HAUCK AUFHÄUSER LAMPE

Disclosure

As of: 28.05.2025, Version 3.0

Statement on principal adverse impacts of investment decisions on sustainability factors in accordance with Article 4 (4) of the Disclosure Regulation

Hauck Aufhäuser Lampe Privatbank AG (LEI 529900OOZP78CYPYF471)
Summary

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Hauck Aufhäuser Lampe Privatbank AG (LEI 529900OOZP78CYPYF471) considers principal adverse impacts of its investment decisions on sustainability factors. The present statement is the consolidated statement on principal adverse impacts on sustaina-bility factors of Hauck Aufhäuser Lampe Privatbank AG and its subsidiaries, namely Hauck & Aufhäuser Fund Services S.A., Lam-pe Asset Management GmbH. As Hauck Aufhäuser Lampe Privatbank AG sold its stake to DALE Investment Advisors GmbH (DALE) in 2024, this year's statement no longer includes data from DALE.

This statement on principal adverse impacts on sustainability factors covers the reference period from 1 January 2024 to 31 December 2024.

Sustainability is firmly anchored in the HAL Group's corporate governance and is particularly important for the HAL Group in its future strategic orientation. Therefore, in the context of individual asset management and fund management, material adverse impacts of investment decisions on sustainability factors (‘Principal Adverse Impact’, ‘PAI’) are taken into account if the mandates pursue a sustainable investment strategy in accordance with their investment conditions. PAI covers the areas of environment, social and corporate governance (ESG). This concerns the impact of investment decisions made by managers on third parties, e.g. greenhouse gas emissions, carbon footprint, violations of the UN Global Compact principles and exposure to banned weapons (e.g. biological and chemical weapons, cluster munitions, landmines).

It should be noted that PAIs are generally taken into account to varying degrees (or not at all) in investment decisions within the framework of the general due diligence obligations of the HAL Group companies, depending, among other things, on the external asset managers commissioned, the investment strategies of the fund or segments, and the assets.

Furthermore, the consideration of PAI significantly depends on the extent to which the data on issuers required to identify and weight the adverse sustainability impacts is made available by professional ESG data providers. Not all assets in which the companies of the HAL Group invest have the necessary data available in sufficient quantity and quality to take into account the PAI required by regulation, nor are processes already in place to take this into account comprehensively. Therefore, the focus of PAI consideration is initially on investments in equities and bonds of issuers (companies and governments) for which sufficient data is available, as well as investment funds that take ESG criteria more strongly into account in their investment strategy.

Description of the principal adverse impacts on sustainability factors

Data on all investments in companies, countries or real estate is currently not available in a comprehensive and sufficiently high quality. The explanation column therefore shows the percentage of investments covered by data in relation to all investments.

Explanation of indicator 1. GHG emissions from companies:

The increase in absolute greenhouse gas emissions (total GHG emissions: approx. +40%) is in line with the increase in market value of the considered companies' investments (approx. +35%).

Indicators applicable to investments in investee companies

Adverse sustainability indicator		Metric	Impact 2024	Impact 2023	Impact 2022	Explanation	Actions taken, and actions planned and targets set for the next reference period
CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS							
Greenhouse gas emissionen	1. GHG emissions	Scope 1 GHG emissions	990.199,63 tCO2e	869.087,31 tCO2e	750.696,63 tCO2e	The proportion of investments in companies covered by data is 61,17%.	LAM and HAL take into account the most significant adverse impacts associated with greenhouse gas emissions at different levels and through various processes, depending on the investment strategy of the respective portfolio. They are taken into account, for example, through exclusions based on thresholds for revenue shares from certain activities. Depending on the investment strategy, companies operating in the following sectors may be excluded from the investment universe: - Coal and/or oil extraction - Energy production or other use of fossil fuel - Mining, exploration and services for oil sands and oil shale Some financial products do not invest in companies that would significantly impair UN Sustainable Development Goals No. 7 (Affordable and Clean Energy) and No. 13 (Climate Action).
		Scope 2 GHG emissions	143.216,45 tCO2e	141.537,70 tCO2e	127.063,48 tCO2e	The proportion of investments in companies covered by data is 61,15%.	
		Scope 3 GHG emissions	10.401.567,74 tCO2e	7.229.596,69 tCO2e	6.077.480,57 tCO2e	The proportion of investments in companies covered by data is 60,73%.	
		Total GHG emissions	11.535.005,84 t CO2e	8.240.221,71 tCO2e	6.955.240,68 tCO2e	The proportion of investments in companies covered by data is 60,78%.	
	2. Carbon footprint	Carbon footprint	679,91 tCO2/mEUR	655,63 tCO2/mEUR	655,36 tCO2/mEUR	The proportion of investments in companies covered by data is 60,78%.	
	3. GHG intensity of investee companies	GHG intensity of investee companies	1.509,80 tCO2/mEUR	1.286,35 tCO2/mEUR	1.520,55 tCO2/mEUR	The proportion of investments in companies covered by data is 62,37%.	

