary liquid assets and derivatives, will be aligned with the first two objectives of the EU Taxonomy, climate change mitigation and climate change adaptation. EU Taxonomy alignment is achieved essentially by investing directly and indirectly in equity securities. The investment strategy also invests in sustainable investments with an environmental objective not aligned with EU Taxonomy by targeting a minimum of 20% of investments, net of cash, ancillary liquid assets and derivatives, in investee companies with a decarbonisation trajectory, calculated according to the methodological requirements set out in Commission Delegated Regulation (EU) 2020/1818, consistent with the achievement of Paris Agreement's objectives and carbon neutrality by 2050. Targeting a minimum investment-level yearly reduction rate of the carbon intensity consistent with achieving carbon neutrality by 2050 allows the investment strategy to allocate capital also in favour of companies consistently making significant efforts to reduce GHG emissions, thus playing a crucial role in contributing to absolute GHG emissions reduction objectives, despite not contributing per se to EU Taxonomy environmental objectives, with investee companies operating in carbon-intensive sectors being particularly relevant in this respect. The investment policy of the Sub-Fund allows for a maximum share of investments of 10% in bonds, including sovereign bonds. Any residual sovereign exposure of the Sub-Fund is justified for its instrumental role in optimizing exposure to concentration, market and liquidity risks, thus contributing to the efficient portfolio management of the Sub-Fund. Owing to current limited availability of standardized EU Taxonomy alignment data, both actual and estimated data will be used to measure investment-level EU Taxonomy alignment. Estimated EU Taxonomy alignment can be subject to a certain degree of uncertainty, which is expected to decrease over time, mainly due to an evolving regulatory framework and limited corporate disclosure on EU Taxonomy alignment. EU Taxonomy alignment data are calculated on a revenue basis. Whenever available, actual EU Taxonomy data are preferred. EU Taxonomy alignment data are not audited.

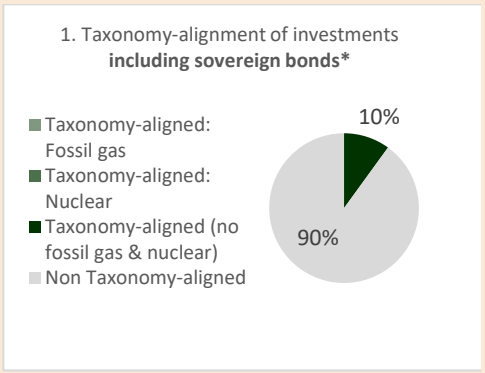
Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[48]?

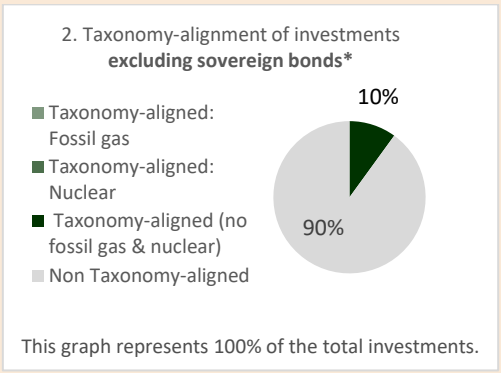
☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.





* *For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.*

What is the minimum share of investments in transitional and enabling activities?

The Sub-Fund does not commit to a minimum share of investments in transitional and enabling activities; however, these investments may form part of the portfolio.

What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

The minimum share of sustainable investments with an environmental objective not aligned with the EU Taxonomy for the Sub-Fund is 20%, net of cash, ancillary liquid assets and derivatives. For an investment to qualify as sustainable with an environmental objective not aligned with the EU Taxonomy its decarbonisation trajectory, calculated according to the methodological requirements set out in Commission Delegated Regulation (EU) 2020/1818, needs to be consistent with the achievement of Paris Agreement's objectives and carbon neutrality by 2050. Targeting a minimum investment-level yearly reduction rate of the carbon intensity consistent with achieving carbon neutrality by 2050 allows the investment strategy to allocate capital also in favour of companies playing a crucial role in contributing to absolute GHG emissions reduction objectives, despite not contributing per se to EU Taxonomy environmental objectives, with investee companies operating in carbon-intensive sectors being particularly relevant in this respect.

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentaly sustainable economic activities under the EU Taxonomy.

[48] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

What is the minimum share of sustainable investments with a social objective?

The investment strategy invests a minimum share of 20% in sustainable investments, net of cash, ancillary liquid assets and derivatives, with a social objective. For an investment to qualify as sustainable with a social objective, it needs to have a positive health impact performance.

What investments are included under "#2 Not sustainable", what is their purpose and are there any minimum environmental or social safeguards?

Other investments (#2 Not sustainable) are limited to 20% of the Sub-Fund's net assets and may include derivatives, cash and cash equivalents. The use of such investments does not affect the delivery of the sustainable investment objectives of the Sub-Fund, as these investments are used for the purposes of liquidity management, hedging and efficient portfolio management.

Whilst these investments may not be aligned with the sustainable investment objective of the Fund, they will, insofar as investment-level sustainability data allows, still be subject to the abovementioned minimum environmental and social safeguards.

Is a specific index designated as a reference benchmark to meet the sustainable investment objective?

Not applicable

Reference benchmarks are indexes to measure whether the financial product attains the sustainable investment objective.

- ***How does the reference benchmark take into account sustainability factors in a way that is continuously aligned with the sustainable investment objective?***

  Not applicable

- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

  Not applicable

- ***How does the designated index differ from a relevant broad market index?***

  Not applicable

- ***Where can the methodology used for the calculation of the designated index be found?***

  Not applicable

Where can I find more product specific information online?

More product-specific information can be found on the website:
https://www.impactsgr.it/informativa-sulla-sostenibilita/?lang=en&area=6083&sez=6084