

ANNEX IV

Regular disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a of Regulation (EU) 2019/2088 and Article 6, paragraph 1 of Regulation (EU) 2020/852

Product name: Ethna-AKTIV

Legal entity identifier: 529900GYLM0Z95YA0Y09

Environmental and/or social characteristics

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**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Did this financial product have a sustainable investment objective?**

**Yes**    **No**

<p><input type="checkbox"/> Sustainable investments with an environmental objective were made: %</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <p><input type="checkbox"/> Sustainable investments with a social objective were made: %</p>	<p><input type="checkbox"/> It promoted Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it had 0.00% of sustainable investments</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with a social objective</li> </ul> <p><input checked="" type="checkbox"/> It promoted E/S characteristics, but <b>did not make any sustainable investments</b></p>
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**To what extent were the environmental and/or social characteristics promoted by the financial product fulfilled?**

In its bond and equity investments, the Fund favours companies that already have low exposure to material ESG risks or that actively manage and so reduce the ESG risks inevitably associated with their business activities. The analyses of the external rating agency Sustainalytics are used to assess the ESG risks that are relevant for the individual companies and to evaluate the active management of ESG risks within the companies. The ESG Risk Score calculated by Sustainalytics assesses three factors that are crucial for a risk assessment:

- Governance
- Material ESG risks at sector level and the individual measures taken by the company to counter them
- Idiosyncratic risks (controversies that companies are involved in)

The corporate governance assessment is an important feature for assessing the financial and ESG risks associated with an investment. The analysis of the environmental and social characteristics focuses on material risks for the sector. Besides social factors, resource consumption is always a risk factor in the manufacturing sector. Consequently, the analysis incorporates ecological features, for example:

- greenhouse gas emissions and greenhouse gas intensity,
- protection of natural resources, especially water,
- limiting of soil sealing,
- biodiversity

Service companies have a much lower environmental impact due to their activities, and so they focus on social characteristics, which include, for example:

- Fair working conditions and adequate pay,
- Health and safety at work,
- Prevention of corruption,
- Prevention of fraud,
- Control of product quality.

As such, the Fund focuses on taking into account relevant environmental and social risks, which may vary from company to company. The Fund seeks not only to avoid environmental risks by investing in companies whose environmental risks are already low based on the company’s activities, but also to consider companies that use appropriate management policies to limit and reduce the environmental risks associated with their business model.

There are also comprehensive exclusions that prohibit the Fund from making a large number of investments that are generally regarded as critical. Specifically, investments in companies with a core activity in the areas of armaments, tobacco, pornography, staple food speculation and/or the production/distribution of coal are prohibited. Additionally, investments in companies are prohibited when serious violations of the principles of the UN Global Compact have been identified and there is no compelling prospect that the violations will be remedied. For sovereign issuers, investments in bonds of countries declared “unfree” in the annual analysis by Freedom House ([www.freedomhouse.org](http://www.freedomhouse.org)) are prohibited.

**How did the sustainability indicators perform?**

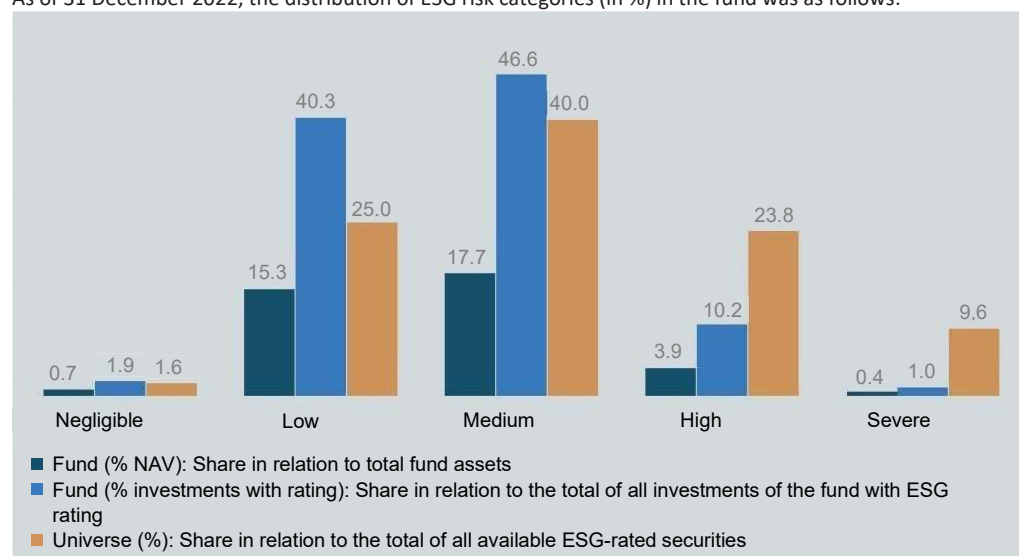
**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

The analyses of the external rating agency Sustainalytics are used to assess the ESG risks that are relevant for the individual companies and to evaluate the active management of ESG risks within the companies. Sustainalytics summarises the results of its analyses in an ESG risk score ranging from 0 to 100, where the risk assumptions are assessed as follows:

- less than 10: minor risks
- from 10 to 19.99: low risks
- from 20 to 29.99: medium risks
- from 30 to 39.99: high risks
- greater than 40: serious risks.