	4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	6,84%	4,98%	2,68%	The proportion of investments in companies covered by data is 64,45%.	
	5. Share of non-renewable energy consumption and production	Share of non-renewable energy consumption and non-renewable energy production of investee companies from non-rene able energy sources compared to renewable energy sources, expressed as a percentage of total energy sources	47,66%	46,35%	58,35%	The proportion of investments in companies covered by data is 34,96%.	
		Share of non-renewable energy consumption and non-renewable energy production of investee companies from non-rene able energy sources compared to renewable energy sources, expressed as a percentage of total energy sources	2,43%	2,67%	5,00%	The proportion of investments in companies covered by data is 60,95%. The PAI calculation does not take into account the share of energy production of the invested company in the total energy production of all invested companies.	
	6. Energy consumption intesity per high impact climate sector	Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector					
		Agriculture and forestry	0,24 GWh/mEUR	0,15 GWh/mEUR	0,29 GWh/mEUR	The proportion of investments in companies covered by data is 33,68%.	LAM and HAL take into account the most significant adverse impacts associated with greenhouse gas emissions at different levels and through various processes, depending on the investment strategy of the respective portfolio. They are taken into account, for example, through exclusions based on thresholds for revenue shares from certain activities. Depending on
		Mining and quarrying of stones and earth	1,71 GWh/mEUR	1,46 GWh/mEUR	1,23 GWh/mEUR	The proportion of investments in companies covered by data is 33,68%.	

		Manufacturing sector/production of goods	0,32 GWh/mEUR	0,33 GWh/mEUR	0,61 GWh/mEUR	The proportion of investments in companies covered by data is 33,68%.	the investment strategy, companies operating in the following sectors may be excluded from the investment universe: - Coal and/or oil extraction - Energy production or other use of fossil fuel - Mining, exploration and services for oil sands and oil shale Some financial products do not invest in companies that would significantly impair UN Sustainable Development Goals No. 7 (Affordable and Clean Energy) and No. 13 (Climate Action).
		Energy supply	1,71 GWh/mEUR	1,14 GWh/mEUR	2,63 GWh/mEUR	The proportion of investments in companies covered by data is 33,68%.	
		Water supply, sewage and waste disposal, and pollution control	1,70 GWh/mEUR	1,93 GWh/mEUR	3,54 GWh/mEUR	The proportion of investments in companies covered by data is 33,68%.	
		Construction sector	0,08 GWh/mEUR	0,11 GWh/mEUR	0,25 GWh/mEUR	The proportion of investments in companies covered by data is 33,68%.	
		Trade, maintenance and repair of motor vehicles	0,08 GWh/mEUR	0,07 GWh/mEUR	0,24 GWh/mEUR	The proportion of investments in companies covered by data is 33,68%.	
		Transport and storage	5,43 GWh/mEUR	3,44 GWh/mEUR	4,29 GWh/mEUR	The proportion of investments in companies covered by data is 33,68%.	
		Real estate and housing	0,34 GWh/mEUR	0,48 GWh/mEUR	0,00 GWh/mEUR	The proportion of investments in companies covered by data is 33,68%.	
Biodiversity	7. Activities negatevly affecting biodiversity-sensitive areas	Share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas	0,10%	0,11%	0,07%	The proportion of investments in companies covered by data is 64,38%.	LAM and HAL take into account the most significant adverse impacts on the conservation and development of biodiversity at different levels and through various processes, depending on the investment strategy of the respective portfolio. Depending on the investment strategy, investments in companies whose activities harm biodiversity may be excluded. In addition, investments in companies that generate a certain percentage of their revenue from activities that exert

