

# Information according to Art 10 SFDR

Name of the product: **ERSTE RESPONSIBLE STOCK AMERICA**

Legal entity identifier: 529900KAXKGJVGP2XF39

ISIN: AT0000A0A1P0, AT0000822655, AT0000822812, AT0000673371, AT0000858584, AT0000812862, AT0000639463, AT0000627476, AT0000A2HQE9, AT0000A1YNU9, AT0000A1YNS3, AT0000A1YNT1, AT0000A1YNV7, AT0000A1YNW5, AT0000A2B4Z0, AT0000A1YNX3, AT0000A1YNY1, AT0000A1YNZ8;

## a) Summary

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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.

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 financial product 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 financialproducts 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 80% of its assets in equities from issuers that have been categorised as sustainable by the Management Company on the basis of a predefined screening process and that are registered in America, that are listed on a securities exchange in America, or that are traded on a regularly operating securities market in America in the form of directly purchased individual instruments, in other words not indirectly or directly through investment funds or through derivatives.

The Fund may purchase shares in companies with small market capitalisations or mid-sized market capitalisations as well as shares in large, strong, and important companies that are internationally known (blue chips). There are no restrictions with regard to the economic sector in which the issuer is 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. In the screening process, issuers are assessed in terms of their environmental, social, and corporate governance risks. Only companies whose business policy demonstrates a sufficiently sustainable approach (in part based on the positive criteria listed below) to the Management Company are eligible for inclusion in the investment universe. This analysis is completed on the basis of internal evaluation and using external research. These issuers must also comply with the exclusion criteria to be eligible for the Fund. 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 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**

V zájmu srozumitelnosti se pro účely tohoto dokumentu "Nařízením o taxonomii" rozumí nařízení (EU) 2020/852, "Nařízením o zveřejňování" se rozumí nařízení (EU) 2019/2088 a "RTS" se rozumí nařízení v přenesené pravomoci (EU) 2022/1288.

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“).

Pro majetek fondu jsou nabývány minimálně z 80 % majetku fondu akcie emitentů se sídlem v Americe nebo od emitentů, kteří jsou zapisováni na některé burze cenných papírů v Americe nebo kteří jsou obchodováni na některém z řádně fungujících trhů s cennými papíry v Americe, a to ve formě přímo získaných jednotlivých titulů, tedy ne nepřímo nebo přímo prostřednictvím investičního fondu nebo prostřednictvím derivátů, a kteří jsou klasifikováni na bázi předdefinovaného procesu výběru správcovskou společností jako udržitelné společnosti. Nabývány mohou být jak akcie firem s nízkou kapitalizací na burze nebo akcie firem se střední kapitalizací na burze a také akcie majetkově silných, velkých, mezinárodně známých a významných společností (Blue Chips). Emitenti nepodléhají - pokud jde o předmět jejich podnikání - žádným oborovým omezením. Všechny nabýté jednotlivé tituly musí být k časovému termínu nabytí zatřídeny na bázi předdefinovaného procesu výběru

správcovskou společností jako udržitelné. V rámci procesu výběru jsou emitenti hodnoceni podle jejich ekologických, sociálních rizik a rizik spojených s vedením společnosti. Do investičního portfolia mohou být přijaty pouze ty firmy, v nichž obchodní politika správcovské společnosti dokáže identifikovat dostatečně udržitelnou orientaci (mimo jiné podle níže uvedených pozitivních kritérií). Tato analýza probíhá prostřednictvím interního hodnocení a evaluace a rovněž na základě externího průzkumu. Aby mohla proběhnout investice, musí navíc tito emitenti vyhovovat vylučovacím kritériím fondu. K vylučovacím kritériím pro firmy se počítají mimo jiné porušování lidských práv, porušování pracovních práv, dětská práce, porušení OSN Global Compact, korupce, falšování bilance, atomová energie, dobývání uhlí za účely výroby termické a elektrické energie, dobývání ropy a zemního plynu, výroba a obchod s výstroji/zbraněmi, zelené genové technologie, konzumní výzkum embryí, hazardní hry, pornografie, tabák a rovněž pokusy na zvířatech, kterým se lze vyhnout. 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.

