

## Article 10 (SFDR)

### Website disclosure for an Article 8 fund

Moventum Plus Aktiv – Defensives Portfolio  
Moventum Plus Aktiv – Ausgewogenes Portfolio  
Moventum Plus Aktiv – Ausgewogenes Portfolio Europa  
Moventum Plus Aktiv – Dynamisches Portfolio  
Moventum Plus Aktiv – Offensives Portfolio

## (A) Summary

The sub-funds promote environmental and social characteristics by predominantly investing in companies with outstanding Environmental, Social and Governance characteristics while also ensuring good governance practices of the majority of the companies invested in. The characteristics are taken from the fund data provider Morningstar Inc. or directly from the funds' EET files<sup>1</sup>. The sub-funds do not use benchmarks to assess their environmental or social performance but use different indicators to assess such performance of its investee companies.

## (B) No Sustainable Investment Objective

Does this financial product have a sustainable investment objective?

This financial product promotes environmental or social characteristics, but does not have as its objective a sustainable investment.

## (C) Environmental or social characteristics of the financial product

What are the environmental or social characteristics promoted by this financial product?

The Sub-funds will essentially invest in a diversified portfolio of UCITS, UCIs and ETFs that either promote ESG characteristics pursuant to Article 8 or have a sustainable investment objective pursuant to Article 9 of the SFDR. Beyond the selection of the Article 8 or Article 9 funds, the portfolio managers will strive not to select any funds that do not support or conduct good governance practises as for example outlined in the United Nations Global Compact's ten principles, which outline a value system for corporate sustainability in the areas of Human Rights, Labour, Environment, and Anti-Corruption. These principles outline that

- 1) Businesses should support and respect the protection of internationally proclaimed human rights; and
- 2) make sure that they are not complicit in human rights abuses.
- 3) Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- 4) the elimination of all forms of forced and compulsory labour;
- 5) the effective abolition of child labour; and
- 6) the elimination of discrimination in respect of employment and occupation.
- 7) Businesses should support a precautionary approach to environmental challenges;
- 8) undertake initiatives to promote greater environmental responsibility; and
- 9) encourage the development and diffusion of environmentally friendly technologies.

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<sup>1</sup> EET stands for European ESG Template. It describes a file format that is provided directly by the manufacturers of financial products and intends to standardize the data exchange between manufacturers and stakeholders of a financial product with regards to ESG data.

10) Businesses should work against corruption in all its forms, including extortion and bribery.

#### **(D) Investment strategy**

What investment strategy does this financial product follow?

The Sub-Funds will essentially invest in UCITS, UCIs, and ETFs that either promote environmental and social characteristics pursuant to Article 8 or have sustainable investment objectives pursuant to Article 9 of the SFDR. In case a financial product no longer meets this requirement, the financial product will be sold within the next regular quarterly rebalancing process. This ensures that financial products not meeting the requirements anymore will be held for a maximum period of three month after not meeting the requirements. Beyond the selection of the Article 8 or Article 9 funds, the portfolio managers will strive not to select any funds that do not support or conduct good governance practises as for example outlined in the United Nations Global Compact's ten principles. Good governance is regularly assumed for all funds fulfilling Article 8 or Article 9 SFDR. For the remaining investments, relevant fields in Morningstar database and/or the EET file of the fund are assessed for hints that good governance is not pursued by any of the investments or upcoming investments. In case two funds are otherwise identical towards their eligibility for investment, portfolio managers will select the fund with a higher ESG score as per their rating in Morningstar's fund database.

What is the policy to assess good governance practices of the investee companies?

Good governance practices by investee companies are ensured through investing the majority of the subfunds' portfolios in Article 8 or Article 9 SFDR products, which in turn are required to ensure the good governance practices of their investee companies.

#### **(E) Proportion of Investments**

Each subfund aims to invest at least 51 percent of its assets in funds that comply with either Article 8 or Article 9 SFDR. At the same time, each subfund aims to invest at least 10% of its assets into funds that comply with Article 9 SFDR.

#### **(F) Monitoring of environmental or social characteristics**

How are the environmental or social characteristics and the sustainability indicators monitored throughout the lifecycle of the financial product?

To ensure that environmental and social characteristics are met throughout the lifecycle of the fund, the ESG process above is applied and monitored on an ongoing basis with a regularity of at least once a quarter. In case a financial product no longer meets this

requirement, the financial product will be sold within the next regular quarterly rebalancing process. This ensures that financial products not meeting the requirements anymore will be held for a maximum period of three month after not meeting the requirements.

### **(G) Methodologies**

What is the methodology to measure the attainment of the environmental or social characteristics promoted by the financial product using the sustainability indicators?

The sustainability indicators used to measure the attainment of the environmental or social characteristics promoted are:

- The share of UCITS, UCIs, and ETFs categorised as Article 8
- The share of UCITS, UCIs, and ETFs categorised as Article 9
- The share of funds that do apply good governance practices

Each subfund aims to invest at least 51 percent of its assets in funds that comply with either Article 8 or Article 9 SFDR. At the same time, each subfund aims to invest at least 10% of its assets into funds that comply with Article 9 SFDR. Unless other information is made available to the asset management team, it is regularly assumed that all funds in category 8 or 9 of SFDR ensure the good governance practices (e.g. 10 principles of United Nations Global Compact).

### **(H) Data sources and processing**

What are the data sources used to attain each of the environmental or social characteristics?

For the data sources, the Investment Manager will mainly rely on Morningstar database as a fund data service provider. The compliance of the funds or issuing fund companies with good governance practices (e.g. the 10 principles of the UN Global Compact) is ensured by analysing the respective data fields in Morningstar, from the EET files directly or through the fund prospectuses and/or company reports. Once data fields of reliable data providers (such as Morningstar) are sufficiently filled with the respective information, the asset manager might consider using these data providers exclusively as a resource for providing data on good governance.

### **(I) Limitations of Methodologies and Data**

As criteria, the methodology includes both legally binding classifications and measures implemented by the company on a voluntary basis to increase its own sustainability. While the legal classification of the company (or the investment) can be observed relatively easily and is regulated relatively precisely by the legislator, those voluntarily implemented to

pursue good corporate governance are more difficult to observe and evaluate. To compensate for this, relevant fields are used in the EET file, as for example compliance with the principles of the United Nations Global Compact. However, not every fund currently fills in all the fields in the EET file, so that different fields in the EET file may be used when assessing good corporate governance in comparison. Furthermore, the Investment Manager may choose to either observe these fields directly from the EET-file, the relevant legal documentation of the investment, or a reliable data provider (such as Morningstar).

#### **(J) Due Diligence**

In the course of its investment process, Moventum Asset Management S.A. is conducting a due diligence process on the underlying fund companies. This due diligence process assesses the quality of each fund company and tries to rule out that investments are done with companies where it can be reasonably assumed that they severely violated generally accepted global norms in their business practices and conduct.

#### **(K) Engagement Policies**

In view of the size of Moventum Asset Management S.A. and its assets under management, we consider the influence that Moventum Asset Management S.A. is able to exert on the investment behaviour of potential target funds to be such that the influence of Moventum Asset Management S.A. extends little beyond the pure allocation function. For this reason, Moventum Asset Management S.A. does not currently exert any further influence on the invested investment funds beyond the pure allocation function of the invested funds.

#### **(L) Reference benchmark**

Has a reference benchmark been designated for the purpose of attaining these characteristics promoted by the financial product?

The fund has not defined a benchmark with regards of attaining the sustainability characteristics.