							significant pressure on biodiversity may be excluded, such as: - Tobacco production - Use of fracking technologies or Arctic drilling - Production of genetically modified organisms for agriculture - Distribution or production of furs and/or exotic leather - Mining, exploration and services for oil sands and oil shale
Water	8. Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	0,04 t/mEUR	0,04 t/mEUR	0,09 t/mEUR	The proportion of investments in companies covered by data is 10,00%.	The LAM and HAL take into account the most significant adverse impacts related to water at different levels and through various processes, depending on the investment strategy of the respective portfolio. Depending on the investment strategy, investments in companies that generate a certain percentage of their revenue from activities that exert increased pressure on water resources may be excluded, such as: - Production of hazardous pesticides - Distribution or production of furs and/or exotic leather Some financial products do not invest in companies that would significantly impair UN Sustainable Development Goals No. 6 (Clean Water and Sanitation) and No. 12 (Sustainable Consumption and Production).
Waste	9. Hazardous waste and radioactive waste ratio	Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average	3,11 t/mEUR	4,05 t/mEUR	226,80 t/mEUR	The proportion of investments in companies covered by data is 25,22%.	LAM and HAL take into account the most significant adverse impacts associated with hazardous and radioactive waste at different levels and through various processes, depending on the investment strategy of the respective portfolio. Depending on the investment strategy, investments in companies that generate a certain percentage of their revenue from activities that may produce hazardous or radioactive waste may be excluded, such as: - Production of nuclear energy - Services/supplies for nuclear energy

							- Use of fracking technologies - Mining, exploration and services for oil sands and oil shale Some financial products do not invest in companies that would significantly impair UN Sustainable Development Goal No. 12 (Sustainable Consumption and Production).

	INDICATORS FOR SOCIAL AND EMPLOYEE; RESPECT FOR HUMAN RIGHTS; ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS						
Social and employee matters	10. Violations of UN Global Compact principles and Organisation vor Economc Cooperation and Development (OECD) Guidelines for Multinational Enterprises	Share of investments in investee companies that have been involved in violations of th UNGC principles or OECD Guidelines for Multinational Enterprises	1,38%	0,80%	0,53%	The proportion of investments in companies covered by data is 64,39%.	LAM and HAL take into account the most significant adverse impacts in relation to social and labour issues and respect for human rights at different levels and through various processes, depending on the investment strategy of the respective portfolio. Depending on the investment strategy, investments in companies that violate the UN Global Compact Code and/or the OECD Guidelines may be excluded. Companies may be excluded if they: - violate standards of good corporate governance - commit serious or very serious violations of human and labour rights - engage in business misconduct.
	11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	Share of investmens in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance/complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	11,38%	12,87%	4,51%	The proportion of investments in companies covered by data is 56,89%.	
	12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	13,99%	14,64%	13,12%	The proportion of investments in companies covered by data is 15,07%.	LAM and HAL take into account the most significant adverse impacts in terms of gender pay gaps and gender diversity at different levels and through various processes, depending on the investment strategy of the respective portfolio. Depending on the investment strategy, soft selection criteria may be applied. If several filter-compliant companies are rated identically in terms of their economic attractiveness, the selection is prioritised on the basis of criteria such as equal opportunities and non-discrimination.
	13. Board gender diversity	Average ratio of female to male board members in investee companies, expressed as a percentage of all board members	34,49%	34,63%	33,50%	The proportion of investments in companies covered by data is 43,38%.	

