

## Nachhaltigkeitsbezogene Offenlegungen

### Name des Produkts:

Raiffeisen-Nachhaltigkeit-Momentum (ein Anlagefonds von Raiffeisen Capital Management Österreich) (R)

(ein Anlagefonds von Raiffeisen Capital Management Österreich)

ISIN ausschüttend (A): AT0000A1PKQ1 ISIN thesaurierend (T): AT0000A1PKP3 ISIN vollthesaurierend (V):

AT0000A20EY5 ISIN vollthesaurierend (W): AT0000A2NWC9

**Unternehmenskennung (LEI-Code):** 529900QK6MEXFY248Z50

Das Produkt (der Fonds) wird von der Raiffeisen Kapitalanlage-Gesellschaft m.b.H. als Verwaltungsgesellschaft verwaltet. Fondsmanager: Raiffeisen Kapitalanlage-Gesellschaft m.b.H.

### Zusammenfassung

Der Fonds berücksichtigt im Zuge der Veranlagung ökologische und soziale Merkmale (Art. 8 Verordnung (EU) 2019/2088 / Offenlegungsverordnung).

Mit diesem Finanzprodukt werden ökologische und soziale Merkmale beworben, aber keine nachhaltigen Investitionen angestrebt.

Der Fonds berücksichtigt im Zuge der Veranlagung ökologische und soziale Merkmale, wie insbesondere Klimawandel, Naturkapital & Biodiversität, Umweltverschmutzung und Abfall, ökologische Verbesserungsmöglichkeiten (wie grüne Technologien und erneuerbare Energien), Humanressourcen, Produkthaftung & -sicherheit, Beziehung zu Interessensgruppen und soziale Verbesserungsmöglichkeiten (wie Zugang zu Gesundheitsversorgung). Eine gute Unternehmensführung ist Voraussetzung für eine Veranlagung. Es besteht keine Beschränkung auf bestimmte ökologische oder soziale Merkmale. Zur Erreichung der beworbenen ökologischen oder sozialen Merkmale wurde kein Referenzwert bestimmt.

Die Anlagestrategie umfasst im Hinblick auf ESG („environment“, „social“, „governance“) verbindliche Negativkriterien, eine umfassende nachhaltigkeitsbezogene Analyse und die Konstruktion der Portfolios unter Berücksichtigung der ESG Bewertung und des ESG Momentums. Dabei wird besonders hoher Wert auf die Qualität des Unternehmens und des Geschäftsmodells gelegt. Ein hoher Grad an Nachhaltigkeit und fundamentaler Stärke sind ausschlaggebend für eine Veranlagung.

Der Mindestanteil nachhaltiger Investitionen beträgt 51 %.

Die Entwicklung des Nachhaltigkeitsindikators (siehe dazu unter „Methoden für ökologische oder soziale Merkmale“) wird zum Ende des Rechnungsjahres überprüft und im Rechenschaftsbericht des Fonds ausgewiesen.

Im Rahmen des internen Limitsystems wird der MSCI ESG Score laufend überwacht und gegen definierte Grenzen im Hinblick auf die Bewertung von ökologischen und/oder sozialen Merkmalen geprüft.

Die definierten Negativkriterien werden auf täglicher Basis im Rahmen des internen Limitsystems geprüft.

Die Verwaltungsgesellschaft bedient sich zu Risikomanagementzwecken, Überprüfung von Negativkriterien, Bewertung von Kontroversen und Auswertungen zur EU-Taxonomy und zu den wichtigsten nachteiligen Auswirkungen auf Nachhaltigkeitsfaktoren Daten von MSCI ESG Research Inc. und Institutional Shareholder Services. Die von den Datenanbietern bezogenen Daten werden in einem qualitätsgesicherten monatlichen Prozess in die Systeme der Verwaltungsgesellschaft eingespielt. Die Sicherung der Datenqualität erfolgt durch

regelmäßiges Monitoring der eingespielten Dateien sowie Durchführung von Plausibilitätschecks.

Teilweise ist die Offenlegung von Daten durch Unternehmen eingeschränkt, was die Notwendigkeit von Datenschätzungen zur Folge hat. Datenanbieter schätzen daher regelmäßig Datenpunkte, wobei Abdeckungsgrad und Methodik laufend verbessert werden.

