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Introduction

ESG and socially responsible investing are important themes because they allow investment capital to be directed towards socially responsible companies and projects. As this investment trend develops, there has been a rise in the requirements for defining the sustainability criteria a product should meet. These issues are addressed by the Sustainable Finance Disclosure Regulation (SFDR), which seeks greater transparency on how financial institutions take so-called ESG (environmental, social and governance) criteria into account in their investment decisions and recommendations. The SFDR determines how end clients should be informed about the inclusion of sustainability risks, adverse impacts on sustainability, sustainable investment objectives and/or the promotion of environmental or social characteristics in investment decision-making and other advisory processes.

PARTNERS INVESTMENTS supports sustainable investing and is able to tailor investments to environmental and social goals. To achieve specific ESG objectives, the following investment strategies have been developed: Conservative ESG, Balanced ESG, Dynamic ESG and Thematic. This document summarizes the approach to sustainability in a product and presents specific ESG criteria that both investment instruments and the portfolios themselves must meet. In future, our clients will also be receiving transparent information from us on ESG compliance in our company.

Financial product specifications under the SFDR

PARTNERS INVESTMENTS offers its clients portfolio management services. The portfolios offered are classified according to the SFDR as follows:

- **Conservative, Balanced, Dynamic and Real Estate portfolios** not factoring sustainability criteria in their investment strategies. These portfolios are not considered sustainable within the meaning of the SFDR.
- Conservative ESG, Balanced ESG, Dynamic ESG and Thematic portfolios ("ESG portfolios") promote environmental and social characteristics. Sustainable investing is not the main objective of these products they are so-called light green products within the meaning of Article 8 of the SFDR.

ESG portfolio investment strategies

ESG portfolios are based on the long-term passive investing principle. In terms of investment focus, they are looking for broadly diversified global strategies that take ESG factors into account. They seek to create exposure on world markets crucial in terms of size and importance for the global economy. The focus is primarily on market-wide instruments with selection limited to responsible companies (based on ESG scores).

ESG portfolios focus on acquisition of primary ETF (exchange-traded funds) instruments. Variants of those investment instruments are chosen for ESG portfolios, which themselves promote environmental and social characteristics (more details below). Issuers usually identify such instruments either as ESG (environmental, social and governance) or SRI (socially responsible investing). This designation lets issuers demonstrate that the investment takes certain forms of sustainability into account.

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The Company is incorporated in the Business Register of the Bratislava III Municipal Court, Section Sa, File No 6941/B

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Promoted environmental and social characteristics

ESG portfolios support the environmental and social characteristics under Article 8 of the SFDR by assessing the significance of environmental, social and governance (ESG) risks and opportunities for the underlying assets. The sustainability indicators defined below assess whether an investment instrument meets the environmental and social characteristics those products supposedly support.

Like other portfolios, standard criteria are taken into account when selecting suitable investment instruments. These include the underlying tracked index, the issuer's reputation, the internal cost of the instrument (ICI), the amount of money under management (AUM), market liquidity, spreads and the way the index is replicated.

Besides them, sustainability indicators or 'ESG criteria' are also considered in ESG portfolios, which are based on each investment instrument's sustainability data either their issuers or the MSCI company provide. Investment instruments whose investment policy aims to avoid or reduce sustainability risks are selected.

In particular, the following indicators are considered for sustainability purposes when selecting appropriate instruments:

- Product Classification under the SFDR
- ESG rating
- Carbon intensity
- Absence of controversial sectors.

SFDR Classification

Data on how the SFDR classifies investment instruments under the SFDR are taken from the websites of their issuers. ESG portfolios include investment instruments classified under either Article 8 ("light green" funds) or Article 9 ("dark green" funds).

ESG rating

Each company and country is assigned an ESG rating to by MSCI, a reputable company that indexes stock, bonds and real estate in addition to other services. MSCI rates companies' ESG using a valuation model that identifies and evaluates significant environmental, social and governance opportunities and risks in light of the company's future financial performance. Funds are assigned so-called ESG Fund Rating by MSCI according to the weighted average of the ESG ratings from all the companies whose securities are held in a particular fund. MSCI's ESG ratings vary from AAA, the best, to CCC, the worst. Based on them, MSCI categorizes companies as Leaders (AAA, AA), Average (A, BBB, BB) or Laggards (B, CCC). ETF funds in ESG portfolios must be rated either BBB or higher. To be considered sustainable, investment instruments are required to have an ESG fund rating equal to AAA.

