

Statement on principal adverse impacts of investment decisions on sustainability factors

Financial Market Participant: Generali Investments TFI

Summary

Generali Investments TFI considers principal adverse impacts of its investment decisions on sustainability factors.

The present statement is the consolidated statement on principal adverse impacts on sustainability factors of Generali Investments TFI.

This statement on principal adverse impacts on sustainability factors covers the reference period from 1 January 2022 to 31 December 2022.

Data source: external data provider (mainly MSCI Inc.). Information in terms of the level of data coverage for each indicator refers to the value of investments in instruments of the entities covered by the factor.

In case of doubt, the Polish version shall prevail.

Description of the principal adverse impacts on sustainability factors

TABLE 1

Indicators applicable to investments in investee companies					
Adverse sustainability indicator	Metric	Impact [year n]	Impact [year n-1]	Explanation	Actions taken, and actions planned and targets set for the next reference period
CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS					
Greenhouse gas emissions	1. GHG emissions	Scope 1 GHG emissions	747 952,11	Sum of portfolio companies' Carbon Emissions Scope 1 (tCO ₂ e) weighted by the portfolio's value of investment in a company and by the company's most recently available enterprise value including cash. Coverage ratio: 82,72%	Generali Investments TFI notes that due to the construction of Polish stock market indices and the substantial number of issuers from sectors deemed in need of emission improvements, Poland's efforts to gradually transition to an economy based in greater part on renewable energy sources are important. The result of the accelerating transition to a low-carbon economy should be a natural and gradual decline in indicators related to greenhouse gas emissions. Generali Investments TFI, taking into account issues related to greenhouse gas emissions, will be guided in doing so by the best interests of clients and fund participants, selection criteria and the type of investments made, specific rules for diversification of investments and other investment restrictions, adopted benchmarks and benchmark rates, compliance with the strategy and investment objective, availability and liquidity of financial instruments, competitiveness and profitability compared to alternative financial instruments available on the market. Generali Investments TFI will undertake activities in the following areas: Limits and investment lists: Generali Investments TFI, in order to control its exposure to the coal sector, uses a coal list and appropriate exposure limits. Negative selection: Generali Investments TFI has introduced internal restrictions on investments in entities that derive direct income from tar sands production. Product offer: Generali Investments TFI will seek to increase the number of products that aim to make sustainable investments or promote the environmental or social aspect, as well as the amount of assets accumulated in such products, which should promote a reduction in indicators related to greenhouse gas emissions.
		Scope 2 GHG emissions	32 228,67	Sum of portfolio companies' Carbon Emissions Scope 2 (tCO ₂ e) weighted by the portfolio's value of investment in a company and by the company's most recently available enterprise value including cash. Coverage ratio: 82,72%	
		Scope 3 GHG emissions	682 887,94	Sum of portfolio companies' Carbon Emissions Scope 3 (tCO ₂ e) weighted by the portfolio's value of investment in a company and by the company's most recently available enterprise value including cash. Coverage ratio: 82,63%	
		Total GHG emissions	1 463 974,01	The total annual Scope 1, Scope 2, and estimated Scope 3 GHG emissions associated with the market value of the portfolio. Companies' carbon emissions are apportioned across all outstanding shares and bonds (based on the most recently available enterprise value including cash).	Actions as an active stakeholder/vote: Generali Investments TFI will evaluate the possibility of actively engaging in dialogue with issuers, possibly in collaboration with other investors, to promote a just transition toward reducing greenhouse gas emissions. The ESG Committee of Generali Investments TFI will evaluate at least once a year the effectiveness of the measures taken and

