



ETHENEA

Sustainability Report 2023



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Foreword

Dear Readers,

These are turbulent times. Profound changes are taking place on many levels at the same time. Wars, structural, political and geostrategic decisions, as well as climate extremes, are shaping the course of the year.

As an intermediary, the financial sector is recognised as having a major responsibility. From year to year, it becomes clearer that social endeavours and the related developments are aligned with the three pillars of environmental, social and governance (ESG).

Stock markets have risen from record to record. And towards the end of last year, the central banks came to their senses and stopped the cycle of interest rate hikes.

In 2023, nature once again demonstrated its life-creating and destructive abilities. The earthquake in Turkey and Syria had the most devastating effect. Although other major catastrophes fortunately

remained the exception, a large number of medium-sized events affected the lives of many people.

This is not the only reason why we, as asset managers, are operating in an extremely challenging environment and why our sustainable portfolio management is strongly influenced by the ongoing and fast-moving changes referred to above. The global economy has clearly felt the effects of global crises, combined with rapid interest rates increases by the central banks and persistent inflation. The energy crisis has had a significant impact on the European understanding of sustainable activities as defined in principle in the EU Taxonomy Regulation.

We will continue to face many challenges in the year ahead. We know from experience that with every change comes opportunities. Unlocking innovative potential and finding joint solutions are our goals. We are ready!

**Sincerely yours,
Thomas Bernard**



Thomas Bernard
CEO
ETHENEA Independent Investors S.A.

Chapter 1

ETHENEA – who we are and what is important to us

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Signatory to the UN Principles for Responsible Investment

On 28 November 2017, ETHENEA signed the Principles for Responsible Investment (PRI) and committed to sustainability in its active asset management process by respecting the six United Nations Principles for Responsible Investment developed by the United Nations in 2006 to integrate ESG principles into investment practice. PRI signatories are required to publish an annual report on their responsible investment activities. Since becoming a signatory, ETHENEA has consistently sought to integrate the six principles into its processes. This is also reflected in the PRI Transparency Report, which is published annually and can be viewed on the [PRI website](#). It is only this year that signatories will be asked to report on their progress in the area of responsible investment.



With our commitment to these principles, ETHENEA has now been formally committed to sustainability in its mandates for several years. The portfolio management team actively incorporates environmental, social and governance aspects (ESG factors) into its investment analysis and decision-making process with a view to taking responsibility for a sustainable society.

The sustainable investment of funds entrusted to ETHENEA has played an important role for years. Accordingly, the portfolio management team is committed to applying the following principles when actively managing portfolios and making investment decisions:

6th principle:
We will publish reports on our activities, and progress towards implementing the Principles.

1st principle:
We will incorporate ESG issues into investment analysis and decision-making processes.

2nd principle:
We will be active shareholders and will incorporate ESG issues into our ownership policies and practices.

Signatory of:



5th principle:
We will work together to enhance our effectiveness in implementing the Principles.

4th principle:
We will promote acceptance and implementation of the Principles within the asset management industry.

3rd principle:
We will seek appropriate disclosure of ESG issues from the entities in which we invest.

Sustainability-related disclosure obligations

Regulation (EU) 2019/2088 on sustainability-related disclosure requirements in the financial services sector (Sustainable Finance Disclosure Regulation (SFDR)) requires all participants in the financial markets and in financial advisory services in the EU to disclose information on the integration of sustainability risks and the consideration of adverse impacts on sustainability in their processes.

The SFDR is an important component of the European Commission's Sustainable Finance Action Plan. This regulation is designed to improve transparency concerning the sustainability of financial products in order to direct funds into truly sustainable investments and prevent greenwashing.

The "double materiality principle" is at the heart of SFDR: By considering both financial and sustainability aspects, investors will be better able to understand the extent to which ESG and sustainability factors are taken into account in their investments.

