

Investment advice

Information pursuant to Article 3 (2) Regulation (EU) 2019/2088 (Disclosure Regulation)

Unlike in its fund management, Impact Asset Management GmbH has elected to not take the sustainability risks into account in its activities as an investment adviser. The expansion of the process to include the taking into account of the sustainability risks is not practicable due to the lack of knowledge about how the advisory client applies the investment recommendation. Thus, there is no targeted and systematic management or integration of the sustainability risks in the provided investment recommendations.

Information pursuant to Article 4 Regulation (EU) 2019/2088 (Disclosure Regulation)

Statement on no consideration of adverse impacts of investment advice on sustainability factors

The Disclosure Regulation uses the term “sustainability factors” to mean indicators applied to measure “environmental, social and employee matters, respect for human rights, anti- corruption and anti-bribery matters” with regard to investment activities.

In terms of taking the principal adverse impacts (PAI) on these sustainability factors into account, the Disclosure Regulation explicitly allows for the disclosure obligation to be fulfilled through statements to the effect that the PAI are not taken into account.

Unlike in its fund management, Impact Asset Management GmbH has elected to not take the PAI into account in its activities as an investment adviser. The expansion of the process to include the taking into account of the sustainability factors is not practicable due to the lack of knowledge about how the advisory client applies the investment recommendation. Thus, there is no targeted and systematic management or calculation of the PAI in the provided investment recommendations.