

**Statement on the most significant adverse impacts of investment decisions on sustainability factors, consolidated with respect to our two asset management products**

**Art. 5 of EU Regulation 2022/1288**

**Summary**

**Smavesto GmbH, LEI: 967600RGHAIXR9HIVI76**

Within the scope of the asset management enterprise “Smavesto Nachhaltigkeitsvariante” (Smavesto Sustainability Variant), the most significant adverse impacts on sustainability factors are taken into account. Within the scope of the asset management enterprise “Smavesto Klassisch” (Smavesto Classic), the most significant adverse impacts on sustainability factors are not taken into account.

This statements relates to the period from 1 January 2022 to 31 December 2022 and applies to all our asset management activities.

In order to maintain due diligence within its internal asset management enterprise, Smavesto takes into account the adverse impacts of investment decisions on the sustainability factors of environmental, social and employee concerns, respect for human rights and the fight against corruption and bribery. Our investment decision process includes consideration of the most significant adverse impacts on sustainability factors in the context of investments made. This investment decision process is integrated into standard processes, which are subject to internal and external monitoring by Internal Audit, Compliance and external auditors. Compliance with the described organizational precautions is monitored at Smavesto. This ensures that essential adverse sustainability impacts are considered in our asset management enterprise.

This statement provides a detailed explanation of the tabular presentation of the PAI indicators. These data are processed and made available to us by our service providers. We integrate these data into our regular investment decision-making process and take them into account when making investment decisions. Measures rendering possible the improvement of these indicators are always discussed in the overall context together with other decision criteria.

The strategies for identifying and weighting the most significant adverse impacts on sustainability factors provides that the selection of sustainability indicators and the identification and assessment of the most significant sustainability impacts takes place by using the appraisals and analyses of the MSCI rating agency. They are regularly reviewed and kept up to date. This is firmly inscribed in our asset management processes and represents an integral part of internal process monitoring.

In its role as an asset manager, Smavesto does not pursue a policy of active involvement. It does not enter into a dialogue with companies that it has invested in, with its stakeholders or with any other shareholders. It does not exercise any voting rights derived from equities, nor does it exert any other influence on the issuing companies, either in its own interests or in the interests of third parties. It does not submit proposals concerning the exercise of voting rights.

With regard to responsible corporate governance, Smavesto is committed to complying with various standards and principles. Smavesto takes over the internal ethics guideline of the parent company that is focusing among other things on the prevention of corruption or bribery, as well as a guideline on the acceptance of gifts and benefits, which are binding on all employees. In its role as an asset manager, Smavesto is guided by the UN Global Compact and the OECD guidelines for multinational enterprises when making investment decisions.