At ETHENEA, both the three Ethna funds and the HESPER FUND – Global Solutions are classified as Article 8 funds under the new Sustainable Finance Disclosure Regulation. Article 8 funds pursue a sustainability strategy. The companies in which they invest must follow good governance (G) practices

and the fund must take environmental (E) and/or social (S) criteria into account in its investment process. This reaffirms our resolve to offer our clients responsible investment solutions with a competitive and sustainable return.

Of course, ETHENEA complies with this obligation and has been providing its investors with detailed information since 10 March 2021. This information can be found for each relevant product, clearly and comprehensively prepared, within the fund information provided on the www.ethenea.com the year, the so-called "pre-contractual information" on sustainability aspects has found its way into the sales prospectuses of the products we manage. Essential aspects of the investment process are presented in a general framework with uniform chapters for all products. The annual reports of the funds have also been expanded. Readers will now find "regular information" on the sustainability features of the funds.

In June 2023, the management company also published its first PAI (Principal Adverse Impacts) report at company level, in which it issued its statement on the principal adverse impacts of investment decisions on sustainability factors. The second PAI Report will be published in June 2024.



Implementation at company level

In addition to factoring ESG criteria into investment decisions, integrating sustainability aspects at the company level is an integral part of the corporate strategy. ETHENEA has launched a large number of initiatives in the past to minimise its environmental footprint and contribute to a more sustainable and socially responsible society.

In particular, the avoidance of discrimination of any kind in employment and occupation is fully

guaranteed by ETHENEA at all times. Breaches of these policies are unacceptable. ETHENEA also works continuously on increasing employee diversity. Environmental issues are addressed through our responsible use of resources and focus on environmentally relevant factors that are relevant to the environment, savings and resource-efficient corporate management.

ETHENEA has also recently taken the following measures:

1. The Company purchases electricity from renewable energy sources for its office building.
2. Only hybrid or e-cars will now be approved as company cars.
3. Five new charging stations with two charging points have been installed in the underground car park.
4. Business travel by car or plane is being scaled back.
5. Switch to IT-based tools such as Microsoft Teams are used for meetings and conferences.
6. Company benefits, e.g. Cheque Repas, company pension scheme.
7. We have stopped the use of water from plastic bottles and instead have drinking water dispensers in the kitchen.
8. Use of organic cleaning products.
9. Encouraging a healthy lifestyle through the availability of a fitness room for employees on site.





Chapter 2

Organisation

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Authenticity and character are the cornerstones of ETHENEA’s approach to sustainability.

ETHENEA, as a company, provides optimal frameworks and tools for portfolio management to implement their ESG approaches and defines minimum exclusions such as investments in

companies with a core activity in armaments, tobacco, pornography, speculation in basic foodstuffs and/or the mining/distribution of coal. The individual portfolio managers have downstream independence in the individual design of the research process and the integrated analysis of ESG risks.



Conditions

The funds managed by ETHENEA can invest flexibly in different asset classes such as equities, bonds, commodities, currencies and cash. Each fund sets different priorities in its allocation based on its risk-reward profile. Ethna-DEFENSIV invests exclusively in bonds and Ethna-DYNAMISCH invests primarily in equities.

Ethna-AKTIV is particularly flexible and prioritises equities or bonds depending on the market assessment. Currencies and cash are mixed in for diversification or when, in the opinion of the portfolio management, attractive investment opportunities arise. HESPER FUND – Global Solutions is primarily macro-driven and also invests heavily in ETFs and derivatives.

ETHENEA’s ESG Committee has been in existence for quite some time. Membership of the ESG Committee consists of equal numbers of one member from ETHENEA management, one member from Compliance, and one member from Risk or portfolio management. The ESG Committee will meet regularly, but at least once every six months.

The ESG Committee discusses significant developments, including changes in regulatory requirements related to sustainable investment, and reports to the Board of Directors and the management of ETHENEA.

ETHENEA established a number of additional committees to complement the ESG Committee in 2021 after intensive deliberations on the implementation and maintenance of specific requirements in the context of ESG implementation, monitoring and documentation, the effective organisation of vibrant internal dialogue and the continuous application of ETHENEA’s ESG standards as a key criterion in the Company and in portfolio management.

