



**Information Statement
on our Policy on
the Consideration of Principal Adverse Impacts of Investment Decisions on Sustainability Factors**

Issued by Kieger AG (the "**Company**")
In respect of Kieger UCITS Fund

Date of initial publication of this Information Statement: 10 March 2021

This Information Statement has been updated and is accurate as at: 23 March 2021

Sustainable Finance Transparency

The European Union has introduced a series of legal measures (the primary one being the Sustainable Finance Disclosures Regulation (Regulation (EU) 2019/2088), "SFDR") requiring firms that manage investment funds to provide transparency on how they integrate sustainability considerations into the investment process with respect to the investment funds they manage.

This Information Statement has been prepared for the purpose of meeting the disclosure requirements in Article 4 of SFDR, that is, specifically, the disclosure requirements applicable to us as a firm with regard to whether and how we consider principal adverse impacts of investment decisions on sustainability factors.

It is noted that the regulatory technical standards ("RTS") to specify the details of the content, methodologies and presentation of the information to be disclosed under Article 4 of SFDR remain in draft form and will not be issued when the relevant disclosure obligations in SFDR become effective.

It is noted that the European Commission has recommended that, from the effective date of SFDR, firms comply with the specific disclosure obligations in SFDR that are reliant on RTS on the basis of a high-level, principles-based approach.

We therefore seek to comply on a best efforts basis with the relevant disclosure obligations and issue this Information Statement as a means of achieving this objective.

It is expected that this Information Statement will be reviewed and updated once the relevant RTS come into effect, noting in particular, that the RTS are expected to contain details on the content, methodologies and presentation of the information to be disclosed and this could therefore require a revised approach to how we seek to meet the SFDR disclosure obligations.

The Information Statement may also be updated to take account of the Regulation on the Establishment of a Framework to Facilitate Sustainable Investment (Regulation EU/2020/852, the "Taxonomy Regulation") once it comes into effect (1 January 2022).

Our Approach to Sustainable Investment

We believe that investors, and asset managers that invest on their behalf, have a responsibility to make their investments in a way that effectively supports a sustainable society.

At the core of our commitment to help our clients achieve their financial objectives is a conviction that this can be achieved by investing responsibly.

We value the importance of integrating Environmental, Social, and Governance ("ESG") factors into our investment and risk processes and fundamentally believe that this is aligned with the aim of achieving long-term positive financial performance for our investors. We also recognise and value the fact that this will also support the better functioning

of companies we invest in, enhancing behaviour in a wide range of markets and industries and having a positive societal impact beyond the financial markets.

What is a Sustainability Risk?

In this context a sustainability risk is considered to be an environmental, social or governance event or condition that, if it occurs, could cause an actual or potential material negative impact on the value of an investment.

Information Regarding the Consideration of Principal Adverse Impacts of Investment Decisions on Sustainability Factors

Principal adverse impacts ("PAI") are understood as the impacts of investment decisions that result in negative effects on sustainability factors.

Sustainability factors mean environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

PAIs are considered when we make investment decisions.

Our investment due diligence process involves reviewing and evaluating a range of ESG factors prior to purchasing a security, seeking to identify securities benefitting from ESG trends and avoid those with underappreciated risks.

We may factor consideration of whether companies we invest in contribute negatively to environmental objectives (such as climate change mitigation, climate change adaptation, and pollution prevention and control) or social objectives (such as product safety and quality, corporate stewardship, human or labour rights controversies, anti-corruption and anti-bribery) and therefore potentially represent PAIs.

We may also factor consideration of whether companies we invest in contribute positively to environmental objectives or social objectives (such as tackling inequality, fostering social cohesion, social integration and labour relations, or an investment in human capital or economically or socially disadvantaged communities).

In order to avoid or reduce any PAIs identified, where these are considered material (taking account of the size, nature and scale of our activities), we may seek to engage with an issuer with the objective of addressing the specific PAI in question or we may exclude these companies from further consideration for investment. In addition, we may exclude securities or issuers across all or certain portfolios that we manage based on their involvement in certain industries we believe are widely deemed to be controversial.

We may engage with companies as part of our investment due diligence and to clarify or express concerns over potential environmental, social or governance issues at the company or at industry level.

A more complete description of these activities can be found in our Responsible Investment Policy, which can be found here: <https://kieger.com/regulatory-disclosures/>.

We adhere to certain business conduct rules and international standards including the UN-supported Principles for Responsible Investment (PRI). Kieger supports the objectives of the Paris Agreement and is taking steps to [fully] comply with the Paris Agreement. In addition, Kieger aims to ensure that all healthcare assets are compliant with the Paris Agreement targets.

Further Information

This Information Statement is issued for information purposes only.

This Information Statement is not intended as investment advice and is not an offer or a recommendation about managing or investing assets and should not be used as the basis for any investment decision.

The information contained herein is current as of the date of issuance and is subject to change without notice.

We do not make any express or implied warranties or representations as to the completeness or accuracy or accept responsibility for errors.

No risk management technique can guarantee the mitigation or elimination of risk in any market environment.

Past performance is not a guarantee or a reliable indicator of future results and an investment could lose value. All investments involve risk, including the possible loss of capital.

Kieger AG has its registered office at Limmatstrasse 264, 8005 Zürich, Switzerland.

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Kieger AG is authorised in Switzerland and regulated by the Swiss Financial Market Supervisory Authority.

Zürich, 23 March 2021