2. Carbon footprint	Carbon footprint	1 439,22	The total annual Scope 1, Scope 2, and estimated Scope 3 GHG emissions associated with 1 million EUR invested in the portfolio. Companies' carbon emissions are apportioned across all outstanding shares and bonds (based on the most recently available enterprise value including cash). Coverage ratio: 82,63%	the need for further action.
3. GHG intensity of investee companies	GHG intensity of investee companies	962,95	The portfolio's weighted average of its holding issuers' GHG Intensity (Scope 1, Scope 2 and estimated Scope 3 GHG emissions/EUR million revenue). Coverage ratio: 84,47%	
4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	13,25%	The percentage of the portfolio's market value exposed to issuers with fossil fuels related activities, including extraction, processing, storage and transportation of petroleum products, natural gas, and thermal and metallurgical coal. Coverage ratio: 81,68%	
5. Share of non-renewable energy consumption and production	Share of non-renewable energy consumption and non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage of total energy sources	92,25%	The portfolio's weighted average of issuers' energy consumption and/or production from nonrenewable sources as a percentage of total energy used and/or generated Coverage ratio: 74,44%	
6. Energy consumption intensity per high impact climate sector	Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector			For sectors with a high climate impact, energy consumption is one of the factors used to create ESG ratings considered by Generali Investments TFI in its investment process.
	NACE Code A (Agriculture, Forestry and Fishing)	1,36	The portfolio's weighted average of Energy Consumption Intensity (Gwh/million EUR revenue) for issuers classified within NACE Code A (Agriculture, Forestry and Fishing) Coverage ratio: 71,06%	Generali Investments TFI, while taking into account ESG ratings issues, will be guided by the best interests of clients and fund participants, selection criteria and the type of investments made, specific rules for diversification of investments and other investment restrictions, adopted benchmarks and benchmark rates, compliance with the strategy and investment objective, availability and liquidity of financial instruments, competitiveness and profitability compared to alternative financial instruments available on the market.
	NACE Code B (Mining and Quarrying)	1,24	The portfolio's weighted average of Energy Consumption Intensity (Gwh/million EUR revenue) for issuers classified within NACE Code B (Mining and Quarrying) Coverage ratio: 71,06%	The ESG Committee of Generali Investments TFI will evaluate at least once a year the effectiveness of the measures taken and the need for further action.
	NACE Code C (Manufacturing)	2,17	The portfolio's weighted average of Energy Consumption Intensity (Gwh/million EUR revenue) for issuers classified within NACE Code C (Manufacturing) Coverage ratio: 71,06%	
	NACE Code D (Electricity, Gas, Steam and Air Conditioning Supply)	6,96	The portfolio's weighted average of Energy Consumption Intensity (Gwh/million EUR revenue) for issuers classified within NACE Code D (Electricity, Gas, Steam and Air Conditioning Supply) Coverage ratio: 71,06%	
	NACE Code E (Water Supply; Sewerage, Waste Management and Remediation Activities)	2,06	The portfolio's weighted average of Energy Consumption Intensity (Gwh/million EUR revenue) for issuers classified within NACE Code E Water Supply; Sewerage, Waste Management and Remediation Activities) Coverage ratio: 71,06%	
	NACE Code F (Construction)	41,42	The portfolio's weighted average of Energy Consumption Intensity (Gwh/million EUR revenue) for issuers classified within NACE Code F (Construction) Coverage ratio: 71,06%	

