Statement on principal adverse impacts of investment decisions on sustainability factors. **Financial market participant:** IQAM Invest GmbH, LEI: 529900W18I98LQ7Q5541



As at 30 June 2024

Summary

IQAM Invest GmbH (LEI: 529900W18I98LQ7Q5541) considers principal adverse impacts of its investment decisions on sustainability factors. The present statement is the consolidated statement on principal adverse impacts on sustainability factors of IQAM Investment GmbH.

This statement on principal adverse impacts on sustainability factors covers the reference period from 1 January 2023 to 31 December 2023.

The statement refers to the consideration of the most significant adverse impacts on sustainability factors in the company's investment decision-making processes for its investment funds. This applies both to investment decisions that it makes itself and, in general, to investment decisions that it has outsourced to external asset managers. Principal adverse impacts of investment decisions on sustainability factors (hereinafter also referred to as "Principal Adverse Impacts" or "PAI") are understood to be the negative impacts on the environment and society associated with investments in companies, sovereigns and supranational organizations as well as real estate assets. The consideration of PAI includes the identification, measurement and prioritization of PAI as well as measures to mitigate and reduce PAI in the company's investment processes. IQAM considers all 18 mandatory PAI indicators defined in the Delegated Regulation to the Sustainable Finance Disclosure Regulation ((EU) 2022/1288) – 14 for investments in companies, 2 for investments in sovereigns and supranational organizations, 2 for investments in real estate. In addition, two further PAI indicators are taken into account at IQAM in accordance with Deka Group – one of which is an environmental PAI indicator and one a social PAI indicator. The selection of the additional indicators is based on the availability and quality of data, the irreversibility and severity or scope of the PAI, the relevance for the company's main asset classes and the company's general sustainability orientation.

The principal adverse impacts of investment decisions are measured using the PAI indicators for all companies, sovereign and quasi-sovereign issuers, target funds and real estate assets in the investment universe, provided that investments have been made in the respective categories and data is available to the best of our ability. A leading ESG data provider with access to a wide range of data points and resources is used for this purpose. In addition, PAI data, for example, is occasionally requested directly from companies by Deka Group (especially in the event of irregularities). Furthermore, companies may also be encouraged to publish PAI-related information by a specialized service provider for selected products on behalf of IQAM. The PAI data used includes both data reported by the companies and data estimated by the data provider.

The measures for dealing with the PAI associated with the investments include company-wide exclusion criteria that apply to all of the company's investment decisions (e.g. exclusion of manufacturers of controversial weapons for investments in individual securities). Furthermore, a PAI steering mechanism is applied, that defines threshold values for a selection of PAI indicators, which, depending on the PAI indicator and product category (products with sustainability features or products without sustainability features), leads to the exclusion of companies, countries or target funds that exceed the defined threshold value. Further measures include the application of Deka's own ESG risk level model, which is also applied at IQAM, that leads to the exclusion of companies involved in very serious ESG controversies, as well as sustainability-related exclusion criteria for products with sustainability characteristics. The measures intend to avoid investments in financial instruments from issuers with particularly high adverse sustainability impacts or that these are removed from the investment universe in the event of an increase in adverse impacts. By applying the PAI steering mechanism, the Group's engagement activities – the targeted dialog with companies and the exercise of voting rights at general meetings of the companies in which the company invests – are also incorporated to a certain extent into the measures to reduce the PAI of investment decisions.

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IQAM Invest GmbH supports and complies with the principles of the UN Global Compact as an international standard for responsible corporate governance and is a signatory of the UN Principles for Responsible Investment (UN PRI).

The principles of responsible corporate governance are firmly anchored in Deka Group and therefore also at IQAM. Deka Group's Code of Ethics serves as a code for responsible corporate governance for all employees, managers, members of the Management Board and all those who act on behalf of Deka Group. The Code of Ethics creates a binding orientation framework for sustainable action within Deka Group by defining guidelines and principles relating to integrity, professionalism, responsibility, trust, collegiality, compliance, sustainability, respect and consequences when dealing with violations.