Carbon intensity

Another sustainability indicator taken into account is carbon intensity. It is expressed in tons of carbon dioxide emissions per million dollars of sales of a company and then translated to a scale where the lower the value, the better the rating. Like the ESG ratings, this data is sourced either from the issuers themselves or MSCI. The latter uses the weighted average carbon footprint of issuers of the securities included in the fund. Investment instruments whose carbon footprint is significantly lower than found in standard instruments are selected for ESG portfolios.

Absence of controversial sectors

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In creating ESG portfolios, the emphasis is on eliminating sectors directly at odds with sustainability principles:

Environmental:

- Companies whose main source of income lies in any of the following areas are excluded from the portfolios:
 - Defense (conventional and nuclear)
 - Unconventional oil and gas extraction
 - Coal mining
- The following sectors are likewise excluded as much as possible:
 - Genetically modified organisms
 - Nuclear energy
 - Tar sand extraction
 - o Conventional oil and gas extraction
 - Heat energy
 - Coal and tar sand storage
 - Companies with high greenhouse gas emissions.

<u>Social</u>

- Companies whose main source of income lies in any of the following areas are excluded from the portfolios:
 - o Tobacco
 - Domestic firearms
 - Conventional weapons
 - Nuclear weapons

In addition, other sustainability criteria are taken into account when deciding on the inclusion of an investment instrument in ESG portfolios:

- Percentage of income generated from fossil fuels
- Percentage of income generated from green sources (e.g. alternative energy sources)
- Supervisory board independence
- Representation of women in company management
- MSCI's most serious controversial factors
- Factoring in of the UN Global Compact initiative

Strategic allocation of ESG portfolios

In terms of strategic allocation, ESG portfolios with dynamic and thematic strategies should hold only equity and those with conservative and balanced strategies should hold both equity and bonds. These portfolios aim to approximate their structure, and thus their performance, as much as possible to the global market portfolio, taking into account the number of responsible companies, where they are located around the world and their market capitalization.

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Portfolio composition and selected instruments

The objectives are to create globally diversified equity-bond portfolios that factor in ESG and to gain exposures for them on key global markets in terms of global market capitalization. They should achieve exposure in all major trendsetting regions in global equity markets, specifically in the United States, Europe and Japan. In addition, for a truly globally diversified investment strategy, it is desirable to select instruments also covering stock markets in developing countries, which provide significant diversification and contribute toward mitigating a global portfolio's volatility, as proven by research. A portfolio is strategically allocated across these four areas according to both importance and size (in terms of market capitalization) of individual regions and the distribution and size of responsible, sustainable companies around the world. They are found mostly in developed countries and usually are characterized by high market capitalization.

In order to achieve the target exposure, ETFs from ESG leaders - Blackrock (ishares), Amundi, UBS and Xtrackers were selected, taking into account mainly exposure, liquidity and sustainability criteria.

MSCI carbon intensity tCO2 / MSCI areen MSCI fossil MSCI \$m based fuel FSG Board ISIN Security sales) revenues evenues rating independence Board diversity iShares EUR High Yield Corp Bond ESG UCITS ETF EUR IE00BJK55C48 (Acc) 137,5 3,60% 0,60% AA 79,20% 37,30% Shares \$ Development Bank Bonds UCITS ETF EUR IE00BMCZI H06 Hedged (Acc) 1,5 0,00% 0,00% AAA 87,70% 42,00% Shares \$ High Yield Corp Bond ESG UCITS ETF EUR IE00BMDFDY08 Hedged (Acc) 171,8 2,50% 0,60% AA 78,30% 28,60% UBS (Lux) Fund Solutions – Bloomberg MSCI US Liquid LU1215461325 0,10% Corporates Sustainable UCITS ETF (hedged to EUR) A-acc 37.8 2,90% AAA 83,40% 35,00% UBS (Lux) Fund Solutions – J.P. Morgan USD EM IG ESG Diversified Bond UCITS ETF (hedged to EUR) A-acc LU1974696418 380,8 2,80% 5.60% BBB 65,40% 20,40% UBS (Lux) Fund Solutions – MSCI Japan Socially LU1273488715 Responsible UCITS ETF (hedged to EUR) A-acc 35.9 4,10% 0.00% AAA 47,20% 18,90% AMUNDI INDEX EURO CORPORATE SRI - UCITS ETF DR LU1437018168 (C) 0.20% 39.60% 93.3 4.80% AAA 84,30% AMUNDI INDEX MSCI EUROPE SRI PAB - UCITS ETF DR LU1861137484 (C) 60,2 5,80% 0,00% AA 85,70% 40,30% AMUNDI INDEX MSCI USA SRI PAB - UCITS ETF DR -LU2153616599 HEDGED EUR (C) 43,7 8,70% 0,00% AAA 85,00% 33,40% AMUNDI MSCI EMERGING ESG LEADERS - UCITS ETF LU2109787551 DR (C) 216.5 5.30% 2.50% 63.10% 17.60% AA