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.

Informace o tom, jak jsou podporovány environmentální nebo sociální charakteristiky fondu, naleznete v příloze prospektu nebo v Informacích pro investory dle zákona.

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

### **Summary - hungarian**

A jelen dokumentum alkalmazásában a "Taxonómiai rendelet" az (EU) 2020/852 rendeletet, "Közzétételi rendelet" vagy "SFDR"az (EU) 2019/2088 rendeletet, "RTS" pedig az (EU) 2022/1288 felhatalmazáson alapuló rendeletet jelenti.

Ez a pénzügyi termék előmozdít környezeti vagy társadalmi jellemzőket, de nem rendelkezik fenntartható befektetési célkitűzéssel.

Az alap a fenntarthatóságot tágan értelmezi. Mind a környezeti, mind a társadalmi jellemzőket elősegíti az Alapkezelő saját fenntarthatósági megközelítésének alkalmazása. Ezt az Alapkezelő ESG eszköztárának a befektetési folyamat részeként történő alkalmazása biztosítja:

A részben ezzel a pénzügyi termékkel megvalósuló fenntartható befektetések nem károsítják jelentős mértékben a környezeti, illetve társadalmi fenntartható befektetési célkitűzéseket, mivel ez a befektetési alap olyan pénzügyi termékekbe fektet be, amelyeket az Alapkezelő Társaság az alkalmazandó fenntartható befektetési folyamat alapján fenntarthatónak minősített. Ez a besorolás megköveteli, hogy a pénzügyi termékek ne gyakoroljanak

jelentős káros hatást a környezeti, illetve társadalmi tényezőkre, mivel a befektetési folyamat kötelező ESG-jellemzői miatt ilyen jogosítás esetén a befektetés elfogadhatatlanná válna.

Az alapkezelő az alap befektetési stratégiájában figyelembe veszi a fenntarthatósági tényezőkre gyakorolt főbb káros hatásokat (PAI).

Az alap eszközeinek legalább 80%-a erejéig amerikai székhellyel rendelkező kibocsátók által kibocsátott részvényekbe, illetve olyan kibocsátók által kibocsátott részvényekbe fektet be közvetlen részvényvásárlás útján, vagyis nem közvetve vagy közvetlenül befektetési alapokon keresztül, illetve származékos ügyletek révén, amelyeket Amerika valamely értékpapírtőzséjén jegyeznek vagy Amerikában szabályszerűen működő értékpiacon forgalmaznak, és amelyeket az Alapkezelő Társaság egy előre meghatározott kiválasztási eljárás alapján fenntarthatónak minősített. Az alap vásárolhat kis, valamint közepes tőzsdei kapitalizációjú vállalatok, illetve tőkeerős, nemzetközi szinten is elismert és jelentős nagyvállalatok (blue chips) részvényeiből is. A kibocsátók tevékenységi köre vonatkozásában iparági korlátozások nincsenek. Valamennyi megvásárolt eszköz a vásárlás időpontjában az Alapkezelő Társaságnak egy előre meghatározott kiválasztási eljárás alapján fenntarthatónak kell minősítenie. A kiválasztási eljárás során a kibocsátókat környezeti, társadalmi, illetve vállalatirányítási (ESG) kockázataik tekintetében értékelik. A befektetési univerzumba csak azok a vállalatok kerülhetnek be, amelyek üzletpolitikájában az Alapkezelő Társaság kellően fenntartható orientációt tud azonosítani (többek között az alábbi pozitív kritériumoknak való megfelelés esetén). Ezt az elemzést belső értékelés és minősítés útján, valamint külső kutatók eredményeire alapozva végzik. Ezen túlmenően, a befektetésre alkalmas minősítés eléréséhez e kibocsátóknak meg kell felelniük az alap kizárási kritériumainak. A vállalatok számára meghatározott kizárási kritériumok közé sorolhatók többek között az emberi jogok megsértése, a munkajogi szabályok megsértése, a gyermekmunka, az ENSZ Globális Megállapodás (UN Global Compact) megsértése, a korrupció, a könyvelési csalás, az atomenergia, a termikus szén kitermelése és villamos energia termelésére történő felhasználása és alakítása, a kőolaj és földgáz kitermelése, a haditechnikai eszközök/fegyverek gyártása és kereskedelme, a zöld géntechnológia, a nem tudományos céllal végzett embriókutatás, a szerencsejáték, a pornográfia, a dohányipar és az elkerülhető állatkísérletekkel végzett kutatás. A kizárási kritériumok észlelhetőség és megbízhatóság szempontjából történő hatékony használata az Alapkezelő Társaság által meghatározott küszöbértékek és mérési eljárások (operacionalizálás) alkalmazásával biztosítható.

