

## Generali Investment SICAV – SRI Euro

### Corporate Short Term Bond

Template periodic 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: Generali Investment SICAV – SRI Euro  
Corporate Short Term Bond

Legal entity identifier: 549300EED9376Q5XK934

## Environmental and/or social characteristics

### Did this financial product have a sustainable investment objective?

☒ ☒ ☐ Yes

☐ It made **sustainable investments 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

☐ It made **sustainable investments with a social objective**: \_\_\_\_%

☒ ☐ ☒ No

☐ It **promoted Environmental/Social (E/S) characteristics** and while it did not have as its objective a sustainable investment, it had a proportion of \_\_\_\_% of sustainable investments

☐ with an environmental objective in economic activities that 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 promoted E/S characteristics, but **did 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 lay down 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 environmental or social characteristics promoted by the financial product are attained.

### To what extent were the environmental and/or social characteristics promoted by this financial product met?

The Sub-fund promoted environmental and social characteristics pursuant to Article 8 of the Regulation (EU) 2019/2088, through the application of Responsible investment process. The Sub-fund benefits from the SRI label in France.

The Investment Manager actively managed the Sub-fund, and selected from the Euro-denominated short term corporate debt securities (the “**Initial Investment Universe**”), securities

which presented positive Environmental, Social & Governance (“ESG”) criteria relative to the Initial Investment Universe provided that the issuers followed good corporate governance practices. The Investment Manager analysed and monitored the ESG profile of securities’ issuers using ESG scores sourced from an external ESG data provider (rating of environmental, social and governance risks, relying on several indicators, such as but not limited to: carbon footprint, absenteeism rate, percentage of women in the board).

Furthermore, the Investment Manager aimed to select issuers that demonstrated a better result, on average, on at least two of the following factors, carbon intensity, women in workforce, independent board directors, labour rights severe controversies compared to the Initial Investment Universe.

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by the Sub-fund.

### ● **How did the sustainability indicators perform?**

The sustainability indicators used to measure the attainment of the environmental and social characteristics promoted by the Sub-fund are:

- The carbon intensity compared to that of the Initial Investment Universe;

	31/12/2022
<i>Carbon Intensity Fonds</i>	38.85
<i>Carbon Intensity Bench</i>	116.83

- The percentage of women in the workforce compared to that of the Initial Investment Universe;

	31/12/2022
<i>Percentage of women in the workforce fonds</i>	46,1%
<i>Percentage of women in the workforce Bench</i>	40,8%

- The percentage of independent directors within the board compared to that of the Initial Investment Universe

	31/12/2022
<i>Independency of board of directors fonds</i>	84.7%
<i>Independency of board of directors Bench</i>	82.2%

- The labor rights severe controversies compared to that of the Initial Investment Universe;

	31/12/2022
<i>Severe controversies related to labour management Fonds</i>	5.8%
<i>Severe controversies related to labour management Bench</i>	11.6%

- The average ESG Rating of the Sub-fund and the ESG Rating of the Initial Investment Universe (score from 1 to 10);

	31/12/2022
ESG Score fonds	8,12
ESG Score Bench	7,27
Coverage	95,06%

- The share of issuers within the portfolio with exposure to economic activities set out in the exclusions list. The investment manager excluded investments if they match one or more of the following criteria:
  - Production of weapons violating fundamental humanitarian principles (antipersonnel landmines, cluster bombs and nuclear weapons),
  - Severe environmental damages,
  - Serious or systematic violation of human rights,
  - Cases of gross corruption,
  - Significant involvement in coal and tar sand-sector activities, or
  - Exclusions defined by the International Labor Organization (ILO)

**... and compared to previous periods?**

N/A. This is the first reporting period.

- **What were the objectives of the sustainable investments that the financial product partially made and how did the sustainable investment contribute to such objectives?**

N/A

- **How did the sustainable investments that the financial product partially made not cause significant harm to any environmental or social sustainable investment objective?**

N/A

— How were the indicators for adverse impacts on sustainability factors taken into account?

N/A

— Were sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details: N/A

*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 Union criteria.*

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the Union criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the Union criteria for environmentally sustainable economic activities.



## How did this financial product consider principal adverse impacts on sustainability factors?

The Sub-fund considered principal adverse impacts (“PAIs”) on sustainability factors.

The main focus is on the following PAIs with reference to Annex IV of the Commission Delegated Regulation (EU) 2022/1288. Those indicators are considered and will be monitored continuously:

- Table 1, indicator 3 – GHG Intensity of investee companies: in addition to the monitoring of issuers’ GHG intensity, investments in companies who are involved in Coal activities are excluded.

The Carbon Intensity of the fund as of 31/12/2022 was : 38.85

During the reference period, investments in companies who are involved in Coal activities were excluded if one or more of the following criteria occurred:

- Coal-related business: more than 20% of the revenues deriving from coal;
- Coal power generation: more than 20% of power generated from coal;
- Companies with an installed coal power capacity of more than 5 GW.

