PAI Statement

Statement on the main adverse impacts of investment decisions on sustainability factors

Preamble

This publication serves the transparency of adverse effects on sustainability factors - the so-called PAIs (Principal Adverse Impacts) - at the level of our company and as financial market participant.

EB - Sustainable Investment Manager GmbH, hereinafter referred to as EB-SIM, is an asset manager for liquid and alternative assets.

The aggregation of data from these different business activities / portfolios misses, in our view, the goal of a transparent disclosure of adverse impacts on sustainability factors at the company level. Therefore, in this document, we disclose a PAI statement for liquid portfolio management and a PAI statement for portfolio management in illiquid, so-called alternative-assets.

Justification:

a. Even though we have decided to issue a statement on all mandatory PAIs for the business area of alternative assets, we do not combine the data from the two business units due to differences in data availability and quality. In some cases, no data is available for the PAIs of alternative assets, so that the data in the liquid area would be "diluted".

b. Data from the data provider MSCI ESG Research is used for liquid assets. Thus, the calculations are based on the assumptions / parameters of MSCI ESG Research. For the alternative assets, own assumptions / parameters were defined. Thus, different assumptions / parameters can exist for a PAI.

We will review this procedure of separate presentation regularly, at least annually, before preparing our next PAI-Statement. This year's review did not reveal any need to change the procedure described above.

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Financial market participant EB - Sustainable Investment Management GmbH,

LEI 529900Y0LNAZYNTVUR39

Summary:

EB - Sustainable Investment Management GmbH (hereafter EB-SIM), LEI 529900Y0LNAZYNTVUR39 considers as financial market participant the main adverse impacts of its investment decisions on sustainability factors.

We consider the main adverse impacts - the so-called PAIs (Principal Adverse Impacts) - at company level by measuring and monitoring the cumulative adverse impacts of the investments on the sustainability factors. In our investments, we take into account the indicators for the principal adverse impacts in particular via exclusion criteria.

Key adverse impacts on sustainability factors include climate indicators and other environment-related indicators such as greenhouse gas emissions, non-renewable energy consumption, adverse impacts on biodiversity, water, and through waste:

By taking into account - for portfolios investing in liquid asset classes - exclusion criteria, such as more than 5% revenues in coal production, the negative impact due to greenhouse gas emissions and non-regenerative energy consumption were considered.

This kept the exposure to critical companies low.

In addition, no investments were made in countries with very poor climate protection.

By specifically investing in renewable energies in the alternative portfolios (alternative assets) and through the use of exclusion criteria the greenhouse gas emissions, including the associated PAIs, were taken into account.

In addition, adverse impacts on biodiversity and water as well as through waste were included in the liquid portfolios by taking into account exclusion criteria. For example, companies with a strongly negative impact on the Sustainable Development Goals of the United Nations (SDGs) 14[1] and 15[2] in combination with a low ESG-rating were excluded from the investment universe. This kept the exposure to critical companies low.

In the area of alternative assets, the environmental permits of the alternative asset properties and the conditions contained therein, which take biodiversity, water, and waste PAIs into account, were reviewed.

Social and employment indicators were included in both liquid portfolios and alternative portfolios:

Companies with a proven record of very serious and systematic violations of the UN Global Compact, the ILO (core) labor standards or the OECD Guidelines for Multinational Enterprises were not eligible for investment. In this context, the UN Global Compact also works towards the elimination of discrimination in employment.

[1] https://sdgs.un.org/goals/goal14 - Conserve and sustainably use the oceans, seas and marine resources for sustainable development

[2] https://sdgs.un.org/goals/goal15 - Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss

Companies producing **controversial weapons** and countries with **very low levels of human rights protection** were both not investable. In addition, countries that are classified as 'not free' according to the Freedom House Index were excluded.

This statement on the main adverse impacts on the sustainability factors relates to the reference period from 1 January to 31 December 2025.

The complete PAI statements for liquid portfolios and for alternative assets as financial market participant can be found published in German on our homepage: https://eb-sim.de/wp-content/uploads/2026/06/PAI-Statement-FMT-EB-SIM_20260630-1.pdf

EB - Sustainable Investment Management GmbH

Kassel, 30th June 2026