Aufgrund solider Methoden und hohem Abdeckungsgrad hinsichtlich des Investmentuniversums ist die Erfüllung der mit dem Finanzprodukt beworbenen ökologischen oder sozialen Merkmale nicht durch Beschränkungen der Methoden oder Datenquellen gefährdet. Insgesamt ist der Abdeckungsgrad der Datenanbieter im Hinblick auf das Investmentuniversum sehr hoch. Für einzelne Prozesse der Verwaltungsgesellschaft wurden Mindestabdeckungsgrade festgelegt, die im Regelfall deutlich überschritten werden.

Die Verwaltungsgesellschaft hat gemäß § 30 InvFG im besten Interesse des Fonds und der Marktintegrität bei der Auswahl und der laufenden Überwachung der Anlagen besondere Sorgfalt walten zu lassen. Die Veranlagungen des Fonds werden systemmäßig laufend im Hinblick auf die Einhaltung der Fondsbestimmungen kontrolliert. Ebenso werden die Berücksichtigung der ökologischen und / oder sozialen Merkmale und die Nachhaltigkeitsrisiken laufend kontrolliert. Darüberhinaus wird die Einhaltung der Fondsbestimmungen im Zuge der Veranlagungen extern durch die Depotbank laufend und durch den Wirtschaftsprüfer im Zuge der Rechnungsprüfung kontrolliert.

Die Raiffeisen KAG betreibt aktives Engagement mit Unternehmen, um die Interessen ihrer Kunden bestmöglich zu wahren. Weitere Information zur Mitwirkungspolitik inklusive der Grundsätze der Stimmrechtsausübung sowie den jährlichen Engagementbericht finden Sie auf unserer Website [www.rcm.at](http://www.rcm.at) bzw. [www.rcm-international.com](http://www.rcm-international.com) unter Corporate Governance

Der Fonds wird hinsichtlich der Erreichung der ökologischen und sozialen Merkmale nicht an einem Referenzwert gemessen.

## **No sustainable investment objective**

This financial product promotes environmental and social characteristics, but is targeting no sustainable investments. The minimum share of sustainable investments is 51 % of the fund assets.

### **How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?**

To avoid significant adverse impacts on an environmental or social sustainable investment objective, securities that violate negative criteria as defined by the management company for this purpose and relating to environmental and social objectives (such as the extraction and use of coal, labour rights violations, human rights violations, and corruption) do not qualify as a sustainable investment. Details on how negative criteria are handled can be found in the section "What investment strategy does this financial product follow? / What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?".

### **How have the indicators for adverse impacts on sustainability factors been taken into account?**

The consideration of the principal adverse impacts of investment decisions on sustainability factors occurs through the negative criteria specified below, through the integration of ESG research into the investment process (ESG scores), and in security selection (positive criteria). The use of positive criteria includes the absolute and relative assessment of companies regarding stakeholder-related data, e.g. relating to employees, society, suppliers, business ethics, and the environment. In addition, the instrument of shareholder engagement is used with companies in the form of corporate dialogue and especially the exercise of voting rights so as to reduce adverse sustainability impacts. These shareholder engagement activities are conducted irrespective of any concrete investment in the respective company. The table shows the topics for which sustainability scores for adverse impacts are considered in particular, as well as the main methods that are applied. For information on the principal adverse impacts on sustainability factors, please also refer to the annual fund reports where applicable (annex "Environmental and/or Social Characteristics").

### **How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:**

The positive and negative criteria contained in the investment strategy as listed below cover all aspects of the OECD Guidelines for Multinational Enterprises (such as avoidance of environmental destruction, corruption, and human rights violations as well as adherence to the core ILO labour standards). The fund management continuously monitors various channels of information such as the media and research agencies to determine whether investments are affected by serious controversies.

In addition, the fund assets are assessed for potential violations of the OECD Guidelines for Multinational Enterprises by means of a screening tool from a recognised ESG research provider. A company that does not comply with the OECD Guidelines for Multinational Enterprises is not eligible for investment. A violation is assumed to exist if a company is involved in one or more controversial incidents in which there are credible allegations that the company or its management has caused substantial damage of a significant scope in violation of global standards.

## Environmental or social characteristics of the financial product

### What environmental and/or social characteristics are promoted by this financial product?

The fund takes environmental and social criteria into consideration for investment, in particular climate change, natural capital & biodiversity, pollution and waste, environmental improvement opportunities (such as green technologies and renewable energy), human resources, product liability & safety, stakeholder relations and social improvement opportunities (such as access to healthcare). Corporate governance as well as entrepreneurial behaviour & business ethics (overall "good governance") are in any case prerequisites for an investment in securities/money market instruments issued by companies. There is no limitation to specific environmental or social characteristics.

