

ANNEX III

ANNEX IV

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: PHARUS SICAV - BEST REGULATED COMPANIES Legal entity identifier: 549300G81CVUJTUGB498

Environmental and/or social characteristics

Did this financial product have a sustainable investment objective? *[tick and fill in as relevant, the percentage figure represents sustainable investments]*

<input checked="" type="radio"/> <input type="radio"/> <input type="checkbox"/> Yes	<input checked="" type="radio"/> <input type="radio"/> <input checked="" type="checkbox"/> No
<input type="checkbox"/> It made sustainable investments with an environmental objective : ____% <input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	<input checked="" type="checkbox"/> It promoted Environmental/Social (E/S) characteristics and while it did not have as its objective a sustainable investment, it had a proportion of __97.32__% of sustainable investments <input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy <input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy <input checked="" type="checkbox"/> with a social objective
<input type="checkbox"/> It made sustainable investments with a social objective : ____%	<input type="checkbox"/> 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 include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



Sustainability indicators measure how the 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?

Sustainability indicators used to measure the attainment of each of the social and environmental characteristics promoted by the financial product confirmed that the environmental and/or social characteristics have been fully met.

The **Sustainability indicators** are:

1. **ESG ratings**, that are defined relying on industry leading data providers. The Portfolio average ESG RATING cannot follow below average (or ESG Rating B) in a scale from high+ to low-.

2. The **compliance** of the target investments **to exclusion criteria** related **to social** characteristics promoted by the financial product. The exclusion criteria applied to the investment universe are aimed to exclude companies (1) involved in controversial weapons production (in details are excluded companies involved in production of anti-personnel mines, production of cluster weapons, production of depleted uranium, production of white phosphorus, whose revenues deriving from the production of biological and chemical weapons are higher than 5%, whose revenues deriving from the production of nuclear weapons are higher than 5%), (2) whose revenues deriving from the tobacco production is higher than 5%; (3) whose revenues deriving from adult entertainment sector is higher than 5%; (4) whose revenues deriving from gambling sector is higher than 5%; (5) which do not respect the principles of United Nation Global Pact.
3. The **compliance** of the target investments **to inclusion criteria**, that is made up by 60% of scoring weight related **to environmental** factors, including such companies (1) whose revenues linked to carbon emissions are below 5%, (2) whose revenues deriving from water stress are below 5%, (3) whose revenues deriving from toxic emissions are below 5%, (4) with revenues deriving from renewable energy and (5) limiting their impact on the climate. The other 40% is about **Social and Governance** factors such as (but not limited to) treatment of employees, product safety and business ethics.

Sustainable Investments:

Investments that comply with the inclusion and exclusion criteria and that have a strong ESG Rating are considered Sustainable Investments and should be at least 80% of the Portfolio's net asset value.

Considering that 60% of inclusion criteria is made up by scoring weight related to environmental factors and the other 40% is about Social and Governance factors, than:

- Sustainable Environmental investments should be at least 48% of the Portfolio's net asset value.
- Sustainable Social Investments should be at least 32% of the Portfolio's net asset value.

● *How did the sustainability indicators perform?*

1. **ESG RATING INDICATOR:** PORTFOLIO AVERAGE ESG RATING: A
2. **EXCLUDING CRITERIA INDICATOR:** Securities not complaint to the excluding criteria: 0% of the Portfolio's net asset value
3. **INCLUDING CRITERIA INDICATOR:** Securities not complaint to the including criteria: 0% of the Portfolio's net asset value
4. **Sustainable Investments:** 97.32% of the Portfolio's net asset value
 - 4.1. **Sustainable Environmental Investments:** 58.39% of the Portfolio's net asset value
 - 4.2. **Sustainable Social Investments:** 38.93% of the Portfolio's net asset value
5. **Contribution to Environmental Objective 9a- Climate change mitigation:** 0.50% of the Portfolio's net asset value
6. **Contribution to Environmental Objective 9b- Climate change adaptation:** 0% of the Portfolio's net asset value

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

INDICATORS AS OF 30.12.2022:

1. **ESG RATING INDICATOR:** PORTFOLIO AVERAGE ESG RATING: A+
2. **EXCLUDING CRITERIA INDICATOR:** Securities not complaint to the excluding criteria: 0% of the Portfolio's net asset value
3. **INCLUDING CRITERIA INDICATOR:** Securities not complaint to the including criteria: 0% of the Portfolio's net asset value
4. **Sustainable Investments:** 84% of the Portfolio's net asset value
 - 4.1. **Sustainable Environmental Investments:** 50.4% of the Portfolio's net asset value
 - 4.2. **Sustainable Social Investments:** 33.6% of the Portfolio's net asset value
5. **Contribution to Environmental Objective 9a- Climate change mitigation:** 0.60% of the Portfolio's net asset value
6. **Contribution to Environmental Objective 9b- Climate change adaptation:** 0% of the Portfolio's net asset value

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

The objectives of the sustainable investments that the financial product partially intends to make is to promote peaceful, just and inclusive societies, avoiding the exposure to such companies involved in controversial weapons production, tobacco production, adult entertainment, gambling sector, violation of United Nation Global Pact, as per the internal ESG policy defined. The investments of the financial product will be limited to issuers evidencing a strong Sustainability rating and which follow good governance practices as defined below.

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

The sustainable investments that the financial product partially intends to make do not cause significant harm to any social sustainable investment objective as the product cannot invest in companies involved in the abovementioned activities according to the analysis and monitoring of PAI.

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

The PAI are monitored with the close support of a ESG advisor that provides the financial product with a complete report on a quarterly basis with all the information regarding the invested companies and their characteristics. In details, PAI number 10, 11 and 14 are monitored; PAI number 10 and 14 are also included in the excluding criteria. Below the indicators that are monitored:

Description of PAI	Number of indicator (Table 1)
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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.

Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	10
Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	11
Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	14

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

YES, compliance to the exclusion criteria also considers the respect/alignment with the OECD and the UNGC.

0% of the financial product is not compliant with UNGC and OECD principles.



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

This financial product monitors PAI with the support of a ESG Advisor that produces, on a quarterly basis, a complete report that illustrates the PAI and the results for the Portfolio. Data are collected from an external info provider and subsequently processed to obtain the Portfolio analysis that takes into account all the constituents and their impact on the PAI in order to have a complete picture of the situation.

In details, PAI number 10, 11 and 14 are monitored; PAI number 10 and 14 are also included in the excluding criteria.



What were the top investments of this financial product?

The list includes the investments constituting the **greatest proportion of investments** of the financial product during the reference period which is: **[complete]**

Largest investments	Sector	% Assets	Country
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NEXTERA ENERGY INC	Utilities	6.3	US
DUKE ENERGY CORP	Utilities	5.5	US
TERNA SPA	Utilities	4.9	IT
FORTIS INC	Utilities	4.7	CA
AMERICAN ELECTRIC POWER	Utilities	4.0	US
SNAM SPA	Utilities	3.9	IT
ELIA GROUP SA/NV	Utilities	3.5	BE
SEMPRA ENERGY	Utilities	3.2	US

NATIONAL GRID PLC	Utilities	3.1	GB
DOMINION ENERGY INC	Utilities	3.0	US
REDES ENERGETICAS NACIONAIS	Utilities	3.0	PT
ALLIANT ENERGY CORP	Utilities	3.0	US
AMERICAN WATER WORKS CO INC	Utilities	2.9	US
SOUTHERN CO/THE	Utilities	2.8	US
ITALGAS SPA	Utilities	2.7	IT



What was the proportion of sustainability-related investments?

Sustainable investments represent the 97.32% of the Portfolio's net asset value.

What was the asset allocation?

Asset allocation

describes the share of investments in specific assets.

[include note only for the financial products referred to in Article 6, first paragraph, of Regulation (EU) 2020/852]

