

# Information according to Art 10 SFDR

Name of the product: **YOU INVEST GREEN balanced**

Legal entity identifier: 529900014PE8LS5ROWZ4

ISIN: AT0000A11FC7, AT0000A11FB9, AT0000A11FA1;

For improved readability, for the purpose of this document, "Taxonomy Regulation" means Regulation (EU) 2020/852, "Disclosure Regulation" means Regulation (EU) 2019/2088, and "RTS" means Delegated Regulation (EU) 2022/1288.

## a) Summary

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This financial product promotes environmental or social characteristics, but does not have as its objective sustainable investment.

Fund applies a broad interpretation of sustainability. Both environmental and social characteristics are promoted through the application of the Management Company's proprietary sustainability approach. This is ensured by the application of the Management Company's ESG toolbox as part of the investment process.

The sustainable investments that comprise part of this investment fund do no significant harm to the environmental or social sustainable investment objectives because this Fund invests in financial products that have been categorised as sustainable by the Management Company on the basis of the applicable sustainable investment process. This categorisation sets forth that the financial products may have no significant adverse impacts on environmental or social factors, as such a violation would preclude an investment based on the binding ESG characteristics of this investment process.

The Management Company takes into account the principal adverse impacts (PAI) on sustainability factors in the investment strategy of this Fund.

The Fund invests at least 51% of its assets in financial instruments from issuers that have been categorised by the Management Company as sustainable on the basis of a predefined screening process.

The Fund can purchase equities, bonds, and/or money market instruments. The specified assets can be purchased directly or indirectly through investment funds or derivatives.

The Management Company is not subject to any restrictions in the selection of the instrument issuers or the issuers of the securities included in the respective funds with regard to the locations of their registered offices or the respective economic sectors in which they are active.

All purchased securities must have been categorised as sustainable by the Management Company on the basis of a predefined screening process at the time of purchase. The exclusion criteria for companies include human rights violations, labour law violations, child labour, violations of the UN Global Compact, corruption, balance sheet fraud, nuclear energy, coal mining, electricity generation from coal, the thermal conversion of coal, petroleum and natural gas extraction, the manufacture and sale of armaments/weapons, green gene technology, consumptive embryo research, gambling, pornography, tobacco, and unnecessary animal testing. The Management Company may employ defined thresholds and operationalisation to facilitate the application of the exclusion criteria in terms of an identification limit and to ensure that the criteria have the desired effect. The exclusion criteria for sovereigns include authoritarian regimes, human rights restrictions, capital punishment, child labour, nuclear weapons, a high share of nuclear energy in primary energy generation, disproportionate military spending, insufficient cooperation and serious violations relating to money laundering, corruption (as measured by the corruption index of Transparency International), and deficits in climate protection and biodiversity preservation. Operationalisation is employed at the discretion of the Management Company.

The Management Company also exercises an active ownership function when it makes direct investments in securities.

Data from external providers are also used when gathering sustainability related data for internal analyses.

The external data may be incomplete, imprecise, or unavailable at times. The providers of sustainability ratings also take different influences into account and apply different weightings, meaning that a company that is the target of an investment can have different sustainability scores. There is therefore the risk of a security or issuer being assessed incorrectly.

A proprietary rating model called ESGenius is used to limit this risk. In this rating model, the predominant sustainability approaches in the market (ethically oriented approach versus a risk view) are combined into an overall view during the analysis. Combining the different providers reduces any data gaps and also verifies the plausibility of the different approaches.

Due to the investment process and the measures taken to ensure the quality of the data, the Management Company assumes that the previously mentioned restrictions will not have a material negative impact on the environmental and social characteristics.

No index has been designated as a reference benchmark for the attainment of the environmental and/or social characteristics promoted by the investment fund.

Information on how the environmental or social characteristics of the Fund are promoted can be found in the annex to the prospectus or the Information for Investors pursuant to § 21 AIFMG.

Information on how the environmental or social characteristics were met and information on the overall sustainability-related impact of the Fund can be found in the annual reports of the Fund.