Raiffeisen Kapitalanlage-Gesellschaft m.b.H. / the management company is embedded in the sustainability strategy of RBI Group (Raiffeisen Bank International AG) as an asset manager of this group. The management company understands sustainability to mean responsible corporate action for long-term business success, in harmony with environmental and social objectives. Sustainability is a core component of its business policy. Its actions are based on the commitment to being a responsible fund manager, fair partner, and good corporate citizen.

Sustainability in the investment process is achieved through the consistent integration of environmental, social and governance (ESG) criteria. In addition to economic factors, these also include traditional criteria such as profitability, liquidity and security, but also environmental and social factors and (good) corporate governance, which are all integrated into the investment processes.

This investment policy serves to reduce sustainability risks, to take into consideration the principal adverse impacts of investment decisions on sustainability factors, and to encourage the establishment of sustainability goals.

1. Avoidance and show responsibility: negative criteria to exclude controversial sectors and/or companies and countries (sovereigns) that violate the established criteria.
2. Support and empower sustainability by integrating ESG research into the investment process (ESG scores) for the evaluation of companies and ultimately for stock-picking (best-in-class approach). This is applied analogously to countries (sovereigns) as issuers of debt securities.
3. Influence and make an impact: "Engagement" as an integral component of a responsible and sustainable investment policy by means of initiating corporate dialogue and, in particular, exercising voting rights. The unification of all three elements – avoidance, support and, above all, influence – is required for the responsible, active management of sustainable funds.

The following criteria in particular are decisive here:

- Good financial development with a consistently high ESG level
- Positive influence in the area of sustainable development goals (SDG); these goals for sustainable development were established by the United Nations and unanimously adopted by 193 nations, and are also implemented by the Austrian Federal Government.
- Positive impact on sustainability factors as compared to the traditional market (carbon footprint calculation, work accidents, waste production and water consumption)
- Selection of companies with an above-average ESG assessment and positive development (ESG momentum).

No reference benchmark was designated for the achievement of the promoted environmental or social characteristics.

**What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

The Raiffeisen ESG indicator is used by the management company as an internal sustainability indicator. The management company continually analyses companies and sovereigns based on internal and external research sources. The results of this sustainability research are combined with a comprehensive ESG evaluation, including an ESG risk assessment, to create the so-called Raiffeisen ESG indicator. The Raiffeisen ESG indicator is measured on a scale from 0 to 100. The assessment also takes into account the relevant sector.

**What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?**

The objectives of the sustainable investments cover improvements in the areas of climate change, natural capital and biodiversity, pollution and waste, environmental improvement vectors (such as green technologies and renewable energy), human resources, product liability and safety, relationships with interest groups, and social improvement vectors (such as access to health care) compared with the traditional market. Good corporate governance, including business practices and business ethics, is a prerequisite for an investment in any case.

The sustainability of an economic activity is assessed on the basis of the internal Raiffeisen ESG corporate indicator. This indicator combines the following sustainability assessments from data providers:

- ISS ESG Corporate Rating
- MSCI ESG Score
- ISS SDG Impact Score
- MSCI Controversy Score

The Raiffeisen ESG corporate indicator is the corporate-specific iteration of the Raiffeisen ESG indicator and is also measured on a scale of 0 to 100. The assessment also takes into account the relevant sector.

It combines a wide range of data points relating to environmental, social, and governance (ESG) factors. In addition to sustainability opportunities and risks, the contribution that the business activity makes to sustainable objectives along the entire value chain is examined and transformed into qualitative and quantitative ratings. An important part of this is the sustainable influence of the respective products and/or services (economic activity).

Climate protection bonds, also called green bonds, serve to raise financing for environmental projects. These are categorised as sustainable investments if the issuer is not excluded from investment based on the investment criteria listed below under "What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?" and if they comply with the Green Bond Principles of the International Capital Markets Association or the EU Green Bond Principles.

The financed projects normally fall into the following categories:

- Renewable energy,
- Energy efficiency,
- Sustainable waste management,
- Sustainable land use,

- Clean transport,
- Sustainable water management, or
- Sustainable buildings.

The project assessment generally includes an evaluation of whether there are material adverse impacts on environmental or social objectives.