Emellett az Alapkezelő Társaság aktív tulajdonosi funkciót is betölt értékpapírokba történő közvetlen befektetés során.

Azon fenntarthatósággal kapcsolatos nyers adatok gyűjtése, amelyeket később saját elemzésekhez használnak fel, külső szolgáltatóktól származó adatokra is támaszkodva történik.

A felhasznált külső adatok hiányosak, pontatlanok lehetnek, illetve előfordulhat, hogy ideiglenesen nem állnak rendelkezésre. Ezen túlmenően a fenntarthatósági minősítések szolgáltatói különböző befolyásoló tényezőket és súlyozásokat vesznek figyelembe, így esetenként egyazon befektetés tárgyat képező vállalat értékelésekor eltérő fenntarthatósági pontszámok születhetnek. Ezért fennáll annak a kockázata, hogy egy értékpapír vagy egy kibocsátó értékelése nem megfelelő.

E kockázt korlátozható a saját fejlesztésű minősítési modell, az ESGenius alkalmazásával. Ezen minősítési modell segítségével az elemzés során a piacon domináló fenntarthatósági irányzatokat (etika-orientált megközelítés, illetve kockázt alapú értékelés) kombinálva egy összetett mérőszámot állítunk elő. A különböző szolgáltatók adatainak ötvözésével csökkenthető az adathiányok kockázata, elvégezhető az eltérő megközelítések hitelességének együttes ellenőrzése.

A befektetési folyamatnak és az adatminőség biztosítása érdekében tett intézkedéseknek köszönhetően az alapkezelő társaság feltételezi, hogy a fent említett korlátozásoknak nem lesz jelentős negatív hatása a környezeti és társadalmi jellemzőkre.

A befektetési alap által támogatott környezeti és/vagy társadalmi jellemzők tekintetében nem határoztak meg referenciaindexet.

A befektetési alap környezetvédelmi vagy társadalmi jellemzőinek előmozdítására vonatkozó információk az Alap Tájékoztatójának mellékletében, illetve a Kezelési szabályzat 12. pontjában található.

A befektetési alapok éves jelentéseiből tájékozódhat arról, hogy a környezeti vagy társadalmi jellemzők hogyan teljesültek, vagy a befektetési alap általános fenntarthatósági hatásáról.

## **Summary - romanian**

În scopul unei bune înțelegeri, în sensul acestui document, "Regulamentul privind Taxonomia" înseamnă Regulamentul (UE) 2020/852, "Regulamentul privind transparența" înseamnă Regulamentul (UE) 2019/2088, iar "RTS" înseamnă Regulamentul delegat (UE) 2022/1288. Valorile raportate mai jos au fost determinate la data 31.12.2023.

Acest produs finanțier promovează caracteristici de mediu sau sociale, dar nu are ca obiectiv realizarea de investiții durabile.

Fondul aplică o interpretare largă a durabilității. Atât caracteristicile de mediu, cât și cele sociale sunt promovate prin aplicarea abordării de durabilitate, proprie Societății de administrare. Acest lucru este asigurat prin aplicarea setului de instrumente ESG al Societății de administrare ca parte a procesului de investiții:

Investițiile durabile care fac parte din acest Fond de investiții nu aduc prejudicii semnificative obiectivelor de investiții durabile de mediu sau sociale, deoarece acest Fond investește în instrumente finanțiere care au fost clasificate ca fiind durabile de către Societatea de Administrare pe baza procesului de investiții durabile aplicabil. Această clasificare stabilește că instrumentele finanțiere nu pot avea un impact negativ semnificativ asupra factorilor de mediu sau sociali, deoarece, datorită caracteristicilor ESG obligatorii ale acestui proces de investiții, o investiție ar fi inadmisibilă în cazul unei astfel de încălcări.

