

Transparency under 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

Moventum Asset Management S.A. (Moventum AM) is very aware of its responsibilities as an investor in the context of environmental, social and governance considerations. We all see almost daily the impact that unethical behaviour can have on our environment, on the social fabric of societies and on the employees of companies. Making a positive contribution here is a major concern for us. Therefore, in the medium to long term, we aim to incorporate ESG criteria into the investment policy of the strategies managed by Moventum AM. Studies show that companies that act responsibly in the ESG area are often more successful in the long term. In this respect, it is also in our interest if ESG criteria are taken into account in the investment approach.

In terms of Article 7(2) of the Regulation, Moventum AM does not currently take into account any negative impact of investment decisions on sustainability factors in the investment strategies it manages. In our view, the available relevant data that would need to be used to identify and weight adverse sustainability impacts is currently insufficient. As a pure fund investor Moventum AM is dependent on the offerings of other management companies and the funds effectively offered on the market. With the introduction of the European Union's Sustainable Finance Initiative, it is apparent that only a small proportion of funds meet the criteria for a higher ESG rating under this regulation. In order not to lose a large part of the previous investment universe for the successful strategies that have been offered for decades, we can currently only choose a classification in the lowest ESG category according to the Sustainable Finance Initiative without a complete change in the investment policy of each single strategy.

Furthermore, there are currently no monetary remuneration systems, neither for members of the management nor for employees of Moventum AM, which take ESG objectives into account as part of the remuneration policy.

Moventum AM will inform by 30 December 2022 at the latest whether and how the material adverse effects of investment decisions on sustainability factors are taken into account. In this context, we draw obligatory attention to the fact that: The objective of the investment strategies is not sustainable investment; with the underlying investments in either strategy, Moventum AM does not take into account the EU criteria for environmentally sustainable management as set out in Regulation (EU) 2019/2088 and Regulation (EU) 2020/852.