

## OptoFlex

### OptoFlex – description of sustainability strategy pursuant to Article 10 of the Sustainable Finance Disclosure Regulation (SFDR)

This Fund is a financial product promoting environmental and social characteristics and is qualified according to Article 8 (1) of Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector.

The Fund’s main investment objective is to generate a positive annual return and achieve income while keeping economic risks at a reasonable level.

In order to achieve the investment objective, Fund Assets will mainly be invested worldwide in bonds (including floating rate notes), money market instruments, demand deposits, target funds (money market funds, near-money-market funds or pension funds) or derivatives. Derivatives in this case are mainly options and futures on US stock indices and/or their volatility indices. Where bonds are acquired directly, the bonds concerned or the issuer of the bonds must have an investment grade rating.

The promoted environmental and social characteristics are asserted through mandatory investment limits or exclusions. A continuous investment limit review process ensures compliance with these minimum requirements.

## Summary

<b>1. Sustainable investment objectives of the investments partially made by the financial product</b>	
This financial product promotes environmental or social characteristics, but does not have sustainable investment as its objective.	
Are the principal adverse impacts (PAIs) of investment decisions on sustainability factors considered for this Sub-Fund?	<input checked="" type="checkbox"/> Yes, as described in detail in the pre-contractual disclosure. <input type="checkbox"/> No
<b>2. Environmental or social characteristics of the financial product</b>	
The Fund promotes environmental and social characteristics concerning the environment (including climate change and pollution), social aspects (including human capital and social standards) and governance (corporate governance and corporate conduct) as well as general ESG quality. Minimum requirements have been defined for investments in individual securities and target funds (FERI ESG methodology).	
<input checked="" type="checkbox"/> Exclusion criteria	<input checked="" type="checkbox"/> ESG
<input type="checkbox"/> Sustainable investments	This Fund does not have sustainable investment as its objective.
<b>3. Investment strategy</b>	
The promoted environmental and social characteristics are asserted through mandatory investment limits. This is accomplished by limiting the investment universe of the Fund using ESG-specific exclusion criteria.	
<b>4. Distribution of the investments</b>	
As a rule, the Fund invests predominantly in assets that are in accordance with the promoted environmental and social characteristics. Besides investments geared towards environmental and social characteristics, the Fund also holds assets that are not based on the defined sustainability indicators, including demand deposits, callable deposits and fixed-term deposits. Likewise, investments in derivatives are not part of the ESG strategy and do not serve to meet the environmental and social characteristics of the Fund.	
<b>5. Monitoring of the environmental and social characteristics</b>	
Attainment of the environmental and social characteristics is continuously monitored using the sustainability indicators for this purpose. This involves a daily review of the assets invested in based on the defined exclusion criteria and ESG integration criteria.	
<b>6. Methods for environmental or social characteristics</b>	
The FERI ESG methodology includes binding elements of the investment strategy that are used to select investments that meet the promoted environmental and social characteristics. The methodology includes exclusion criteria for individual securities (i.e. sovereign and non-sovereign bonds and equities) and target funds as well as a system to review ESG quality and performance of issuers or companies.	

<input checked="" type="checkbox"/> Exclusion criteria	The FERI ESG methodology defines exclusion criteria for individual securities (sovereign and non-sovereign bonds and equities) and target funds. Sovereign bonds, in the form of both direct investments in individual securities and indirect investments through a target fund, may not originate from issuers that are classified as “not free” in accordance with the Freedom House Index and that have more than one criterion in the lowest quartile of the Worldwide Governance Indicators (WGI). Moreover, they may only be held as direct investments if the issuer does not emit more than 1,500 tonnes of CO2 per million euros of gross domestic product and generates a maximum of 10% of its turnover from nuclear energy. In addition, the issuer has not committed any human rights violations. Negative exclusion criteria are defined for non-sovereign bonds, equities and target funds based on the business segments of the investee companies. Exclusions are also applied in the event of violations of global standards and with respect to climate and environmental risks.
<input checked="" type="checkbox"/> ESG integration	FERI ESG methodology: <ul style="list-style-type: none"> <li>▪ Direct investments in equities and corporate bonds: minimum ESG rating of BBB.</li> <li>▪ Investment funds: minimum ESG rating of BBB or among best 25% of the peer group.</li> </ul>
<input type="checkbox"/> Sustainable investments	This Fund does not have sustainable investment as its objective.  <b>The fund did not aim to make any taxonomy-compliant investments in fossil gas and/or nuclear energy. Nevertheless, it may be the case that it also invested in companies that are also active in these areas as part of its investment strategy. The percentage of taxonomy-compliant investments, including investments in fossil gas and/or nuclear energy, is therefore shown as 0% as at the reporting date.</b>
<b>7. Data sources and processing</b>	
The portfolio management team obtains data from various specialist data providers and also analyses publicly accessible data. The portfolio manager allocates scores to the raw sustainability data obtained in order to place them in the overall context. Refined data is also obtained and exclusion criteria defined on the basis of raw data.	
<b>8. Restrictions regarding methods and data</b>	
Potential restrictions may arise with regard to the quality and completeness of data, which may vary considerably between investments.	
<b>9. Investment evaluation (due diligence)</b>	
The Management Company has defined procedures to ensure that the environmental and/or social characteristics promoted by the Fund are maintained during the evaluation of the underlying assets.	
<b>10. Engagement policy</b>	
Engagement is not part of the environmental or social investment strategy of the Sub-Fund.	
<b>11. Designated reference benchmark</b>	
No index is used as a reference benchmark for the Fund to determine whether this financial product is aligned with the promoted environmental and/or social characteristics.	