## Investment strategy

### What investment strategy does this financial product follow?

The three pillars of sustainability environment (E), social (S) and responsible corporate governance (G) form the basis of every investment decision. This is done at several levels in the investment process linking traditional financial analysis with ESG analysis.

The integrated approach pursued by Raiffeisen KAG starts with an analysis focusing on internal and external data and information:

A corporate and sovereign ESG indicator developed by the management company on the basis of internal and external ESG data forms the centerpiece of the investment strategy.

The first pillar of the Raiffeisen ESG indicator for corporate stocks focuses on internal assessments linked to the so-called "Zukunfts-Themen", reflecting an evaluation of the potential of sectors and subsectors from a sustainability perspective. At present, the Zukunfts-Themen specifically include energy, infrastructure, commodities, technology, healthcare/nutrition/wellbeing, circular economy and mobility.

Calculating the ESG corporate assessment is the second pillar of the investment process. This includes various scores from external partners, comprising a stakeholder assessment, an assessment of ESG risks, a corporate governance assessment, an assessment of controversies and an SDG assessment, as well as an assessment against the negative criteria defined by the management company. At this analysis level, a preselection is made of the overall investment universe.

In terms of sustainability, no company/issuer in this universe may violate the negative criteria established by the management company in order to avoid investments in controversial sectors and practices. The negative criteria are subject to constant monitoring and may be amended or adjusted on the basis of new information and developments on the market. Negative criteria may have various backgrounds. Specifically, the management company differentiates between negative criteria that are related to the environment, social or socially motivated, connected with corporate governance, or linked to the theme "addiction", and negative criteria that are related to the preservation and dignity of natural life respectively (simply referred to as the theme "natural life"). Criteriology also serves to avoid scandals and the related, potentially negative adverse effects on prices.

Negative criteria do not necessarily mean the total exclusion of a sector or a business practice. In some cases, thresholds are established in consideration of the significance.

Some of the negative criteria mentioned are typically not discovered until after the occurrence of an event (for example, accusations of manipulating balance sheet figures) and therefore support the estimation of future behavior for an investment decision.

The third pillar in the corporate segment is the engagement rating, which involves a combination of three dimensions:

1. the intensity and form of engagement
2. communication

This assesses the company's willingness to respond to questions raised by the management company, the frequency of communication and the swift and timely response to these questions.

3. the impact of the engagement

This is an assessment of the company's implementation of its engagement objectives.

Where reputational risks are identified in the context of the engagement process, the company will be excluded from any investment. If engagement did not yet occur, the company is rated neutral.

At the end of the "green path", a broadly diversified portfolio is constructed from the selected companies and sovereigns on the basis of the above analyses, taking into account the ESG indicator, its development (ESG momentum) and fundamental aspects. During this process, particular importance is placed on the quality of the company and the business model. A high degree of sustainability and fundamental strength are of crucial importance for an investment.

For Details on the investment policy and the investment objective of the Fund, please see Section II / Item 13 of this Prospectus.

**What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?**

Derivative instruments that may enable or support speculative deals with food commodities are excluded from purchase altogether.

The management company aspires to resolutely withdraw from the financing of the coal industry by 2030. This includes all investible companies that are active in the field of coalmining, coal processing, coal burning (for the production of electrical or thermal energy), coal transport and other infrastructure. In the sustainable investment process, no investment whatsoever is allowed in coal production.

Negative criteria for companies:

Environmental negative criteria (category "E")

- Coal: production, mining, processing and use, and other related services
- Extraction of oil and gas (including high-volume fracking and extraction of oil sands)
- Nuclear energy: producers of nuclear energy and uranium; services in connection with nuclear energy production
- Massive destruction of the environment

Social negative criteria (category "S")

- Violation of human rights
- Infringement of labor laws (according to the protocol of the International Labour Organization)
- Use of child labor

Corporate governance negative criteria (category "G")

- Corruption
- Balance sheet manipulation
- Violation of the United Nations Global Compact criteria

Negative criteria relating to the theme "addictions"

- Alcohol: producers of beverages with a high alcohol content
- Gambling: in particular controversial forms
- Tobacco: producers of end products

Negative criteria relating to the theme “natural life”

- Abortion: pharmaceuticals and clinics
- Embryo research
- Green gene technology: producers
- Pornography: producers
- Animal testing (except where legally provided for)
- Defense supplies: producers of weapons (systems) and banned weapons; dealers of conventional weapons, producers of other defense supplies; dealers of banned weapons

For violations of negative criteria by companies that are not obvious, such as moderate infringement of labor laws or cases of corruption, the fund management initiates a so-called engagement process with the company. During this process, it is examined as to how the company reacts to the case and which precautions will be taken in the future. Then the fund management decides on whether to keep the position in the fund or sell it off.

