BG FUND MANAGEMENT LUXEMBOURG

Statement on principal adverse impacts of investment decisions on sustainability factors

Disclosure on the implementation of the requirements of Article 4 (1) of Regulation (EU) 2019/2088 and Delegated Regulation (EU) 2022/1288 Chapter II - Section 1 on sustainability-related disclosures in the financial services sector regarding the transparency of adverse sustainability impacts at entity level

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1. Introduction

Group Affiliation

BG FUND MANAGEMENT LUXEMBOURG S.A. (hereinafter "BG FUND MANAGEMENT LUXEMBOURG S.A." or the "Management Company") is a management company authorised by the Luxembourg supervisory authority Commission de Surveillance du Secteur Financier (hereinafter “CSSF”) pursuant to Chapter 15 of the Luxembourg law of 17 December 2010 on undertakings for collective investment (hereinafter "UCI Law") and is also authorised as an alternative investment fund manager pursuant to the Luxembourg law of 12 July 2013 on alternative investment fund managers (hereinafter "AIFM Law").
In the above context, BG FUND MANAGEMENT LUXEMBOURG S.A. is managing the following three SICAVs that are umbrella funds containing various sub-funds:

- LUX IM
- BG COLLECTION INVESTMENTS
- BG PRIVATE MARKETS SICAV-SIF

The Management Company’s policies respect the principles declared by the Banca Generali Group and they are aligned with the commitments undertaken at group level through the signatory to various internationally recognised initiatives, such as the United Nations Principles for Responsible Investment.

Scope of the statement

The scope for the PAI consideration and calculation in the following statement encompasses the managed (sub-)funds that either qualify as per article 9 of the Sustainable Finance Disclosure Regulation - EU 2019/2088 (SFDR) or as per article 8 of the SFDR under the condition that they pursue a dedicated PAI strategy or commit to invest in sustainable assets as per SFDR article 2(17) or as per Taxonomy Regulation article 2(1) - EU 2020/852. The inclusion of these sub-funds ensures a comprehensive evaluation of principal adverse impacts associated with the investments. The following content of the statement, including actions taken, description of policies, engagement activities and other relevant information, pertains specifically to the sub-funds that are directly managed by the Management Company and not to the ones managed by delegated investment managers.

It should be noted, that for all the sub-fund which are managed by delegated investment managers, one should refer to their respective PAI statements for comprehensive insights into the actions taken and policies implemented within those specific sub-funds.

This statement explicitly does not cover any non-sustainable funds, i.e. SFDR article 6 and plain vanilla SFDR article 8 funds without a dedicated PAI strategy and / or sustainable investments in which's context a PAI consideration is mandatory.

Commitments for funds in scope

BG FUND MANAGEMENT LUXEMBOURG S.A. is aware and fully concerned of the potential impact that sustainability risks may have on the managed sub-funds and their risk-return profiles, therefore considering them in the context of the investment decision making process as well as on an ongoing basis during the management of a fund.

% of AUM

The sub-funds taken into consideration for this PAI Statement represent (as of December 29st, 2023):

- **49.55% of total AuM of the ManCo** *(regardless of their SFDR product classification)*
- **88.73% of total AuM of the ManCo** *(including sub-funds qualified under Article 8 and Article 9 of SFDR and irrespectively of the nature of the investment manager – directly managed by BG FUND MANAGEMENT LUXEMBOURG S.A. or by a delegated investment manager*)

2. Summary

Financial Market Participant
BG FUND MANAGEMENT LUXEMBOURG S.A. (549300UQ9FXR10DMTM81)
Summary
BG FUND MANAGEMENT LUXEMBOURG S.A. (549300UQ9FXR10DMTM81) considers principal adverse impacts (hereinafter "PAIs") of its investment decisions on sustainability factors. The present statement is the consolidated statement on principal adverse impacts on sustainability factors of BG FUND MANAGEMENT LUXEMBOURG S.A. This statement on principal adverse impacts on sustainability factors covers the reference period from 1 January 2023 to 31 December 2023. BG FUND MANAGEMENT LUXEMBOURG S.A. has chosen to consider PAIs of investment decisions on sustainability factors for the managed (sub-)funds that either qualify as per article 9 of the Sustainable Finance Disclosure Regulation - EU 2019/2088 (SFDR) or as per article 8 of the SFDR under the condition that they pursue a dedicated PAI strategy or commit to invest in sustainable assets as per SFDR article 2(17) or as per Taxonomy Regulation article 2(1) - EU 2020/852. In the course of the PAI consideration, BG FUND MANAGEMENT LUXEMBOURG S.A. generally looks at all mandatory PAI indicators as per Delegated Regulation - EU 2022/1288 (SFDR RTS) Annex I - Table 1, as well as two additional PAI indicators from SFDR RTS Annex I - Tables 2 and 3 for both corporate- and sovereign assets. The PAI indicators considered are duly disclosed in the pre-contractual disclosures of the respective sub-funds and are eventually reflected in this statement. The inclusion of these sub-funds ensures a comprehensive evaluation of principal adverse impacts associated with the investments. BG FUND MANAGEMENT LUXEMBOURG S.A. mitigates PAIs by adhering to a dedicated Sustainable Investment Policy that entails different elements in that respect e.g. negative screening and ESG integration. The following content of the statement, including actions taken, description of policies, engagement activities and other relevant information, pertains specifically to the sub-funds that are directly managed by BG FUND MANAGEMENT LUXEMBOURG S.A.. For any sub-funds which are managed by a delegated investment manager, please refer to their respective PAI statement for comprehensive insights into the actions taken and policies implemented within the specific sub-funds.

Description of the principal adverse impacts on sustainability factors

The below table represents an overview of the PAIs which are considered in at least one of the following situations:

a) In the course of the "do no significant harm" assessment for conducting sustainable investments as per SFDR article 2(17) in order to ensure no significant harm or no adverse impact is triggered by an investment taken; or

b) by following a dedicated PAI strategy that particularly focuses on (selected) PAIs.