		NACE Code G (Wholesale and Retail Trade; Repair of Motor Vehicles and Motorcycles)	0,09	The portfolio's weighted average of Energy Consumption Intensity (Gwh/million EUR revenue) for issuers classified within NACE Code G (Wholesale and Retail Trade; Repair of Motor Vehicles and Motorcycles) Coverage ratio: 71,06%	
		NACE Code H (Transportation and Storage)	1,65	The portfolio's weighted average of Energy Consumption Intensity (Gwh/million EUR revenue) for issuers classified within NACE Code H (Transportation and Storage) Coverage ratio: 71,06%	
		NACE Code L (Real estate activities)	1,02	The portfolio's weighted average of Energy Consumption Intensity (Gwh/million EUR revenue) for issuers classified within NACE Code L L (Real estate activities) Coverage ratio: 71,06%	
Biodiversity	7. Activities negatively affecting biodiversity-sensitive areas	Share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas	0,08%	The percentage of the portfolio's market value exposed to issuers that reported having operations in or near biodiversity sensitive areas and have been implicated in controversies with severe or very severe impacts on the environment. Companies' water emissions are apportioned across all outstanding shares and bonds (based on the most recently available enterprise value including cash). Coverage ratio: 83,01%	Generali Investments TFI has taken steps to examine exposures to entities for the severity of controversies related to a company's use or management of natural resources. The impact of issuers on biodiversity is one of the factors used to create ESG ratings considered by Generali Investments TFI in its investment process. In doing so, Generali Investments TFI, guided by the best interests of clients and fund participants, selection criteria and the type of investments made, specific rules for diversification of deposits and other investment restrictions, adopted benchmarks and benchmark rates, compliance with the strategy and investment objective, availability and liquidity of financial instruments, competitiveness and profitability compared to alternative financial instruments available on the market, will strive to maintain a lack of exposure to issuers whose level of this controversy indicates an ongoing, very serious negative controversy in this regard, in which the company is directly involved through its overall business, operations or through its products and at the same time violates the UNGC Global Compact's environmental principles. The ESG Committee of Generali Investments TFI will evaluate at least once a year the effectiveness of the measures taken and the need for further action.
Water	8. Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	110,75	The total annual wastewater discharged (metric tons reported) into surface waters as a result of industrial or manufacturing activities associated with 1 million EUR invested in the portfolio. Coverage ratio: 0,37%	Generali Investments TFI has taken steps to examine exposures to entities for the severity of controversies related to the company's water management practices. Issues such as water scarcity and the company's overall framework for managing water resources and reducing environmental impacts, where applicable to the sector, are among the inputs used to create ESG ratings considered by Generali Investments TFI in its investment process. In doing so, Generali Investments TFI, guided by the best interests of clients and fund participants, selection criteria and the type of investments made, specific rules for diversification of deposits and other investment restrictions, adopted benchmarks and benchmark rates, compliance with the strategy and investment objective, availability and liquidity of financial instruments, competitiveness and profitability compared to alternative financial instruments available on the market, will strive to maintain a lack of exposure to issuers whose level of this controversy indicates an ongoing, very serious negative controversy in this regard, in which the company is directly involved through its overall business, operations or through its products and at the same time violates the UNGC Global Compact's environmental principles. The ESG Committee of Generali Investments TFI will evaluate at least once a year the effectiveness of the measures taken and the need for further action.

Waste	9. Hazardous waste and radioactive waste ratio	Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average		10,73	The total annual hazardous waste (metric tons reported) associated with 1 million EUR invested in the portfolio. Companies' hazardous waste is apportioned across all outstanding shares and bonds (based on the most recently available enterprise value including cash). Coverage ratio: 25,54%	Generali Investments TFI has taken steps to examine exposures to entities for the severity of controversies related to the company's waste practices. Issues such as waste management practices, including the management of any hazardous waste and radioactive waste, insofar as they are relevant to the sector, are one of the inputs used to create ESG ratings considered by Generali Investments TFI in its investment process. In doing so, Generali Investments TFI, guided by the best interests of clients and fund participants, selection criteria and the type of investments made, specific rules for diversification of investments and other investment restrictions, adopted benchmarks and benchmark rates, compliance with the strategy and investment objective, availability and liquidity of financial instruments, competitiveness and profitability compared to alternative financial instruments available on the market, will strive to maintain a lack of exposure to issuers whose level of this controversy indicates an ongoing, very serious negative controversy in this regard, in which the company is directly involved through its overall business, operations or through its products and at the same time violates the UNGC Global Compact's environmental principles. The ESG Committee of Generali Investments TFI will evaluate at least once a year the effectiveness of the measures taken and the need for further action.
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INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS

Social and employee matters	10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises		0,39%	The percentage of the portfolio's market value exposed to issuers with very severe controversies related to the company's operations and/or products. Coverage ratio: 83,19%	Generali Investments TFI has taken steps to examine exposures to entities for the severity of controversies related to issuers' human rights practices, labor and social issues. Social and labor issues in issuers' operations are one of the factors used to create ESG ratings considered by Generali Investments TFI in its investment process. In doing so, Generali Investments TFI, guided by the best interests of clients and fund participants, selection criteria and the type of investments made, specific rules for diversification of deposits and other investment restrictions, adopted benchmarks and benchmark rates, compliance with the strategy and investment objective, availability and liquidity of financial instruments, competitiveness and profitability compared to alternative financial instruments available on the market, will strive to maintain a lack of exposure to issuers whose level of this controversy indicates an ongoing, very serious negative controversy in this regard, in which the company is directly involved through its overall business, operations or through its products and at the same time violates the UNGC Global Compact's principles on labor and social issues. The ESG Committee of Generali Investments TFI will evaluate at least once a year the effectiveness of the measures taken and the need for further action.
	11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance /complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises		52,39%	The percentage of the portfolio's market value exposed to issuers that are not signatories in the UN Global Compact. Coverage ratio: 81,67%	The quality of ESG controversy management policies and violations of international standards are among the inputs used to create ESG ratings considered by Generali Investments TFI in its investment process. Generali Investments TFI monitors the actions taken at all times, guided by the best interests of clients and fund participants, selection criteria and the type of investments made, specific rules for diversification of investments and other investment restrictions, adopted benchmarks and benchmark rates, compliance with the strategy and investment objective, availability and liquidity of financial instruments, competitiveness and profitability compared to alternative financial instruments available on the market. The ESG Committee of Generali Investments TFI will evaluate at least once a year the effectiveness of the measures taken and the need for further action.

12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	22,48%		The portfolio holdings' weighted average of the difference between the average gross hourly earnings of male and female employees, as a percentage of male gross earnings. Coverage ratio: 21,93%	Evaluation of issuers' corporate governance frameworks and policies is one of the elements used to create ESG ratings considered by Generali Investments TFI in its investment process. In doing so, Generali Investments TFI, guided by the best interests of clients and fund participants, selection criteria and the type of investments made, specific rules for diversification of deposits and other investment restrictions, adopted benchmarks and benchmark rates, compliance with the strategy and investment objective, availability and liquidity of financial instruments, competitiveness and profitability compared to alternative financial instruments available on the market, will strive to maintain a lack of exposure to issuers whose level of this controversy indicates an ongoing, very serious negative controversy in this regard, in which the company is directly involved through its overall business, operations or through its products and at the same time violates the UNGC Global Compact's principles on labor and social issues. The ESG Committee of Generali Investments TFI will evaluate at least once a year the effectiveness of the measures taken and the need for further action.
13. Board gender diversity	Average ratio of female to male board members in investee companies, expressed as a percentage of all board members	29,63%		The portfolio holdings' weighted average of the ratio of female to male board members. Coverage ratio: 83,00%	
14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	Share of investments in investee companies involved in the manufacture or selling of controversial weapons	0,04%		The percentage of the portfolio's market value exposed to issuers with an industry tie to landmines, cluster munitions, chemical weapons or biological weapons. Note: Industry ties includes ownership, manufacturing and investments. Ties to landmines do not include related safety products. Coverage ratio: 81,68%	Generali Investments TFI's negative selection approach to direct investments is to exclude or limit investments involving entities that have any connection to cluster munitions, landmines, biological/chemical weapons, depleted uranium weapons, blinding laser weapons, incendiary weapons and/or undetectable fragments. Generali Investments TFI will maintain this approach. Exposure is derived from the methodology adopted by the third-party data provider and is derived from indirect investments. The ESG Committee of Generali Investments TFI will evaluate at least once a year the effectiveness of the measures taken and the need for further action.