Issuers classified in the restricted list were excluded and no new investment were carried in any asset class.

- Table 1, indicator 10 – Violations of the UN Global Compact (“**UNGC**”) Principles and the Organisation for Economic Co-operation and Development (“**OECD**”) Guidelines for Multinational Enterprises: Through the application of the exclusion criteria, no investment can be made in companies where there are violations or serious suspicions of possible violations of the OECD Guiding Principles for Multinational Enterprises or the UNGC Principles.

During the reference period, no investments have been made in funds that invest in companies where there were violations or serious suspicions of possible violations of the OECD Guidelines for Multinational Enterprises or the UNGC principles.

Issuers classified in the restricted list were excluded and no new investment were carried in any asset class.

- Table 1, indicator 14 – Exposure to controversial weapons: Investments in companies whose main turnover is generated by controversial weapons are excluded.

During the reference period, no investments have been made in companies directly involved in armament and weapons that violate fundamental humanitarian principles through their normal use (cluster bombs, antipersonnel landmines, nuclear weapons, biological and chemical weapons).

Issuers classified in the restricted list were excluded and no new investment were carried in any asset class.

**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.



## What were the top investments of this financial product?

As of 31/12/2022, the top investments were as following :

	Investment	%AuM	Country	Sector
1	AXA SA 5.125 07/04/43	4,16%	France	Financials
2	AUTOSTRADA TORIN 3.375 02/13/24	2,99%	Italy	Industrials
3	ALLIANZ SE 4.75 PERP	2,94%	Germany	Financials
4	NATWEST GROUP 2 03/04/25	2,91%	United Kingdom	Financials
5	ING GROEP NV 0.1 09/03/25	2,74%	Netherlands	Financials
6	VODAFONE GROUP 01/03/79	2,59%	United Kingdom	Communication Services
7	BANK OF AMER CRP 04/25/24	2,21%	United States	Financials
8	BRITISH TELECOMM 1 06/23/24	2,12%	United Kingdom	Communication Services
9	ING GROEP NV 2.125 05/23/26	1,91%	Netherlands	Financials
10	AVIVA PLC 07/05/43	1,90%	United Kingdom	Financials
11	URW PERP	1,88%	France	Real Estate
12	CITIGROUP INC 1.5 07/24/26	1,73%	United States	Financials
13	CRED AGRICOLE SA 1 04/22/26	1,72%	France	Financials
14	SAMHALLSBYGG 1.75 01/14/25	1,59%	Sweden	Real Estate
15	COOPERATIEVE RAB PERP	1,57%	Netherlands	Financials

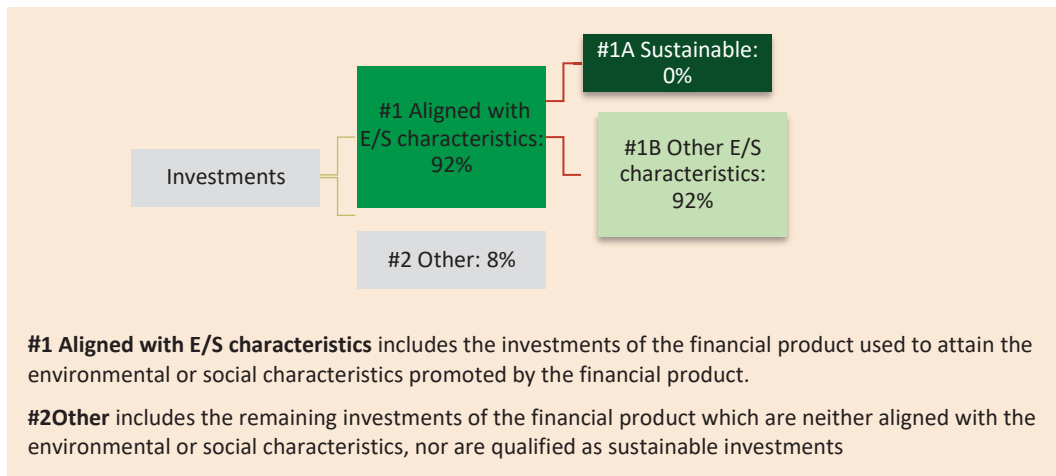


## What was the proportion of sustainability-related investments?

N/A

## ● What was the asset allocation?

**Asset allocation** describes the share of investments in specific assets.



## ● In which economic sectors were the investments made?

Sectors	%AuM
Financials	62,45%
Real Estate	11,74%
Communication Services	6,77%
Industrials	4,38%
Energy	2,69%
Utilities	1,79%
Materials	1,20%
Consumer Discretionary	1,10%
Health Care	0,74%
Consumer Staples	0,42%

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflects the “greenness” of investee companies today.
- **capital expenditure** (CapEx) shows the green investments made by investee companies, relevant for a transition to a green economy.
- **operational expenditure** (OpEx) reflects the green operational activities of investee companies.



## To what extent were the sustainable investments with an environmental objective aligned with the EU Taxonomy?

### ● Did the financial product invest in fossil gas and/or nuclear energy related activities complying with the EU Taxonomy<sup>1</sup>?