Target portfolio structure and chosen instruments

Conservative ESG strategy

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Balanced ESG strategy

			MSCI green based	MSCI fossil fuel	MSCI ESG	Board	Board
ISIN	Security	2 / \$m sales)	revenues	revenues	rating	independence	diversity
IE00BJK55C48	iShares EUR High Yield Corp Bond ESG UCITS ETF EUR (Acc)	137,5	3,60%	0,60%	AA	79,20%	37,30%
IE00BMCZLH06	iShares \$ Development Bank Bonds UCITS ETF EUR Hedged (Acc)	4,5	0,00%	0,00%	ААА	87,70%	42,00%
IE00BMDFDY08	iShares \$ High Yield Corp Bond ESG UCITS ETF EUR Hedged (Acc)	171,8	2,50%	0,60%	AA	78,30%	28,60%
LU1215461325	UBS (Lux) Fund Solutions – Bloomberg MSCI US Liquid Corporates Sustainable UCITS ETF (hedged to EUR) A-acc	37,8	2,90%	0,10%	ААА	83,40%	35,00%
LU1974696418	UBS (Lux) Fund Solutions – J.P. Morgan USD EM IG ESG Diversified Bond UCITS ETF (hedged to EUR) A-acc	380,8	2,80%	5,60%	BBB	65,40%	20,40%
LU1273488715	UBS (Lux) Fund Solutions – MSCI Japan Socially Responsible UCITS ETF (hedged to EUR) A-acc	35,9	4,10%	0,00%	ААА	47,20%	18,90%
LU1437018168	AMUNDI INDEX EURO CORPORATE SRI - UCITS ETF DR (C)	93,3	4,80%	0,20%	AAA	84,30%	39,60%
LU1861137484	AMUNDI INDEX MSCI EUROPE SRI PAB - UCITS ETF DR (C)	60,2	5,80%	0,00%	AA	85,70%	40,30%
LU2153616599	AMUNDI INDEX MSCI USA SRI PAB - UCITS ETF DR - HEDGED EUR (C)	43,7	8,70%	0,00%	ААА	85,00%	33,40%
LU2109787551	AMUNDI MSCI EMERGING ESG LEADERS - UCITS ETF DR (C)	216,5	5,30%	2,50%	АА	63,10%	17,60%

Dynamic ESG strategy

		MSCI carbon	MSCI green	MSCI fossil	MSCI		
		intensity(tCO	based	fuel	ESG	Board	Board
ISIN	Security	2 / \$m sales)	revenues	revenues	rating	independence	diversity
	iShares Sustainable MSCI Emerging Markets SRI UCITS						
IE00BYVJRP78	ETF	121,8	5,40%	0,60%	AA	66,60%	19,70%
IE00B52VJ196	iShares MSCI Europe SRI UCITS ETF EUR (Acc)	63	6,30%	0,50%	AA	85,40%	40,50%
IE00BYVJRR92	iShares Sustainable MSCI USA SRI UCITS ETF	65,2	7,90%	0,90%	AAA	85,40%	33,30%
IE00BG36TC12	Xtrackers MSCI Japan ESG UCITS	55,6	5,60%	0,00%	AAA	49,00%	18,50%

