

STATEMENT ON PRINCIPAL ADVERSE IMPACTS OF INVESTMENT DECISIONS ON SUSTAINABILITY FACTORS¹

Financial market participant: LAIC Vermögensverwaltung GmbH (LEI 9845005D911B65F5C480)
Reference period: 1 January 2024 – 31 December 2024

Summary

LAIC Vermögensverwaltung GmbH takes into account the most significant adverse impacts of its investment decisions on sustainability factors. This statement is the consolidated statement on the most significant adverse impacts on the sustainability factors of LAIC Vermögensverwaltung GmbH.

This statement on the most significant adverse impacts on sustainability factors refers to the reference period from 1 January 2024 to 31 December 2024.

- a) Name of the financial market participant: LAIC Vermögensverwaltung GmbH; LEI: 9845005D911B65F5C480
- b) LAIC Vermögensverwaltung GmbH (LEI: 9845005D911B65F5C480) hereby declares that the most significant adverse impacts on sustainability factors (so-called PAI) have been taken into account. LAIC Vermögensverwaltung GmbH (hereinafter "LAIC") acts as a financial portfolio manager for its clients and has the following authorisations: Investment brokerage (Section 2 (2) No. 3 WpIG), contract brokerage (Section 2 (2) No. 5 WpIG), investment advice (Section 2 (2) No. 4 WpIG) and financial portfolio management (Section 2 (2) No. 9 WpIG); LAIC Vermögensverwaltung GmbH has been pursuing the inclusion of environmental or social characteristics in its financial products – in particular for individual asset management – since 1 April 2023.
- c) The reference period for the statement on the most significant adverse impacts of investment decisions on sustainability factors is 1 January 2024 to 31 December 2024, with the key data for the portfolios as at 31 March, 30 June, 30 September and 31 December 2024 being used in consolidated form. An average value was calculated from these four reference dates. The analysis was carried out on 27 May 2025.
- d) LAIC takes into account the most significant adverse impacts of investment decisions on sustainability factors by measuring and monitoring relevant sustainability data of the companies or financial instruments in which we invest. From this data, we can derive aggregate data on the negative impacts of our financial portfolios investments on sustainability factors. In our financial portfolios and strategies, we take into account the mandatory indicators and two additional voluntary indicators as defined by Del. Regulation (EU) 2022/1288 – depending on data availability and quality. The assessment of the most significant adverse impacts of investment decisions on sustainability factors is explained in our guidelines, which are essentially based on the current regulations and guidelines applicable at the parent company LAIQON AG, namely the "Implementation of Sustainability" and the "Responsible Investment Policy" from 2021/2022. The applicability for LAIC is specified in more detail there. Further levers to ensure consideration are provided by negative or exclusion lists of issuers or financial

¹ Information referred to in Article 4(1)(a) and Article 4(2), (3), and (4) of Regulation (EU) 2019/2088 and in Articles 4 to 10 of this Regulation

instruments that could contribute to adverse impacts on sustainability factors. These exclusion lists are binding investment limits within the meaning of the investment policy. The product and service offering is designed to take into account certain sustainability indicators (PAIs) and mitigate sustainability risks through a binding allocation in Article 8 or Article 9 funds within the meaning of the Disclosure Regulation. The same applies to investments in individual securities within the framework of LAIC's equity funds. PAI data is taken into account as part of the AI-supported investment process (LAIC ADVISOR®) and comes either from commercial ESG data providers or from the European ESG Template (EET). LAIC does not pursue an active engagement policy in this regard.

Since 1 April 2023, LAIC has been taking into account the most significant adverse impacts of investment decisions on sustainability factors in its individual asset management services with the "LAIC Sustainability Concept" offering, whereby LAIC has prioritised the following sustainability factors as "the most significant":

- Greenhouse gas emissions (GHG emissions)
- Carbon footprint
- GHG emission intensity
- Involvement in controversial weapons

Serious violations of the United Nations Global Compact (UNGC) and OECD Guidelines are excluded in accordance with the association concept of the German target market for sustainability preferences, and investments in revenues from the manufacture and/or distribution of armaments, coal and tobacco production are also largely excluded.