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

Enabling activities

directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are

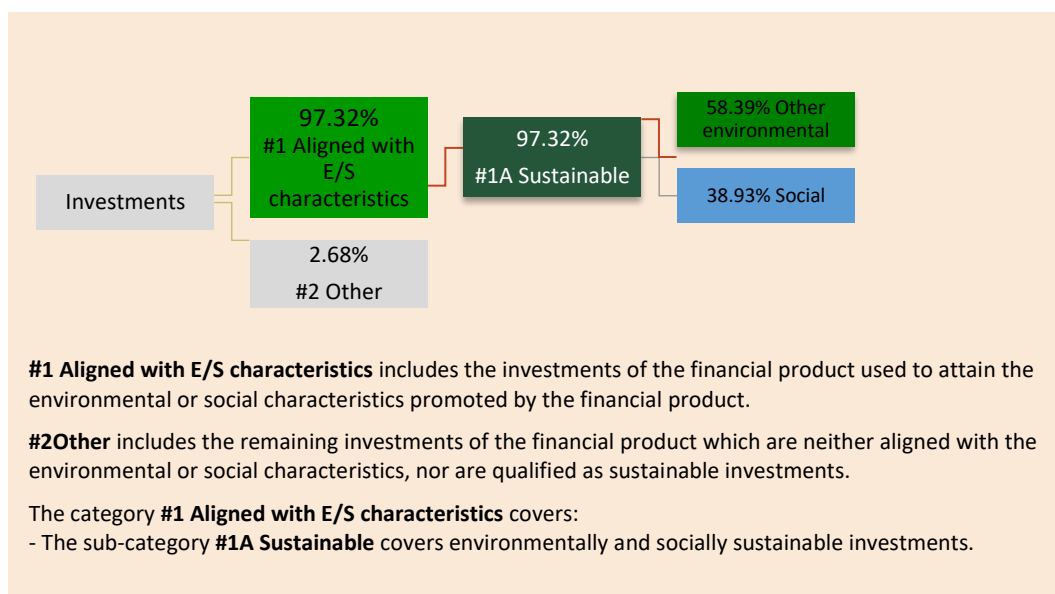
activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

Eligible investments are those securities which are compliant with including criteria and are not in breach with excluding criteria set out on the applicable ESG policy.

#1 Investments aligned with E/S characteristic

#2 other assets: cash, derivatives and securities without ESG rating or with a weak ESG rating.

#1A Sustainable investment are investments in securities whose rating is considered acceptable and which comply with the inclusion and exclusion criteria set out in the ESG policy applicable.



In which economic sectors were the investments made?

Sector: Utilities

Sub Sector: Electric Utilities, Multi-Utilities, Gas Utilities, Water Utilities



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

0% of Portfolio's net asset value.

● **Did the financial product invest in fossil gas and/or nuclear energy related activities complying with the EU Taxonomy¹?**

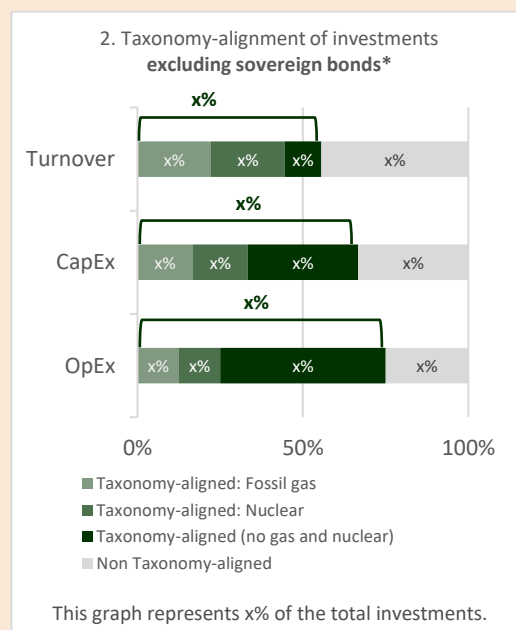
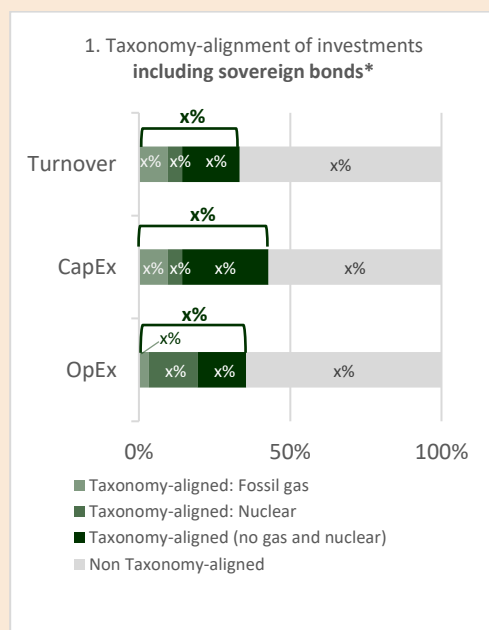
☐ Yes:

In ☐ fossil gas ☐ In nuclear energy

☒ No

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.*

[Include information on Taxonomy aligned fossil gas and nuclear energy and the explanatory text in the left hand margin on the previous page only if the financial product invested in fossil gas and/or nuclear energy Taxonomy-aligned economic activities during the reference period]



* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.