As stated in the introductory summary, generally the following PAIs are considered:

a) Indicators applicable to investments in investee companies

(i) all 14 mandatory PAI indicators from the SFDR RTS Annex I - Table 1

(ii) one additional PAI indicator related to climate and other environment aspects

(iii) one additional PAI indicator related to social and employee, respect for human rights, anti-corruption and anti-bribery matters

b) Indicators applicable to investments in sovereigns and supranationals

(i) all two mandatory PAI indicators from the SFDR RTS Annex I - Table 1;

(ii) one additional PAI indicator related to climate and other environment aspects;

(iii) one additional PAI indicator related to social and employee, respect for human rights, anti-corruption and anti-bribery matters.

Furthermore the table overview below also provides an explanation to the different PAIs as well as insight into what actions were taken respectively are planned to be taken and any specific targets which are set for the following period regarding specific PAIs or an overall adverse impact area.

Please note: *For the sake of clarity, BG FUND MANAGEMENT LUXEMBOURG S.A. does not manage any (sub-)funds investing into real estate, neither directly or indirectly, and thus the specific PAIs as per SFDR RTS Annex I pertaining to real estate investments are not in scope of this PAI statement.*

3. Quantitative information

3.1 Mandatory indicators

Please note: Any actions taken, planned and targets set are pertaining to (sub-)funds which are in scope of this PAI statement, i.e. any (sub-)funds that either qualify as per article 9 of the SFDR or as per article 8 of the SFDR under the condition that they pursue a dedicated PAI strategy or commit to invest in sustainable assets as per SFDR article 2(17) or as per Taxonomy Regulation article 2(1) and are directly managed by BG FUND MANAGEMENT LUXEMBOURG S.A..

	Indicators applicable to investments in investee companies					
	CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS					
Adverse sustainability indicator		Metric	Impact 2023	Impact 2022	Explanation	Actions taken, and actions planned and targets set for the next reference period
Greenhouse gas emissions	1. GHG emissions	Scope 1 GHG emissions	252,276.10	551,148.52	**Expressed as:** Tonnes of CO2 equivalent *(tC02e)* **Coverage:** 63.8% of the AUM	**Banca Generali Group level:** In 2022, Banca Generali Group took the initiative to implement a comprehensive monitoring system for assessing the carbon footprint (scope 1 and 2 emissions) of its direct investments. This monitoring system aims to support the strategic objective of achieving net zero emissions by 2040 as outlined in its Strategic Plan. By closely monitoring and managing the carbon footprint of its investments, Banca Generali is committed to minimizing its environmental impact and contributing to a more sustainable future. Banca Generali has set some specific environmental targets to guide its efforts in reducing carbon emissions. These targets include: • A 25% reduction in carbon footprint by 2025 (compared to the 2019 baseline) for corporate securities; • Phasing out coal by 2030 for all corporate investments; • Achieving net zero emissions by 2040.
		Scope 2 GHG emissions	80,303.62	271,185.72	**Expressed as:** Tonnes of CO2 equivalent *(tC02e)* **Coverage:** 63.8% of the AUM	
		Scope 3 GHG emissions	3,784,372.24	5,059,211.34	**Expressed as:** Tonnes of CO2 equivalent *(tC02e)* **Coverage:** 63.8% of the AUM	
		Total GHG emissions	4,116,947.41	3,306,235.60	**Expressed as:** Tonnes of CO2 equivalent *(tC02e)* **Coverage:** 63.8% of the AUM	
	2. Carbon footprint	Carbon footprint	457.3	414.75	**Expressed as:** Total GHG emissions as a ratio of all investments *(tC02e/current value)* **Coverage:** 63.8% of the AUM	
	3. GHG intensity of investee companies	GHG intensity of investee companies	1215.6	2,199.39	**Expressed as:** GHG emissions as a ratio of investee company's revenue *(tC02e/€M)* **Coverage:** 64% of the AUM	

	4. Exposure to companies active in the fossil fuel sector	a) Share of investments in companies active in the fossil fuel sector	5.3%	3.88%	**Expressed as:** Share of investments **Coverage:** 65.6% of the AUM	**BG FUND MANAGEMENT LUXEMBOURG S.A. level:** As part of its commitment to sustainable investing, BG FUND MANAGEMENT LUXEMBOURG S.A. has adopted a Sustainable Investment Policy that incorporates a sector exclusion on coal. This exclusion reflects BG FUND MANAGEMENT LUXEMBOURG S.A.'s stance against investments in coal-related activities, which are known to have a significant environmental impact. By implementing this exclusion policy, BG FUND MANAGEMENT LUXEMBOURG S.A. aims to allocate its resources towards more environmentally friendly investment opportunities. Within the context of BG FUND MANAGEMENT LUXEMBOURG S.A.'s investment management, some of the (sub-)funds in scope of this PAI statement, are subject to explicit consideration of PAI 2 (Carbon footprint) by means of a dedicated carbon footprint score provided by an external advisor. In addition to monitoring the carbon footprint of investments, BG FUND MANAGEMENT LUXEMBOURG S.A. is actively engaged in assessing the ESG performance of its portfolio. To support these efforts, BG FUND MANAGEMENT LUXEMBOURG S.A. relies on a data provider that provides such ratings for all (sub-)funds in scope of this PAI statement. The PAIs represented in this section are considered via the corporate ESG model in various categories: a) "Production Processes": GHG Emissions (Scope 1-3) and GHG intensity are directly incorporated within the "Production Process" category. Moreover, companies that have established renewable energy targets, leading to a reduced share of non-renewable energy consumption or production, receive favourable recognition. Additionally, the energy efficiency of a company's operations is
	5. Share non-renewable energy consumption and production	a) Share of non-renewable energy consumption of investee companies from non-renewable energy sources compared to renewable energy sources	64.9%	41.50%	**Expressed as:** Share of non-renewable energy consumption **Coverage:** 64.0 % of the AUM	
		b) Share of non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources	45.3%	40.85%	**Expressed as:** Share of non-renewable energy production **Coverage:** 2.3% of the AUM	
	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 (NACE A)	0.00	0.00	**Expressed as:** Energy consumption in GWh per million EUR of revenue of investee companies *(GWh/€M)* **Coverage:** 0.017% of the AUM	
		Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector (NACE B)	0.01	0.05	**Expressed as:** Energy consumption in GWh per million EUR of revenue of investee companies *(GWh/€M)* **Coverage:** 1.33% of the AUM	
		Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector (NACE C)	1.60	10.60	**Expressed as:** Energy consumption in GWh per million EUR of revenue of investee companies *(GWh/€M)* **Coverage:** 28.20% of the AUM	
		Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector (NACE D)	0.09	44.54	**Expressed as:** Energy consumption in GWh per million EUR of revenue of investee companies *(GWh/€M)* **Coverage:** 2.80% of the AUM	
		Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector (NACE E)	0.01	0.00	**Expressed as:** Energy consumption in GWh per million EUR of revenue of investee companies *(GWh/€M)* **Coverage:** 0.97% of the AUM	

		Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector (NACE F)	0.00	0.00	**Expressed as:** Energy consumption in GWh per million EUR of revenue of investee companies *(GWh/€M)* **Coverage:** 0.74% of the AUM	considered as a data point affecting its score in this category. b) "Environmental Strategy": this category evaluates a company's emission reduction targets and the implementation of relevant programs to mitigate air emissions. Companies that demonstrate alignment with global agreements such as the Paris Agreement, in terms of temperature goals and emission reduction commitments, are rewarded. Conversely, companies that lag behind or fail to align with these global agreements may face penalties in their scoring. c) "Products": datapoints within this category generate a premium for companies that sell green products/services and penalise those companies that are characterised by minimal green product offerings. BG FUND MANAGEMENT LUXEMBOURG S.A. continuously strives to improve its sustainable investment approach thereby looking for new possibilities to limit and minimize adverse impacts on the environment and particularly greenhouse gas emissions.
		Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector (NACE G)	0.00	0.03	**Expressed as:** Energy consumption in GWh per million EUR of revenue of investee companies *(GWh/€M)* **Coverage:** 2.97% of the AUM	
		Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector (NACE H)	0.02	28.92	**Expressed as:** Energy consumption in GWh per million EUR of revenue of investee companies *(GWh/€M)* **Coverage:** 1.34% of the AUM	
		Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector (NACE L)	0.01	0.00	**Expressed as:** Energy consumption in GWh per million EUR of revenue of investee companies *(GWh/€M)* **Coverage:** 0.92% of the AUM	
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	1.80%	3.20%	**Expressed as:** Share of investments **Coverage:** 65.64% of the AUM	As foreseen in BG FUND MANAGEMENT LUXEMBOURG S.A.'s Sustainable Investment Policy, the corporate ESG model incorporates the PAI indicators related to biodiversity, water and waste within its comprehensive assessment framework, for (sub-)funds in scope of this PAI statement. These indicators are specifically evaluated within the "Production Process" category, providing a deeper insight in the environmental practices. Within this category, one crucial aspect is a company's impact on biodiversity. The ESG model assesses the measures implemented by the company to mitigate its ecological footprint and safeguard biodiversity. This includes evaluating targets and initiatives aimed at
Water	8. Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested (value expressed as a weighted average)	0.09	1.28	**Expressed as:** Tonnes per million EUR invested *(t/€M)* **Coverage:** 10.25% of the AUM	

Waste	9. Hazardous waste and radioactive waste ration	Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested (value expressed as a weighted average)	0.89	94.90	**Expressed as:** Tonnes per million EUR invested *(t/€M)* **Coverage:** 37.54% of the AUM	reducing the negative impact on ecosystems, preserving habitats and protecting endangered species. Companies that demonstrate a strong commitment to biodiversity conservation and have well-defined targets for reducing their ecological impact receive positive recognition in this category. The ESG model takes also into account programs and initiatives related to hazardous waste reduction. Companies that prioritize the implementation of effective waste management strategies are rewarded in their evaluation. The same concept applies to the water usage and conservation strategies. The model evaluates a company's strategies and practices related to water usage, including measures to e.g. reduce water consumption and increase water efficiency. BG FUND MANAGEMENT LUXEMBOURG S.A. continuously strives to improve its sustainable investment approach thereby looking for new possibilities to limit and minimize adverse impacts on the environment and particularly in the area of biodiversity, water stress and waste management.
	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	0.31%	0.37%	**Expressed as:** Share of investments **Coverage:** 65.64% of the AUM	In the assessment of all (sub-)funds in scope of this PAI statement, a specific exclusion policy is in place that explicitly considers the violations of the UN Global Compact principles and the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises. This exclusion policy ensures that companies or entities found to be in violation of these internationally recognized standards are excluded from the investment portfolio. Both the UN Global Compact principles and the OECD Guidelines provide principles and recommendations for responsible business conduct in areas such as human rights, labour, environment and anti-corruption. They serve as frameworks for businesses to align their operations with universally accepted values

						and responsible business practices. Moreover they promote responsible corporate behaviour and contribute to the sustainable development and societal well-being. Any violations of these principles by the entities within the investment portfolio are carefully examined and appropriate measures are taken, such as exclusion or divestment. BG FUND MANAGEMENT LUXEMBOURG S.A. continuously strives to improve its sustainable investment approach thereby looking for new possibilities to limit and minimize adverse impacts on social matters and particularly in the area of adherence to international principles and guidelines.
	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	9.19%	7.08%	**Expressed as:** Share of investments **Coverage:** 65.64% of the AUM	As foreseen in BG FUND MANAGEMENT LUXEMBOURG S.A.'s Sustainable Investment Policy, the corporate ESG model incorporates PAI indicators within its comprehensive assessment framework, for (sub-)funds in scope of this PAI statement. In the evaluation of companies that violate the UN Global Compact principles and OECD Guidelines for Multinational Enterprises, the ESG rating considers their non-compliance with these internationally recognized standards. Companies lacking appropriate processes and compliance mechanisms to monitor adherence to the UN Global Compact principles and OECD Guidelines are penalized in their ESG ratings. While the ESG rating system considers violations of these principles and guidelines, it is important to note that there is no specific category within the rating framework solely dedicated to these PAI indicators. Instead, most categories within the ESG rating system are directly linked to the principles of the UN Global Compact or the guidelines of the OECD. Nevertheless PAI 10, which pertains to the violation of these principles and guidelines, is treated as an exclusion (please refer also to the explanatory notes above), which means that companies found to be in direct violation are