Measured against this ESG risk score, the Fund is expected to achieve on average at least a medium ESG risk profile (ESG risk score less than 30). This objective was achieved. During the reporting period, the fund’s ESG risk score was consistently below 30. The average ESG risk score for the reporting period was 21.9. As of 31 December 2022, the ESG risk score was 21.6. Individual securities with very serious risks (ESG risk score greater than 50) will only be considered for inclusion as an investment in the Fund in justified exceptional cases and should be accompanied by an active engagement process to improve the ESG risk profile of the investment. There were no investments in the fund with a correspondingly high ESG risk score during the reporting period.

As of 31 December 2022, the distribution of ESG risk categories (in %) in the fund was as follows:



The fund excludes investments in companies or products issued by companies that violate the UN conventions on cluster munitions, chemical weapons and other outlawed weapons of mass destruction or that finance such companies/products. Additional product-related exclusions apply if the turnover of a company from the production and/or distribution of certain goods exceeds the revenue volumes listed below: coal (25%), armaments (10%), small arms (10%), adult entertainment (10%), tobacco (5%).

Additionally, investments in companies are prohibited when serious violations of the principles of the UN Global Compact have been identified and there is no compelling prospect that the violations will be remedied. For sovereign issuers, investments in bonds of countries declared “unfree” in the annual analysis by Freedom House ([www.freedomhouse.org](http://www.freedomhouse.org)) are prohibited.

All listed exclusion criteria were met during the reporting period.

- **... and in comparison with previous periods?**  
n/a
- **What were the objectives of the sustainable investments that the financial product partially intended to make and how does the sustainable investment contribute to such objectives?**  
E/S characteristics are promoted with the financial product, but no sustainable investments will be made.
- **How have the sustainable investments, which were in part made with the financial product, not caused significant harm to any environmental or social sustainable investment objective?**

E/S characteristics are promoted with the financial product, but no sustainable investments will be made.

----- How were the indicators for adverse impacts on sustainability factors taken into account?

E/S characteristics are promoted with the financial product, but no sustainable investments will be made.

----- How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?

E/S characteristics are promoted with the financial product, but no sustainable investments will be made.

The EU Taxonomy sets out a “do no significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anticorruption and antibribery matters.

**How did this financial product consider principal adverse impacts on sustainability factors?**

Within the Fund, the principal adverse impacts of investment decisions on sustainability factors from the following groups of issues from Annex 1 of Table I of Regulation (EU) 2022/1288 of the European Parliament and of the Council of 6 April 2022 are taken into consideration: greenhouse gas emissions, biodiversity, water, waste, and social and employment issues.

The portfolio managers draw on the external analyses of ESG agencies, public documents of the companies and notes from direct dialogues with company leaders to identify, measure and assess adverse sustainability impacts. The adverse sustainability impacts can then be subjected to comprehensive analysis and taken into account in investment decisions.

Different sustainability aspects are weighted in the sustainability assessment of investments depending on their relevance for the respective business model. For example, greenhouse gas emissions are significantly more relevant in particularly CO2-intensive sectors than in less CO2-intensive sectors.

Regular reporting of the sustainability factors is based on the raw data provided by the Sustainability rating agency.



## What are the main investments of this financial product?

Average of four reporting dates (31/03/2022; 30/06/2022; 30/09/2022 and 31/12/2022):

The list includes the following investments, which accounted for the largest share of the investments made in the financial product during the reference period 01/01/2022 – 31/12/2022:

Largest investments	Sector	in % of the	Country
JAB Consumer Partners SCA SICAR - Global Consumer Brands	PROVISION OF FINANCIAL AND INSURANCE SERVICES	3.4175	Luxembourg
United States of America v.21(2023)	PUBLIC ADMINISTRATION, DEFENCE: SOCIAL SECURITY	2.7075	United States of America
United States of America v.21(2023)	PUBLIC ADMINISTRATION, DEFENCE: SOCIAL SECURITY	2.305	United States of America
United States of America v.20(2023)	PUBLIC ADMINISTRATION, DEFENCE: SOCIAL SECURITY	2.24	United States of America
United States of America v.21(2026)	PUBLIC ADMINISTRATION, DEFENCE: SOCIAL SECURITY	2.145	United States of America
United States of America v.21(2026)	PUBLIC ADMINISTRATION, DEFENCE: SOCIAL SECURITY	2.14	United States of America
United States of America v.21(2026)	PUBLIC ADMINISTRATION, DEFENCE: SOCIAL SECURITY	2.135	United States of America
United States of America v.17(2024)	PUBLIC ADMINISTRATION, DEFENCE: SOCIAL SECURITY	2.0825	United States of America
JAB Consumer Partners SCA SICAR Class A1	PROVISION OF FINANCIAL AND INSURANCE SERVICES	2.0225	Luxembourg
United States of America v.21(2026)	PUBLIC ADMINISTRATION, DEFENCE: SOCIAL SECURITY	1.815	United States of America
United States of America v.20(2025)	PUBLIC ADMINISTRATION, DEFENCE: SOCIAL SECURITY	1.8025	United States of America
Federal Republic of Germany Reg.S. v.19(2024)	PUBLIC ADMINISTRATION, DEFENCE: SOCIAL SECURITY	1.7475	Germany
United States of America v.22(2024)	PUBLIC ADMINISTRATION, DEFENCE: SOCIAL SECURITY	1.745	United States of America



## What was the share of sustainability-related investments?

### Asset allocation

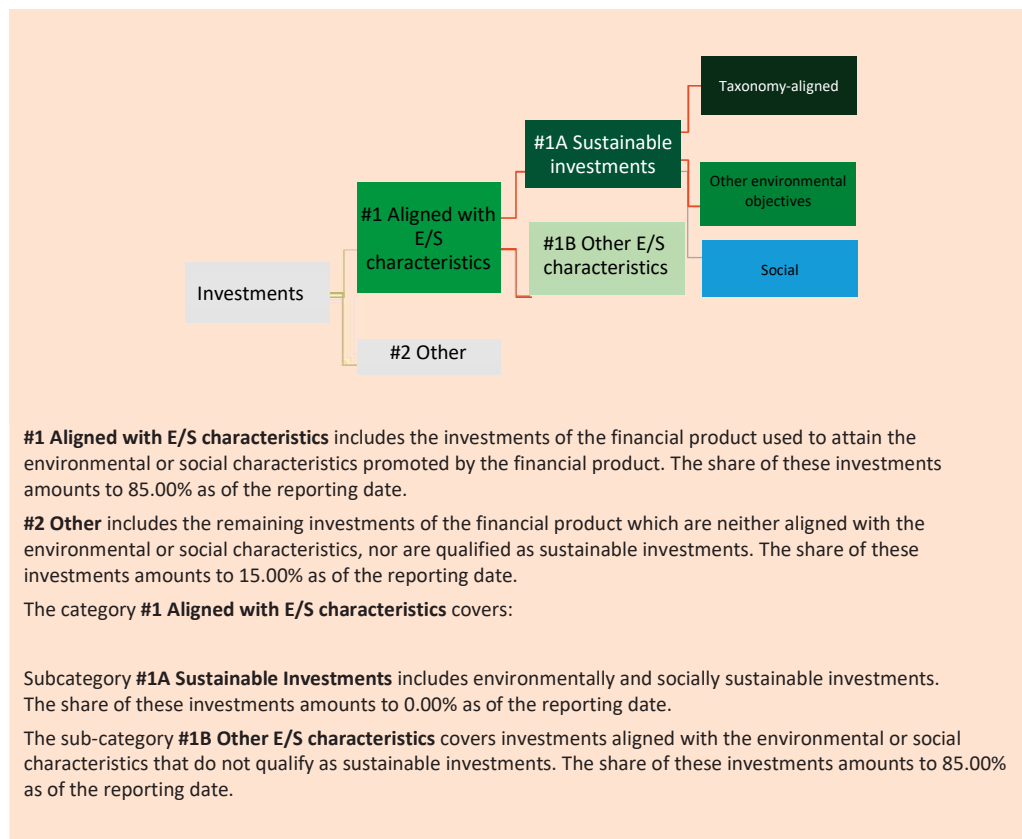
describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the current “environmental friendliness” of investee companies
- **capital expenditure** (CapEx) showing the relevant green investments made by investee companies for a transition to a green economy
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies

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### What were the asset allocations?



