

## Article 10 Information Statement

Issued by Kieger AG (the "**Company**")

In respect of Kieger Impact Healthcare Fund (the "**Sub-Fund**") of Kieger UCITS Fund (the "**Fund**")

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

This Information Statement is accurate as at: 10 March 2021

In this Information Statement the following words and phrases have the meanings set forth below:

<b>"European Commission Letter"</b>	A letter from the European Commission to the European supervisory authorities on the application of SFDR dated 20 October 2020.
<b>"ESG"</b>	Environmental, social and governance.
<b>"ESG Orientated Fund"</b>	A Sub-Fund that meets the criteria in SFDR to qualify as a financial product (which includes a UCITS authorised in accordance with article 5 of the UCITS Directive) and promotes, among other characteristics, environmental or social characteristics, or a combination of those characteristics and provided that the companies that the fund invests in follow good governance practices.
<b>"SFDR"</b>	Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial sector, as may be amended, supplemented, consolidated, substituted in any form or otherwise modified from time to time.
<b>"Sustainability Risk"</b>	An environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of an investment, including but not limited to, risks stemming from climate change, natural resource depletion, environmental degradation, human rights abuses, bribery, corruption and social and employee matters.
<b>"Sustainable Investment"</b>	An investment in an economic activity that contributes to an environmental objective, as measured by key resource efficiency indicators on (i) the use of energy, (ii) renewable energy, (iii) raw materials, (iv) water and land, (v) the production of waste, (vi) greenhouse gas emissions, or (vii) its impact on biodiversity and the circular economy, or an investment in an economic activity that contributes to a social objective (in particular an investment that contributes to tackling inequality or that fosters social cohesion, social integration and labour relations), or an investment in human capital or economically or socially disadvantaged communities, provided that

such investments do not significantly harm any of those objectives and that the investee companies follow good governance practices.

<b>“Sustainable Investment Fund”</b>	A Sub-Fund that, in accordance with the criteria outlined in Article 9 of SFDR, has Sustainable Investment as its objective.
<b>“Taxonomy Regulation”</b>	The Regulation on the Establishment of a Framework to Facilitate Sustainable Investment (Regulation EU/2020/852) as may be amended from time to time.

All other defined terms used in this Information Statement shall have the same meaning as in the supplement of the Sub-Fund or the prospectus of the Fund, as appropriate, which are also available at <https://kieger.com/regulatory-disclosures/>.

## 1. Sustainable Finance Transparency

The European Union has introduced a series of legal measures (the primary one being the 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 specific website disclosure requirements contained in SFDR and, specifically, the disclosure requirements applicable to a Sustainable Investment Fund under Article 10 of SFDR.

It is noted that the application of the regulatory technical standards ("RTS") to specify the details of the content, methodologies and presentation of the information to be disclosed under Article 10 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 Letter 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 Taxonomy Regulation.

## 2. Article 10 Disclosures

Information on the Sub-Fund's Sustainable Investment objective	<p>As noted in the “Investment Strategy” section, the Sub-Fund's investment objective is to achieve long term capital growth by principally investing in equities of healthcare and healthcare related companies or issuers worldwide (including Emerging Markets) with a focus on issuers that contribute to the realisation of the healthcare related SDGs.</p> <p>In managing the Sub-Fund, the Investment Manager will actively seek to generate a positive societal impact alongside a financial return. Furthermore, the Investment Manager will manage the Sub-Fund in</p>
--	---

	<p>accordance with its impact management framework thereby identifying companies that exhibit a strong link to the healthcare related SDGs and meet various other qualifying criteria. The impact management framework will help to assess and manage impact progress of the investee companies.</p> <p>ESG analysis is performed by the Investment Manager and is not outsourced. The responsible investment analyst utilizes the Investment Manager's internal ESG evaluation process to create a holistic assessment of an investee company's ESG related risks and opportunities.</p> <p>The Investment Manager excludes companies from the investment universe that are involved in (i) the production and distribution of distilled alcoholic beverages; (ii) the production and distribution of tobacco products; (iii) the production of defence equipment; (iv) the production of legal adult entertainment related products and services; (v) the extraction and distribution of fossil fuels; (vi) and mining activities. Companies that fail to meet ESG investment criteria or which may be subject to ESG negative screening or exclusion criteria are also excluded.</p> <p>The Investment Manager also participates in direct and indirect engagement with investee companies through direct dialogue as well as through proxy-voting and other engagement activities. When engaging with its investee companies, the Investment Manager highlights its assessment of the ESG weaknesses, encourages them to improve, for example by highlighting best practices in the industry, and monitors each investee company's progress. This engagement is an essential part of the investment process.</p>
<p>Information on the methodologies used to assess, measure and monitor the environmental or social characteristics or the impact of the sustainable investments selected for the Sub-Fund, including its data sources, screening criteria for the underlying assets and the relevant sustainability indicators used to measure the environmental or social characteristics or the overall sustainable impact of the Sub-Fund</p>	<p>As outlined above, based on the ESG analysis performed by the Investment Manager certain companies that (i) are not considered to meet socially responsible principles, (ii) fail to meet ESG investment criteria or (ii) may be subject to ESG negative screening or exclusion criteria are excluded from the investment universe.</p> <p>Furthermore, every potential investment undergoes an in-depth sustainability evaluation, which is conducted and validated before an initial investment is made. This process includes a multi-step assessment of quantitative as well as a qualitative ESG factors and is performed by the investment team. Quantitative factors are analysed with a proprietary tool, which is based on data from external sustainability research providers and highlights areas of past ESG controversies as well as potential future risks. The "Environmental" quantitative analysis includes (1) energy efficiency and environmental awareness and (2) waste and toxic emissions. The "Social" quantitative analysis includes (1) Human Capital Management and CSR (e.g. equal opportunity commitment, social risks in the supply chain, health &amp; safety policies), (2) Product Safety &amp; Quality (controversies), and (3) Privacy &amp; Data Safety.</p> <p>The qualitative assessment is performed by the responsible investment analyst and includes the examination of sustainability and other company reports, as well as personal meetings with company management.</p>