### **Summary - czech**

Tento finanční produkt prosazuje environmentální nebo sociální vlastnosti, ale nesleduje cíl udržitelných investic.

Otevřený podílový fond („Podílový fond“) uplatňuje široký výklad udržitelnosti. V souladu s přístupem obhospodařovatele Podílového fondu investiční společnosti Erste Asset Management GmbH („Investiční společnost“) jsou prosazovány jak environmentální, tak sociální charakteristiky. To je v rámci investičního procesu zajištěno prostřednictvím softwarové aplikace Investiční společnosti s názvem ESG Toolbox.

Udržitelné investice, které tento finanční produkt částečně realizuje, významně nenarušují environmentální nebo sociálně udržitelné investiční cíle, protože tento fond investuje do finančních produktů, které byly investiční společností klasifikovány jako udržitelné díky uplatnění udržitelného investičního procesu. Z této klasifikace vyplývá, že finanční produkty nesmí mít významný negativní dopad na environmentální nebo sociální faktory, protože závazné charakteristiky ESG tohoto investičního procesu by v případě takového porušení neumožnily pořízení této investice.

V investiční strategii tohoto Podílového fondu Investiční společnost zohledňuje pro přímé investice a investice do investičních fondů Investiční společnosti nejdůležitější nepříznivé dopady na faktory udržitelnosti („hlavní nepříznivé dopady“ – „PAI“).

Do majetku fondu jsou minimálně do 51 % majetku fondu získávány finanční nástroje takových emitentů, které jsou na základě správcem fondu předem definovaného procesu výběru klasifikovány jako udržitelné. Pro investiční fond mohou být získávány jak akcie tak také půjčka a/nebo nástroje peněžního trhu. Uvedené majetkové hodnoty lze získávat přímo nebo nepřímo prostřednictvím investičního fondu nebo derivátů. Správce fondu nepodléhá při výběru emitentů, resp. emitentů zahrnutých v příslušném investičním fondu s ohledem na jejich příslušné sídlo, žádným geografickým omezením, a s ohledem na jejich příslušný předmět podnikání, žádným oborovým omezením. Všechny nabyté jednotlivé tituly musí být k časovému termínu nabytí zaříděny na bázi předdefinovaného procesu výběru správcovské společnosti jako udržitelné. K vylučovacím kritériím pro firmy se počítá mimo jiné porušování lidských práv, porušování pracovní legislativy, dětská práce, porušování Global Compact OSN, korupce, falšování bilance, atomová energie, dobývání a rovněž výroba elektrické energie a přeměna uhlí na termickou energii, dobývání ropy a zemního plynu, výroba zbrojní výstroje / výroba zbraní, zelené genové technologie, aplikovaný výzkum embryí, hazard, pornografie, tabákové výrobky a rovněž pokusy se zvířaty, které nejsou nezbytné. Pro udržení operativní realizovatelnosti vylučovacích kritérií ve smyslu prokazatelné meze, resp. pro zabezpečení jejich cílové bezpečnosti, mohou být použity správcovskou společností definované prahové hodnoty a operacionalizace. K vylučovacím kritériím pro státy se počítají mimo jiné autoritářské režimy, omezování lidských práv, trest smrti, dětská práce, atomové zbraně, vysoký podíl atomové energie na primární výrobě energie, nadměrné výdaje na armádu, nedostatečná kooperace a hrubé přestupky s ohledem na praní peněz, korupci (na základě indexu korupce od

Transparency International) a rovněž deficitu v přístupu k ochraně klimatu a ochrany biodiverzity. Operacionalizace probíhá podle měřítko správcovské společnosti.

Správcovská společnost kromě toho sleduje při přímých investicích do cenných papírů také funkci Active Ownership.

Pro sběr dat spojených s udržitelností, která se následně použijí pro vlastní analýzu, jsou také brána v potaz data externích poskytovatelů.