						excluded from consideration regardless of their overall ESG score. In such cases, the focus shifts from mitigation through the ESG score to a strict exclusionary approach based on the severity of the violation. BG FUND MANAGEMENT LUXEMBOURG S.A. continuously strives to improve its sustainable investment approach thereby looking for new possibilities to limit and minimize adverse impacts on social matters and particularly in the area of insufficient compliance mechanisms.
	12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	15.56%	14.30%	**Expressed as:** Average pay gap **Coverage:** 20.77% of the AUM	As foreseen in BG FUND MANAGEMENT LUXEMBOURG S.A.'s Sustainable Investment Policy, the corporate ESG model incorporates the PAI indicators related to gender pay gap and board gender diversity within its comprehensive assessment framework, for (sub-)funds in scope of this PAI statement. These indicators are considered across various categories within the ESG model, providing insights into a company's commitment to gender equality and inclusion. One category in which these PAI indicators are assessed is the "CG Structure" category. In this context, the ratio of female to male board members directly impacts the evaluation. Companies that demonstrate a higher representation of women on their boards receive positive recognition in terms of corporate governance. This evaluation

	13. Board gender diversity	Average ratio of female to male board members in investee companies, expressed as a percentage of all board members	33.29%	31.23%	**Expressed as:** Share of investments **Coverage:** 63.96% of the AUM	recognizes the importance of diverse perspectives and the benefits of gender diversity in decision-making processes at the highest level of corporate leadership. Additionally, the "Human and Labour Rights" category within the ESG model encompasses an evaluation of gender-related data. This includes analysing company-specific gender pay gaps and assessing the representation of women across the entire workforce. Companies that actively work towards reducing gender pay gaps and promoting gender diversity throughout their organizational hierarchy receive favourable recognition in this category. BG FUND MANAGEMENT LUXEMBOURG S.A. continuously strives to improve its sustainable investment approach thereby looking for new possibilities to limit and minimize adverse impacts on social matters and particularly in the area of gender diversity and -inequalities.

	14. Exposure to controversial weapons (antipersonnel mines, cluster munitions, chemical weapons and biological weapons)	Share of investments in investee companies involved in the manufacture or selling of controversial weapons	0.06%	0.05%	**Expressed as:** Share of investments **Coverage:** 65.64% of the AUM	In the assessment of (sub-)funds in scope of this PAI statement, there is a direct consideration of PAI 14, which pertains to the exposure of companies to controversial weapons. This particular PAI focuses on weapons that are deemed highly unethical and inhumane, including antipersonnel mines, cluster munitions, chemical weapons, and biological weapons. In order to ensure responsible investment practices, a specific exclusion policy is in place for (sub-)funds in scope of this PAI statement. This policy considers PAI 14 and mandates the exclusion of companies that are involved in the production, distribution, or use of these controversial weapons. Companies found to be associated with such weapons are considered incompatible with the ethical and responsible investment criteria outlined by the fund. By directly considering PAI 14 in the exclusion policy, the investment management process demonstrates a commitment to ethical investing and a strong stance against the use and proliferation of controversial weapons. BG FUND MANAGEMENT LUXEMBOURG S.A. continuously strives to improve its sustainable investment approach thereby looking for new possibilities to limit and minimize adverse impacts on social matters and particularly in the area of exposure to controversial weapons.
	Indicators applicable to investments in sovereigns and supranationals					
Adverse sustainability indicator		**Metric**		**Impact 2022**	**Explanation**	**Actions taken, and actions planned and targets set for the next reference period**

Environmental	15. GHG intensity	GHG intensity of investee countries	42.47	32.42	**Expressed as:** GHG emissions (tC02e) as a ratio of investee country's GDP **Coverage:** 22.43% of the AUM	As foreseen in BG FUND MANAGEMENT LUXEMBOURG S.A.'s Sustainable Investment Policy, this PAI is a crucial component within the Environmental pillar of the ESG country model, specifically focusing on two key categories: "Resource Efficiency" and "Climate Change". This indicator assesses the greenhouse gas (GHG) intensity of investee countries by examining their emissions in relation to their Gross Domestic Product (GDP). Within the "Resource Efficiency" category, an important indicator evaluates the current GHG emissions per capita of countries. This indicator considers both the absolute emissions and the trend in GHG emissions per capita over the past five years. It rewards countries that actively mitigate this PAI by reducing their emissions and penalizes those countries experiencing an upward trend in emissions. In the "Climate Change" category, another significant indicator focuses on the amount of primary energy used per capita by countries. Alongside the GHG emissions per capita indicator, the trend scores from this indicator acknowledge countries that are successfully implementing energy efficiency measures or demand reduction initiatives. BG FUND MANAGEMENT LUXEMBOURG S.A. continuously strives to improve its sustainable investment approach thereby looking for new possibilities to limit and minimize adverse impacts on the environment and particularly greenhouse gas emissions.