The individual design of the individual fund philosophies, which is based on ESG, is supported by a forum that creates a space for the exchange of ideas and suggestions for continuous further development. In 2021, the first steps were taken to form an ESG task force consisting of representatives from the individual fund teams.

The ESG Council supports the ESG Committee. This is an independent advisory board, which also has a mediating role.

Since 2021, the ESG Council, the ESG Committee and the ESG Task Force have been working together constructively and adding value.

The mode of operation and effect can be illustrated as follows:



Procedural support



ETHENEA provides the portfolio management team with a variety of standardised evaluations, individual analyses and detailed data from specialised data provider Sustainalytics on a daily or ad hoc basis for the evaluation of different types of sustainability risks. [Sustainalytics](#) is a leading independent ESG and corporate governance research, ratings and analytics firm that provides analysis to investors around the world.

The Sustainalytics database serves as the basis for a wide range of ESG analyses with information on ESG risks, controversies, shareholdings and international standards and other issues. The database is updated daily. The database is supplemented by the annual

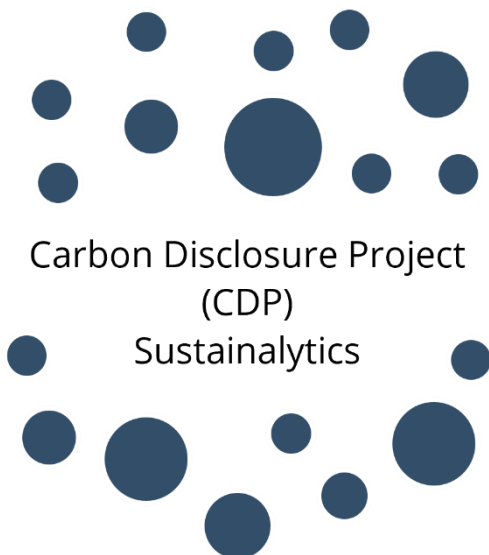
democracy assessments (“Freedom in the World”) published by the international NGO www.freedomhouse.org.



This database is used to maintain the exclusion lists in the order management system. Before a trade is executed, investment compliance is automatically monitored to ensure that the investment is permissible.

ETHENEA’s central data storage on its own servers enables it to provide timely and targeted support to the portfolio management team for enquiries and decisions.

Data



Order-Management-System



Chapter 3

Success on the path to sustainable portfolio management

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Significant improvement to the ESG risk profile