Externí data mohou být mimo jiné nekompletní, nepřesná nebo nemusí být dočasně k dispozici. Poskytovatelé ratingů udržitelnosti navíc zohledňují nejrůznější vlivové faktory a nejrůznější specifikace, takže pro jednu a tu samou firmu, do které je v rámci investice investováno, mohou vycházet různá skóre udržitelnosti. Proto existuje riziko, že cenný papír nebo emitent nebude správně vyhodnocen.

Pro omezení tohoto rizika se používá vlastní ratingový model, ESGenius. V rámci tohoto ratingového modelu jsou v rámci analýzy do celkového pohledu slučována zaměření s ohledem na udržitelnost, která na trhu dominují (eticky orientovaný vklad vs. náhled na riziko). Kombinací různých poskytovatelů jsou redukovány eventuální mezery v datech, různé vklady jsou současně plausibilizovány.

Vzhledem k investičnímu procesu a opatřením přijatým k zajištění kvality údajů správcovská společnost předpokládá, že výše uvedená omezení nebudou mít významný negativní dopad na environmentální a sociální charakteristiky.

Jako referenční hodnota pro environmentální a/nebo sociální charakteristiky podporované podílovým fondem nebyl stanoven žádný index.

Údaje k tomu, jak jsou podporovány ekologické nebo sociální znaky investičního fondu, lze nalézt v příloze k informačnímu prospektu, příp. v Informacích pro investory dle § 21 AIFMG.

Informace o naplnění environmentálních či sociálních charakteristik nebo informace o celkovém dopadu investičního fondu na udržitelnost lze nalézt ve výročních zprávách investičních fondů.

### **Summary - croatian**

Ovaj finansijski proizvod promiče okolišna ili socijalna obilježja, ali nema za cilj održivo ulaganje.

Fond primjenjuje široko tumačenje održivosti. Ekološke i društvene karakteristike promiču se primjenom interno razvijenog pristupa održivosti Društva za upravljanje. Navedeno je osigurano primjenom ESG alata Društva za upravljanje u sklopu investicijskog procesa:

Održiva ulaganja koja su dio ovog investicijskog fonda ne nanose značajnu štetu okolišnim ili socijalnim ciljevima održivog ulaganja jer Fond ulaže u finansijske proizvode koje je Društvo za upravljanje kategoriziralo kao održive na temelju važećeg procesa održivog ulaganja. Ova kategorizacija navodi da finansijski proizvodi ne smiju imati značajne štetne učinke na okolišne ili socijalne čimbenike, budući da bi takvo kršenje onemogućilo ulaganje na temelju obvezujućih ESG karakteristika ovog procesa ulaganja.

Društvo za upravljanje uzima u obzir glavne štetne učinke (PAI) na čimbenike održivosti u strategiji ulaganja ovog Fonda.

Za najmanje 51 % imovine fonda kupuju se finansijski instrumenti takvih izdavatelja koji su na temelju postupka odabira, koji je unaprijed definiralo društvo za upravljanje fondovima, klasificirani kao održivi. Za investicijske fondove mogu se kupovati dionice kao i zajmovi i/ili instrumenti tržišta novca. Navedena imovina može se kupovati izravno ili neizravno preko investicijskih fondova ili derivata. Pri odabiru izdavatelja, odnosno izdavatelja koji su uključeni u određeni investicijski fond, društvo za upravljanje fondovima ne podliježe nikakvim geografskim ograničenjima po pitanju sjedišta izdavatelja ni sektorskim ograničenjima po pitanju predmeta poslovanja. U trenutku kupnje svi kupljeni pojedinačni vrijednosni papiri moraju na temelju postupka odabira, koji je unaprijed definiralo društvo za upravljanje fondovima, biti klasificirani kao održivi. Kriteriji isključivanja za poduzeća između ostaloga obuhvaćaju i povrede ljudskih prava, povrede radnog prava, rad djece, povrede sporazuma UN Global Compact, korupciju, računovodstvenu prijevartu, nuklearnu energiju, vađenje, proizvodnju i pretvorbu ugljena, proizvodnju nafte i zemnog plina, proizvodnju i trgovinu naoružanjem/oružjem, zeleni genetički inženjering, izrabljivačko istraživanje na embrijima, igre na sreću, pornografiju, duhan kao i eksperimente na životinjama koji se mogu izbjeći. Kako bi se kriteriji isključivanja u smislu granice detekcije mogli održati operativno izvedivima, odnosno kako bi se osigurala njihova točnost, društvo za upravljanje može primijeniti definirane vrijednosti praga i operacionalizacije.