Societatea de administrare ia în considerare principalele efecte adverse (PAI) asupra factorilor de sustenabilitate în strategia de investiții a acestui Fond.

Pentru activele fondului se achiziționează, în proporție de cel puțin 80% din activele fondului, acțiuni de la emitenți cu sediul în America sau acțiuni de la emitenți care sunt cotate la bursa de valori din America sau care sunt tranzacționate pe o piață a titlurilor de valoare din America, sub forma unor titluri individuale achiziționate direct, deci nu indirect sau direct prin fonduri de investiții sau prin instrumente derivate, care sunt clasificate de către societatea de administrare ca fiind sustenabile, pe baza unui proces de selecție predefinit. Pot fi achiziționate atât acțiuni de la societăți cu o capitalizare scăzută la bursă sau acțiuni de la societăți cu o capitalizare medie la bursă, precum și acțiuni de la societăți puternice, mari, cunoscute și importante la nivel internațional (Blue-Chips). Emitenții nu se supun niciunui fel de limitări specifice industriei cu privire la obiectul de activitate. La momentul achiziționării, toate titlurile individuale achiziționate trebuie să fi fost încadrăte de către societatea de administrare ca fiind sustenabile, pe baza unui proces de selecție predefinit. În cadrul procesului de selecție, emitenții sunt evaluați în funcție de riscurile lor ecologice, sociale și de management. În cadrul universului investițional vor fi incluse doar acele societăți în a căror politică de afaceri poate societatea de administrare să recunoască o orientare sustenabilă adecvată (printre altele, în conformitate cu criteriile pozitive de mai jos). Această analiză se realizează prin analiză internă și evaluare, precum și cu ajutorul unor cercetări externe. Suplimentar, pentru investiție, acești emitenți trebuie să respecte criteriile de excludere ale fondului. Criteriile de excludere pentru companii includ, printre altele, încălcări ale drepturilor omului, încălcări ale legislației în domeniul muncii, exploatarea prin muncă a copiilor, încălcări ale UN Global Compact, corupția, falsificarea bilanțului, energia nucleară, exploatarea, precum și conversia în energie electrică și transformarea cărbunelui termic, extractia de petrol și gaze naturale, producția și comerțul de armament/arme, ingerința genetică verde, cercetarea embrionară consumatoare, jocurile de noroc, pornografia, tutunul, precum și experimentele, care pot fi evitate, pe animale. Pentru a menține criteriile de excludere realizabile la nivel operațional, în sensul unei limite de detecție, respectiv pentru a asigura acuratețea acestora, societatea de administrare poate folosi praguri definite și operaționalizări.

Societatea de Administrare practică o proprietate activă în ceea ce privește investițiile directe în valori mobiliare.

Datele de la furnizori externi sunt, de asemenea, utilizate atunci când se colectează date legate de durabilitate pentru analize interne.

Datele externe pot fi uneori incomplete, imprecise sau indisponibile. Furnizorii de ratinguri de durabilitate țin cont și de diferite influențe și aplică diferite ponderi, ceea ce înseamnă că o companie în care se investește poate avea scoruri de durabilitate diferite. Astfel, există riscul ca un instrument finanțier sau un emitent să nu fie corect evaluat.

Pentru a limita acest risc, se utilizează un model de rating propriu numit ESGenius. În acest model de rating, în timpul analizei sunt combinate, într-o viziune de ansamblu, abordările predominante ale durabilității de pe piață

(abordarea orientată spre etică versus o viziune de risc). Combinarea informațiilor de la diferiți furnizori reduce eventualele lacune de date și, de asemenea, verifică plauzibilitatea diferitelor abordări.