Prioritisation was based on data availability, quantitative measurability and feasibility for the investment product. More details on the "LAIC sustainability concept" can also be found in the section "Transparency on how sustainability risks are incorporated at the financial product level" on the company's website at <https://laic.de/nachhaltigkeit>.

The above guidelines also include requirements and methods for taking into account the likelihood of occurrence and severity of these most significant adverse impacts, including their potentially irreversible nature. LAIC also uses external ESG data for this purpose.

Description of the most significant adverse impacts of investment decisions on sustainability factors

The mandatory indicators specified by the SFDR are shown in Table 1 below. These indicators must be taken into account to ensure that material adverse impacts on sustainability factors are minimised or even avoided. LAIC has selected indicators from the areas of "climate and other environmental indicators" and "combating corruption and bribery".

Information on the impact compared to the previous year will be provided by 30 June 2025 and thereafter on an annual basis. The "Impact" column shows the average impact on 31 March, 30 June, 30 September and 31 December of the respective period from 1 January to 31 December. The "Measures" column in Table 1 shows the measures taken or planned for each individual indicator, including targets where applicable.

LAIC's average assets under management over this period amounted to EUR 62,208,704 and were distributed across 491 securities and financial instruments. The assets under management also include the assets that LAIC manages as an outsourced financial portfolio manager.

Description of the strategies for identifying and weighting the most significant adverse impacts of investment decisions on sustainability factors.

- a) LAIC uses guidelines that enable the relevant LAIC employees to identify and prioritise the most significant adverse impacts on sustainability factors. These were developed by the parent company's management body in March 2022 and specified for LAIC in 2023. The relevant data is available from external data providers and is accessible to LAIC's financial portfolio management decision-makers. The implementation in the "LAIC Sustainability Concept" took place on 1 April 2023, and the approval process (including approval by the management body) dates from 31 August 2022/14 April 2023/27 April 2023. There were no changes to the strategies and/or adjustments to the LAIC Sustainability Concept in 2024.
- b) Relevant guidelines are designed or revised by LAIC's parent company. Their implementation is the responsibility of the respective financial portfolio manager. There is regular communication regarding regulatory requirements and their implementation. Minimum standards in the areas of social affairs and corporate governance (including corruption, bribery, forced or child labour) are ensured through the integration of the ten principles of the United Nations Global Compact (UNGC).
- c) The methods for selecting the aforementioned indicators and for identifying and assessing the most significant adverse impacts in accordance with Article 6(1) of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 (Disclosure Regulation) are part of the corresponding investment strategies or the selected exclusion criteria at the level of the individual financial portfolio. The exclusion criteria are designed to take into account the likelihood of occurrence and the severity of these most significant adverse impacts, including their potentially irreversible nature. Within the investment limits, the securities analysis process is designed to take into account the most significant adverse impacts of investment decisions on sustainability factors within the framework of the respective investment strategies. For some individual securities, less data availability or a less stringent legal framework with regard to guidelines and disclosure requirements is to be expected. We expect data availability to improve as the Corporate Sustainability Reporting Directive (CSRD) becomes more effective and, in the next step, as its scope is expanded and companies' disclosures become more

reliable.

- d) The identification of the most significant adverse impacts on sustainability factors is the responsibility of financial portfolio management. The influencing factors outlined above are analysed and evaluated at regular intervals using existing tools. This enables portfolio management to respond to any changes within the respective investment strategies at any time.
- e) Identification is based on external ESG databases. The LAIC data used comes from established ESG rating agencies such as ISS-ESG, MSCI-ESG, Sustainalytics (via Bloomberg) and Urgentem (with a special focus on climate data and transition paths). Further data is sourced from the EET data fields, which are obtained by ISS FWW via the data supplier ARIVA.DE Financial Services. The qualitative content of the listed data sources cannot be verified. LAIC relies on proper data maintenance by the data providers. In justified exceptional cases, separate validation may be carried out after prior consultation with the ESG data providers. If this is the case, this will be indicated accordingly.