### In which economic sectors were the investments made?

Average of four reporting dates (31/03/2022; 30/06/2022; 30/09/2022 and 31/12/2022):



Sector	in % of Assets
Government bonds	47.21%
Other	5.70%
Software & services	3.70%
Pharmaceuticals, biotechnology and biosciences	3.49%
Utilities	3.18%
Food, beverages and tobacco	2.85%
Banks	2.45%
Hardware and equipment	2.44%
Media & entertainment	2.40%
Wholesale and retail	2.20%
Healthcare: Equipment & services	1.95%
Automobiles and components	1.47%
Diversified financial services	1.42%
Capital goods	1.42%

Consumer services	1.42%
Semiconductors & equipment for semiconductor production	1.40%
Energy	1.29%
Raw materials and supplies	1.23%
Insurance	1.07%
Real estate	1.05%
Telecommunications services	1.01%
Household goods & personal care products	0.91%
Food and basic goods retail	0.71%
Transport	0.57%
Consumer goods and clothing	0.56%
Commercial services & supplies	0.05%

With a view to EU taxonomy alignment, the criteria for fossil gas include limiting emissions and switching to renewable energy or low-carbon fuels by the end of 2035. These nuclear energy criteria include comprehensive safety and waste management regulations.

### **To what extent were sustainable investments with an environmental objective aligned with the EU Taxonomy?**

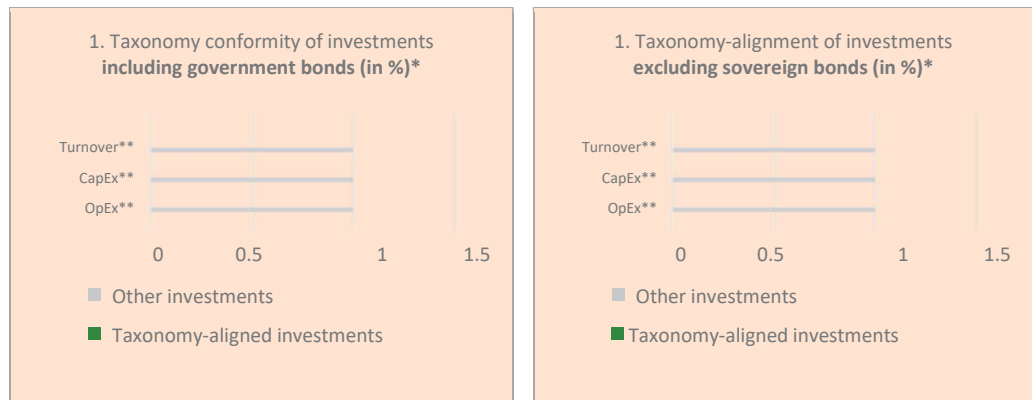
The main objective of this Fund is to contribute to the pursuit of E/S characteristics. Accordingly, this Fund does not currently commit to investing a minimum proportion of its total assets in environmentally sustainable economic activities as defined in Article 3 of the EU Taxonomy Regulation (2020/852). This also applies to information on investments in economic activities that are classified as enabling or transitional activities under Article 16 or 10(2) of the EU Taxonomy Regulation (2020/852).

● **Does the financial product invest in EU taxonomy-aligned fossil gas and/or nuclear energy<sup>1</sup> activities?**

- Yes:**
- in fossil gas                       in nuclear energy
- No**

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.

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\* For the purpose of these graphs, “sovereign bonds” consist of all sovereign exposures.  
 \*\* The share of taxonomy-aligned investments measured in terms of turnover, CapEx and OpEx cannot be determined on the basis of the data available on the market at the current time. The statement for the fossil gas and nuclear energy sector is omitted in this chart. The investments made in these sectors amount to 0.00% each.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

● **What is the share of investments made in transitional and enabling activities?**

Transitional activities: 0%  
 Enabling activities: 0%

The share of taxonomy-aligned investments invested in transitional and enabling activities cannot be determined based on the data available on the market at the current time. The assumption is that this data will be available for the next annual financial statement.

<sup>1</sup> Fossil gas and/or nuclear energy activities are only EU taxonomy aligned if they contribute to mitigating climate change and do not significantly affect any EU Taxonomy objective – see explanation in the left margin. The detailed criteria for EU taxonomy-aligned economic activities in the sector of fossil gas and nuclear energy are set out in Commission Delegated Regulation (EU) 2022/1214.

- **How has the share of investments brought into line with the EU Taxonomy evolved compared to previous reference periods?**

n/a



### **What was the share of non-EU- taxonomy-compliant sustainable investments with an environmental objective?**

E/S characteristics are promoted with the financial product, but no sustainable investments will be made. The minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 0%.

