

## Sustainability-related disclosures pursuant to Article 10 of Regulation (EU) 2019/2088 in conjunction with Article 24 et seq. of Delegated Regulation (EU) 2022/1288

The subject of this document is mandatory information on the environmental and/or social characteristics of this Fund. This document is not promotional material. This information is required by law in order to transparently explain the environmental and/or social characteristics promoted by the Fund.

### FISCH Convex Multi Asset Fund

WKN / ISIN: A113SW / LU0997985303; A113SX / LU0997996508; A14V72 / LU1253562810; A113SY / LU0997999601; A113SZ / LU0998002165; A2DKK4 / LU1542194128

This (sub-)fund is managed by the capital investment company Universal-Investment-Luxembourg S.A.

#### a) "Summary"

##### No sustainable investment objective

No sustainable investments are targeted.

##### Environmental or social characteristics of the financial product

This (sub-)fund promotes environmental and social characteristics within the meaning of Article 8 of the Disclosure Regulation.

The following environmental and social characteristics are applied:

Climate change, water use, raw material procurement and energy efficiency, product safety, employer behaviour, diversity, data security and supply chain management as well as the independence of the Board of Directors, shareholder rights, corruption and business ethics.

##### Investment strategy

The sub-fund invests its assets worldwide in direct and indirect investments that are broadly diversified by return sources and risk classes. It pursues a dynamic investment policy based on fundamental financial analysis criteria and quantitative analyses. The majority of investments are made in corporate bonds, government bonds, convertible bonds, equities and equity-like investments, money market instruments and target funds. In addition, the capital security for the benefit of the investor and compliance with the principles of sustainability are to be ensured.

Environmental and social characteristics are used to select securities. Criteria such as greenhouse gas emissions, energy and raw materials handling, labour law and security, democracy and human rights, weapons, tobacco and coal exclusions are taken into account.

The financial product aims to achieve an above-average risk-adjusted investment performance by taking all relevant aspects, including ESG factors, into account in the investment analysis. The sustainable investment process consists of the three steps exclusion, integration and engagement. As part of this process, companies that deviate from sustainable business practices or have controversial business activities are not invested in.

##### Investment breakdown

Investments in ETCs, cash for liquidity management and hedging instruments for currency, equity and interest rate risks are not part of the sustainability strategy.

For other investments not covered by the (sub-)fund's sustainability strategy, there are no binding criteria to take into account minimum environmental and/or social safeguards. This is either due to the nature of the assets, for which at the time of the preparation of these contractual documents there are no legal requirements or standard market procedures on how to implement minimum environmental and/or social safeguards for these assets or investments are specifically excluded from the sustainability strategy, which are then also not subject to the examination of minimum environmental and/or social safeguards.

##### Monitoring of environmental or social characteristics

Compliance with the investment limits, based on the individual sustainability strategy, is measured and monitored on a daily basis by the investment limit checks of the Management Company and – in the case of outsourced portfolio management mandates – by the portfolio manager. Internal controls are carried out by Portfolio Management and Risk Controlling. Other external controls are carried out on a regular basis by auditors and at government level by the national supervisory authority.

##### Methods for environmental or social characteristics

Environmental, social and governance (ESG) considerations of the sub-fund are taken into account throughout the investment process. The aim is to adapt the portfolio to international standards, reduce controversial holdings, improve the sustainability risk profile and take advantage of opportunities.

The responsible investment strategy includes the selection of corporate securities (bonds, convertible bonds and equities), government bonds, own funds and target funds. The strategy is applied to at least 80% of the investments. Selected principle adverse impact (PAI) indicators are applied throughout the process.