# KIEGER

*dare to care*

	<p>The sustainability assessment forms an integral part of the investment case and is thoroughly discussed and challenged within the investment team. Companies that do not satisfy Kieger's sustainability standards will not be eligible for investment.</p> <p>For ambiguous cases, a detailed ESG report needs to be submitted to the Sustainability &amp; Impact Committee (the "S&amp;I Committee"), which has the authority to finally approve or reject any investment. If the S&amp;I Committee concludes that a company does not fulfil Kieger's sustainability standards it will be rejected and the investment team will be not be able to invest in this company.</p> <p>Additionally, all companies that are constituents of the Sub-Fund are continuously monitored for improvement or deterioration of sustainability related matters. Companies are evaluated on a quarterly basis with our proprietary quantitative ESG framework. With this framework, changes in underlying ESG data are detected. These changes are then assessed by the investment team, and reported to the S&amp;I Committee. The S&amp;I Committee reviews the sustainability assessment of the investment team and approves or rejects their conclusions. Additionally, ad-hoc sustainability evaluations are done if a material ESG issue occurs.</p> <p>Investments that do not comply with the sustainability assessment have to be divested within three months.</p> <p>With this process we intend to deeply understand all ESG related aspects of our portfolio companies because we believe that this is the only way we can truly call ourselves responsible investors.</p>
<p>Information on the manner in which sustainability risks are integrated into the investment decision-making process</p>	<p>The Fund recognises that investments made by ESG Orientated Funds or Sustainable Investment Funds can have a large impact on the environment and society, and vice versa, and sustainability factors are increasingly important drivers of business risk and opportunity.</p> <p>In managing each ESG Orientated Fund or Sustainable Investment Fund and as part of the process to undertake appropriate due diligence on investments, the Investment Manager will conduct a level of research on each company or issuer which will give the Investment Manager an understanding of the company or issuer. This will include a consideration of fundamental and quantitative elements such as financial position, revenue and capital structure as well as qualitative and non-financial elements such as the company's or issuer's approach to ESG factors and consideration of Sustainability Risks, with the aim of taking a more holistic view of an investment and its long-term financial performance.</p> <p>The Investment Manager integrates these ESG factors and this Sustainability Risk assessment into its investment process for each ESG Orientated Fund and Sustainable Investment Fund. This will occur both initially and on an ongoing basis for the duration of the period the relevant ESG Orientated Fund or Sustainable Investment Fund holds an investment. The specific approach to ESG integration taken by the Investment Manager in respect of each ESG Orientated Fund or Sustainable Investment Fund is</p>

	<p>based on multiple factors, including (i) the objectives of the relevant ESG Orientated Fund's or Sustainable Investment Fund's strategy, (ii) the assets held by the relevant ESG Orientated Fund or Sustainable Investment Fund, (iii) the investment time horizon, (iv) specific research undertaken by the Investment Manager, (v) the assessment of the likely impact of Sustainability Risks on the returns of the relevant ESG Orientated Fund or Sustainable Investment Fund and (vi) the overall investment process.</p> <p>Further details on the Investment Manager's approach to ESG integration and sustainability-related stewardship can be found at <a href="https://kieger.com/regulatory-disclosures/">https://kieger.com/regulatory-disclosures/</a>.</p>
Information on the results of the assessment of the likely impacts on sustainability risks on the returns of the Sub-Fund	<p>The Investment Manager has developed a proprietary ESG assessment framework against which companies are systematically screened for potential ESG issues and controversies. In applying this proprietary ESG assessment framework as well as the Sustainability Risk assessment to the investment decision making process, the Investment Manager may forgo opportunities for each ESG Orientated Fund and Sustainable Investment Fund to gain exposure to certain portfolios and it may choose to sell an investment when it might otherwise be disadvantageous to do so. As such, each ESG Orientated Fund and Sustainable Investment Fund may focus on investments in companies that relate to certain sustainable development themes and demonstrate adherence to environmental, social and corporate governance practices. Accordingly, the investment universe of each ESG Orientated Fund and Sustainable Investment Fund may be smaller than that of other sub-funds and may underperform or perform differently relative to other sub-funds.</p>
Benchmark Index	<p>The Benchmark has not been designated as a reference benchmark for the purposes of SFDR. Therefore, it is not consistent with the Sustainable Investment objective. For further details on the Benchmark, please refer to the "Investment Strategy" section of the supplement.</p>
Periodic reports	<p>A description of the overall sustainability-related impact of the Sub-Fund by means of relevant sustainability indicators will be available as part of the periodic report. The Sub-Fund's most recent periodic report does not include any information pursuant to SFDR.</p>

### 3. Important 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

*dare to care*

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

LEI Reference: 506700V3NV80GF8CBW48

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

Zürich, 10 March 2021