Cooperation policy

As an outsourced financial portfolio manager for public funds, LAIC works together with the capital management companies (KVGen) of the financial portfolios for which it is responsible. In order to comply with legal requirements, protect the interests of investors and fulfil the associated responsibilities, the capital management companies exercise the shareholder rights associated with the shareholdings held on behalf of the managed investment funds in the interests of investors and good corporate governance. The voting policy and exercise of voting rights by Universal-Investment-Gesellschaft mbH or the service providers commissioned by it is based, for funds domiciled in Germany, on the analysis guidelines for annual general meetings developed by the Bundesverband Investment und Asset Management e. V. (BVI). The capital management companies based in Germany regularly inform LAIC of their voting intentions on the individual agenda items for the shareholdings of their special funds registered for a general meeting.

Further information on the engagement policy for funds launched by the capital management company Universal-Investment-Gesellschaft mbH, Frankfurt am Main:
Regulatory framework in Germany | Universal Investment

As an asset manager within the meaning of Section 134a (1) No. 2 of the German Stock Corporation Act (AktG), LAIC is subject to the provisions of Sections 134b and 134c AktG and must therefore describe and publish its engagement policy within the meaning of Section 134b (1) AktG.

LAIC does not exercise any shareholder rights on behalf of its clients. It does not attend general meetings, does not exercise voting rights on behalf of clients, only takes note of announcements made by public limited companies within the scope of mandatory disclosures, and does not actively communicate with the company or other shareholders. Further details can be found on the LAIC website: <https://laic.de/rechtliche-hinweise>

Reference to internationally recognised standards

Internationally recognised guidelines include, in particular, the ten principles of the United Nations Global Compact, the ILO core labour standards, the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises.

Through its parent company LAIQON AG, LAIC is a signatory to the Principles for Responsible Investments (PRI)². Investment decisions and external transparency are guided by these principles through regular reporting to the PRI. In addition, the financial portfolios are guided by the UN Global Compact, compliance with which is to be ensured through investment limits or regular monitoring of possible controversies. The validation of the climate targets of the parent company LAIQON AG via the Science-Based Targets Initiative (SBTi)³ mentioned for the previous reporting period has not been pursued since the fourth quarter of 2024.

The SBTi targets are based on the targets of the Paris Agreement. The relevant indicators are the sustainability indicators (PAI) 1-6 in Table 1 below. ISS-ESG was the sole data source for this in 2024. Some of LAIC's financial portfolios set targets at portfolio level to achieve an annual CO2 reduction of 7% or to align the portfolio in such a way that a global temperature increase of no more than 1.5 degrees can be achieved by 2030.

Additional data points are determined with the help of the external data provider ISS-ESG for direct investments in equities as well as for third-party funds and ETFs. If there is low data coverage (less than 10%) or estimated values, this is indicated in Table 1 below. For the sustainability concept of LAIC and the public funds for which LAIC acts as an outsourced financial portfolio manager, the PAIs are covered by exclusion criteria. LAIC reserves the right to use one or more other data providers at any time. Ensuring data quality is only partially within LAIC's control. However, in this report, we disclose the PAIs together with a coverage ratio in order to ensure transparency regarding data quality. Exclusions are already taken into account upstream as part of a screening process or within ongoing monitoring. We are refraining from making our own estimates of the data until further notice. External data signals are not overwritten.

Historical comparison

A historical comparison of the reference period with the previous reference period 2023 will be possible for the first time with the declaration for the calendar year 2024, which will be published by 30 June 2025 at the latest.