Datorită procesului de investiții și a măsurilor luate pentru a asigura calitatea datelor, societatea de administrare presupune că restricțiile menționate mai sus nu vor avea un impact negativ semnificativ asupra caracteristicilor sociale și de mediu.

Nu a fost identificat niciun indice ca punct de referință pentru caracteristicile de mediu și/sau sociale promovate de fondul mutual.

Informațiile referitoare la modul în care Fondul promovează caracteristicile de mediu sau sociale pot fi consultate în anexa la Prospectul de emisiune sau în Informațiile destinate investitorilor în conformitate cu articolul 21 din AIFMG.

Informații despre modul în care au fost îndeplinite caracteristicile de mediu sau sociale sau informații despre impactul general asupra durabilității fondului de investiții pot fi găsite în rapoartele anuale ale fondurilor de investiții.

### **Summary - slovak**

V záujme lepšej čitateľnosti na účely tohto dokumentu "Nariadenie o taxonómii" znamená nariadenie (EÚ) 2020/852, "Nariadenie o zverejňovaní" znamená nariadenie (EÚ) 2019/2088 a "RTS" znamená delegované nariadenie (EÚ) 2022/1288.

Tento finančný produkt presadzuje environmentálne alebo sociálne vlastnosti, ale jeho cieľom nie sú udržateľné investície.

Fond sa riadi širokou interpretáciou udržateľnosti. Uplatňovaním vlastného prístupu Správcovskej spoločnosti k udržateľnosti sú presadzované environmentálne aj sociálne vlastnosti. To je v rámci investičného procesu zabezpečené prostredníctvom súboru nástrojov Správcovskej spoločnosti s názvom ESG Toolbox.

Udržateľné investície čiastočne uskutočnené týmto finančným produkтом výrazne nenarúšajú environmentálne alebo sociálne udržateľné investičné ciele, pretože tento fond investuje do finančných produktov, ktoré Správcovská spoločnosť klasifikovala ako udržateľné z dôvodu aplikovania udržateľného investičného procesu. Z tejto klasifikácie vyplýva, že finančné produkty nesmú mať významný nepriaznivý vplyv na environmentálne alebo sociálne faktory, pretože záväzné ESG charakteristiky tohto investičného procesu by v prípade takého porušenia neumožnili nadobudnúť túto investíciu.

V investičnej stratégii tohto fondu Správcovská spoločnosť zohľadňuje hlavné nepriaznivé vplyvy (PAI) na faktory udržateľnosti.

Najmenej 80 % imania fondu sa nadobúda ako akcie emitentov so sídlom v Amerike alebo akcie emitentov kótovaných na burze cenných papierov v Amerike, alebo obchodovaných na riadne fungujúcim trhu s cennými papiermi v Amerike vo forme priamo nadobúdaných cenných papierov, t. j. nie nepriamo ani priamo prostredníctvom investičných fondov alebo derivátov, ktoré správcovská spoločnosť klasifikuje ako udržateľné na základe vopred stanoveného výberového procesu. Môžu sa nadobúdať akcie spoločností s nízkou burzovou kapitalizáciou alebo akcie spoločností so strednou burzovou kapitalizáciou, ako aj akcie významných, veľkých, medzinárodne známych a dôležitých spoločností (blue chips). Na emitentov sa nevzťahujú žiadne sektorové obmedzenia, pokiaľ ide o predmet ich podnikania. Všetky jednotlivé nadobudnuté cenné papiere musia byť v čase nadobudnutia klasifikované správcovskou spoločnosťou ako udržateľné na základe vopred stanoveného výberového procesu. V rámci výberového procesu sú emitenti hodnotení podľa svojich environmentálnych a sociálnych rizík, ako aj rizík súvisiacich s riadením podniku. Do investičného prostredia môžu byť zaradené len také podniky, v ktorých obchodnej politike dokáže správcovská spoločnosť identifikovať dostatočne udržateľné nasmerovanie (okrem iného na základe pozitívnych kritérií uvedených nižšie). Táto analýza sa vykonáva na základe interného hodnotenia a evalvácie, ako aj externého prieskumu. Títo emitenti musia navyše vyhovieť kritériám vylúčenia platným pre fond, aby ich bolo možné zaradiť do investičného procesu. Ku kritériám vylúčenia platným pre podniky sa zaradujú okrem iného porušovanie ľudských práv, porušovanie pracovných práv, detská práca, porušovanie iniciatívy UN Global Compact, korupcia, falšovanie bilancií, atómová energia, ťažba, ako aj produkcia elektrickej energie a spracovanie uhlia pre získavanie tepla, ťažba ropy a zemného plynu, výroba a obchodovanie so zbraňami/zbrojenie, pestovanie geneticky modifikovaných plodín, výskum embryonálnych kmeňových buniek, hazardné hry, pornografia, tabakové výrobky, ako aj odvrátitelné pokusy na zvieratách. Na