	14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	Share of investmens in investee companies involved in the manufacture or selling of controversial wapons	0,00%	0,00%	0,00%	The proportion of investments in companies covered by data is 64,50%.	LAM and HAL take into account the most significant adverse impacts associated with involvement in controversial weapons at different levels and through various processes, depending on the investment strategy of the respective portfolio. Securities that violate the UN Convention on Cluster Munitions are excluded. Depending on the investment strategy, companies that generate revenue from the production and/or distribution of banned weapons may also be excluded from the investment universe.
	Indicators applicable to investments in sovereigns and supranationals						
Adverse sustainability indicator		**Metric**	**Impact 2024**	**Impact 2023**	**Impact 2022**	**Explanation**	**Actions taken, and actions planned and targets set fort he next reference period**
Environment	15. GHG intensity	GHG intensity of investee countries	246,72 tCO2e/mEUR	317,32 tCO2e/mEUR	198,04 tCO2e/mEUR	The proportion of investments in companies covered by data is 67,36%.	The LAM and HAL take into account the most significant adverse impacts associated with greenhouse gas emissions from countries at different levels and through various processes, depending on the investment strategy of the respective portfolio. Depending on the investment strategy, countries may be excluded from the investment universe if: - their greenhouse gas emission intensity exceeds a defined threshold - they do not have adequate climate protection measures in place (review of non-ratification of the Kyoto Protocol and/or Paris Climate Agreement, as well as inadequate performance with regard to climate change)
Social	16. Investee countries subject to social violations	Number of investee countries subject to social violations (absolute number and relative number divided by all investee countries), as refered to in international treaties and conventions, United	18,00% (39,57%)	20,50 (41,00%)	21,25 (43,38%)	The proportion of investments in companies covered by data is 64,87%.	LAM and HAL take into account the most significant adverse impacts associated with countries that violate social provisions at different levels and through various processes, depending on the investment strategy of the respective portfolio.

		Nations principles and, where applicable, national law					Depending on the investment strategy, countries may be excluded from the investment universe due to: - controversies surrounding child labour - controversies surrounding discrimination - violations of freedom of association, assembly and the press - violations of human and labour rights - assessment of freedom status - violations of social provisions in investment countries
	Indicators applicable to investments in real estate assets						
Adverse sustainability indicator		**Metric**	**Impact 2024**	**Impact 2023**	**Impact 2022**	**Explanation**	**Actions taken, and actions planned and targets set fort he next reference period**
Fossil fuels	17. Exposure to fossil fuels through real estate assets	Anteil der Investitionen in Immobilien, die im Zusammenhang mit der Gewinnung, der Lagerung, dem Transport oder der Herstellung von fossilen Brennstoffen stehen	3,34%	2,98%	0,00%	The proportion of investments in companies covered by data is 96,12%.	
Energy efficiency	18. Exposure to energy-inefficient real estate assets	Share of investments in energy-inefficient real estate assets	65,60%	65,85%	38,90%	The proportion of investments in companies covered by data is 96,11%.	

	Other indicators für principal adverse impacts on sustainability factors						
Sustainability indicator for adverse impacts		**Metric**	**Impact 2024**	**Impact 2023**	**Impact 2022**	**Explanation**	**Actions taken, and actions planned and targets set fort he next reference period**
Emissions	4. Investments in companies without carbon emission reduction initiatives	Share of investments in investee companies without carbon emission reduction initiatives aimed at aligning with the Paris Agreement	29,37%	26,02%	13,42%	The proportion of investments in companies covered by data is 61,50%	LAM and HAL take into account the most significant adverse impacts associated with greenhouse gas emissions at different levels and through various processes, depending on the investment strategy of the respective portfolio. They are taken into account, for example, through exclusions based on thresholds for revenue shares from certain activities. Depending on the investment strategy, companies operating in the following sectors may be excluded from the investment universe: - Coal and/or oil extraction - Energy production or other use of fossil fuels - Mining, exploration and services for oil sands and oil shale Some financial products do not invest in companies that would significantly impair UN Sustainable Development Goals No. 7 (Affordable and Clean Energy) and No. 13 (Climate Action).
Social and employee matters	1. Investments in companies without workplace accident prevention policies	Share of investments in investee companies without a workplaxe accident prevention policy	5,84%	7,16%	6,25%	The proportion of investments in companies covered by data is 53,18%	LAM and HAL take into account the most significant adverse impacts in relation to investments in companies without measures to prevent occupational accidents at different levels and through various processes, depending on the investment strategy of the respective portfolio. Depending on the investment strategy, soft selection criteria may be used. If several filter-compliant companies are rated identically in terms of their economic attractiveness, the selection is prioritised on the basis of criteria such as health and safety.

Description of policies to identify and priorities principal adverse impacts on sustainability factors

The companies within the HAL Group sometimes have different strategies for identifying and weighting the most significant sustainable impacts on sustainability factors.

1. Hauck Aufhäuser Lampe Privatbank AG and Lampe Asset Management GmbH

Hauck Aufhäuser Lampe Privatbank AG (‘HAL’) acts as asset manager for individual asset management mandates, while Lampe Asset Management GmbH (‘LAM’) acts as asset manager for mutual funds and special funds.