² The Principles for Responsible Investment are an investor initiative in partnership with the UNEP Finance Initiative and the United Nations Global Compact. Together with its international network of signatories, the PRI initiative is dedicated to the practical implementation of the six principles for responsible investment. The aim is to improve understanding of the impact of investment activities on environmental, social and corporate governance issues and to support signatories in integrating these issues into their investment decisions. Further details can be found here: <https://www.unpri.org/>

³ The SBTi is a partnership between CDP (formerly the Carbon Disclosure Project), the United Nations Global Compact, the World Resources Institute (WRI) and the Worldwide Fund for Nature (WWF); further details can be found at <https://sciencebasedtargets.org/>.

Table 1: Summary of the most significant adverse effects

Indicators for investment decisions in companies in which investments are made:

Sustainability indicator for adverse impacts	Measured variable	Effects [Year n]	Effects [Year n-1]	Explanation	Measures taken and planned, and targets for the next reference period
CLIMATE INDICATORS AND OTHER ENVIRONMENTAL INDICATORS					
Greenhouse gas emissions	1. GHG emissions	Scope-1- greenhouse gas emissions	1,941.33 (t)	639.67 (t)	
		Scope-2- greenhouse gas emissions	568.15 (t)	234.05 (t)	
		Scope-3- greenhouse gas emissions	33,543.07 (t)	13,622.23 (t)	
		Total GHG emissions	36,052.54 (t)	14,495.94 (t)	
	2. CO ₂ footprint	CO ₂ footprint	573.99 (t/million €)	411.14 (t/million €)	
	3. GHG emission intensity of companies in which investments are made	GHG emission intensity of companies in which investments are made	1,488.54 (t/million € turnover)	891.94 (t/million € turnover)	
	4. Engagement in companies that are active in the fossil fuel sector fuels	Proportion of investments in companies active in the fossil fuel sector	4.45%	4.32%	
	5. Share of energy consumption and energy production from non-renewable energy sources	Proportion of energy consumption and energy production of the companies in which investments are made from non-renewable energy sources compared to renewable energy sources, expressed as a percentage of total energy sources	Consumption of non-renewable energy: 26.39% Production of non-renewable energy: 1.07%	Consumption of non-renewable energy: 27.95% Production of non-renewable energy: 1.25%	Value approximated by our data provider ISS-ESG
	6. Intensity of energy consumption by climate-intensive sectors	Energy consumption in GWh per million EUR of turnover of the companies in which investments are made, broken down by climate- intensive sectors	See separate presentation	See separate presentation	

Biodiversity	7. Activities that adversely affect areas with biodiversity in need of protection	Proportion of investments in companies with locations/operations in or near areas with vulnerable biodiversity, where the activities of these companies have a negative impact on these areas	0.066%	0.07%	Value approximated by our data provider ISS-ESG	Attributable to indirect holdings via a third-party fund or ETF. The value is analysed for potential alternatives.
Water	8. Emissions in water	Tonnes of emissions into water caused by the companies in which investments are made per million EUR invested, expressed as a weighted average	0.00 (t)	0.01 (t)	Low (<10%) data coverage; value approximated by our data provider ISS-ESG	
CLIMATE INDICATORS AND OTHER ENVIRONMENTAL INDICATORS						
Waste	9. Proportion of hazardous and radioactive waste	Tonnes of hazardous and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average	2.30 (t)	0.49 (t)	Moderate (10-30%) data coverage; value approximated by our data provider ISS-ESG	Due to the low data coverage, some values carry significant weight; these are analysed and, if necessary, contacted.
INDICATORS IN THE AREAS OF SOCIAL AFFAIRS AND EMPLOYMENT, RESPECT FOR HUMAN RIGHTS AND COMBATING CORRUPTION AND BRIBERY						
Social and employment	10. Violations of the UNGC principles and the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises	Proportion of investments in companies that have been involved in violations of the UNGC principles or the OECD guidelines for multinational enterprises	3.03%	1.45%		During the reporting period, a large US technology group was downgraded to level 10 RED according to ISS-ESG, which had a significant impact on the overall rating.
	11. Lack of processes and compliance mechanisms for monitoring compliance with the UNGC principles and the OECD Guidelines for multinational enterprises	Percentage of investments in companies that have not established policies to monitor compliance with the UNGC principles and the OECD Guidelines for Multinational Enterprises or procedures for handling complaints about violations of the UNGC principles and OECD Guidelines for Multinational Enterprises	12.15%	17.57%	Value approximated by our data provider ISS-ESG; interpretations of the indicator may vary	Our financial portfolios are guided by the UN Global Compact guidelines. Funds that are already subject to Article 8 or Article 9 of the Disclosure Regulation also exclude companies that are proven serious violators of the UN Global Compact from the investment universe. Our strategies are also subject to standards-based screening. We strive to reduce this value in the future.