zachovanie operatívnej realizovateľnosti kritérií pre vylúčenie v zmysle dôkazného rámca, prípadne na zaistenie ich spoľahlivosti môže správcovská spoločnosť použiť definované prahové hodnoty a štandardy.

Okrem toho Správcovská spoločnosť pri investovaní do cenných papierov vykonáva činnosti spojené s aktívnym vlastníctvom.

Údaje od externých poskytovateľov sa používajú aj pri zhromažďovaní údajov týkajúcich sa udržateľnosti pre interné analýzy.

Externé údaje môžu byť niekedy neúplné, nepresné alebo nedostupné. Poskytovatelia ratingov udržateľnosti tiež zohľadňujú rôzne vplyvy a uplatňujú rôzne váhy, čo znamená, že jedna a tá istá spoločnosť, do ktorej sa investuje, môže mať rôzne skóre udržateľnosti. Existuje teda riziko nesprávneho posúdenia cenného papiera alebo emitenta.

Na obmedzenie tohto rizika sa používa vlastný skóringový model s názvom ESGenius®. V tomto skóringovom modeli sa ako súčasť analýzy kombinujú do celkového pohľadu prevládajúce prístupy na trhu k udržateľnosti (eticky orientovaný prístup verus perspektíva rizika). Kombináciou dát od rôznych poskytovateľov sa znižujú nedostatky v údajoch a tiež sa overuje vierošodnosť rôznych prístupov.

Vzhľadom na investičný proces a opatrenia prijaté na zabezpečenie kvality údajov Správcovská spoločnosť predpokladá, že uvedené obmedzenia nebudú mať významný negatívny vplyv na environmentálne a sociálne vlastnosti.

Na dosiahnutie environmentálnych a/alebo sociálnych cieľov neboli určené žiadni indexy ako referenčná hodnota.

Informácie o tom, ako sa podporujú environmentálne alebo sociálne vlastnosti vo fonde, možno nájsť v prílohe predajného prospektu fondu s názvom Zásady trvalej udržateľnosti.

Informácie o tom, ako boli splnené environmentálne alebo sociálne charakteristiky, alebo informácie o celkovom vplyve investičného fondu na udržateľnosť možno nájsť vo výročných správach investičných fondov.

### **Summary - spanish**

Para mejorar la legibilidad, a los efectos de este documento, "Reglamento de taxonomía" significa Reglamento (UE) 2020/852, "Reglamento de divulgación" significa Reglamento (UE) 2019/2088 y "RTS" significa Reglamento Delegado (UE) 2022/1288.

Este producto financiero promueve características medioambientales o sociales, pero no tiene como objetivo una inversión sostenible.

El fondo de inversión sigue una interpretación amplia de la sostenibilidad. Al aplicar el enfoque de sostenibilidad propio de la empresa gestora, se promueven características tanto ambientales como sociales. Esto se garantiza mediante el uso de la caja de herramientas ESG de la empresa de gestión como parte del proceso de inversión.