☐ Yes:

☐ In fossil gas

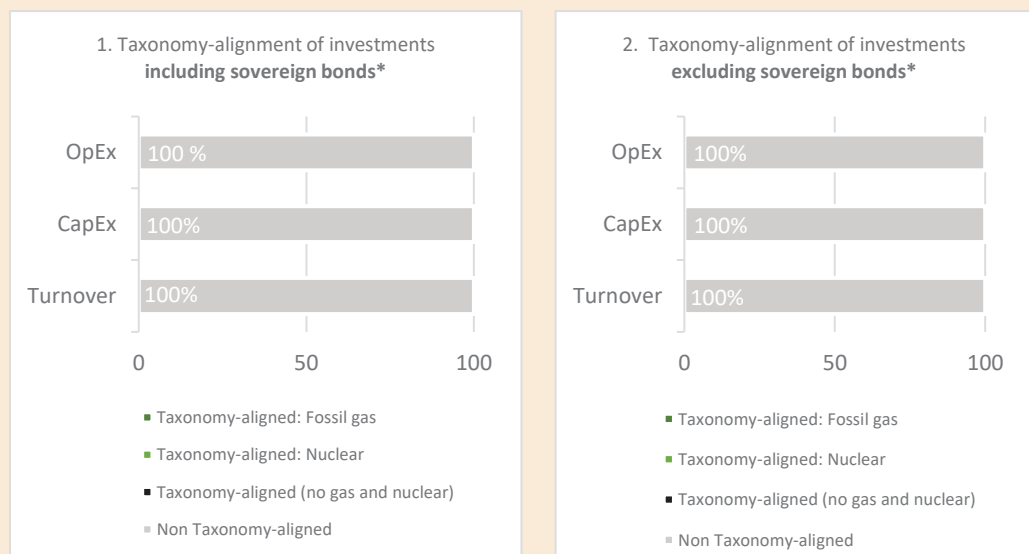
☐ In nuclear energy

☒ No

<sup>1</sup> 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 no significant harm to 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 Sub-fund does not currently commit to invest in any “sustainable investment” within the meaning of the EU Taxonomy. However, the position will be kept under review as the underlying rules are finalized and the availability of reliable data increases over time.

*The graphs below show in green the percentage of investments that were 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 was the share of investments made in transitional and enabling activities?**

The Sub-fund does not currently commit to invest in any “sustainable investment” within the meaning of the EU Taxonomy. However, the position will be kept under review as the underlying rules are finalized and the availability of reliable data increases over time.

● **How did the percentage of investments that were aligned with the EU Taxonomy compare with previous reference periods?**

N/A



### What was the share of sustainable investments with an environmental objective not aligned with the EU Taxonomy?

The Sub-fund promotes environmental and social characteristics but does not commit to making any sustainable investments. As a consequence, the Sub-Fund does not commit to a minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy.



### What was the share of socially sustainable investments?

N/A



### What investments were included under “other”, what was their purpose and were there any minimum environmental or social safeguards?

The “other” investments and/or holdings of the Sub-fund are comprised, directly or indirectly, of securities whose issuers did not meet the ESG criteria described above to qualify as exhibiting positive environmental or social characteristics.

This includes (i) Ancillary Liquid Assets in order to cover current or exceptional payments, or for the time necessary to reinvest in eligible assets or for a period of time strictly necessary in case of unfavourable market conditions, and (ii) cash equivalents (i.e., bank deposits, Money Market Instruments, money market fund), pursuant to the Sub-fund Investment Policy, and (iii) UCITS or UCIs compliant with the provisions set out in Article 41 (1) e) of the UCI Law.

No minimum environmental or social safeguards are applied to these investments.



### What actions have been taken to meet the environmental and/or social characteristics during the reference period?

During the reference period,

- The average ESG rating of the Sub-fund was constantly higher than the average ESG rating of its Initial Investment Universe after eliminating 20% of the initial securities ranking the worst in terms of ESG scoring (rating upgrade approach).
- Application of the Ethical filter The investment manager excluded investments if they match one or more of the following criteria:
  - Production of weapons violating fundamental humanitarian principles (antipersonnel landmines, cluster bombs and nuclear weapons),
  - Severe environmental damages,
  - Serious or systematic violation of human rights,
  - Cases of gross corruption,
  - Significant involvement in coal and tar sand-sector activities, or
  - Exclusions defined by the International Labor Organization (ILO)
- Furthermore, the Investment Manager selected issuers that demonstrate a better result, on average, on at least two of the following factors, carbon intensity, women in workforce, independent board directors, labour rights severe controversies compared to the Initial Investment Universe.





**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

**How did this financial product perform compared to the reference benchmark?**

N/A

- *How does the reference benchmark differ from a broad market index?*

N/A

- *How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the environmental or social characteristics promoted?*

N/A

- *How did this financial product perform compared with the reference benchmark?*

N/A

- *How did this financial product perform compared with the broad market index?*

N/A