Kriteriji isključivanja za države između ostaloga uključuju i autoritarne režime, ograničenje ljudskih prava, smrtnu kaznu, rad djece, nuklearno oružje, visok udio nuklearne energije u proizvodnji primarne energije, prekomjernu vojnu potrošnju, nedostatak suradnje i gruba kršenja u području pranja novca, korupcije (na temelju indeksa percepcije korupcije Transparency Internationala) kao i deficite u zaštiti klime i zaštiti bioraznolikosti. Operacionalizacija se odvija u skladu s uvjetima društva za upravljanje.

Društvo za upravljanje također prakticira aktivno vlasništvo kada izravno ulaže u vrijednosni papir.

Za zbirku podataka u vezi s održivošću, koji se zatim upotrebljavaju za vlastitu analizu, prikupljaju se i podaci vanjskih pružatelja usluga.

Vanjski podaci mogu biti nepotpuni, netočni ili privremeno nedostupni. Usto pružatelji usluga za određivanje stupnja održivosti u obzir uzimaju razne faktore utjecaja i razne pondera, tako da isto poduzeće, u koje se ulaže, može imati različite rezultate po pitanju održivosti. Stoga postoji rizik da neki vrijednosni papir ili izdavalac ne budu ispravno ocijenjeni.

Kako bi se ovaj rizik ograničio, za investicijske fondove kojima upravlja društvo za upravljanje, koristi se poseban rejting model ESGenius. Kao dio ovog modela ocjenjivanja, pristupi održivosti koji dominiraju tržištem (etički orijentirani pristup nasuprot perspektivi rizika) kombiniraju se kako bi se formirao opći pogled kao dio analize. Kombiniranjem različitih pružatelja, praznine u podacima se smanjuju, a različiti pristupi se istovremeno provjeravaju radi vjerodostojnosti.

Zbog investicijskog procesa i poduzetih mjera za osiguranje kvalitete podataka, društvo za upravljanje pretpostavlja da navedena ograničenja neće imati materijalne negativne učinke na okolišna i socijalna obilježja.

Nije utvrđen niti jedan indeks kao referentna vrijednost za ekološke i/ili društvene karakteristike koje se oglašavaju s investicijskim fondom.

Podatke o tome kako se potiču okolišne ili socijalne karakteristike investicijskog fonda, pronađite u prilogu prospektu, odnosno informacijama za ulagatelje.

Informacije o tome kako su zadovoljene ekološke ili socijalne karakteristike ili informacije o ukupnom utjecaju investicijskog fonda na održivost mogu se pronaći u godišnjim izvješćima investicijskih fondova.

## b) No sustainable investment objective

This financial product promotes environmental or social characteristics, but does not have as its objective sustainable investment.

Fund applies a broad interpretation of sustainability. Both environmental and social characteristics are promoted through the application of the Management Company's proprietary sustainability approach. This is ensured by the application of the Management Company's ESG toolbox as part of the investment process.

Exclusion Criteria			ESG Analysis / Best in Class		Integration	Engagement	Voting	Thematic funds	Focused sustainability Impact	Fulfill Austrian ecolabel or FNG label criteria
Minimum criteria	Exclusion criteria	Norm-based Screening	ESG Risk Analysis	Best in Class						
✓	✓	✓	✓	✓	✓	✓	✓	Not applicable		✓

The sustainable investments that comprise part of this investment fund do no significant harm to the environmental or social sustainable investment objectives because this Fund invests in financial products that have been categorised as sustainable by the Management Company on the basis of the applicable sustainable investment process. This categorisation sets forth that the financial products may have no significant adverse impacts on environmental or social factors, as such a violation would preclude an investment based on the binding ESG characteristics of this investment process.