HAL and LAM act as fiduciary managers for the client funds under management. It is up to the respective client to decide whether and which sustainability criteria and most significant adverse sustainability impacts are to be taken into account in their investment. HAL and LAM offer various investment strategies in which sustainability criteria are implemented. There is also a range of investment strategies without corresponding sustainability criteria.

In the sustainable investment processes of both companies, the most significant adverse sustainability impacts are taken into account in investment decisions. This applies in particular to the indicators for investments in companies and countries shown in the table above.

Depending on the data available, these are generally already taken into account through relevant exclusions that are either directly or at least indirectly relevant to the respective adverse sustainability impact. At the company level, for example, exposure to controversial business areas (e.g. fossil fuels, controversial weapons) is already appropriately limited by means of revenue thresholds, or controversial business practices are excluded from portfolios by monitoring compliance with the UNGC principles.

In the case of sustainable investment strategies implemented via funds, PAIs are taken into account by subjecting each potential investment to a systematic quantitative and qualitative review process prior to onboarding with regard to the considera-tion/compliance with PAIs. The quantitative and qualitative review is based on data from fund companies (e.g. EET files) and exter-nal databases (Morningstar).

There is continuous communication between management, portfolio management and risk controlling to take into account the most significant adverse impacts of sustainability factors in investment processes. The strategies were last approved by LAM's management on 11 December 2024. HAL's Executive Board approved this statement on 28 May 2025.

The responsible portfolio managers are responsible for taking the most significant adverse sustainability impacts into account in investment processes. The company's risk control department is responsible for monitoring compliance.

The characteristics of the adverse sustainability impacts are shown in the table above. Sustainability indicators 1 to 18 must be disclosed. In addition, two further sustainability indicators are specified for the most significant adverse impacts. The indicator ‘Investments in companies without initiatives to reduce CO2 emissions’ was selected based on the assessment of the materiality of climate change for the HAL Group.

The selection of the sustainability indicator ‘Proportion of investments in companies that have not established measures to prevent occupational accidents’ reflects the fact that social positive criteria are given special consideration in the selection of companies. These are soft selection criteria. If several filter-compliant companies are rated identically in terms of their economic attractiveness, the selection is prioritised according to various social criteria such as health and safety. These include, among other things, the existence of health and safety management systems, the accident rate and the occurrence of fatal accidents.

By using established filters based on ISS ESG data, the probability of occurrence and severity of the most significant adverse impacts are kept very low, and no violations of a potentially irreversible nature remain in the portfolio on a permanent basis. This is ensured in particular by controversy screening.

Depending on the respective investment strategies, data from the data providers ISS ESG or Morningstar as well as data from the fund companies (e.g. EET files) are used to identify and prioritise relevant sustainability indicators.

The availability of data depends in particular on the provision of information by the data providers used. This can vary greatly depending on the PAI under consideration. For this reason, the respective data coverage is indicated in the explanations in the table above. Furthermore, no information is available on any margins of error on the part of the data providers.

If information on one of the indicators used is not readily available, the data is obtained through cooperation with external data providers wherever possible.

2. Hauck & Aufhäuser Fund Services S.A.

Hauck & Aufhäuser Fund Services S.A. (hereinafter referred to as 'HAFS' or 'Management Company') is a management company authorised by the Luxembourg supervisory authority Commission de Surveillance du Secteur Financier (hereinafter referred to as 'CSSF') in accordance with Chapter 15 of the Luxembourg Law of 17 December 2010 on Undertakings for Collective Investment (hereinafter referred to as the 'OGA Law') and is also authorised as an alternative investment fund manager in accordance with the Luxembourg Law of 12 July 2013 on alternative investment fund managers (hereinafter referred to as the 'AIFM Law'). Within the scope of its regulatory authorisation, HAFS manages funds that qualify as undertakings for collective investment in transferable securities ('U-CITS') or alternative investment funds ("AIFs") (hereinafter referred to as 'investment funds').

In general, the identification and consideration of relevant sustainability indicators depends, among other things, on the investment strategy and the geographical and sectoral focus of the investment funds under management. Monitoring relevant sustainability indicators enables HAFS and the investment fund concerned to gain a better and more informed understanding of the identification of (potential) sustainability risks. In addition, depending on the investment strategy and sectoral focus, the assessment of certain sustainability indicators is prioritised in the investment decision-making process in order to exclude or at least mitigate sustainability risks.