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	13.27%	7.50%	**Expressed as:** Share of investments **Coverage:** 22.44% of the AUM	As per BG FUND MANAGEMENT LUXEMBOURG S.A.'s Sustainable Investment Policy, this PAI plays a critical role within the ESG country model, focusing on evaluating the number of investee countries that may be subject to social violations. These violations encompass actions or practices that contravene international treaties, conventions, United Nations principles, and relevant national laws. In line with its commitment to responsible investing, the ESG country model applies rigorous assessments and penalties to countries that have active sanctions reported by reputable sources such as the United Nations and the European Union. These sanctions may be related to various aspects, including human rights abuses, labour violations, environmental degradation, corruption, or other social misconducts. The model ensures that appropriate penalties are applied to the relevant categories within the framework. For instance, if a country is under sanction relating to the prohibition on training and education, it would incur penalties within the Human Capital category of the Social pillar. This approach reflects the model's comprehensive consideration of different dimensions of social violations and their impact on sustainable development. Furthermore, the ESG country model recognizes the importance of international standards and frameworks in assessing social violations. It considers the obligations and commitments that countries have agreed upon through international treaties, conventions, and United Nations principles. BG FUND MANAGEMENT LUXEMBOURG S.A. continuously strives to improve its sustainable investment approach thereby looking for new possibilities to limit and minimize adverse impacts on social matters and particularly in the area of involvement in social violations.

3.2 Additional indicators

	Additional indicators applicable to investments in investee companies					
	CLIMATE AND OTHER INDICATORS RELATED TO THE ENVIRONMENT					
Adverse sustainability indicator		Metric	Impact 2023	Impact 2022	Explanation	Actions taken, and actions planned and targets set for the next reference period
Emissions	4. Investments in companies without carbon emission reduction initiatives	Share of investments in investee companies without carbon emission reduction initiatives aimed at aligning with the Paris Agreement	29.98%	26.93%	**Expressed as:** Share of investments **Coverage:** 58.74% of the AUM	**Banca Generali Group level**: In 2022, Banca Generali Group took the initiative to implement a comprehensive monitoring system for assessing the carbon footprint (scope 1 and 2 emissions) of its direct investments. This monitoring system aims to support the strategic objective of achieving net zero emissions by 2040 as outlined in its Strategic Plan. By closely monitoring and managing the carbon footprint of its investments, Banca Generali is committed to minimizing its environmental impact and contributing to a more sustainable future. Banca Generali has set some specific environmental targets to guide its efforts in reducing carbon emissions. These targets include: • A 25% reduction in carbon footprint by 2025 (compared to the 2019 baseline) for corporate securities; • Phasing out coal by 2030 for all corporate investments; • Achieving net zero emissions by 2040. **BG FUND MANAGEMENT LUXEMBOURG S.A. level:** As part of its commitment to sustainable investing, BG FUND MANAGEMENT LUXEMBOURG S.A. has adopted a Sustainable Investment Policy that incorporates a sector exclusion on coal. This exclusion reflects BG FUND MANAGEMENT LUXEMBOURG S.A.'s stance against investments in coal-related activities, which are known to have a significant environmental impact. By implementing this exclusion policy, BG FUND MANAGEMENT LUXEMBOURG S.A. aims to allocate its resources towards more environmentally friendly investment opportunities. BG FUND MANAGEMENT LUXEMBOURG S.A. continuously strives to improve its sustainable investment approach thereby looking for new possibilities to limit and minimize adverse impacts on the environment and particularly in the area of carbon emissions.

	INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS					
Anti-corruption and anti-bribery	15. Lack of anti-corruption and anti-bribery policies	Share of investments in entities without policies on anti-corruption and anti-bribery consistent with the United Nations Convention against Corruption	0.82%	1.12%	**Expressed as:** Share of investments **Coverage:** 65.64% of the AUM	As foreseen in BG FUND MANAGEMENT LUXEMBOURG S.A.'s Sustainable Investment Policy, the corporate ESG model incorporates the PAI indicator related to the presence of anti-corruption and anti-bribery policies within its comprehensive assessment framework, for (sub-)funds in scope of this PAI statement. These indicators are considered across various categories within the ESG model, reflecting a company's commitment to ethical business practices and combating corruption. One category where these PAI indicators are evaluated is the "Business Ethics" category. In addition to policies, this category delves deeper into a company's approach to anti-corruption measures. It assesses whether companies conduct anti-corruption audits to identify and address potential risks and vulnerabilities. This evaluation recognizes the importance of proactive efforts in mitigating corruption and promoting a culture of integrity and transparency. Another category that considers the impact of anti-corruption practices is the "CG Structure" category. It acknowledges that a greater level of independence within company committees can play a crucial role in mitigating corruption risks. The evaluation within this category includes multiple Key Performance Indicators (KPIs) related to committee independence. Companies that demonstrate robust committee structures, independent oversight, and effective anti-corruption practices receive positive recognition in this category. BG FUND MANAGEMENT LUXEMBOURG S.A. continuously strives to improve its sustainable investment approach thereby looking for new possibilities to limit and minimize adverse impacts on social and governance matters and particularly in the area of insufficient anti-corruption and anti-bribery policies.

