

Statement on adverse sustainability impacts according to Article 4 Sustainable Finance Disclosure Regulation (SFDR)

1. Summary

Moventum Asset Management S.A. has integrated sustainability aspects into the company's business and risk strategy. The product and service offering of Moventum Asset Management S.A. is basically divided into two product branches: standardized asset management on a fund basis and mutual funds. When making investment decisions within the scope of both product branches, sustainability risks are taken into account to varying degrees depending on the product (portfolio). In this context, sustainability risks are understood to be events or conditions in the environmental, social or governance areas, the occurrence of which could have a significant negative impact on the value of an investment. In accordance with the requirements of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosure requirements in the financial services sector (SFDR), the products of Moventum Asset Management S.A. are to be classified either as a conventional product under Article 6 SFDR or as a sustainable product under Article 8 SFDR.

Moventum Asset Management S.A. currently offers five sustainable strategies. These strategies, Defensive, Balanced, Balanced Europe, Dynamic and Offensive are offered within the fund-based standardized asset management MoventumPlus Active. The sustainability filter criteria applied by Moventum Asset Management S.A. for the selection of sustainable fund investments are in principle also applied in the same way for the respective sub-funds of Moventum Plus Aktiv SICAV classified as sustainable financial products in accordance with Article 8 of the SFDR.

The corresponding product classifications are made in pre-contractual documents (for example in the sales prospectus in the case of funds) and in the investment discussion (for example in the case of asset management on a fund basis).

2. Description of the main adverse sustainability impacts

According to Article 2 (24) of the SFDR, sustainability factors include environmental, social and employee concerns, respect for human rights and the fight against corruption and bribery.

In sustainable investment processes, the most important adverse sustainability impacts of an investment are taken into account in relation to environmental, social and employee-related circumstances, the actual and/or potential occurrence of which would or could have a material adverse effect on the value of the investment. This concerns, for example, the risks to the environment that may arise from investments in companies that are involved in the extraction of fossil fuels. It also concerns, for example, the adverse consequences for consumer health that may arise from an investment in companies engaged in the manufacture or distribution of tobacco products or high-proof alcohol.

Violations by companies of environmental protection guidelines can result in economic risks such as high compensation obligations. Controversial business practices at companies can, in addition to negative social impacts, also lead to reputational risks and resulting declines in sales and/or penalties at the companies concerned. In the case of public issuers, creditworthiness risks exist as a result of corruption, high military spending, or inadequate climate protection policies, for example.

3. Description of strategies to identify and prioritize key adverse sustainability impacts

Moventum Asset Management S.A. considers important adverse sustainability impacts in its existing or intended investments. Depending on the classification of the respective product as Article 6 or Article 8 within the meaning of the SFDR, different processes are applied. However, all strategies managed by Moventum Asset Management S.A. have in common that they exclusively contain fund investments.

Sustainable products within the meaning of Article 8 of the SFDR:

In addition to the deliberate selection of Article 8 and Article 9 funds for the strategies managed by Moventum Asset Management S.A., all potential investments undergo a sustainability screening process that looks for potential violations of the principles of good corporate governance. However, the ability to consider important negative sustainability impacts depends largely on the availability of relevant information. Moventum Asset Management S.A. obtains information on the classification of possible investments as Article 8 or Article 9 according to the SFDR, as well as information regarding possible indications of a breach of the principles of good corporate governance from recognized data providers.

Conventional products as defined in Article 6 of the SFDR:

Until further notice, Moventum Asset Management S.A. continues to offer products as defined in Article 6 of the SFDR. A product categorization as a conventional product is appropriate for these products, as either there is not yet sufficient data available for the investments of these products, which would allow the product to be classified as sustainable in its entirety, or the nature of the investments does not allow a classification as a sustainable product according to the current legal situation. Nevertheless, Moventum Asset Management S.A. encourages all companies, especially those with a high consumption of unsustainable resources, to face their responsibility and contribute towards a more sustainable economy.

4. Description of measures to identify significant adverse sustainability impacts

For the targeted selection of sustainable funds, Moventum Asset Management S.A. uses the database of a reliable independent research provider. Based on this database, a fund screening is performed to uncover important adverse sustainability impacts of existing and potential investments. For investments in funds with the categorization in Article 8 or Article 9 SFDR, it is assumed that the fund companies have already screened for important adverse sustainability impacts for their products. If a fund exhibits criteria that suggest important adverse sustainability impacts, the fund company will be contacted and/or the fund will be excluded from the investment if appropriate. In accordance with the quarterly approach with quarterly rebalancing and reallocation of strategies, the possible divestment of already allocated funds for which criteria emerge during the investment period that

suggest important adverse sustainability impacts takes place with the next achievable quarterly rebalancing.

In addition to the database of the independent research provider, direct reporting by the companies, Internet forums, media databases, and information from non-governmental organizations (NGOs) and government agencies can also serve as research sources.

5. Participation policy

Due to the volume of assets under management and the business model of Moventum Asset Management S.A., the Company currently refrains from pursuing a participation policy within the meaning of Article 3g of Directive 2007/36/EC of the European Parliament and of the Council of 11 July 2007 on the exercise of certain rights of shareholders in funds investing in the companies in which investments are made.

6. Compliance with international standards

The relevant frameworks, such as the UN Principles for Responsible Investment in particular, provide guidance on all sustainability topics and are regularly taken into account when reviewing and initiating concepts and measures. However, due to the size and the business model of Moventum Asset Management S.A., no certification according to the frameworks is sought.

7. Remuneration policy

The remuneration system of Moventum Asset Management S.A. is designed in such a way that there is no incentive to take inappropriate risks and it is open to individual remuneration arrangements for employees that take into account the inclusion of sustainability risks in investment decision-making processes. However, the avoidance of sustainability risks has not yet been explicitly mentioned in the determination of the remuneration parameters.