For severe violations, the securities are generally sold at the management company’s discretion within a period of 14 days.

### **What is the policy to assess good governance practices of the investee companies?**

In the investment process, good corporate governance is assessed based on the application of negative criteria, the integration of ESG research into the investment process (ESG scores) for the evaluation of companies, and ultimately in security selection (best-in-class approach), as well as through the continuous monitoring of the governance-related score of the fund.

### **Required information according to Article 6 of Regulation (EU) 2020/852 (Taxonomy Regulation)**

The minimum share of investments in environmentally sustainable economic activities within the meaning of the Taxonomy Regulation is 0%. The principle of “not significantly harming” is only applied to the underlying investments of the financial product that take the EU criteria for environmentally sustainable economic activities into account. The remaining underlying investments of this financial product do not take the EU criteria for environmentally sustainable economic activities into account.

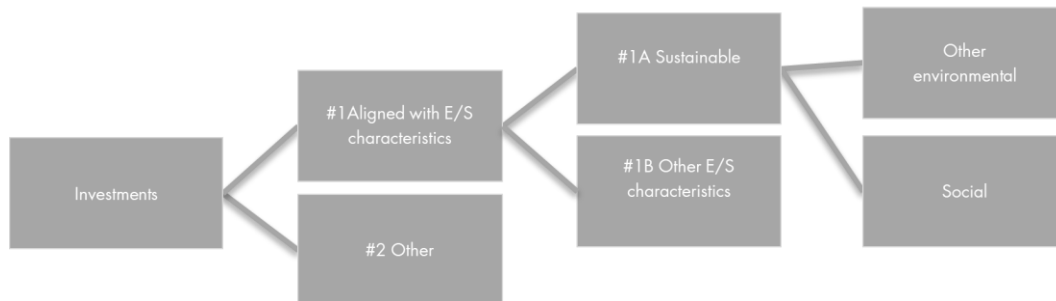
## **Proportion of investments**

### **What is the asset allocation planned for this financial product?**

All securities in which the fund invests comply with the principles described under investment strategy. Raiffeisen Sustainable Momentum is an equity fund that pursues long-term capital growth subject to higher risks. It invests at least 51 % of the fund assets in equities and equity-equivalent securities. At the individual stock level (i.e. not including units in investment funds, derivative instruments and sight deposits or deposits at notice), it exclusively invests in securities and/or money market instruments whose issuers have been classified as sustainable on the basis of social, environmental and ethical criteria. The fund will not invest in certain sectors such as the arms industry or the genetic engineering of crops as well as in companies which violate labor and human rights, etc. The bonds and money market instruments featured in the fund may be issued by sovereigns, supranational issuers and/or companies, etc.

The fund takes environmental and social criteria into consideration for investment. Sustainability in the investment process is achieved through the consistent integration of environmental, social and governance (ESG) criteria.





#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category #1 Aligned with E/S characteristics covers:

-The sub-category #1A Sustainable covers sustainable investments with environmental or social objectives

-The sub-category #1B Other E/S characteristics covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

## Monitoring of environmental or social characteristics

The attainment of the environmental and/or social characteristics promoted by the fund is continuously monitored against defined limits as part of the internal limit system.

The development of the sustainability indicator (see “Methods for environmental or social characteristics” for more information) is reviewed at the end of the accounting year and presented in the annual report of the fund (available at <https://www.rcm.at/at-de/global/fonstdokumente>, or in the case of registration in other countries at [www.rcm-international.com](http://www.rcm-international.com) on the website of the respective country in the section “Prices and Documents”, or in the case of special funds provided in the manner agreed with the investor).

The relevant negative criteria for the fund (see the annex “Environmental and/or Social Characteristics” to the prospectus or the Information for Investors pursuant to § 21 AIFMG, available at <https://www.rcm.at/at-de/global/fonstdokumente/>, or in the case of registration in other countries at [www.rcm-international.com](http://www.rcm-international.com) on the website of the respective country in the section “Prices and Documents”, or in the case of special funds provided in the manner agreed with the investor) are checked daily within the scope of the internal limit system.

