ESG Methodology

Lupus alpha Sustainable Return

Target

Lupus alpha's corporate culture as an independent, owner-managed / partnership-based asset manager is clearly focused on sustainability. With Lupus alpha Sustainable Return we want to give our investors access to downside protection approaches – without compromising on sustainability. Therefore, the objective in this fund is to invest exclusively in stocks, stock options and bonds that meet the criteria mentioned below.

Responsible investing makes an important contribution to making capital investments sustainable. As an investor with a fiduciary mandate from our clients, we therefore want to make our contribution and only invest in companies that pay sufficient attention to certain sustainability criteria.

In this strategy, we apply sustainability filters that meet high standards and are based on the current FinAnKo¹ guidelines. We review the appropriateness of our ESG methodology in an annual review process. We document changes to the methodology internally.

Methodology

All investable companies (stocks or stock options) as well as bond issuers are classified according to environmental, social, ethical and governance criteria. The analysis includes social standards, environmental management, product portfolio and corporate governance. A comprehensive negative screening process excludes stocks that do not meet certain minimum standards. These apply to all shares and underlyings in the portfolio:

Environment:

- Revenue from nuclear power activities > 10%
- Share of nuclear power of total energy > 10%
- Extraction, exploration and services for oil sands & oil shale (shale gas)
- Revenue from exploration and production of oil & gas > 30%
- Revenue from mining & sales of thermal coal > 0%
- Revenue from energy production from thermal coal > 10%
- Share of energy production from thermal coal > 10%

Social:

- Violations of the UN Global Compact
- Violations of international human rights conventions and inadequate response/appraisal of the company
- Violations of ILO core labour standards in the company and the supply chain and inadequate response/appraisal of the company

¹ Richtlinie Ethische Geldanlagen der Österreichischen Bischofskonferenz und der Ordensgemeinschaften Österreich

Lupus alpha

Governance

- Very severe controversies
- Ongoing, structural and severe controversies
- Violations of international corruption conventions and poor response/appraisal of the company

Ethics

- Production/distribution/services of cluster munitions, anti-personnel mines and other controversial weapons
- Production of nuclear weapons or systems used for their transport etc.
- Revenue from production & distribution of military goods > 10%
- Production of tobacco
- Revenue from distribution of tobacco > 10%
- Revenue from production, distribution etc. of alcohol > 10%
- Revenue from gambling > 10%
- Breast milk substitutes
- Stem cell research with human embryos
- Companies related to abortion (also hospitals)
- Turnover from production, distribution etc. of contraceptives > 10%
- Production of pornographic content
- Turnover from distribution of pornographic content > 10%
- Revenue from activities involving genetic manipulation of plants, food etc. > 5 %
- Production, distribution etc. of fur
- Animal testing for non-medical purposes
- Commercial/industrial (mass) animal husbandry for the purpose of food production or fur farming
- Revenue from production of biocides > 5%
- Sector:
 - o Interactive Home Entertainment / Video Games
 - Home Entertainment Software

Both the aforementioned revenue limits and norm-based violations / controversies are reviewed with the help of our external research provider MSCI. Companies for which MSCI has not yet produced an analysis are reviewed internally. Information provided by MSCI is also reviewed internally.

Best-In-Class for stock selection

All companies that do not violate any of the aforementioned exclusion criteria are basically eligible for investment. However, the selection and weighting of individual stocks is based on a best-in-class approach. This means that companies with a better ESG rating tend to be weighted higher in the portfolio than companies with a worse ESG rating.

Engagement

Voting rights arising from the stocks in the portfolio are actively exercised at the general meetings. For this purpose, either an in-house process is used, or an external service provider is commissioned. When exercising voting rights, we follow the FinAnKo guidelines as closely as possible.



Use of derivatives

The portfolio management commits to only use derivatives for hedging purposes.

Developer of the strategy, users and data used

The strategy / methodology described above was developed by Lupus alpha. The portfolio management team is responsible for stock selection and compliance with ESG criteria. External specialised data providers for sustainability research, in particular MSCI and Bloomberg, are also used as part of the ESG analysis:

https://www.msci.com/msci-esg-manager

https://www.bloomberg.com/professional/solution/esg/

For more information on the topic of sustainability at Lupus alpha, please visit https://www.sustaina-bility.lupusalpha.com/.

| Date | Version | Description |
|------------|---------|---------------------|
| 25.10.2021 | 1.0 | Start of versioning |

DISCLAIMER:

This fund information is provided for general information purposes. This information is not designed to replace the investor's own market research nor any other legal, tax or financial information or advice. The information presented does not constitute an invitation to buy or sell or investment advice. It does not contain all key information required to make important economic decisions and may differ from information and estimates provided by other sources or market participants. We accept no liability for the accuracy, completeness or topicality of this information. All statements are based on our assessment of the present legal and tax situation. All opinions reflect the current views of the portfolio manager and can be changed without prior notice. Full details of our funds and their licenses of distribution can be found in the relevant current sales prospectus and, where appropriate, Key Investor Information Document, supplemented by the latest audited annual report and/or half-year report. The relevant sales prospectus and Key Investor Information Documents prepared in German are the sole legally binding basis for the purchase of funds managed by Lupus alpha Investment GmbH. You can obtain these documents free of charge from Lupus alpha Investment GmbH, P.O. Box 1112 62, 60047 Frankfurt am Main, Germany, upon request by calling +49 69 365058-7000, by e-mailing service@lupusalpha.de or via our website www.lupusalpha.de. If funds are licensed for distribution in Austria the respective sales prospectus, Key Investor Information Document and the latest audited annual report or half-year report are available from the Austrian paying and information agent UniCredit Bank Austria AG based in Rothschildplatz 1, 1020 Vienna, Austria. Fund units can be obtained from banks, savings banks and independent financial advisors.

ither this fund information nor its contents or a copy thereof may be amended, reproduced or transmitted to third parties in any way without the prior written consent of Lupus alpha Investment GmbH. By accepting this document, you declare your consent to comply with the aforementioned provisions. Subject to change without notice.

Lupus alpha Investment GmbH Speicherstraße 49–51 D-60327 Frankfurt am Main