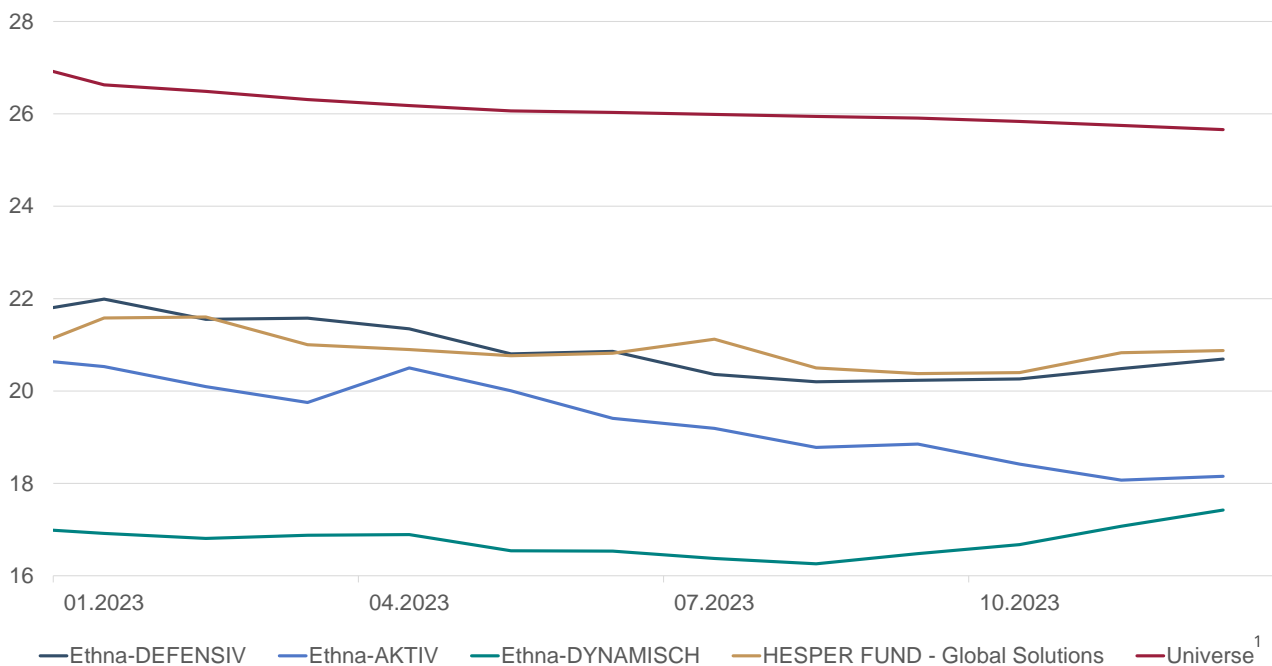
Among the funds managed by ETHENEA, the Ethna-DYNAMISCH and the HESPER Fund - Global Solutions were able to significantly improve their ESG risk profile in the past financial year. The other two funds, Ethna-AKTIV and Ethna-DEFENSIV, remained at a good level. Our ESG risk analysis tools indicate that risks have been significantly reduced across all funds and are well below the level of the broader market.

The risk profile of each fund is calculated on the basis of the weighted average ESG risk rating for each company provided by Sustainalytics, a subsidiary of Morningstar. The ESG risk rating takes into account a company's individual exposure to material ESG risks and includes the company's active

management of these risks in the final rating. Ratings of different sectors are thus directly comparable with each other, so that at portfolio level there is an informative value about the sustainability of the overall fund. Key factors here are: Corporate Governance, Product Governance, Business Ethics, Access to Basic Services, Human Capital, Bribery and Corruption, Emissions, Effluents and Waste, Occupational Health and Safety.

A strong ESG risk rating underlines that material ESG risks have been systematically mitigated at individual security level. It is clear that the efforts towards sustainability in recent years have been extremely successful and are now beginning to bear fruit.

ESG risk profile



Source: Sustainalytics; own calculations

¹ The average ESG Risk Score of all companies in Sustainalytics' research universe.

External view of our portfolios

Our internal risk analyses reflect the positive development of our ESG risk profiles, which are also regularly confirmed by external, independent bodies. We work in close collaboration with Morningstar, which offers sustainability screening and ratings for a broad universe of mutual funds. This increases the transparency of our sustainability approach and makes it easier for existing and new investors to compare our products with those of our competitors.

Ethna-DYNAMISCH has a rating of five globes in the Morningstar Sustainability Rating at the time of this publication. The Ethna-AKTIV is rated four out of five globes by Morningstar. The funds Ethna-DEFENSIV and HESPER FUND – Global Solutions have been rated three out of five possible globes by Morningstar.

The ratings are interpreted as follows: Accordingly, 10% of the funds analysed with the lowest ESG risks have a five-globe rating, the next 22.5% of funds with below-average ESG risks receive four globes, and the next 33% receive an average three-globe rating. This is followed by the 22.5% of funds with above-average risk, which receive a rating of two globes; the 10% of funds with the highest ESG risks receive a rating of one globe.

Correspondingly, the Ethna Funds Ethna-AKTIV and Ethna-DYNAMISCH, fall into the top third of the most sustainable mutual funds. The Ethna-DEFENSIV and the HESPER FUND - Global Solutions are rated in the midfield. Looking ahead, the objective of the portfolio management team is to maintain the top rankings and to improve the average rankings.

