

Declaration on the non-consideration of negative effects on sustainability factors

(Art. 4 Disclosure Regulation)

Investment decisions can have negative effects on the environment (e.g., climate, water, biodiversity), on social and employee issues and can also be detrimental to the fight against corruption and bribery.

In principle, we have a considerable interest in fulfilling our responsibility as a financial service provider and in helping to avoid such effects as part of our investment decisions (or investment recommendations). However, according to the current state of affairs, the implementation of the legal requirements specified for this is unreasonable due to the existing and still threatening bureaucratic framework conditions. In addition, essential legal issues are still unresolved.

In order to avoid legal disadvantages, we are therefore currently prevented from making a public statement that and in what way we take into account the negative effects on sustainability factors (environmental issues, etc.) in the context of our investment decisions. We are therefore required to declare on our website that we will not take these into account for the time being and until further clarification (Art. 4 Paragraph 1 b) Disclosure Regulation resp. At. 4 Paragraph 5b Disclosure Regulation).

However, we expressly declare that this practice does not change our willingness to make a contribution to a more sustainable, resource-efficient economy with the aim of reducing in particular the risks and effects of climate change and other ecological or social grievances.

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