The Management Company takes into account the principal adverse impacts (PAI) on sustainability factors in the investment strategy of this Fund.

Consideration and reduction of key adverse impacts on sustainability factors (Principle Adverse Impact - "PAI") is accomplished through the following procedures and methods: Application of social and environmental exclusion criteria.

In the case of the use of third party funds, based on the ESG fund selection criteria of the Management Company and the analysis of the investment process as disclosed by the respective producer, it is expected that these third party funds will have similar environmental and social characteristics as the funds managed by the Management Company. Nevertheless, differences may remain.

All 14 PAIs from Table 1 of the RTS, that apply to the investment fund were taken into account. The investment fund also takes the following PAIs from Tables 2 and 3, Annex I of the RTS into account:

- Indicator 8 (Table 2) - Exposure to areas of high water stress (share of investments in investee companies with sites located in areas of high water stress without a water management policy)
- Indicator 14 (Table 3) - Number of identified cases of severe human rights issues and incidents (number of cases of severe human rights issues and incidents connected to investee companies on a weighted average basis)

#### **Direct investments in securities and investments in investment funds (indirect investments) managed by the management company**

Sustainable investments are made by applying the exclusion criteria described above and taking into account the ESG analysis of issuers following the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights. Details on the relevant criteria are available on the following website: <https://www.erste-am.at/en/private-investors/sustainability/publications-and-guidelines>

#### **Investments in investment funds (indirect investments) managed by external management companies**

All invested mutual funds managed by external management companies must be classified as either Art. 8 or 9 under the Disclosure Regulation or at least comply with the requirements for good corporate governance. This does not apply to invested government bond funds. How the sustainable investments comply with OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights can be found in the documents of the external management companies.

In the event that third-party funds are held, the indicators for the adverse impacts on sustainability factors are taken into account in the manner defined by the respective manufacturers.

### **c) Environmental or social characteristics of the financial product**

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#### **Direct investments in securities and investments in investment funds (indirect investments) managed by the management company**

The focus topics of the ESG analysis, selection process, and active ownership practices are adapted to the specific ESG risk profile of each issuer.

At the level of the Fund, the Management Company is pursuing the objective of achieving improvements in the following key environmental and social aspects through its proprietary sustainability approach:

- The environmental footprint of the investments held by the Fund, in particular
  - the carbon footprint and the mitigation of climate change in general, and

- the water footprint and measures for the responsible use of the resource water.
- The avoidance of environmental risks
    - for the protection of biodiversity
    - the responsible management of waste and other emissions
  - Social factors such as
    - the exclusion of any investments in companies that produce or deal in controversial weapons.
    - the promotion of human rights and exclusion of issuers complicit in human rights violations.
    - the promotion of good working conditions, for example in the areas workplace safety and training, and the exclusion of issuers that are complicit in labour law violations, in particular of the core standards of the ILO.
    - the promotion of diversity and the exclusion of issuers that practice discrimination.
    - The avoidance of corruption and fraud.
  - The promotion of good corporate governance:
    - the independence of supervisory bodies
    - management remuneration
    - good accounting practices
    - the protection of shareholder rights

#### **Investments in investment funds (indirect investments) managed by external management companies**

All invested financial products managed by external management companies must be classified as either Art. 8 or Art. 9 under the Disclosure Regulation, or at least comply with good governance requirements. This does not apply to invested government bond funds.

In addition, the sustainable/ESG investment process of all such investment funds undergo a pre investment due diligence. Only investment funds demonstrating an ESG selection process and ESG criteria similar to those of ERSTE RESPONSIBLE funds will be whitelisted for investment. Compliance with this requirement is reviewed on a regular basis. Funds, which's ESG standard no longer meet the ERSTE RESPONSIBLE standards are deleted from the whitelist and divested in the best interests of the investors.

