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Statement on the principal adverse impacts on sustainability factors

To facilitate legibility, the language forms male, female and diverse (m/f/d) are not used simultaneously in this text. All references to persons apply equally to all genders.

We currently do not systematically consider the adverse impacts of investment decisions on sustainability factors (Principal Adverse Impacts, PAI) for direct or indirect investments. Sustainability factors are environmental, social and employee matters, respect for human rights, and the fight against corruption and bribery.

As financial service providers, we have a significant interest in fulfilling our responsibility and avoiding adverse effects of investment decisions on sustainability factors in the course of our activities. However, due to a lack of data availability and limitations in data integration, implementation of the legal requirements is currently not possible for either direct or indirect investments.

For direct investments, consideration is currently ruled out due to limitations in data integration prior to investment. The same applies to indirect investments, where there are limitations in data availability resulting from a look-through approach for the underlying investments and the current limitations of the data integration infrastructure prior to investment.

However, we disclose adverse impacts for both direct and indirect investments post-investment, if data is available, to increase transparency and reporting for clients. For example, we currently report quarterly on the greenhouse gas emissions (Scope 1 & 2) of a client's equity portfolio. Additional reports on other adverse impacts, including exposure to the fossil fuel sector and controversial weapons, are also available post-investment. Similarly, we can consider exposure to companies operating in the fossil fuel sector and exposure to controversial weapons, but this is done post-investment at the request of the respective client.

Furthermore, we are constantly working to more systematically consider the adverse impacts of investment decisions on sustainability factors in the future, across a broader asset base, both pre and post-investment, over the next 18 months.

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