	12. Unadjusted gender-specific earnings gap	Average unadjusted gender pay gap at the companies in which investments are made	0.13%	0.07%	Low (<10%) data coverage	
	13. Gender diversity in management and supervisory bodies	Average ratio of women to men in the management and supervisory bodies of investee companies, expressed as a percentage of all members of the management and supervisory bodies	35.10%	20.14%		
	14. Involvement in controversial weapons (anti-personnel mines, cluster munitions, chemical and biological weapons)	Proportion of investments in companies involved in the manufacture or sale of controversial weapons	0.02%	0.01%		Attributable to indirect holdings via isolated third-party funds/ETFs in which individual securities are classified as "AMBER" according to the ISS ESG signal. LAIC will analyse the target funds and their composition.

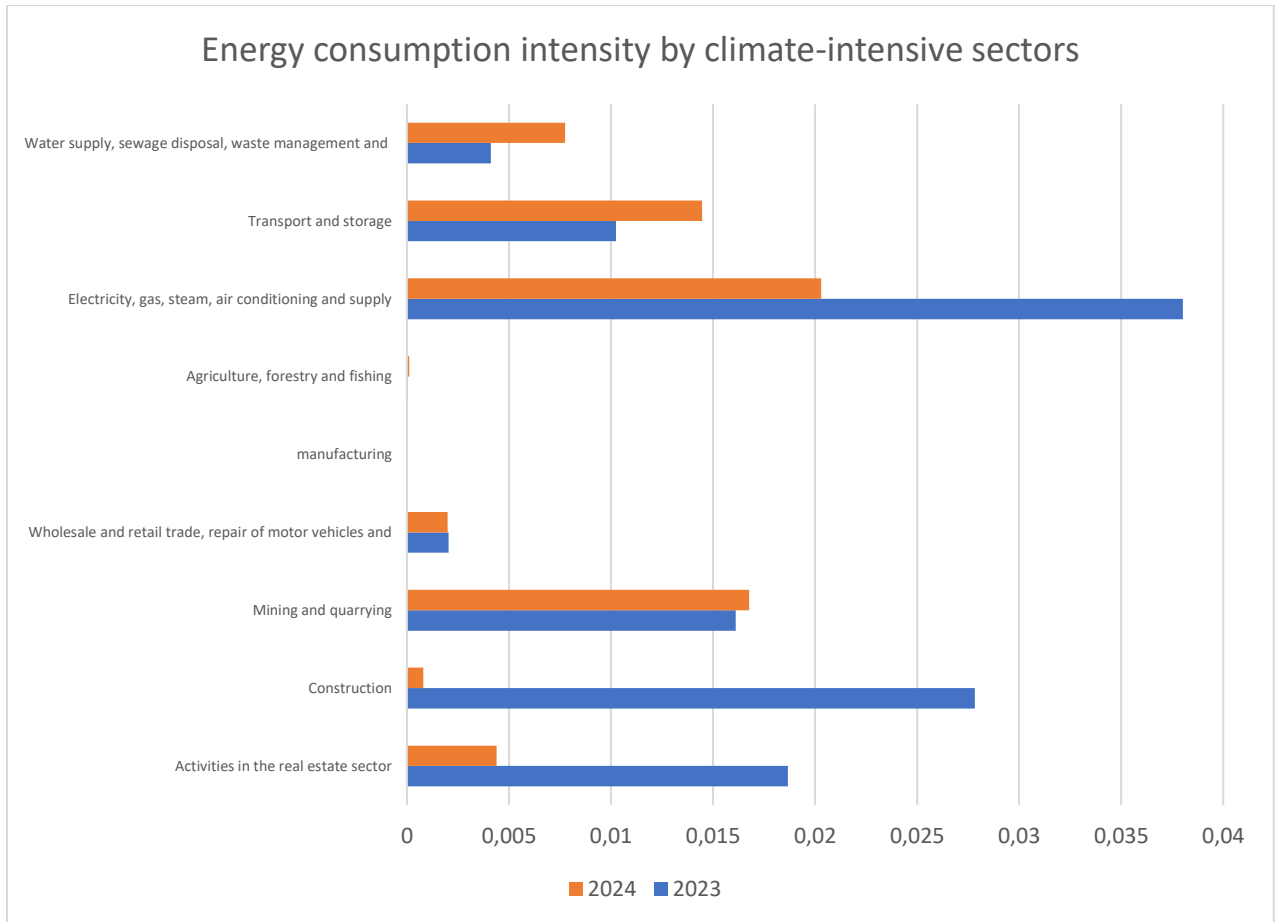
INDICATORS FOR INVESTMENTS IN STATES AND SUPERNATIONAL ORGANISATIONS

Environment	15. GHG emission intensity	GHG emission intensity of countries in which investments are made	12.34	37.8	Value approximated by our data provider ISS-ESG;	LAIC does not hold any government bonds in its direct portfolios, only via third-party funds and ETFs
Social	16. Countries in which investments are made that violate social provisions	Number of countries invested in that violate social provisions in accordance with international treaties and conventions, United Nations principles or, where applicable, national legislation (absolute number and relative number divided by all countries invested in)	2.50%	2.81%	Interpretations of the indicator may vary	LAIC does not hold government bonds in its direct portfolios, only via third-party funds and ETFs