	Additional indicators applicable to investments in sovereigns and supranationals					
	CLIMATE AND OTHER INDICATORS RELATED TO THE ENVIRONMENT					
Adverse sustainability indicator		Metric	Impact 2023	Impact 2022	Explanation	Actions taken, and actions planned and targets set for the next reference period
Green securities	17. Share of bonds not issued under Union legislation on environmentally sustainable bonds	Share of bonds not issued under Union legislation on environmentally sustainable bonds	100.00%	100.00%	It is important to note that the value for the years 2022 and 2023 is displayed as "100%". This is due to the fact that the implementation of this indicator requires populating data related to the share of bonds not certified as green under the EU Green Bond Standard. However, currently, the lack of available data poses a challenge in accurately determining this share, as the certification for Green Bonds is yet to come into force. Indeed, despite the formal approval of the standard in October 2023 its adoption will be active from December 2024	This PAI, which contains the optional indicator related to the share of bonds not certified as green, requires information on both the total amount of active bonds and the amount specifically certified under the EU Green Bond Standard. Unfortunately, without the necessary certification framework in place, it becomes not possible to obtain this data and implement the indicator effectively. While BG FUND MANAGEMENT LUXEMBOURG S.A. continues to navigate the complexity of implementing this specific PAI, it remains dedicated to transparency and accountability in the reporting. This is also achieved by recognising the importance of environmentally sustainable bonds, striving to provide meaningful data and commentary to demonstrate the ongoing efforts in this area, as from the statement for the following year. BG FUND MANAGEMENT LUXEMBOURG S.A. continuously strives to improve its sustainable investment approach thereby looking for new possibilities to limit and minimize adverse impacts on the environment and particularly in the area of exposure to green securities.
	INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS					
Human Rights	20. Average human rights performance	Measure of the average human right performance of investee countries using a quantitative indicator explained in the "explanation" column	4.37	3.84	**Expressed as:** weighted average of the current performance score of a country (weighted as 70%) and a 5-year performance trend score of the same country (weighted as 30%). The score can take values from a minimum of 1 to a maximum of 5. **Coverage:** 22.43% of the AUM	As foreseen in BG FUND MANAGEMENT LUXEMBOURG S.A.'s Sustainable Investment Policy, this PAI is a fundamental component within the "Human Rights and Wellbeing" category of the ESG country model. This indicator directly assesses the protection of fundamental human rights and freedoms within a country. The 'Human Rights and Rule of Law' indicator utilizes data from Fragile States and other reliable sources to evaluate the extent to which fundamental human rights and freedoms are safeguarded. It considers various aspects, including the prevalence of widespread abuse of legal, political, and social rights. Moreover, the indicator also considers outbreaks of politically inspired violence perpetrated against citizens. By including this aspect, the ESG country model acknowledges the impact of politically motivated violence on human rights and overall stability within a country. BG FUND MANAGEMENT LUXEMBOURG S.A. continuously strives to improve its sustainable investment approach thereby looking for new possibilities to limit and minimize adverse impacts on social matters and particularly in the area of human rights (under-)performance.

4. Qualitative information

4.1 Description of policies

Description of policies to identify and prioritise principal adverse impacts on sustainability factors

Sustainability factors encompass various dimensions such as environmental considerations, social impacts, employee welfare, human rights protection, and measures against corruption and bribery. In the context of financial markets, the term "Principal Adverse Impact" (hereinafter "PAI") refers to detrimental effects resulting from investment decisions or advice on these sustainability factors. To facilitate the assessment of investments made by financial market participants, the Delegated Regulation - EU 2022/1288 (SFDR RTS) to the Sustainable Finance Disclosure Regulation - EU 2019/2088 (SFDR) provides a range of specific indicators that can be deployed to gauge the negative influence of an issuer or investee company on sustainability factors. These indicators enable the identification and evaluation of the adverse impact caused by such investments.

Additionally, SFDR establishes a link between the requirement to consider sustainability risks in the investment decision-making process (SFDR article 3) and the consideration of PAIs of investment decisions on sustainability factors (SFDR article 4). Both concepts share the same core foundation, i.e., they commence with the identification and consideration of relevant sustainability indicators. In general, the identification and consideration of relevant sustainability indicators are inter alia dependent on the investment strategy as well as the geographical and sectorial focus of the managed sub-funds. The monitoring of relevant sustainability indicators allows to establish a better and more informed understanding with reference to the identification of (potential) sustainability risks. Moreover, the assessment of certain sustainability indicators may be prioritised within the investment decision-making process to eliminate or at least mitigate sustainability risks.

The identification and prioritization of principal adverse impacts of investment decisions on sustainability factors require the consideration of various elements by the portfolio manager and are based on:

	Elements (non-exhaustive)	Relevant considerations (non-exhaustive)
Identification & prioritisation of principal adverse impacts	**Regulatory minimum requirements**	SFDR
		EU Taxonomy Regulation (EU) 2020/852
	Investment strategy	Asset classes focus
		Geographical focus
		Industry and sector focus
	SFDR classification	Qualification of the investment fund under article 9 SFDR
		Qualification of the investment fund under article 8 of the SFDR and allocation of part of the portfolio in sustainable investments as defined in article 2 (17) SFDR
	Sustainability strategy (taking into consideration the investment strategy and SFDR classification)	Thematic focus of the sustainability strategy, if any
		Identification of relevant sustainability indicators to be considered in the investment decision-making process
		Prioritisation of sustainability indicators that are essential to the delivery of the sustainability strategy
		Definition of relevant limits for the relevant sustainability indicators
		Definition of the binding elements of the sustainability strategy in the investment decision-making process
		Quantitative or qualitative assessment of the relevant sustainability indicators

Disclosure	Integration in the pre-contractual and website disclosures (art. 8, 9, 10 SFDR)

In relation to above requirements, BG FUND MANAGEMENT LUXEMBOURG S.A. has chosen to consider PAIs of investment decisions on sustainability factors for the managed (sub-)funds that either qualify as per article 9 of the SFDR or as per article 8 of the SFDR under the condition that they pursue a dedicated PAI strategy or commit to invest in sustainable assets as per SFDR article 2(17) or as per Taxonomy Regulation article 2(1) - EU 2020/852, as per their respective pre-contractual disclosures. The PAIs are assessed and addressed in accordance with the principles and guidelines outlined in the Sustainable Investment Policy adopted by the Management Company. Several measures are taken in order to consider and most importantly to avoid adverse impacts on sustainability factors in the first place. The following list provides an overview of the most significant measures and aspects that is generally applied to all sub-funds in scope of this PAI statement:

a) Indirectly via negative screening for controversial activities and controversial behaviour; and
b) Indirectly via an ESG rating for investee companies and sovereigns that is dependent on certain aspects pertaining to the PAIs; and
c) PAI 2 - Directly via a carbon footprint score; and
d) PAI 10 - Directly by excluding any company that is in serious breach of the "United Nations Global Compact Code" (hereinafter "UNGC"); and
e) PAI 14 - Directly by excluding any company that is involved in adverse business activities from which they derive any revenues (i.e. controversial weapons such as anti-personnel mines, cluster munitions, chemical weapons and biological weapons).