Las inversiones sostenibles realizadas en parte con este producto financiero no perjudican de forma ostensible los objetivos de inversión sostenibles medioambientales o sociales, pues este fondo de inversión invierte en productos financieros que han recibido la clasificación de sostenibles de la sociedad gestora en virtud del proceso de inversión sostenible aplicable. Esta clasificación requiere que los productos financieros no tengan un efecto adverso considerable en los factores medioambientales o sociales, puesto que, dadas las características ESG vinculantes de este proceso de inversión, una inversión sería inadmisible en caso de un incumplimiento de este tipo.

En la estrategia de inversión de este fondo de inversión, la Sociedad Gestora tiene en cuenta los impactos adversos más importantes sobre los factores de sostenibilidad (Principle Adverse Impacts - "PAI").

Al menos el 80 % de los activos del fondo se compran en acciones de emisores domiciliados en América o de emisores que coticen en una bolsa de valores de América o que se negocien en un mercado de valores que funcione correctamente en Estados Unidos, en forma de títulos individuales comprados directamente, es decir, no de forma indirecta ni directa a través de fondos de inversión o de derivados, siempre que los emisores hayan recibido la clasificación de sostenibles de la sociedad gestora sobre la base de un proceso de selección predefinido. Pueden comprarse acciones de empresas de baja capitalización bursátil o acciones de empresas

de mediana capitalización bursátil, así como acciones de empresas con una posición financiera sólida y estable, grandes, conocidas internacionalmente e importantes («blue chips»). Los emisores no están sujetos a ninguna restricción sectorial con respecto a su objeto social. Todos los títulos individuales comprados deben haber recibido la clasificación de sostenibles de la sociedad gestora en el momento de la compra sobre la base de un proceso de selección predefinido. Como parte del proceso de selección, los emisores se evalúan en función de sus riesgos medioambientales, sociales y de gobierno corporativo. Solo se pueden incluir en el espectro de inversión aquellas empresas cuya política empresarial la sociedad gestora pueda reconocer que tiene una orientación suficientemente sostenible (entre otros, de acuerdo con los criterios positivos que se exponen a continuación). Este análisis se basa en la valoración y evaluación internas, así como en investigaciones externas. Además, estos emisores deben cumplir los criterios de exclusión del fondo para poder optar a la inversión. Los criterios de exclusión para las empresas incluyen las violaciones de los derechos humanos, las violaciones de los derechos laborales, el trabajo infantil, las violaciones del Pacto Mundial de la ONU, la corrupción, el fraude contable, la energía nuclear, la extracción y conversión de carbón térmico en electricidad, la extracción de petróleo crudo y gas natural, la fabricación y el comercio de armamento/armas, la ingeniería genética verde, la investigación que utiliza embriones, los juegos de azar, la pornografía, el tabaco y los ensayos evitables con animales. Pueden utilizarse umbrales e implementaciones definidos por la sociedad de gestión para mantener los criterios de exclusión operativamente viables en el sentido de un límite de detección o para garantizar que se puedan cumplir.

Además, la sociedad gestora ejerce una función de tenencia activa («Active Ownership») en las inversiones directas en valores.

También se recurrirá a datos de proveedores externos para recopilar datos relacionados con la sostenibilidad, que luego se utilizarán para el propio análisis.

En determinadas circunstancias, los datos externos pueden ser incompletos, inexactos o no estar disponibles temporalmente. Además, los proveedores de las calificaciones de sostenibilidad tienen en cuenta diferentes factores influyentes y diferentes ponderaciones, lo que significa que puede haber puntuaciones de sostenibilidad distintas para una sola y misma empresa en la que se invierta en el marco de la disposición. Así pues, existe el riesgo de que un valor o un emisor no se califiquen correctamente.

Con el fin de limitar este riesgo, se utiliza un modelo de calificación propio denominado ESGenius. En el marco de este modelo de calificación, las orientaciones de sostenibilidad que dominan el mercado (enfoque orientado a la ética frente a la perspectiva de riesgo) se reúnen en una visión de conjunto como parte del análisis. Al combinar los diferentes proveedores, se reduce la posibilidad de que surjan lagunas de datos, se comprueba al mismo tiempo la plausibilidad de los diferentes enfoques.