Sustainability indicator for adverse impacts Measure		Measure	Impact [Year n]	Impacts [Year n-1]	Explanation	Measures taken and planned, and targets for the next reference period
Emissions	Investments in companies without initiatives to reduce co ₂ emissions	Proportion of investments in companies that do not implement initiatives to reduce co ₂ emissions in line with the Paris Agreement	38.93%	30.77%	For this indicator, our data provider ISS-ESG uses initiatives to reduce CO2 emissions. These corporate initiatives should aim to comply with the Paris Agreement, but only if they have already been made mandatory through the Science Based Targets Initiative.	
INDICATORS IN THE AREAS OF SOCIAL AND EMPLOYMENT, RESPECT FOR HUMAN RIGHTS AND COMBATING CORRUPTION AND BRIBERY						
Combating corruption and bribery	Lack of measures to combat corruption and bribery	Proportion of investments in companies that have not established measures to combat corruption and bribery within the meaning of the United Nations Convention against Corruption	0.01%	0.02%		

Source: ISS ESG module "SFDR Annual Average" based on financial portfolios managed by LAIC during 2024 on key dates (31 March, 30 June, 30 September, 31 December). The analysis was carried out on 27 May 2025 .

Separate presentation for PAI #6



Energy consumption in GWh per million EUR of turnover of the companies in which investments are made, broken down by climate-intensive sectors. In the "manufacturing" sector, the holdings in an ETF (HSBC EMERGING MARKET SCREENED EQUITY UCITS ETF) produced indirect exposure to Yangzijiang Shipbuilding (Holdings) Ltd., which (according to ISS-ESG) reported extremely high energy consumption figures. As a result, the actual figures of 12.41 for 2023 and 23.65 for 2024 cannot be shown in the graph without distorting the axes.