### **What was the share of socially sustainable investments?**

E/S characteristics are promoted with the financial product, but no sustainable investments will be made. The minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 0%.



### **What investments were included under “Other Investments”, what was their purpose and were there any minimum environmental or social safeguards?**

This includes hedging instruments, investments used for diversification purposes (for example commodities and other investment funds), investments for which no data is available, and cash.

“#2 Other investments” in particular is used for diversification of the Fund and for liquidity management in order to achieve the investment objectives described in the investment policy.

The sustainability indicators used to measure the achievement of the individual environmental or social characteristics in “#1 Investments focused on environmental or social characteristics” do not apply systematically in “#2 Other investments”. There is no minimum protection for “#2 Other investments”.



### **What measures were taken during the reference period to fulfil the environmental and/or social characteristics?**

A key measure was the consideration of the comprehensive exclusions that permanently prohibit the fund from making a large number of investments that are generally regarded as critical. Specifically, investments in companies or products issued by companies that violate the UN conventions on cluster munitions, chemical weapons and other outlawed weapons of mass destruction or that finance such companies/products were excluded during the reporting period. Additional product-related exclusions apply if the turnover of a company from the production and/or distribution of certain goods exceeded the revenue volumes listed below: coal (25%), armaments (10%), small arms (10%), adult entertainment (10%), tobacco (5%). Additionally, investments in companies were prohibited when serious violations of the principles of the UN Global Compact have been identified and there was no compelling prospect that the violations will be remedied. For sovereign issuers, investments in bonds of countries declared “unfree” in the annual analysis by Freedom House ([www.freedomhouse.org](http://www.freedomhouse.org)) were prohibited.

Another significant measure was the fundamental approach in the selection of bond and equity investments for the fund. Here, the focus continued to be on companies that already had low exposure to material ESG risks or that actively managed and consequently reduced the ESG risks inevitably associated with their business activities.

The analyses of the external rating agency Sustainalytics were used to assess the ESG risks that are relevant for the individual companies and to evaluate the active management of ESG risks within the companies.

The ESG Risk Score calculated by Sustainalytics assesses three factors that are crucial for a risk assessment: corporate governance, sector-level material ESG risks, as well as individual company countermeasures and idiosyncratic risks (controversies involving companies). The corporate governance assessment is an important feature for assessing the financial and ESG risks associated with an investment. The analysis of the environmental and social characteristics focuses on material risks for the sector. Besides social factors, resource consumption is always a risk factor in the manufacturing sector. Consequently, the analysis incorporates environmental characteristics, such as greenhouse gas emissions and intensity, the protection of natural resources, especially water, the limiting of soil sealing and the protection of species diversity (biodiversity). Service companies have a much lower environmental impact due to their activities, and so they focus on social characteristics, which include, for example: fair working conditions and adequate remuneration, health and safety at work, prevention of corruption, prevention of fraud and control of product quality.

As such, the fund focused on taking into account relevant environmental and social risks, which may vary from company to company. The Fund was seeking not only to avoid environmental risks by investing in companies whose environmental risks are already low based on the company’s activities, but also to consider companies that use appropriate management policies to limited and reduced the environmental risks associated with their business model.



Another measure was engagement with the fund's investee companies. In addition to dialogues with company representatives and written statements which called for improved supply chain control to prevent human rights violations, for example, voting rights at general meetings in particular were used as an important communication channel. While dialogues are opportunities to discuss positions, they are not usually formally binding. In contrast, exercising voting rights at a general meeting has just such characteristics. This makes it a powerful tool for influencing the direction of companies. Further details on the implementation of this measure can be found in both the voting policy and the voting report on the website of the management company of the fund (<https://www.ethenea.com/dokumente-zu-esg/>).



**Reference benchmarks**  
are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

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### How did this financial product perform compared to the specific reference benchmark?

No index is designated as a reference benchmark to determine whether this Fund is aligned with the environmental and/or social characteristics that it promotes.

- **How does the reference benchmark differ from a broad market index?**

No index is designated as a reference benchmark to determine whether this Fund is aligned with the environmental and/or social characteristics that it promotes.

- **How did this financial product perform in relation to the sustainability indicators used to determine the alignment of the reference value with the environmental or social characteristics being promoted?**

No index is designated as a reference benchmark to determine whether this Fund is aligned with the environmental and/or social characteristics that it promotes.

- **How did this financial product perform compared to the reference benchmark?**

No index is designated as a reference benchmark to determine whether this Fund is aligned with the environmental and/or social characteristics that it promotes.

- **How did this financial product perform compared to the broad market index?**

No index is designated as a reference benchmark to determine whether this Fund is aligned with the environmental and/or social characteristics that it promotes.