For more detailed information on the dedicated investment strategies of the different sub-funds in scope of this PAI statement, please consult their respective pre-contractual documentation documents which are available on BG FUND MANAGEMENT LUXEMBOURG S.A.'s official website (www.bgfml.lu) and in addition the dedicated sustainability part on BG FUND MANAGEMENT LUXEMBOURG S.A.'s website (www.bgfml.lu/site/en/home/sustainable).

As described above, also in terms of responsibilities, the identification and prioritization of PAIs fall under the purview of the Sustainable Investment Policy adopted by the Management Company, as initially approved by the Board of Directors of the Management Company on July 23, 2021 and last updated on May 10, 2023. The policy defines the specific responsibilities and accountabilities for these processes, ensuring a systematic approach and clear guidelines for their implementation. The use of such methodologies is paired with a continuous assessment of the evolution of the regulatory framework, in order to always comply with the extent and the applicable set of indicators to be used for the determination of PAIs. The aim of the Management Company is to expand and enhance, on an ongoing basis, the consideration of PAIs, taking into consideration the specific investment strategies and focus of all the managed Sub-funds.

All necessary data and information in order to ensure an orderly consideration of PAIs by means of the measures briefly described above is provided by a third-party data provider. The data provider gathers and generates PAI data based on a proprietary assessment and selected secondary data. The data provider's research process includes publicly available data inputs reported by companies such as sustainability- and annual reports as well as data sourced from leading data providers that were subject to thorough due diligence before service initiation. For what concerns, government issuers, data are gathered directly from public websites of leading supranational institutions and research centres. The criteria used by third-party providers can differ significantly, and data can vary across providers and within the same industry for the same provider. While the data provider looks to data inputs that it believes to be reliable it cannot guarantee the accuracy, availability or completeness of its proprietary system or third-party data. To avoid large data gaps in the PAI statement and in accordance with SFDR RTS article 7(2), the data provider may estimate the PAI data on a best effort basis. The data provider only estimates PAI data in cases where sufficient reported data is available, and the appropriate variables are identified to receive a statistically significant and robust result. Depending on the nature of the PAI data, various models such as statistical or machine learning models are deployed to receive optimal results. The models applied by the data provider account for asymmetry, kurtosis and biases caused by outliers in order to obtain a robust result which is validated using R- squared.

4.2 Engagement policies

Engagement policies

In accordance with its Sustainable Investment Policy, the Management Company integrates the investment analyses with the ones focused on sustainability risks and on the negative effects of investments on sustainability factors, represented by environmental, social and governance issues.

Specifically, the Sustainable Investment Policy takes into consideration the PAIs through appropriate negative screening tools (i.e., restricted lists and watch lists) aimed at detecting any exposures to controversial sectors or violations of the United Nations Global Compact. The PAI indicators considered are:

- PAI 2: Carbon footprint (for some of the sub-funds in scope of this statement, depending on their investment strategy and investment universe);
- PAI 10: Violations of UN Global Compact principles and OECD Guidelines (for all sub-funds in scope of this statement);
- PAI 14: Exposure to controversial weapons (for all sub-funds in scope of this statement).

Banca Generali Group, including BG FUND MANAGEMENT LUXEMBOURG S.A., adopted an active ownership policy with a date of entry into effect on January 1, 2024 and available at www.bgfml.lu.
The active ownership policy has been adopted to further develop the commitment of Banca Generali Group towards sustainable and responsible investment and to strengthen their investment decision approach, in line with:

- Banca Generali's Vision;

- the commitments undertaken by signing the UN Principles for Responsible Investment, which place active ownership (also known as "stewardship") among the main responsible investment strategies;
- the fulfilment of the obligations and implementation of the leading practices introduced by the SFDR, particularly with regard to the pursuing of sustainable investment objectives and monitoring of the principal adverse impacts of investments, in the belief that the application of tangible and sound stewardship principles (e.g., anticipating and preventing sustainability risks, generating a true and tangible impact, etc.) results in multiple benefits.

The active ownership policy applies to the sub-funds that either qualify as per article 9 or as per article 8 of the SFDR and foresees activities which take the form of engagement (i.e., direct dialogue with issuers) and exercise of voting rights and participation in shareholders' meetings, in accordance with the methods and principles defined in the policy. The active ownership policy is implemented based on the analysis of the target issuers' sustainability performance, in line with Banca Generali Group's identified ESG material topics and European and international regulatory frameworks, such as the consideration of PAIs. The active ownership policies and processes are reviewed on an ongoing basis, enhanced, monitored and adapted when insufficient progress is identified, and also in order to incorporate additional principal adverse impact indicators and to ensure the key environmental, socials and governance topics are taken into consideration.

In accordance with the applicable legislation, BG FUND MANAGEMENT LUXEMBOURG S.A. will, on an annual basis, publicly disclose how the active ownership policy has been implemented, including a general description of voting behaviour, an explanation of the most significant votes and the use of the services of proxy advisors. The first disclosure will be published during 2025 covering the activities performed over the year 2024.
Specific active ownership activities which target PAI indicators, if any, will be described in the next periodic reviews of this statement.

4.3 References to international standards

References to international standards

As a responsible Management Company, BG FUND MANAGEMENT LUXEMBOURG S.A. places great emphasis on adhering to responsible business conduct codes and internationally recognized standards for due diligence and reporting. These standards serve as important guidelines for the operations and enable BG FUND MANAGEMENT LUXEMBOURG S.A.to align its practices with global sustainability objectives, including those outlined in the Paris Agreement.

For all sub-funds under management, irrespective of their SFDR classification, PAI 10, and specifically the compliance with the United Nations Global Compact Code (the "UN Global Compact Code"), is considered. The UN Global Compact Code provides a comprehensive framework for promoting responsible business practices in the areas of human rights, labour, environment and anti-corruption. By monitoring compliance with the UN Global Compact Code, the management of all sub-funds ensures that responsible business practices are upheld. This commitment demonstrates a dedication to ethical conduct and sustainability, hence creating alignment with international standards and best practices. Embracing the principles set forth by the UN Global Compact not only benefits BG FUND MANAGEMENT LUXEMBOURG S.A. itself but also contributes to global efforts in promoting a more inclusive, just, and sustainable world.