				
3 years	★★★★★	★★★★★	★★★	★★★
5 years	★★★★★	★★★★★	★★★	—
10 years	★★★★★	★★★★	★★★	—
Overall	★★★★★	★★★★★	★★★	★★★
Morningstar Sustainability	 Out of 2 490 "Europe Fixed Income" funds as of 31.12.2023. Based on 92.88% eligible corporate AUM and 100% of eligible sovereign AUM. Data is based on long positions only.	 Out of 5 964 Cautious Allocation funds as of 31.12.2023. Based on 87.98% eligible corporate AUM and 100% of eligible sovereign AUM. Data is based on long positions only.	 Out of 5 707 Moderate Allocation funds as of 31.12.2023. Based on 97.04% eligible corporate AUM and 100% of eligible sovereign AUM. Data is based on long positions only.	 Out of 109 Macro Trading EUR funds as of 31.12.2023. Based on 92.52% eligible corporate AUM and 100% of eligible sovereign AUM. Data is based on long positions only.

Source: Morningstar. As of: 31.12.2023

ESG qualifications

In a context of growing social, environmental and regulatory challenges, it is becoming increasingly important to integrate ESG information into the investment process chain and to assess opportunities and risks in this context. And at the same time, the World Economic Forum reports that insufficient training in ESG is one of the biggest obstacles to integrating sustainability criteria into investment decisions. Consequently, two portfolio managers decided to train as EFFAS Certified Environmental, Social and Governance Analyst® (CESGA) in 2021. Another portfolio manager obtained the Certificate in ESG Investing from the CFA Institute in 2023.

The professional development programmes are designed to address social and environmental challenges by providing the necessary training for assessing, measuring and integrating ESG issues into investment decisions. [CESGA®](#) combines ESG expertise and fundamental company analysis at an academic level and covers the following topics, including:

- Integration of ESG criteria into the investment process chain.
- A systematic analysis of different ESG investment approaches.
- Evaluation of various ESG reporting standards.
- Responsible investing in diverse asset classes.
- Integration of ESG factors into valuation models.

The Certificate in ESG Investing from the CFA Institute expands the CESGA® programme to include the following topic areas:

- Engagement and stewardship
- ESG-integrated portfolio construction and management
- Client reporting



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Portfolios

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Product classification under the Transparency Regulation (SFDR)

To establish more solid and objective criteria for assessing the sustainability of individual investment products, the European Union has enacted the Sustainable Finance Disclosure Regulation (SFDR), which has been in force since 10 March 2021. The prime objective of this EU Regulation is to provide the transparency and comparability that was previously lacking. Even though the Regulation was not fully implemented right from the start and

further important ESG-relevant provisions such as the EU taxonomy and adjustments to the MiFID II Directive will follow, it can undoubtedly be seen as agenda-setting for investment funds.

Initially, the most visible distinguishing feature for all funds will be the classification based on their ESG strategy, with all mutual funds having to decide on one of the following three product categories:

Article 6	Article 8	Article 9
<p>Article 6 funds are normal funds that do not pursue an explicit sustainability strategy.</p>	<p>Article 8 funds pursue a sustainability strategy. In doing so, the companies in which investments are made must apply good governance practices (G) and the fund's investment process must take into account environmental (E) and/or social (S) characteristics.</p>	<p>Article 9 funds pursue sustainable investments, often referred to as impact strategies. This requires the pursuit of a specific sustainability objective, such as the reduction of CO₂ emissions.</p>

At ETHENEA, both the three Ethna Funds and the HESPER FUND - Global Solutions are classified as Article 8 funds under the Sustainable Finance Disclosure Regulation. This reaffirms our resolve to offer our clients responsible investment solutions

with a competitive and sustainable return. ESG is and will remain a cornerstone. Furthermore, we thereby ensure that our funds can continue to serve as a core investment in our investors' allocation.