Measurement

1. GHG emissions – Scope 1 GHG emissions, Scope 2 GHG emissions, Scope 3 GHG emissions, total GHG emissions; each per million EUR enterprise value
2. Carbon footprint; calculation according to 1 divided by the current value of all investments
3. GHG intensity of portfolio companies – GHG emissions – Emission intensity – Scope 1, 2 & 3 emissions (EUR)
4. Fossil fuels - Participation (PAI) - Proportion of investments in companies active in the fossil fuel sector
5. Proportion of non-renewable energy consumption and non-renewable energy products of companies in which investments are made, from non-renewable energy sources compared to renewable energy sources, expressed as a percentage of total energy sources (proxy: this ISS ESG factor includes energy consumption from non-renewable energy sources, with the exception of natural gas; figures on energy consumption where the energy source is unclear are also included in this factor)
6. Energy consumption intensity (GWh/mEUR) - Energy consumption in GWh per million EUR of turnover of the invested companies, per climate-relevant sector
7. Proportion of investments in companies with locations/operations in or near biodiversity-sensitive areas where the activities of these companies have a negative impact on these areas (proxy: ISS ESG links controversies to some, but not all, of the standards referred to in the PAI definition of "activities that have a negative impact on biodiversity-sensitive areas". However, the standards/guidelines referred to in the regulation largely overlap with those applied in the proxy).
8. Tonnes of water emissions caused by the companies in which investments are made per million EUR invested, expressed as a weighted average (The PAI indicator refers to various types of water emissions. ISS ESG collects chemical oxygen demand (COD), a commonly used indicator for measuring emissions into water, which can serve as a substitute for the requirements of the PAI indicator. ISS ESG only collects data for companies in the most relevant industries).
9. The PAI indicator refers to various types of emissions into water. ISS ESG collects chemical oxygen demand (COD) data, a commonly used indicator for measuring emissions into water, which can serve as a proxy for the requirements of the PAI indicator. ISS ESG only collects data for companies in the most relevant industries. (Proxy: The PAI indicator refers to various types of emissions into water. ISS ESG collects chemical oxygen demand (COD) data, a commonly used indicator for measuring emissions into water, which can serve as a proxy for the PAI indicator requirements. ISS ESG only collects data for companies in the most relevant industries).
10. Proportion of investments in companies that have been involved in violations of the UNGC principles or the OECD Guidelines for Multinational Enterprises
11. Proportion of investments in companies that are invested in without measures to monitor compliance with the UNGC principles or the OECD Guidelines for Multinational Enterprises or mechanisms for handling complaints to remedy violations of the UNGC principles or the OECD Guidelines for Multinational Enterprises
12. Average unadjusted gender pay gap in investee companies
13. Average ratio of female to male board members in investee companies, expressed as a percentage of all board members
14. Proportion of investments in companies involved in the manufacture or sale of controversial weapons
15. Greenhouse gas intensity of countries in which investments are made (proxy: the definition of GHG intensity of countries in which investments are made in the regulation includes emissions from scopes 1, 2 and 3. This is not the traditional way of accounting for government emissions,

and the available data is limited in this regard. The ISS ESG data factor provides information on emissions from production, using the same boundaries as the UNFCCC).

16. Number of countries in which investments are made that are affected by social violations (absolute number and relative number, divided by all countries in which investments are made), as provided for in international treaties and conventions, United Nations principles and, where applicable, national law

CLIMATE INDICATORS AND OTHER ENVIRONMENTAL INDICATORS

Proportion of investments in companies that do not have initiatives to reduce carbon emissions aimed at complying with the Paris Agreement

Proportion of investments in companies where deficiencies have been identified in measures to combat violations of anti-corruption and anti-bribery procedures and standards.

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