In terms of any minimum share of sustainable investments with an environmental objective within the meaning of the EU Taxonomy (Regulation [EU] 2020/852), the share is not verified by an auditor or other third party.

## Methodologies for environmental or social characteristics

The management company continually analyses companies and sovereigns based on internal and external research sources. The results of this sustainability research are combined with a comprehensive ESG evaluation, including an ESG risk assessment, to create the so-called Raiffeisen ESG indicator. The Raiffeisen ESG indicator is measured on a scale from 0 to 100. The assessment also takes into account the relevant sector. The development of the Raiffeisen ESG indicator as the sustainability indicator is shown in the annual report of the fund (available at <https://www.rcm.at/at-de/global/fonstdokumente/>, or in the case of registration in other countries at [www.rcm-international.com](http://www.rcm-international.com) on the website of the respective country in the section “Prices and

Documents”, or in the case of special funds provided in the manner agreed with the investor).

As part of the internal limit system, the MSCI ESG Score is monitored continuously and checked against defined limits in terms of the promotion of environmental and/or social characteristics. In this scoring model of MSCI ESG Research Inc., aspects of ESG risk and the related risk management at the company in question are assessed in particular on the basis of key sustainability performance indicators (KPIs). The assessment results in the so-called MSCI ESG Score, which is measured on a scale of 0 to 10. The assessment also takes into account the relevant sector.

## Data sources and processing

The ESG assessment in the management company’s sustainability process is based on internal and external research sources. Two external data providers augment the internal research.

The research input from the management company’s fund managers focuses on high-value, quality growth of the companies. A company’s potential value add for the environment and society is analysed and also discussed within the framework of engagement talks.

The two external data providers employ complementary ESG research approaches and provide distinct input variables for the analysis.

The first approach, applied by the research provider Institutional Shareholder Services, is based on a comprehensive stakeholder and sustainability analysis of the company in question, using a methodology which draws on the Frankfurt-Hohenheim Guidelines.

The second approach, applied by the research provider MSCI ESG Research Inc., especially analyses aspects of ESG risk and the related risk management at the company in question on the basis of key sustainability performance indicators (KPIs).

The analysis is adjusted for sectoral conditions so that companies can be assessed on an equal basis and the aspects relevant for each company are taken into account.

When selecting funds that are not managed by the management company, data from the research providers MSCI ESG Research Inc. and Morningstar Deutschland GmbH are used.

The management company uses data from Institutional Shareholder Services to assess negative criteria, alignment with the EU Taxonomy, and the principal adverse impacts on sustainability factors as well as to evaluate controversies.

The management company uses data from MSCI ESG Research Inc. for the internal limit system and the identification of controversial business fields.

The data obtained from the research partners are imported into the systems of the management company via a quality-controlled monthly process. Especially for research processes, some data are also obtained directly through a web-based solution of Institutional Shareholder Services.

The data quality is ensured through the regular monitoring of the imported data and through plausibility checks.

The selection of data providers is based primarily on the degree coverage (in relation to the investment universe and the available data points), the methodology, and the usability of the data. In some cases, companies are limited in what information they can disclose and estimates need to be made. For this reason, data providers regularly estimate data points, with continuous improvements being made to the coverage and methodology. The management company itself makes no estimates of sustainability indicators. The need for estimates will

decrease continuously, in part due to the expansion of sustainability-related reporting obligations for companies, for example in relation to the criteria for the EU Taxonomy.

## Limitations to methodologies and data

The applied methodologies and relevant data sources are limited by the limited availability of relevant data. To mitigate these limitations, the research providers employed by the management company use a wide range of alternative data including media sources, recognised international and local non-governmental organisations, government authorities, and intergovernmental organisations.

A further limitation of the data stems from the time delay associated with the data and evaluation results. The involved companies generally release annual reports for the previous financial year, which means that the information contained in them is provided with a considerable delay. An additional delay can arise from the difference between the time at which the information is published by the company in question and the point in time at which these data are collected and processed by the data provider. Beyond this, the data providers make use of alternative data such as media reports, which are typically more current and are integrated on an ad hoc basis.

Forward-looking assessments naturally involve a certain degree of uncertainty, in part because declared obligations or strategies may not be fulfilled or executed as expected. The employed data providers apply robust methods to evaluate the credibility of obligations in terms of the future performance of the companies in question.