Debido al proceso de inversión y a las medidas adoptadas para garantizar la calidad de los datos, la Sociedad Gestora asume que las restricciones mencionadas no tendrán un impacto negativo significativo en las características medioambientales y sociales.

No se ha identificado ningún índice como referencia para las características medioambientales y/o sociales promovidas por el fondo de inversión.

Los datos sobre cómo se promueven las características medioambientales o sociales del fondo de inversión pueden consultarse en el Apéndice del folleto o en la información para los inversores a efectos del artículo 21 de la ley austriaca sobre los gestores de fondos de inversión alternativos (AIFMG).

La información sobre cómo se han cumplido las características ambientales o sociales o la información sobre el impacto de sostenibilidad general del fondo de inversión se puede encontrar en los informes anuales de los fondos de inversión.

## b) No sustainable investment objective

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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.

Exclusion Criteria			ESG Analysis / Best in Class						Focused sustainability Impact	
Minimum criteria	Exclusion criteria	Norm-based Screening	ESG Risk Analysis	Best in Class	Integration	Engagement	Voting	Thematic funds		Fulfill Austrian ecolabel or FNG label criteria
✓	✓	✓	✓	✓	✓	✓	✓	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 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 Art. 9 under the Disclosure Regulation or at least comply with the requirements for good corporate governance, if applicable. 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 responsible use of the water as a resource.
- 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, if applicable.

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 80% of its assets in equities from issuers that have been categorised as sustainable by the Management Company on the basis of a predefined screening process and that are registered in America,

that are listed on a securities exchange in America, or that are traded on a regularly operating securities market in America in the form of directly purchased individual instruments, in other words not indirectly or directly through investment funds or through derivatives.

The Fund may purchase shares in companies with small market capitalisations or mid-sized market capitalisations as well as shares in large, strong, and important companies that are internationally known (blue chips). There are no restrictions with regard to the economic sector in which the issuer is 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. In the screening process, issuers are assessed in terms of their environmental, social, and corporate governance risks. Only companies whose business policy demonstrates a sufficiently sustainable approach (in part based on the positive criteria listed below) to the Management Company are eligible for inclusion in the investment universe. This analysis is completed on the basis of internal evaluation and using external research. These issuers must also comply with the exclusion criteria to be eligible for the Fund. 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.

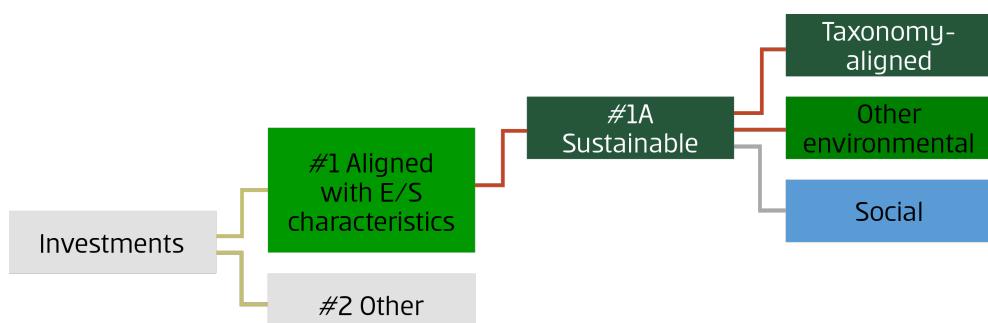
#### **Direct investments in securities and investments in investment funds (indirect investments) managed by the management company**

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 80 % 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 must be classified as either Art. 8 or Art. 9 under the Disclosure Regulation or at least comply with the requirements for good corporate governance, if applicable.

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 50 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.

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 Commitment to Issuers and the Exercise of Voting Rights in the analysed investment universe, contributions are made to the improvement of the environmental and social performance of these companies.

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

All invested investment funds managed by external management companies must be classified as either Art. 8 or Art. 9 under the Disclosure Regulation or at least comply with the requirements for good corporate governance, if applicable.

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 temporarily unavailable. 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>

## I) 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.

Explanation of amendments:

The following changes were made in this version:  
Editorial changes

For information about previous changes, see the previous version.