Product classification according to target market definition (MiFID II)

The regulation 2021/1253 of the EU Commission regulates the definition of sustainability of a financial instrument as an extension of the MiFID II Regulation. Accordingly, a sustainable instrument should, roughly summarised, fulfil one of the following three criteria:

- Minimum proportion of environmentally sustainable investments in the Taxonomy Regulation (2020/852),
- Minimum proportion of sustainable investments as defined in the EU Disclosure Regulation (2019/2088),
- Consideration of Principal Adverse Impacts on sustainability factors (also called PAIs).
- At ETHENEA, we have decided to comply with the latter point ([ETHENEA statement on adverse sustainability impacts](#)).



In doing so, we go one step further and base our practical implementation on an industry standard. The German Banking Industry Committee (GBIC), together with the German Investment Funds Association (BVI) and the German Derivatives Association (DDV) have developed a common

standard for the determination of the target markets for securities, which is also gaining increasing interest in other European markets.

All investment assets managed by ETHENEA therefore take into account:

- a dedicated ESG strategy,
- the standard PAIs on environmental and social issues,
- the minimum exclusions defined by the associations, as well as
- a recognised industry standard (UN PRI).

In line with this, the portfolio management is committed to complying with comprehensive minimum exclusions of critical investments and to systematically integrating sustainability aspects into the investment process. This may be done, for example, by exercising voting rights, actively exercising shareholders' or creditors' rights and/or through dialogue with issuers. The portfolio management also pursues a dedicated ESG investment strategy, which is described in more detail hereinafter.

ESG investment process in detail

The portfolio management regards the integration of ESG criteria as an integral part of the investment process; accordingly, ESG factors are taken into account in every investment decision. To ensure that the necessary ESG standards and criteria are applied at every level of portfolio construction, the portfolio management pursues a standardised ESG analysis and decision-making process. If there is any deviation from the defined process, the portfolio manager is required to obtain the consent of the ESG Committee.

The ESG investment approach consists of a three-step process. Information from external service providers is included in addition to internal research.

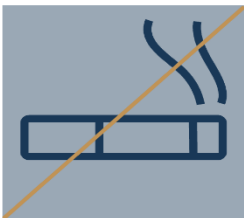


1. Exclusion procedure

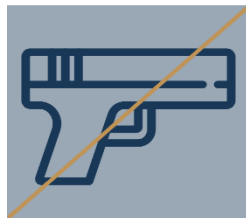
When selecting securities, we exclude companies that do not meet our understanding of minimum standards for a sustainable business model (“negative screening”). To that end, we have developed investment exclusion criteria. These criteria apply to companies whose core activities include the production of or trade in arms, tobacco, pornography, staple food speculation and coal. However, the possibility of the fund investing in large, internationally active conglomerates (such as Siemens) whose customers include the military cannot be ruled out.

Furthermore, we do not invest in companies that have been found to be in serious breach of the principles of the UN Global Compact and have no convincing plan in place to remedy the situation.

In the case of sovereign issuers, we exclude investments in countries that have been designated as “Not Free” in the annual analysis carried out by Freedom House (www.freedomhouse.org).



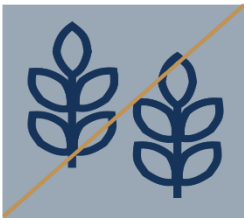
Tobacco



Armor



Coal



Staple food



Pornography

2. ESG risk assessment

The portfolio management team then forms an opinion on the main sustainability risks associated with an investment. In its investments, the portfolio management gives preference to companies that already have low exposure in terms of significant ESG risks and can therefore be described as non-critical, or that actively manage and thus reduce the ESG risks inevitably associated with their business activities.



The portfolio management has access to [Sustainalytics](#) to assess the ESG risks relevant to the individual companies. The risk assessment can be carried out objectively, quickly and efficiently for a large investment universe by working with an external service provider. Sustainalytics sums up the results of its analysis in an ESG risk score ranging from 0 to 100.