If companies are not covered by data providers, the management company prepares its own analysis based on publicly available information and in-house research. These ratings are used until the issuer has been evaluated by one of the data providers.

To assess sovereigns, the management company prepares its own assessment on the basis of publicly available information and data from data providers in addition to the assessment from the data providers, and incorporates this in its overall assessment.

In general, the data providers offer very high coverage of the investment universe. Minimum coverage levels were defined for individual processes of the management company, and these are usually exceeded by a wide margin.

Due to solid methods and high coverage with regard to the investment universe, the attainment of the environmental or social characteristics promoted by the financial product is not endangered by limitations of the methods or data sources.

## Due diligence

In accordance with § 30 InvFG, the management company is obligated to ensure special diligence in the selection and ongoing monitoring of investments, in the best interests of the fund and the integrity of the market. The fund's investments are monitored continuously by the system to ensure compliance with the fund rules. Beyond this, compliance with the fund rules in the making of investment decisions is monitored continuously by the custodian bank and by the auditor during the audit.

In terms of the verification of the taking into account of the environmental and/or social characteristics and sustainability risks during the investment decision, the MSCI ESG Scores of the fund are monitored on an ongoing basis and checked against defined limits within the scope of the internal limit system. In this scoring model of MSCI ESG Research Inc., aspects of ESG risk and the related risk management at the company in question are assessed in particular on the basis of key sustainability performance indicators (KPIs). The assessment results in the MSCI ESG Score, which is measured on a scale of 0 to 10. The assessment also takes

into account the relevant sector.

The relevant negative criteria for the fund (see the annex “Environmental and/or Social Characteristics” to the prospectus or the Information for Investors pursuant to § 21 AIFMG, available at <https://www.rcm.at/at-de/global/fondsdokumente/> or in the case of registration in other countries, at [www.rcm-international.com](http://www.rcm-international.com) on the website of the respective country in the section “Prices and Documents”) are checked daily within the scope of the internal limit system.

The data quality in the context of the ESG research procured by the management company is ensured through the regular monitoring of the imported data and through plausibility checks.

## Engagement Policy

As one of Austria’s leading asset managers, Raiffeisen KAG is conscious of its fiduciary responsibility to its customers. As part of this, it actively engages with companies in order to best preserve its customers’ interests. Engagement can serve different purposes. On the one hand, it is used for a more careful assessment of a company’s financial situation and development. This provides a look behind the scenes, so to speak. On the other hand, in conjunction with a proactive approach, engagement on ESG issues helps companies move towards improvement in corporate social responsibility (CSR) and sustainability. For the company and ultimately for the owners as well, this improvement should lead to “sustainable” benefits, which are reflected over the long term in better operating results. In terms of corporate dialogue, Raiffeisen KAG makes a distinction between proactive engagement and responsive engagement. Proactive, constructive dialogue with companies serves to identify potential financial and non-financial opportunities and risks, and addressing current events – for example relating to sustainability-related controversies – in a targeted manner via responsive dialogue allows for an accurate assessment of the company in the context of its environment and potential risks. The exercise of shareholders’ voting rights occurs either directly or indirectly via proxy. Raiffeisen KAG acts according to internal principles that are based on a transparent, sustainable corporate governance policy and cover significant topics that regularly arise at annual general meetings.

Further information on the engagement policy, including the voting rights policy, and the annual engagement report can be found on our website [www.rcm.at](http://www.rcm.at) or [www.rcm-international.com](http://www.rcm-international.com) under Corporate Governance

## Designated reference benchmark

**Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

No reference benchmark has been designated to measure the fund’s attainment of the environmental and social characteristics.

## Information on the annual fund report/ Consideration of sustainability risks

Details on how the environmental and/or social characteristics of the fund are fulfilled can be found in the Annex “Environmental and/or social characteristics” to the prospectus. Details on how the environmental and/or social characteristics of the fund were fulfilled in the previous accounting year can be found in the Annex “Environmental and/or social characteristics” to the annual fund report. Details on the consideration of sustainability risks and their anticipated impact on the fund's return can be found in Part II / Item 14 of the prospectus, 'Risk profile for the fund'.

The above-mentioned documents can be found at [www.rcm.at](http://www.rcm.at) under "Prices and documents" and, for funds registered outside Austria, at [www.rcm-international.com](http://www.rcm-international.com) on the website of the corresponding country under "Prices and documents".

## Hinweis für Anleger in der Schweiz

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