In the case of the use of third party funds, based on the ESG fund selection criteria of the Management Company and the analysis of the investment process as disclosed by the respective producer, it is expected that these third party funds will have similar environmental and social characteristics as the funds managed by the Management Company.

Nevertheless, differences may remain.

Therefore the environmental and/or social characteristics promoted by these investment funds are those declared by their respective producer in compliance with the Disclosure Regulation.

## **d) Investment strategy**

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The Fund invests at least 51% of its assets in financial instruments from issuers that have been categorised by the Management Company as sustainable on the basis of a predefined screening process.

The Fund can purchase equities, bonds, and/or money market instruments. The specified assets can be purchased directly or indirectly through investment funds or derivatives.

The Management Company is not subject to any restrictions in the selection of the instrument issuers or the issuers of the securities included in the respective funds with regard to the locations of their registered offices or the respective economic sectors in which they are active.

All purchased securities must have been categorised as sustainable by the Management Company on the basis of a predefined screening process at the time of purchase. The exclusion criteria for companies include human rights violations, labour law violations, child labour, violations of the UN Global Compact, corruption, balance sheet fraud, nuclear energy, coal mining, electricity generation from coal, the thermal conversion of coal, petroleum and natural gas extraction, the manufacture and sale of armaments/weapons, green gene technology, consumptive embryo research, gambling, pornography, tobacco, and unnecessary animal testing. The Management Company may employ

defined thresholds and operationalisation to facilitate the application of the exclusion criteria in terms of an identification limit and to ensure that the criteria have the desired effect. The exclusion criteria for sovereigns include authoritarian regimes, human rights restrictions, capital punishment, child labour, nuclear weapons, a high share of nuclear energy in primary energy generation, disproportionate military spending, insufficient cooperation and serious violations relating to money laundering, corruption (as measured by the corruption index of Transparency International), and deficits in climate protection and biodiversity preservation. Operationalisation is employed at the discretion of the Management Company.

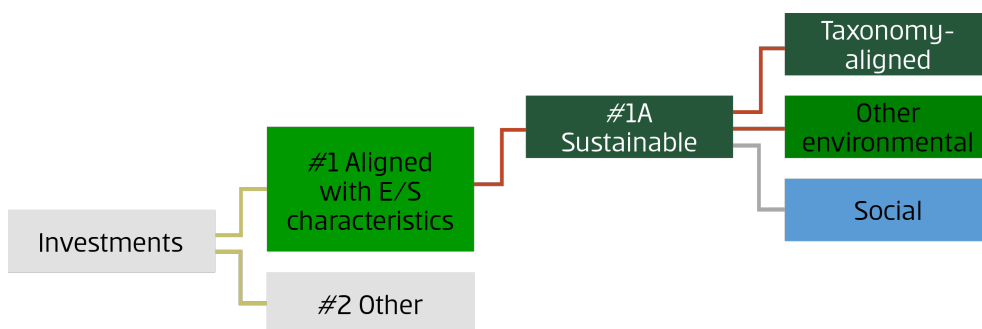
**Direct investments in securities and investments in investment funds (indirect investments) managed by the management company**

The good governance practices are assessed based on compliance with the exclusion criteria, the minimum ESGenius score, and the assessment of compliance with the principles of the UN Global Compact.

**Investments in investment funds (indirect investments) managed by external management companies**

The measures for assessing the good governance practices of the companies in which these financial products invest are specified and disclosed by the respective manufacturer in accordance with the Disclosure Regulation.

**e) Proportion of investments**



The Fund invests at least 51 % of the fund assets in sustainable investments in accordance with Article 2 number 17 of the Disclosure Regulation. This is ensured through compliance with the Fund's sustainability approach.

Under the investment strategy described in lit. b), investments are held in direct or indirect risk positions in companies.