The ability to take the most significant negative impacts into account depends largely on the availability of relevant data and information for the invested assets. The availability and quality of relevant data and information for the systematic assessment of sustainability indicators and the consideration of PAIs is currently not guaranteed for all asset classes in which the managed investment funds invest. For the identification and prioritisation of relevant sustainability indicators, various external sources are used as part of the due diligence process for investment management, depending on the respective investment area of the fund (e.g. external data providers).

Based on the above considerations, the relevant sustainability indicators that have been identified as material for the implementation of the sustainability strategy are prioritised and taken into account in accordance with the requirements of the EU Disclosure Regulation (SFDR) in the pre-contractual and website disclosures pursuant to Articles 8 and 9 SFDR and Article 10 SFDR.

Relevant sustainability indicators that may be taken into account include, for example, the GHG emission intensity of the companies in which investments are made, involvement in companies operating in the fossil fuel sector, violations of the principles of the UN Global Compact, or involvement in controversial weapons (anti-personnel mines, cluster munitions, chemical and biological weapons).

HAFS's strategies for taking into account the most significant negative impacts of investment decisions on sustainability factors were approved by the HAFS Executive Board in May 2024.

The strategies are reviewed and updated regularly, at least annually, and adjusted on an ad hoc basis in the event of relevant changes, e.g. in the event of changes to the organisational structure of the management company, changes to the regulatory framework or if otherwise necessary.

The regulatory task of the HAFS management company basically includes compliance with PAI-specific due diligence obligations. This concerns checks prior to the purchase or sale of investments (ex-ante) and ongoing checks throughout the entire investment phase (ex-post).

The management company has implemented procedures and processes to take into account the most significant adverse impacts of investment decisions on sustainability factors, both ex-ante and ex-post, and its strategy initially focuses on the investment funds under management that pursue sustainable investment strategies in accordance with pre-contractual disclosures and either:

- qualify as investment funds in accordance with Article 9 SFDR (sustainable investment strategy) or
- qualify as investment funds in accordance with Article 8 SFDR and invest part of their portfolio in sustainable investments as defined in Article 2 (17) SFDR, or
- qualify as investment funds in accordance with Article 8 SFDR and take into account the most significant adverse impacts on sustainability factors.

HAFS works with fund initiators in the context of each fund launch and each status change to ensure that funds commit to taking relevant PAIs into account in their pre-contractual information in accordance with Article 8 SFDR and Article 9 SFDR.

HAFS regularly reassesses the availability and quality of relevant data and information with the aim of promoting and continuously expanding the consideration of the most significant adverse impacts at fund level in its function as a management company.

As a management company, HAFS has implemented procedures and processes for selecting, identifying and assessing the most significant adverse impacts of investment decisions on sustainability factors. Application depends, among other things, on the investment strategy and the geographical and sectoral focus of the managed investment funds and leads to an assessment of the likelihood of occurrence and severity of these most significant adverse impacts, including their potentially irreversible nature.

For funds that take into account the most significant adverse impacts in their pre-contractual information in accordance with Article 8 SFDR and Article 9 SFDR, such impacts are limited, for example, through the implementation of controversy screening. Screening is carried out, among other things, through the use of established filters based on ex-ante and ex-post checks.

Various external sources are used, where available, to identify and prioritise relevant sustainability indicators.

HAFS has implemented extensive due diligence processes to ensure the quality of data supplied by external data service providers and thus prevent errors.

If information on one of the indicators used is not available from affiliated external data providers, HAFS has defined a clear multi-stage approach: The necessary PAI information is either requested directly from the companies in which investments are made, obtained through additional research, e.g. through cooperation with external data providers or experts, or, as a last resort, based on reasonable assumptions.

Engagement policies

1. HAL and LAM

Due to the volume of assets under management and the business model of HAL and LAM, both companies are currently refraining 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 listed companies in relation to the companies in which they invest.

2. HAFS

As a management company or AIFM, HAFS is responsible for collective portfolio management in accordance with Annex II of the Luxembourg Law of 17 December 2010 on Undertakings for Collective Investment and Annex I of the Luxembourg Law of 12 July 2013 on Alternative Investment Fund Managers; in this context, it is also responsible for exercising voting rights.