Objectively verifiable criteria have been established for each of the funds managed by ETHENEA. Based on the ESG risk score provided by Sustainalytics, the

funds aim to achieve at least a medium ESG risk profile (score of under 30). Individual securities with high risks (score of over 40) are only considered for investment in justified exceptional instances, and must be supported by an active engagement process designed to improve the ESG risk profile of the investment. Individual securities with serious risks (ESG risk score greater than 50) are fundamentally excluded.

If less than 51% of the fund's company-related direct investments are included in an ESG risk score calculated by Sustainalytics, the portfolio managers must prepare their own analyses with comparable results or select alternative investments with an existing ESG risk score. Investments (e.g. IPOs for equities, new bond issues) are sometimes not covered by Sustainalytics. In this case as well, portfolio managers are required to conduct their own analyses in order to remain in compliance with the ESG process.

Example of an in-house ESG analysis



Rewe International Finance BV
 REWE-Zentralfinanz eG (Garant)
REWEEG 4.875 09/13/23, XS2679898184
 Last revised September 22, 2023

Fixed Income
Retail trade
 Germany

Roadshow: Company presentation 01 September 2023 (recording), first bond issue of the company.

ESG RISK RATING

REWE has set itself measurable targets in all areas of E, S and G, which are aligned with the UN Sustainable Development Goals: 2) No Hunger, 5) Gender Equality, 7) Affordable & Clean Energy, 8) Decent Work and Economic Growth, 12) Sustainable Consumption and Production, 13) Climate Action, 14) Life Below Water, 15) Life on Land.

REWE Group has selected data from its sustainability reporting audited by KPMG in accordance with GRI standards with limited assurance. Audited parts of the report are labelled. The carbon footprint is calculated and checked by external service providers: for Germany by INFRAS AG, for Austria and CEE by denkstatt GmbH.

Environment

Climate targets agreed in line with the SBTi initiative, accession 2023, validation 2024.

Social

REWE also sells tobacco and pornographic products in its stores, but does not provide any information on the share of sales. Sustainability estimates sales of tobacco at < 1% and pornography at < 0.1% for other retailers. There is no reason to estimate different volumes for REWE.

REWE merchants are independent companies with the legal form of a general partnership (OHG). Collective bargaining coverage is generally established by a company joining an employers' association. Membership is the autonomous decision of the independent REWE retailers. The merchants must commit themselves to minimum standards in personnel matters towards REWE Group. Naturally, this includes compliance with all laws, e.g. regarding the minimum wage. It should be possible to implement improvements and more specific requirements.

Governance

The Executive Board consists entirely of independent members, while the Supervisory Board is made up of members and employees.

→ Investment can be made. Monitoring necessary.

	+	/	-
ENVIRONMENT			
Oil & Gas energy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Coal energy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Nuclear energy	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Environmental damages	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SOCIAL			
Gambling	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Adult Entertainment	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Tobacco	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Weapons	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Controversial weapons	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Labor rights	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Child labor	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Human Rights	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
GOVERNANCE			
Corruption / Bribery	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Disclosure	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Shareholder structure	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Supervisory Board structure	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

MARKET DATA (millions of EUR, 2022)

Market cap	Not listed	Revenue	77,200
Free float (%)	private	Ebitda	4,778

SHAREHOLDER	Position	% Out
Co-operative, 1800 independent dealers		

DESCRIPTION

REWE Group is an internationally active group of companies in the retail and tourism sector. The company is proud of its co-operative structure: the Supervisory Board, shareholders, merchants and Management Board are committed to this structure as a guarantee of independence and self-determination. REWE Group is headquartered in Cologne, employs 384,000 people across Europe, is present in 21 European countries and generates a turnover of 77.2 billion euros. REWE Group consists of six business segments: Retail Germany, Retail International, Convenience, DIY, Tourism and Other. These include numerous brands such as REWE, PENNY, BILLA, BIPA, Lekkerland, toom Baumarkt and DER Touristik.

