

Statement on principal adverse impacts of investment decisions on sustainability factors

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This Information Statement has been updated and is accurate as at: 27 December 2022

No consideration of Principal Adverse Impact In accordance with art 4 of EU Regulation 2019/2088 and art 4 of Commission Delegated Regulation (EU) 2022/1288

1. Introduction

The Sustainable Finance Disclosure Regulation (SFDR), Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 supplemented by the Commission Delegated Regulation (EU) 2022/1288 (CDR), requires KIEGER to make a “comply or explain” decision whether to consider the principal adverse impacts (“PAI”) of its investment decisions on sustainability factors and in its investment advice, in accordance with a specific regime outlined in SFDR. PAIs are described as impacts that result, or might result, in negative effects on sustainability factors, such as social and employee matters, respect for human rights, anticorruption or anti-bribery matters.

2. Opt-out on considering PAI at entity level

Following careful evaluation of the requirements of the PAI regime under Article 4 of the SFDR and Article 4 of the CDR, KIEGER decided not to consider the adverse impacts of investment decisions on sustainability factors at entity level and in its investment advice. For those products where KIEGER considers PAI, it will explicitly disclose the manner of consideration in its product specific disclosures. On the one hand, KIEGER is supportive of the policy aims of the PAI regime to improve transparency to clients, but on the other hand KIEGER is aware that, considering the scale of its activities and the types of products, it would be challenging to comply with the specific regime of the SFDR. KIEGER also believes that some of its investment strategies and investment advice cannot currently support the adoption of the PAI regime, as these strategies involve underlying securities or products where it is highly challenging to conduct a detailed due diligence on the adverse sustainability impact. Finally, KIEGER is concerned about the current lack of readily available data to comply with the reporting requirements of the PAI Statement as companies and market data providers are not yet ready to make all necessary data available. KIEGER will revisit on at least a yearly basis its decision not to comply with the PAI regime on entity level and reserves the right to change its position in the future.

3. Our approach

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.

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.

Despite KIEGER's decision not to comply with the PAI regime and as part of its overall commitment to ESG matters, KIEGER has implemented positive ESG-related initiatives and policies. More information is available on our website at: <https://kieger.com/regulatory-disclosures/>

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. LEI Reference: 506700V3NV80GF8CBW48

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

Zürich, 20 December 2022