HAFS's engagement policy – available at the following link (https://www.hauck-aufhaeuser.com/fileadmin/HAL/Downloads/Publikation/Berichte/hal-privatbank-mitwirkungspolitik_HAFS.pdf) – allows investors to gain an overview of how HAFS has implemented the requirements of Article 3 (g) (a) of the Shareholder Rights Directive (hereinafter ‘SRD’) 2007/36/EC, as last amended by Directive (EU) 2017/828. In addition, the relevant provisions of the Luxembourg law of 1 August 2019 amending the law of 24 May 2011 on the exercise of certain rights of shareholders at general meetings of listed companies and implementing 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 listed companies are also taken into account.

In its function as a management company, HAFS distinguishes between two different scenarios and the associated effects on its engagement policy:

1. In the first scenario, HAFS performs the portfolio management function for the managed investment funds itself and receives support from the mandated investment advisors. In such cases, HAFS enlists the support of a proxy advisor to ensure that an appropriate analysis of the relevant companies is carried out and that participation rights are exercised in the interests of sustainable and positive development.

2. If the portfolio management function of the managed investment funds has been delegated to a qualified third party, the delegated portfolio manager is responsible for engagement in relevant companies and the exercise of voting rights. As part of its due diligence processes, HAFS ensures that the portfolio manager complies with its legal obligations under the ARR and takes its requirements into account.

More information on participation can be found in HAFS's participation policy at the following link (https://www.hauck-aufhaeuser.com/fileadmin/HAL/Downloads/Publikation/Berichte/hal-privatbank-mitwirkungspolitik_HAFS.pdf). Furthermore, HAFS believes that transparency is important for investors in the investment funds it manages and, in accordance with Art. 3 (g) (b) of the ARR, prepares an annual engagement report and publishes it on the HAFS website.

Reference to international standards

1. HAL and LAM

The relevant frameworks, such as the UN Principles for Responsible Investment in particular, serve as guidance for all sustainability issues and are regularly taken into account when reviewing and initiating concepts and measures. LAM has been a signatory to the UN PRI since 2022.

In sustainable investment processes, the most significant adverse sustainability impacts are taken into account in investment decisions in accordance with Appendix 1, Table 1. Depending on the data available, these impacts are generally already taken into account through relevant exclusions that are either directly or at least indirectly relevant to the respective adverse sustainability impact.

The portfolios are not explicitly managed on the basis of a forward-looking climate scenario. However, climate influences are indirectly taken into account through exclusions of fossil fuels, the reduction of the carbon footprint and greenhouse gas intensity based on ISS data. An analysis of climate scenarios is carried out on a case-by-case basis and taken into account in portfolio management. This is based on climate scenarios from ISS, which in turn are based on the scenarios of the International Energy Agency.

2. HAFS

HAFS has been a signatory to the UN PRI since 2022 and thus takes into account one of the relevant frameworks for responsible investing and the orientation of sustainability issues.

In the investment processes for sustainable investments, the most significant adverse sustainability impacts are taken into account in accordance with Annex 1, Table 1, depending on the availability of data. Indirect or direct consideration of the respective adverse sustainability impacts is taken into account, for example, by applying exclusions relating to fossil fuels or greenhouse gas emission intensity, among other things.

Various external sources are used, where available, to identify and prioritise relevant sustainability indicators.

If information on one of the indicators used is not available from affiliated external data providers, HAFS has defined a clear multi-stage approach: The necessary PAI information is either requested directly from the companies in which investments are made, obtained through additional research, e.g. through cooperation with external data providers or experts, or, as a last resort, based on reasonable assumptions.

HAFS does not currently have its own climate scenario model. However, climate impacts are indirectly taken into account by excluding fossil fuels and reducing the carbon footprint and greenhouse gas intensity.

HAFS works with fund initiators in the context of each fund launch and each status change of the funds it manages to ensure that funds commit to complying with the highest possible environmental and/or social standards in the pre-contractual information in accordance with Article 8 SFDR and Article 9 SFDR and take into account the most significant adverse impacts.

Historical comparison

In the section 'Description of the principal adverse impacts on sustainability factors', the table shows the measured values for the most significant adverse impacts on sustainability factors for the reporting period 01.01.2024 – 31.12.2024 in the column 'Impacts 2024'. The corresponding measurements for previous years are shown as comparative values in the columns 'Effects 2023' and 'Effects 2022'.