At Banca Generali group level, there is a strategic objective of achieving net zero emissions by 2040. This objective is closely linked to the goals of the Paris Agreement, which seeks to limit global warming to well below 2 degrees Celsius above pre-industrial levels. This commitment to carbon neutrality aligns with Principal Adverse Impact 4 (PAI 4), which is explicitly considered for two specific sub-funds within the scope of this statements. Moreover, PAI 4 is being monitored for all sub-funds, irrespective of their SFDR classification, on a semi-annual basis, ensuring ongoing assessment and mitigation of carbon-related adverse impacts. As also outlined in the Strategic Plan, the ESG monitoring system implemented by Banca Generali Group aims to support the strategic objective of achieving net zero emissions by 2040. By closely monitoring and managing the carbon footprint of its investments, Banca Generali Group is committed to minimizing its environmental impact and contributing to a more sustainable future.
Banca Generali Group has set some specific environmental targets to guide its efforts in reducing carbon emissions. These targets include:

- A 25% reduction in carbon footprint by 2025 (compared to the 2019 baseline) for corporate securities;
- Phasing out coal by 2030 for all corporate investments;
- Achieving net zero emissions by 2040.

Additionally, as a demonstration of the commitment to responsible investment practices, on 20 December 2022, Banca Generali Group completed the process of becoming a member of the United Nations – Principles for Responsible Investing (hereinafter "UN PRI") and on 23 January 2023 it formally became a signatory to the UN PRI by signing the 6 Principles (hereinafter "the Principles") for Responsible Investments. The Principles to which the group has adhered to are the following:

1. incorporate environmental, social and governance (ESG) parameters in the financial analysis and decision-making processes concerning investments;
2. be active shareholders and incorporate ESG metrics into share ownership policies and practices;
3. require investee companies to report on ESG parameters;
4. promote acceptance and implementation of the Principles in the financial industry;
5. work together to improve the application of the Principles;
6. periodically report on the activities and progress made in applying the Principles.

In this sense, Banca Generali Group's adherence to the UN PRI guarantees the consideration of the principal adverse impacts on sustainability factors.

In light of the continuously evolving regulatory framework, the lack of comprehensiveness and the massive use of estimation in the methodologies currently available on the market, the Management Company does not deem the use of a forward-looking climate scenario to be relevant. The Management Company will continue to conduct an assessment of the metrics and methodologies available to ascertain appropriate data sources and providers.

4.4 Historical comparison

Historical comparison

In the historical comparison between the PAIs reported as of June 2023 (referring to the year 2022) and the PAIs reported as of June 2024 (referring to the year 2023), key differences and improvements have been identified, as listed below:

- Due to data availability considerations, the PAIs reported as of June 2023 (referring to the year 2022) were based on the data provider's proprietary assessment and on selected secondary data, among which the European ESG Template "EET" for the investments in underlying funds. This approach included potential outliers, which could affect the reliability of the figures. In contrast, the PAIs reported as of June 2024 (referring to the year 2023) are exclusively based on the data provider's proprietary data, removing the risk of outliers derived from EET files and ensuring a consistent methodology, particularly with respect to the rebasing approach used for certain PAIs.
  The presence of outliers in the PAIs reported as of June 2023 and the different data sources used for the PAIs reported as of June 2024 could result in relevant differences between the figures reported over 2023 and the ones reported over 2022 for some PAIs (e.g. GHG emissions; Hazardous waste and radioactive waste ratio), and thus reduction their comparability;
- The eligibility and coverage of the data have significantly increased, making the figures more representative of the actual impacts. This enhanced coverage ensures a more accurate reflection of the principal adverse impacts, although it may also result in higher reported values for some PAIs due to the broader data set. In average terms, the coverage for mandatory PAIs applicable to investments in investee companies increased by 7% and the one for mandatory PAIs applicable to investments in sovereigns and supranationals increased by 8%.
- Removing the effect of the above mentioned outliers impacting the figures reported over 2022, the following main differences could be observed:
  Mandatory PAIs applicable to investments in investee companies:
  - PAI 1 - GHG Emissions: Despite the Scope 1 emissions decreased, we observed an increase of the Scope 2 and Scope 3 emissions, resulting in an increase of the total GHG Emissions by approximately 25%. The coverage increased as well from 53.39% to 63.8%;
  - PAI 2 – Carbon Footprint: As mentioned above for the GHG Emissions, despite the Scope 1 emissions decreased, we observed an increase of the Scope 2 and Scope 3 emissions, resulting in an increase of the total Carbon Footprint by approximately 10%. The coverage increased as well from 53.39% to 63.8%;
  - PAI 3 - GHG intensity of investee companies: The PAI decreased substantially by 45% due to the absence over 2023 of the investments in investee companies presenting particularly high values;
  - PAI 5 a)– Share non-renewable energy consumption: The PAI increased from 41.5% over 2022 to 64.9% over 2023, also due to the increase of the coverage from 52.5% to 64%;

  Additional PAIs applicable to investments in investee companies:
  - Investments in companies without carbon emission reduction initiatives: The PAI increased from 26.93% to 29.98%. Such increase has been also impacted by the number of companies which, during 2023, did not follow through on their commitment to set verified carbon emissions reduction targets or 1.5C-aligned science-based emissions targets.

  Mandatory PAIs applicable to investments in sovereign and supranationals:
  - PAI 16 Investee countries subject to social violations: The PAI increased from 7.50% to 13.27%. Such increase has been impacted by an enhancement of the eligibility and coverage. Indeed, in relation to the sub-funds' investments in underlying funds, the data provider sourced a greater number of underlying portfolios. Additionally, to standardize the underlying data and methodologies used in calculations, the data provider used proprietary data instead of sourcing information from EET file, as done over the 2022. As a consequence, the increase is also attributable to the previous inability to aggregate EET information at the single product level when products invested in multiple funds, which would have caused double counting.