[include note for the financial products referred to in Article 6, first paragraph, of Regulation (EU) 2020/852

Taxonomy-aligned activities are expressed as a share of:

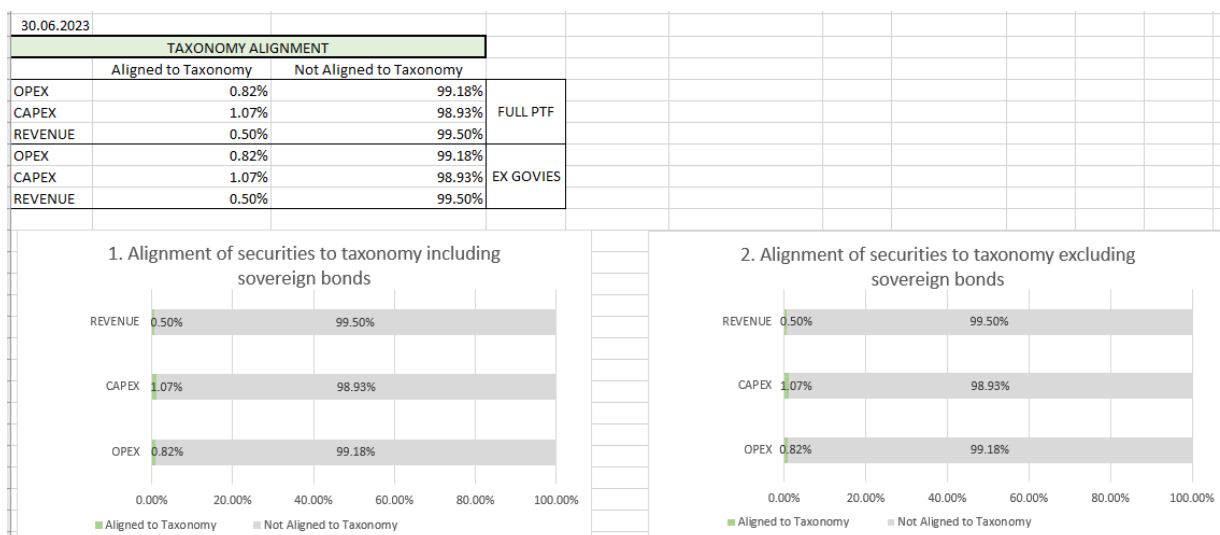
- **turnover** reflecting the share of revenue from green activities of investee companies.
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

[include note for the financial products referred to in Article 6, first paragraph, of Regulation (EU) 2020/852 that invest in environmental economic activities that are not environmentally sustainable economic activities]



are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under Regulation (EU) 2020/852.

¹ Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



● **What was the share of investments made in transitional and enabling activities?**

0% of Portfolio's net asset value is invested in transitional and enabling activities.

● **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 financial product has not set a minimal percentage of investments in economic activities that qualify as environmentally sustainable under the EU Taxonomy. The share of sustainable investments with an environmental objective not aligned with the EU Taxonomy is 99.14 % of the of the Portfolio's net asset value.



What was the share of socially sustainable investments?

The share of socially sustainable investments is 38.93% of the of the Portfolio's net asset value.



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

Under "#2 Other" are included cash, derivatives, bonds and equities which do not have any ESG rating or with a weak ESG rating. The financial product aims to limit the exposure to this category to maximum 20% of its assets. The investments of the financial product will be limited to issuers evidencing a strong Sustainability rating and which follow good governance practices.

The share of #2 Other is 2.68% of the Portfolio's net asset value.



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

To meet the environmental and/or social characteristics during the reference period, the asset manager has selected an eligible asset universe of sustainable securities that considers, for a minimum of 80% of the whole Portfolio, only securities that comply with the inclusion/exclusion criteria; considering that the inclusion policy is composed by the environmental pillar (which represents a minimum of 60% of the sustainable investments universe) and the social pillar (which represents a minimum of 40% of the sustainable investments universe), thanks to the asset universe implemented, the environmental and/or social characteristics are always taken into account.

Compliance with inclusion and exclusion criteria is regularly checked by the asset manager to ensure the financial product constantly meets the defined environmental and/or social characteristics.



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

There is no specific index designated as a reference benchmark.

- ***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

[include note for financial products where an index has been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the financial product]

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