For company selection, the RI strategy consists of the three process steps exclusion, ESG integration and active ownership. ESG integration takes ESG considerations into account in both qualitative and quantitative analysis. In qualitative analysis, the investment manager ranks a company in one of the following four internal risk assessments based on a proprietary "materiality map": Low, intermediate, increased or high risk. The assessment with a high risk is considered insufficient. Quantitative ESG integration uses ESG ratings and scores from various recognised providers, with each provider defining a sufficient rating threshold. The investment manager only selects those securities from the quantitative integration approach that have at least one sufficient rating. If neither qualitative nor quantitative analysis results in a sufficient assessment, the investment is allocated to the residual quota.

The choice of government bonds excludes countries where there are serious violations of democracy and human rights (measured by the Freedom House Index) and which are subject to applicable sanctions on the UN, EU, US and Switzerland.

When investing in funds, at least 80% of target funds are taken into account which are classified under SFDR Art. 8 or 9 and all exclusion criteria are met. All other funds meet the exclusion criteria and are allocated to the residual quota.

## Data sources and processing

MSCI, ISS, Sustainalytics, Clarity AI, Refinitiv, own research

## Limitations concerning methods and data

The coverage of companies with ESG data is not complete in individual areas of our investment universe. The application of two different integration approaches ensures that the required environmental and social characteristics are fulfilled.

## Duty of care

Effective arrangements are taken by establishing and applying written policies and procedures to ensure that investment decisions taken on behalf of the (sub-)fund are consistent with the objectives, the investment strategy and, where appropriate, the risk limits.

## Participation policy

To the extent possible for fund holdings, the AIFM's participation policy (engagement) is applied through the exercise of voting rights.

## Specific reference value

This (sub-)fund has not defined an index as a reference benchmark that meets the environmental and/or social characteristics promoted by that fund.

## b) "No sustainable investment objective"

This financial product promotes environmental and/or social characteristics, but does not aim for sustainable investments.

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

This (sub-)fund promotes environmental and social characteristics within the meaning of Article 8 of the Disclosure Regulation.

The following environmental and social characteristics are applied:

Climate change, water use, raw material procurement and energy efficiency, product safety, employer behaviour, diversity, data security and supply chain management as well as the independence of the Board of Directors, shareholder rights, corruption and business ethics.

## d) "Investment strategy"

The sub-fund invests its assets worldwide in direct and indirect investments that are broadly diversified by return sources and risk classes. It pursues a dynamic investment policy based on fundamental financial analysis criteria and quantitative analyses. The majority of investments are made in corporate bonds, government bonds, convertible bonds, equities and equity-like investments, money market instruments and target funds. In addition, the capital security for the benefit of the investor and compliance with the principles of sustainability are to be ensured.

Environmental and social characteristics are used to select securities. Criteria such as greenhouse gas emissions, energy and raw materials handling, labour law and security, democracy and human rights, weapons, tobacco and coal exclusions are taken into account.

The financial product aims to achieve an above-average risk-adjusted investment performance by taking all relevant aspects, including ESG factors, into account in the investment analysis. The sustainable investment process consists of the three steps exclusion, integration and engagement, As part of this process, companies that deviate from sustainable business practices or have controversial business activities are not invested in.

For the investee companies, aspects of corporate governance are analysed and evaluated on the basis of various factors such as Management Board structure, compliance with tax obligations, executive compensation and compliance with corporate governance codes.

The good governance assessment is an integral part of the sub-fund's exclusion policy and integrated ESG analysis and is ensured by taking into account selected PAI indicators and the exclusion of companies with severe breaches of OECD, UNGC, ILO and UNGP principles and norms. Other governance issues include, for example, board independence, shareholder rights, corruption and business ethics.