Indicators applicable to investments in sovereigns and supranationals

Adverse sustainability indicator		Metric	Impact [year n]	Impact [year n-1]	Explanation	Actions taken, and actions planned and targets set for the next reference period
Environmental	15. GHG intensity	GHG intensity of investee countries	727,36		The portfolio's weighted average of sovereign issuers' GHG Emissions Intensity (Scope 1, 2 and 3 emissions/EUR M GDP). Coverage ratio: 99,75%	Generali Investments TFI notes that due to the construction of the benchmarks, it is important that Poland work towards a gradual transition to an economy based in greater part on renewable energy sources. The result of the accelerating transition to a low-carbon economy, including programs related to improving energy efficiency, should be a natural and gradual decline in benchmarks related to greenhouse gas emissions. Generali Investments TFI's actions will be guided by the best interests of clients and fund participants, selection criteria and the type of deposits made, specific rules for diversification of deposits and other investment restrictions, adopted benchmarks and benchmark rates, compliance with the strategy and investment objective, availability and liquidity of financial instruments, competitiveness and profitability compared to alternative financial instruments available on the market, and the level of the described index will be derived from investments in government bonds and bonds issued at the supranational level.
Social	16. Investee countries subject to social violations	Number of investee countries subject to social violations (absolute number and relative number divided by all investee countries), as referred to in international treaties and conventions, United Nations principles and, where applicable, national law	6		The portfolio's number of unique sovereign issuers with European External Action Service (EEAS) restrictive measures (sanctions) on imports and exports.	Direct investments made by Generali Investments TFI in government bonds and bonds issued at the supranational level include the limitation or exclusion of investments in issuers deemed non-compliant with international guidelines and standards on money laundering, terrorist financing or tax practices, presenting very serious environmental issues (deforestation) and are made in accordance with applicable sanctions. Exposure is derived from the methodology adopted by the external data provider. Exposure is mostly derived from indirect investments. The ESG Committee of Generali Investments TFI will evaluate at least once a year the effectiveness of the measures taken and the need for further action.