SUSTAINABILITY REPORT

[REWE Group Sustainability Report 2022 - german.pdf](#)

+ = ESG-positive, N = ESG-neutral -- = ESG-negative

3. Engagement

Individual stocks with high ESG risks should be monitored with a targeted engagement process. With equity investments, the engagement process is implemented, for example, by exercising voting rights and actively exercising shareholder rights. For bond investments, creditor's rights can be exercised. In addition, the portfolio manager is obliged to actively engage in dialogue with the company's management to align the sustainability goals, to question them critically and, if necessary, to make suggestions for improvement. This can be achieved in the case of a bond issue, for example, during roadshows, at press conferences and following the

presentation of quarterly or annual results, at conferences, directly on site at the company, in meetings and dialogues with company representatives or on an ad hoc basis via investor relations. In any case, it is essential to maintain active dialogue on current business developments, the future strategic direction of the company and sustainability aspects, especially for individual ESG-critical securities.

Monitoring portfolio compliance with the ESG criteria

The Risk and Data Management department prepares a daily report that is used to continuously monitor portfolio compliance with the ESG criteria. This includes all changes that Sustainalytics has made to the investments in the fund since the previous day. Particularly important here are changed ESG risk scores and reassessments of controversies and compliance with the UN Global Compact. Existing investments may need to be reconsidered as a result of the change in assessment. The portfolio manager will promptly sell any investment that is placed on the exclusion list as a result of a change in assessment. If illiquidity or

other reasons make this impossible, or if it is economically very disadvantageous for the investors, an alternative procedure must be agreed in consultation with the ESG Committee.

The daily reports also provide information on the distribution of the ESG risk scores of the investments and their average value. This gives the portfolio manager a continuous overview of the quality of the portfolio in terms of sustainability. The report also covers information on investments whose ESG quality is not assessed by Sustainalytics.



Conclusion

The third ETHENEA Sustainability Report is designed to provide you, our valued investors, a transparent overview of the progress we have made, the goals we have reached and the contribution we have made on the path to more sustainable asset management. We hope that we have been able to provide you with a clear demonstration that sustainability is one of our key concerns, and that it is firmly anchored in our core beliefs and is an integral part of our corporate philosophy.

With this sustainability report, we have reached another milestone, but there is still much to do. The asset management industry is undergoing extremely dynamic development and investors justifiably expect the industry to take responsibility and make its contribution in a social and environmental context. Accordingly, the purpose of this sustainability report is more than just documentation; it will also be used for self-reflection and to help define future milestones on the journey towards more sustainable asset management.

ETHENEA has set itself the goal of continuing to expand the sustainability efforts implemented up to this point and to launch new initiatives. The objective must be to focus even more on sustainability without

compromising on fund performance. We will do everything in our power to maintain and, ideally, improve our top rankings in the various ESG fund ratings this year. We will always favour the more sustainable company if the risk-reward profile is equivalent. Critical securities that are not compatible with our sustainability approach are consistently excluded from our investment universe. It is also our declared ambition to maintain even closer contact with companies and to follow their progress closely.

Regulatory pressure and requirements for asset managers are becoming increasingly strict. ETHENEA has been taking the upcoming regulatory changes and transparency requirements under the EU taxonomy very seriously and is already looking at how to implement them as efficiently as possible. We want to lead by example in this area.

We will provide detailed, regular reports on the next steps to be taken as a result of the concrete implementation of the above-mentioned goals and on the further progress that has been made. ETHENEA's next sustainability report is scheduled for publication in 2025.

Your ETHENEA Team

Important notes

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This sustainability report fulfils the requirements of the EU directive on the publication of non-financial information. It describes ETHENEA's activities and the impact of ETHENEA's activities on people and the environment and documents relevant key performance indicators. The report covers the period from 1 January to 31 December 2023. All information relates to ETHENEA Independent Investors S.A. and the activities of ETHENEA's portfolio management.

The report is available on our website www.ethenea.com. Your feedback or questions about our sustainability report are very welcome. To do so, please send us an email to: info@ethenea.com

We would like to thank all our colleagues who were involved in the publication of this report!

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