**e) “Investment breakdown”**

Investments in ETCs, cash for liquidity management and hedging instruments for currency, equity and interest rate risks are not part of the sustainability strategy

For other investments that do not fall within the scope of the (sub-)fund's sustainability strategy, it is ensured that they are not used contrarily to the sustainability strategy. To the extent that derivatives may be acquired, it is ensured that the underlying asset complies with the sustainability strategy. If an index is used as the underlying asset, it is ensured that the index has sustainability characteristics. Due to the financial instruments available on the market, deviations may occur in the sustainable characteristics of the underlying index to the (sub-)fund characteristics. All derivatives whose underlying asset could not be classified as not in line with the sustainability strategy as well as currency holdings that do not correspond to the (sub-)fund's currency or that are not denominated in EUR, USD, GBP, CHF or JPY may not be included as an integral part of the (sub-)fund. It does not include the use of derivatives to offset negative market fluctuations. In addition, targeted investments can be excluded from the sustainability strategy, which are not subject to an explicit assessment of minimum environmental and/or social safeguards.

**f) “Monitoring environmental or social characteristics”**

The environmental and/or social characteristics promoted with the (sub-)fund and the sustainability indicators used to measure the fulfilment of these environmental and/or social characteristics are initially subjected to a qualitative examination by the ESG Office of Universal Investment

- (a) when a fund is established which is to be classified as an Article 8 fund under the Disclosure Regulation,
- (b) in the event of a transfer of funds from another management company, or
- (c) in the event of a change in the classification of an Article 6 fund into an Article 8 fund

will initially be qualitatively reviewed by Universal Investment's ESG Office on the basis of the strategy pursued.

The individual sustainability strategy of the (sub-)fund is contractually agreed and disclosed in the pre-contractual documents of the (sub-)fund. Compliance with the investment limits, based on the individual sustainability strategy, is measured and monitored on a daily basis by Investment Controlling of the Management Company and – in the case of outsourced portfolio management mandates – by the portfolio manager. Both MSCI data and the portfolio manager's own research or third-party data are used and the portfolio manager's research is reviewed by Investment Controlling.

The monitoring of outsourced portfolio management companies is initially carried out when the portfolio managers are involved and on an ongoing basis by means of specific ESG reports, for example. External controls are carried out on a regular basis by auditors when auditing the annual reports and at government level by the national supervisory authority.

**g) “Methods for environmental or social characteristics”**

Environmental, social and governance (ESG) considerations of the sub-fund are taken into account throughout the investment process. The aim is to adapt the portfolio to international standards, reduce controversial holdings, improve the sustainability risk profile and take advantage of opportunities.

The responsible investment strategy includes the selection of corporate securities (bonds, convertible bonds and equities), government bonds, own funds and target funds. The strategy is applied to at least 80% of the investments. Selected principle adverse impact (PAI) indicators are applied throughout the process.

For company selection, the RI strategy consists of the three process steps exclusion, ESG integration and active ownership. ESG integration takes ESG considerations into account in both qualitative and quantitative analysis. In qualitative analysis, the investment manager ranks a company in one of the following four internal risk assessments based on a proprietary “materiality map”: Low, intermediate, increased or high risk. The assessment with a high risk is considered insufficient. Quantitative ESG integration uses ESG ratings and scores from various recognised providers, with each provider defining a sufficient rating threshold. The investment manager only selects those securities from the quantitative integration approach that have at least one sufficient rating. If neither qualitative nor quantitative analysis results in a sufficient assessment, the investment is allocated to the residual quota.

The choice of government bonds excludes countries where there are serious violations of democracy and human rights (measured by the Freedom House Index) and which are subject to applicable sanctions on the UN, EU, US and Switzerland.

When investing in funds, at least 80% of target funds are taken into account which are classified under SFDR Art. 8 or 9 and all exclusion criteria are met. All other funds meet the exclusion criteria and are allocated to the residual quota.

**h) “Data sources and processing”**

MSCI, ISS, Sustainalytics, Clarity AI, Refinitiv, own research

The following methods and data sources are used for the environmental and social characteristics promoted by the sub-fund:

The quantitative integration approach uses MSCI, ISS, Sustainalytics, Clarity, Refinitiv ratings and scores.

MSCI is used as a data source for the qualitative integration approach, the exclusion criteria and PAI data.

Only data from recognised data providers are used to ensure data quality. Data is processed by being directly integrated into the Aladdin portfolio and risk management system and through access to the portals of data providers. A small proportion of the data, which mainly refers to GHG Scope 3, is estimated by MSCI.

