

## Moventum's approach to environmental, social and governance policies

Environmental, social and governance (ESG) considerations are integral to the policies and principles that govern our business and reflect our commitment to sustainable growth. Our approach to ESG management includes robust governance systems, risk management and controls, a commitment to providing exceptional and transparent service to our customers, investing in our people and fostering a diverse and inclusive work environment, and promoting sustainable solutions for our customers and within our business. Through these efforts, we aim to promote sustainable solutions for our customers and within our company. We view the effective management of ESG as imperative to the business and strive for continuous improvement in all of these areas.

Based on Regulation (EU) 2019/2088 on sustainability-related disclosure requirements in the financial services sector, Moventum has firstly, updated the company's remuneration policy in accordance with Article 5 (1) so that it now clearly indicates how it is consistent with the integration of sustainability risks. Secondly, we comply with Article 3 (1) by providing the following explanation of our strategies to incorporate sustainability risks into our investment advice. The latter are based on internal procedures which we are continuously developing.

**(E)** The Executive Management is aware of the potential ESG impact of the company as well as of the workforce. The Executive Management's defined approach to sustainability risks is clearly communicated to the company's own management, employees, as well as customers and investors. In addition, the business strategy is reviewed holistically at regular intervals to ensure that sustainability risks are taken into account. This can also result in opportunities, as was recently the case with the introduction of digital signatures and paperless identification of customers. In the office too, the workforce pays attention to environmental protection and their environmental impact. For example, only recyclable paper is used internally and emphasis is placed on ensuring that printed documents offer added value.

**(S)** Our employees are our most valuable asset. The Board of Directors and the Executive Management are aware of their responsibility with regard to employees and have established far-reaching measures with regard to strengthening employee protection, working conditions, employee rights and all aspects of diversity. The management pursues an "open-door policy" and is accessible to every employee across hierarchical boundaries. In addition to the Staff Council, an important contribution is made by the Moventum Workplace Wellbeing Committee, which is composed of employees from all levels and departments, meets regularly and makes suggestions to management for improvements in areas such as communication, collaboration and the working environment. The committee is intended to serve as a "link" for communication between employees and management and to change the corporate culture in a way that promotes a healthy lifestyle and creates a positive working environment.

The protection of privacy is of paramount importance to Moventum's Executive Management. Therefore, Moventum is committed to protecting the personal data of its clients at all times. Extensive security mechanisms in both the applications and the operational area ensure a secure handling of sensitive personal data in accordance with the General Data Protection Regulation.

(G) Moventum's governance procedures are designed to ensure a sound and prudent Executive Management and a solid understanding of respective associated risks. The fundamental principles include:

- a clear and coherent organizational and operational structure;
- appropriate internal control mechanisms for all areas of business activity;
- procedures for identifying, measuring, reporting, managing, mitigating and monitoring risks; and
- Business continuity plans, escalation procedures, and crisis management plans.

In addition, Moventum nurtures an internal risk and compliance culture, which aims to ensure that all employees of the company actively participate in internal controls as well as in the identification, reporting and monitoring of risks taken by the company and have a positive attitude towards internal controls. This overall risk and compliance culture is shaped by Moventum's Board of Directors and the Executive Management and is reflected in Moventum's business strategy as well as in all of its operations. It includes the responsibility of all employees for their actions and behaviour, as well as an open and critical dialogue. Incentives for an inappropriate appetite for risk, on the other hand, are excluded.