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Thematic ESG strategy

		MSCI carbon	MSCI green	MSCI fossil	MSCI		
		intensity(tCO	based	fuel	ESG	Board	Board
ISIN	Security	2 / \$m sales)	revenues	revenues	rating	independence	diversity
IE00BYZK4669	iShares Ageing Population UCITS ETF	18,8	0,10%	0,00%	A	76,20%	31,10%
IE00BYZK4552	iShares Automation & Robotics UCITS ETF	24	5,20%	0,00%	AAA	73,70%	27,00%
IE00BYZK4883	iShares Digitalisation UCITS ETF	32,3	3,30%	0,00%	AAA	78,50%	30,40%
IE00BYZK4776	iShares Healthcare Innovation UCITS ETF	25,6	0,00%	0,00%	A	78,10%	29,80%
	AMUNDI INDEX MSCI WORLD SRI PAB - UCITS ETF DR						
LU1861134382	(C)	48,4	9,40%	0,00%	AAA	82,40%	34,10%
	AMUNDI MSCI EMERGING ESG LEADERS - UCITS ETF						
LU2109787551	DR (C)	216,5	5,30%	2,50%	AA	63,10%	17,60%

Portfolio benchmark choice

Index

In view of the broad global focus desired from the investment strategies, their composition and the choice of individual instruments, wide-ranging, globally-oriented benchmarks should be chosen in order to compare performance.

The benchmarks for ESG portfolios are indices synthetically generated from the publicly available indices listed in the table below.

A dynamic ESG portfolio benchmark should be an index synthetically generated from two publicly available reputable company indices created by MSCI. These are the MSCI WORLD SRI NET EUR and MSCI EM SRI Select Reduced Fossil Fuels Net USD Index and they focus on responsible companies from developed and emerging countries respectively. The synthetically generated benchmark combines these two indices in a ratio of equities from developed and emerging countries.

The Conservative ESG portfolio benchmark is a synthetic index consisting of the following indices

Index	Weight
BI. Barcl. MSCI Global Agg Sust. TR Index Value Unh. USD	80%
MSCI ACWI SRI Net Total Return USD Index	20%

The Balanced ESG portfolio benchmark is a synthetic index consisting of the following indices

Weight

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BI. Barcl. MSCI Global Agg Sust. TR Index Value Unh. USD	40%
MSCI ACWI SRI Net Total Return USD Index	60%

The Thematic portfolio benchmark is a synthetic index consisting of the following indices

Index	Weight
MSCI WORLD SRI 5% ISSUER CAPPED USD Net Total Return	50%
MSCI EM (EMERGING MARKETS) SRI Net Total Return USD Index	10%
MSCI World Select Sustainable Mega Trends Net Return USD Index	40%

EU Taxonomy

ESG portfolios, as financial products, do not take into account the EU criteria for environmentally sustainable economic activities defined by the EU Taxonomy.

Adverse impacts on sustainability factors (PAI)

Currently, investment strategies indirectly take into account the substantial adverse impacts on sustainability factors (PAI) by considering the impact on ETF issuers included in the investment strategies specified below.

	Conservative ESG	Balanced ESG	Dynamic ESG	Thematic
Greenhouse gas emissions	Yes	Yes	Yes	Yes
Biodiversity	Yes	Yes	Yes	Yes
Water protection	Yes	Yes	Yes	Yes
Hazardous waste	Yes	Yes	Yes	Yes
Social and employment factors	Yes	Yes	Yes	Yes

Data sources

Specific information on ESG characteristics, sustainable investment objectives and methodologies, and how individual investment instruments are assessed for sustainability was provided either by the issuers or obtained from MSCI. The websites are listed below: https://www.blackrock.com/corporate/about-us/investment-stewardship#guidelines https://www.blackrock.com/corporate/about-us/investment-stewardship#guidelines https://www.blackrock.com/corporate/about-us/investment-stewardship#guidelines https://www.blackrock.com/corporate/about-us/investment-stewardship#guidelines https://www.blackrock.com/corporate/about-us/investment-stewardship#guidelines https://www.blackrock.com/corporate/about-us/investment-stewardship#guidelines https://www.blackrock.com/global/en/assetmanagement/capabilities/sustainable-investing.html https://www.blackrock.com/en-gb/IE00BG36TC12-msci-japan-esg-ucits-etf-1c/ https://www.msci.com/our-solutions/esg-investing/esg-fund-ratings-climate-search-tool

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