**i) “Limitations concerning methods and data”**

The coverage of companies with ESG data is not complete in individual areas of our investment universe. The application of two different integration approaches ensures that the required environmental and social characteristics are fulfilled.

**j) “Duty of care”**

The assets underlying the (sub-)fund are managed by the Management Company exclusively in the interests of the investors and within the strict legal and regulatory requirements.

Before acquiring the assets, the portfolio management examines whether the asset can be acquired in accordance with the legal and contractual requirements. Effective arrangements are taken by establishing and applying written policies and procedures to ensure that investment decisions taken on behalf of the (sub-)fund are consistent with the objectives, the investment strategy and, where appropriate, the risk limits. Once the assets have been acquired, they are subjected to further, corresponding daily checks by the Investment Controlling department of the Management Company and on an ongoing basis by the portfolio manager. The internal control of this due diligence is carried out in the Risk Controlling department as a second line of defence and at a downstream level by Internal Audit as a third line of defence.

The monitoring of outsourced portfolio managers is carried out by means of ISAE or comparable reports. These reports are evaluated by experts from the Management Company as part of outsourcing controlling. Before commencing business activities in new products or on new markets, including the acquisition of assets, the Management Company ensures that the associated risks as well as the effects on the overall risk profile of the (sub-)fund can be adequately recorded, measured, monitored and managed.

The Management Company, and the portfolio manager, if the investment decision is outsourced, or, if applicable, an appointed investment adviser, take into account the sustainability risks and – at their company level – the main adverse effects of investment decisions on sustainability factors in the fulfilment of their duties.

The underlying assets of the (sub-)fund are under the independent supervision, custody and monitoring of the Depositary. Other external controls are carried out on a regular basis by auditors when auditing the annual reports and at government level by the national supervisory authority.

**k) “Participation policy”**

To the extent possible for fund holdings, the AIFM’s participation policy (engagement) is applied through the exercise of voting rights.

In order to safeguard the interests of the investors in the managed (sub-)funds and to fulfil the associated responsibility, the Management Company exercises the shareholder and creditor rights from the shares held in the managed (sub-)funds in the interests of the investors. The decision-making criteria of the Management Company concerning the exercise or non-exercise of voting rights are the interests of the investors and the integrity of the market as well as the benefits for the investment fund in question and its investors.

The Management Company shall base its domestic voting behaviour on the guidelines for exercising voting rights (“voting rights guidelines”). These voting rights guidelines form the basis for a responsible handling of investors’ capital and rights.

When voting abroad, the Management Company applies the Glass Lewis country-specific voting guidelines that take into account the local circumstances. In addition, the Glass Lewis guidelines, “Environmental, Social & Governance (“ESG”) Initiatives”, are applied to the specific country guidelines and are followed as a matter of priority. These guidelines ensure coordination in a country-specific manner and on the basis of the criterion of a transparent and sustainable corporate governance policy and other environmental and social criteria focused on the long-term performance of the companies held by the investment funds (“portfolio companies”).

These voting standards are based on the interests of the (sub-)funds managed by the Management Company and are therefore generally applied to all (sub-)funds, unless it is necessary to deviate from these voting guidelines for individual funds in the interests of the investors, market integrity or the benefit of the respective investment fund.

The Management Company publishes the principles of its participation policy and an annual participation report on its website. The asset manager, if portfolio management is outsourced, or an appointed investment advisor where applicable, may take further measures as part of their company-related engagement activities to fulfil environmental and/or social characteristics.

However, this is not done on behalf of the (sub-)fund.

## l) “Specific reference value”

This (sub-)fund has not defined an index as a reference benchmark that meets the environmental and/or social characteristics promoted by that fund.

## m) “Status and document version”

| Version | Date       | Description   |
|---------|------------|---------------|
| 1.0     | 28.08.2023 | First version |