**f) Monitoring of environmental or social characteristics**

The ESG criteria are complied with continuously in terms of the environmental, social, and ethical exclusion criteria as well as in relation to the ESG analysis for direct investments in securities and investments in investment funds (indirect investments) that are managed by the Management Company. This is ensured by the quarterly review and updating of the eligible investment universe of the Fund.

All invested investment funds managed by external management companies shall be officially classified as Art. 8 or 9 in accordance with the Disclosure Regulation by their manufacturer or at least comply with good governance rules. This is not applicable to invested government bond funds.

In addition, the sustainable/ESG investment process of all such investment funds undergo a pre investment due diligence. Only investment funds demonstrating an ESG selection process and ESG criteria similar to those of ERSTE RESPONSIBLE funds will be whitelisted for investment. Compliance with this requirement is reviewed on a regular basis. Funds, which's ESG standard no longer meet the ERSTE RESPONSIBLE standards are deleted from the whitelist and divested in the best interests of the investors.

The monitoring of environmental or social characteristics is ensured by the investment process applied and a daily review of the investment fund by Risk Management.

## g) Methodologies

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### **Direct investments in securities and investments in investment funds (indirect investments) managed by the management company**

All issuers in which the Fund invests are analysed and selected before acquisition on the basis of a predefined sustainability process. The proprietary ESGenius process provides a comprehensive ESG analysis of each issuer based on its specific ESG risk profile and the measures taken to mitigate these risks. Based on the results of this analysis, the ESGenius rating, only those issuers that achieve a score of at least 30 (Emerging Markets, High Yield) or 50 (Developed Markets) of 100 possible points are eligible for investment based on a best-in-class approach. This minimum score can be higher depending on the sector of the economy in which the issuer is active. All issuers are also evaluated for violations of the Fund's exclusion criteria. This excludes at least half of the analysed issuers from the eligible universe of the Fund. The investment universe is assessed for compliance with these criteria at least once per quarter and updated as needed. Compliance with the eligible investment universe is verified daily. Securities from issuers that no longer meet the sustainability criteria of the Fund are sold while protecting Unit-holder interests.

Investments in sovereign bonds are subject to similar, specific analysis. The minimum ESGenius Score for investment in sovereign bonds is 70 out of 100 points.

Moreover, social, and environmental characteristics are promoted by applying exclusion criteria.

These are available on the following website:

<https://www.erste-am.at/en/private-investors/sustainability/publications-and-guidelines>

The Management Company also exercises an active ownership function. Through Engagement with issuers in the analysed investment universe, contributions are made to the improvement of the environmental and social performance of these companies.

Investments in sovereign bonds are not covered by the fund management company's active ownership programmes.

### **Investments in investment funds (indirect investments) managed by external management companies**

All invested investment funds managed by external management companies shall be officially classified as Art. 8 or 9 in accordance with the Disclosure Regulation by their manufacturer or at least comply with good governance rules. This is not applicable to invested government bond funds.

In addition, the sustainable/ESG investment process of all such investment funds undergo a pre investment due diligence. Only investment funds demonstrating an ESG selection process and ESG criteria similar to those of ERSTE RESPONSIBLE funds will be whitelisted for investment. Compliance with this requirement is reviewed on a regular basis. Funds, which's ESG standard no longer meet the ERSTE RESPONSIBLE standards are deleted from the whitelist and divested in the best interests of the investors.

In the case of the use of third party funds, based on the ESG fund selection criteria of the Management Company and the analysis of the investment process as disclosed by the respective producer, it is expected that these third party funds will have similar environmental and social characteristics as the funds managed by the Management Company. Nevertheless, differences may remain.

Therefore the objectives of the sustainable investments that these investment funds partially intends to make and the ways the sustainable investment contribute to such objectives are those defined by their respective producers.

## h) Data sources and processing

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In addition to internal research based on information published by the issuers, data from external providers are also used when gathering sustainability-related data for the sustainability analysis.