Indicators applicable to investments in real estate assets

Adverse sustainability indicator		Metric	Impact [year n]	Impact [year n-1]	Explanation	Actions taken, and actions planned and targets set for the next reference period
Fossil fuels	17. Exposure to fossil fuels through real estate assets	Share of investments in real estate assets involved in the extraction, storage, transport or manufacture of fossil fuels	Not applicable	Not applicable	No investments in real estate	Not applicable
Energy efficiency	18. Exposure to energy-inefficient real estate assets	Share of investments in energy-inefficient real estate assets	Not applicable	Not applicable	No investments in real estate	Not applicable
Description of policies to identify and prioritise principal adverse impacts on sustainability factors						
<p>Regarding investment funds:</p> <p>Generali Investments TFI strategy to identify and prioritize principal adverse impacts on sustainability factors is to select the types of sustainability controversies linked to indicators of major adverse sustainability impacts and then prioritize them in terms of their potential negative impact on sustainability.</p> <p>With the most important investigated controversies in the Generali Investment TFI approach directly affecting the level of major adverse effects on sustainability are: involvement in the coal sector as part of the exposure from the fossil fuel company, controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons), environmental damage (activities adversely affecting biodiversity-sensitive areas, water emissions, waste).</p> <p>Generali Investments TFI, in cases where access to data provided by third parties allows it, examines the involvement of potential issuers that may be included in investment portfolios in the aforementioned controversies in terms of their intensity (very serious, serious, moderate, low) and the type of issuer involvement (direct, indirect). On this basis, the Society creates restrictive, watch and carbon lists, as well as investment limits, i.e. maximum overall levels of investment portfolio exposure to entities on the aforementioned lists. The Society controls the limits by checking the impact of potential transactions prior to their conclusion and on a daily basis the levels of utilization of these limits.</p> <p>The Society, through the reduction and management of the exposure associated with each controversy, influences the amount of adverse sustainability indicators.</p> <p>In addition to evaluating issuers for controversy, the Society examines issuers for holistic characteristics related to sustainability using ESG ratings calculated and assigned by reputable third-party data providers.</p> <p>In terms of exposure to coal mining and non-renewable energy production activities, Generali Investments TFI S.A., in addition to the environmental and climate aspect, also takes into account the social aspect in the spirit of "Just Transition," i.e. taking care to ensure that possible investment decisions in entities mainly in Central and Eastern Europe do not reduce their potential for transformation to climate-neutral activities and do not have a negative impact on local communities.</p>						
<p>Regarding the asset management service:</p> <p>Generali Investments TFI strategy for identifying and prioritizing the main adverse sustainability effects, when the Client declares a willingness to take adverse sustainability effects into account, is based on individual agreements. This means that in the event that the Client declares a willingness to take into account adverse sustainability impacts, Generali Investments TFI takes them into account in its investment decision-making process. In the event that the Client does not declare a willingness to take into account adverse sustainability effects, they will not be a criterion for selecting investments for the portfolio.</p>						
<p>Regarding the investment advisory service:</p> <p>Generali Investments TFI strategy for identifying and prioritizing the main adverse sustainability effects, when the Client declares a willingness to take adverse sustainability effects into account, is based on individual agreements. This means that in the event that the Client declares a willingness to take into account adverse sustainability impacts, Generali Investments TFI takes them into account in its investment decision-making process. In the event that the Client does not declare a willingness to take into account adverse sustainability effects, they will not be a criterion for the preparation of investment recommendations.</p>						
<p>Engagement policies</p> <p>Generali Investments TFI has an enacted Engagement Policy describing, among other things, the rules for monitoring and conducting dialogue with public companies, exercising voting and other rights related to shares, cooperation and communication with other shareholders and members of public company bodies.</p> <p>Some of the issuers that are actually or potentially subject to engagement and voting in the framework of the business of Generali Investments TFI may also be independently covered by the Generali Group's activities in this regard.</p>						
<p>References to international standards</p> <p>Generali Group is a signatory to the PRI, PRI Net-Zero Asset Owner Alliance, Paris Pledge for Action.</p> <p>Generali Investments TFI is not a direct signatory to codes of responsible business conduct and internationally recognized standards for due diligence and reporting.</p>						
<p>Historical comparison</p> <p>The year 2022 is the first year for which Generali Investments TFI publishes data. A historical comparison will be provided by June 2024, when a statement on principal adverse impacts of investment decisions on sustainability factors with data for the 2022 and 2023 reference periods is published.</p>						

TABLE 2 - Additional climate and other environment-related indicators

Adverse sustainability impact	Adverse impact on sustainability factors (qualitative or quantitative)	Metric
Indicators applicable to investments in investee companies		
CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS		
Emissions	4.Investments in companies without carbon emission reduction initiatives 31,13% Coverage ratio: 84,44%	Share of investments in investee companies without carbon emission reduction initiatives aimed at aligning with the Paris Agreement

TABLE 3: Additional indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters

INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS		
Adverse sustainability impact	Adverse impact on sustainability factors (qualitative or quantitative)	Metric
Indicators applicable to investments in sovereigns and supranationals		
Governance	22. 22. Non-cooperative tax jurisdictions 0,02%	Investments in jurisdictions on the EU list of non-cooperative jurisdictions for tax purposes

Generali Investments Towarzystwo Funduszy Inwestycyjnych Spółka Akcyjna z siedzibą w Warszawie, ul. Senatorska 18, 00-082 Warszawa, wpisana do Rejestru Przedsiębiorców prowadzonego przez Sąd Rejestrowy dla m.st. Warszawy, XII Wydział Gospodarczy KRS pod nr 50329, NIP 527-10-24-937, o kapitale zakładowym 21 687 900,00 PLN, opłaconym w całości.