The following data sources and providers are used, among others:

- MSCI ESG



- ISS ESG
- FactSet TrueValueLabs
- Sustainalytics
- ESGPlus

The careful selection of data providers and the consideration of data from different data providers ensures maximum data quality. For the investment funds that are managed by the Management Company, the data used are aggregated and analysed using the Management Company's proprietary sustainability approach (ESGenius) and/or additional research approaches of the Management Company. ESG data from the listed data providers may contain temporary estimates to a limited extent, depending on the type of sustainability-related data.

## **i) Limitations to methodologies and data**

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The external data may be incomplete, imprecise, or unavailable at times. The providers of sustainability ratings also take different influences into account and apply different weightings, meaning that a company that is the target of an investment can have different sustainability scores. There is therefore the risk of a security or issuer being assessed incorrectly.

A proprietary rating model called ESGenius is used to limit this risk. In this rating model, the predominant sustainability approaches in the market (ethically oriented approach versus a risk view) are combined into an overall view during the analysis. Combining the different providers reduces any data gaps and also verifies the plausibility of the different approaches.

Due to the investment process and the measures taken to ensure the quality of the data, the Management Company assumes that the previously mentioned restrictions will not have a material negative impact on the environmental and social characteristics.

## **j) Due diligence**

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The Management Company has drawn up procedures for fulfilling its due diligence obligations relating to the underlying assets.

The due diligence procedure consists primarily of

- the regular review of quantitative requirements and limits in risk management using
  - positive lists and/or
  - negative lists
- additional supporting (quantitative) evaluations in risk management for verifying the plausibility of assumptions and further (relevant) information for management
- the review of the processes and documentation as part of the regular OP risk, ICS, and compliance audits

Procedures for taking the relevant financial and sustainability risks into account have been integrated into the Management Company's processes.

## **k) Engagement policies**

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We understand active ownership to mean our responsibility to not only take sustainability criteria into account when selecting securities, but to also be an active investor that engages with the companies to promote measures that serve social responsibility, environmental protection, and enhanced transparency.

We differentiate here between engagement, in other words formal and informal dialogue with companies, and the exercise of voting rights at annual general meetings.

### **Engagement**

As a committed investor, EAM seeks active dialogue with the management of relevant companies as part of its sustainability process where it holds direct investments. This puts the spotlight on weaknesses in the management

of environment, social, and governance aspects and is intended to serve as a way to find a joint solution for improvement. Engagement is not only a question of responsibility, but also contributes to minimising risks and can thus improve long-term investment success. EAM can exclude companies that consistently refuse to enter into dialogue from the investment universe.

EAM employs three engagement strategies:

*Local engagement:* Promoting the integration of ESG criteria in management decisions of local and/or domestic companies through investor meetings/personal discussions.

*Collaborative engagement:* Combination of ESG interests with other investors to have a more powerful voice, especially with international corporate groups. International sustainability networks such as PRI and CRIC and the engagement service of a research services provider are used for this.

*ESG dialogues:* Promotion of the integration of ESG risks in management decisions of international companies via dialogues at the executive management level.

### **Voting**

Voting, i.e. the exercise of voting rights associated with directly held shares, is a central pillar of the active ownership approach.

More detailed information about the voting policy can also be found on EAM's website at <https://www.erste-am.at/en/private-investors/sustainability/publications-and-guidelines>

To ensure transparency and consistency in voting behaviour, the voting behaviour is reported regularly on the EAM voting portal.

<https://www.erste-am.at/de/private-anleger/nachhaltigkeit/publikationen-und-richtlinien#/active-ownership>

## **l) Fixed reference value**

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No index has been designated as a reference benchmark for the attainment of the environmental and/or social characteristics.

## **m) Information referred to in Article 8 of the Disclosure Regulation**

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Information on how the environmental or social characteristics of the Fund are promoted can be found in the annex to the prospectus or the Information for Investors pursuant to § 21 AIFMG.

## **n) Information referred to in Article 11 of the Disclosure Regulation**

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Information on how the environmental or social characteristics were met and information on the overall sustainability-related impact of the Fund can be found in the annual reports of the investment funds.