I-AM ETFs-Portfolio Select

Ampega Investment GmbH

#### **ANNEX**

Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

Product name: I-AM ETFs-Portfolio Select Legal entity identifier: 529900I5WDB7ZQS4RO15

### **Environmental and/or social characteristics**

#### Sustainable investment

means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of environmentally sustainable economic activities. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

| Does this financial product have a sustainable investment objective?   |   |  |  |  |  |
|--|---|--|--|--|--|
| • • Yes  | ●● X No   |  |  |  |  |
| It will make a minimum of sustainable investments with an environmental objective:%  in economic activities that qualify as environmentally sustainable under the EU Taxonomy  in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy | It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of% of sustainable investments  with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy |  |  |  |  |
| It will make a minimum of sustainable investments with a social objective:%  | with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy  with a social objective  It promotes E/S characteristics, but will not make any sustainable investments  |  |  |  |  |
|  |   |  |  |  |  |



Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.

## What environmental and/or social characteristics are promoted by this financial product?

In addition to financial performance, the following environmental and social characteristics are taken into account when selecting assets:

- Environmental: Avoidance of climate transition risks, conservation of flora and fauna, protection of natural resources and the atmosphere, limitation of soil degradation and climate change, avoidance of interference with ecosystems and losses of biodiversity.
- Social: Universal human rights, prohibition of child labour and forced labour, compliance with the principles of equal treatment, fair working conditions and appropriate remuneration.
- Governance: Compliance with business ethics and anti-corruption principles in accordance with the UN Global Compact, principles of corporate governance and regulations for the prevention of money laundering and terrorist financing.

The ESG selection process looks for target funds that have integrated ESG criteria into their investment process. This means that they promote environmental or social characteristics or a combination of these characteristics (Article 8 of the Disclosure Regulation) or aim for a sustainable investment (Article 9 of the Disclosure Regulation). Based hereon, both positive criteria and negative criteria are taken into account in the selection process. In addition, it is important to maintain an active dialogue with the providers of target funds in order to obtain detailed information about their entire investment process on the one hand and to find out how ESG criteria are taken into account in it on the other. The manager thus sees ESG integration as a tool for reducing (ESG) risks which can thus make a positive contribution to the overall return of the portfolio.

This ESG screening is only to be understood as a basic component. The delegated manager not only works by applying filters, but also supplements them with qualitative analyses. Data and assessments from rating agencies, amongst others, are used to assess the sustainable orientation of a potential investment. As an external manager, Impact Asset Management obtains the underlying data and detailed background information from MSCI ESG Research, Institutional Shareholder Services (ISS) and Morningstar.

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 What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?

| Indicator   | Funds that are classified in accordance with Article 8 or 9 of the    |  |  |
|-------------|---|--|--|
|             | Disclosure Regulation   |  |  |
| Description | Funds that promote environmental or social characteristics and        |  |  |
|             | observe the principles of corporate governance or aim for sustaina-   |  |  |
|             | ble investment are considered sustainable. Particular care is taken   |  |  |
|             | to ensure that investments are made exclusively in target funds that  |  |  |
|             | are classified as funds in accordance with Article or 9 of Regulation |  |  |
|             | (EU) 2019/2088 on sustainability-related disclosure requirements in   |  |  |
|             | the financial services sector and are promoted as such.               |  |  |
| Methodology | Verification that the funds are classified in accordance with the     |  |  |
|             | Disclosure Regulation pursuant to Article 8 or 9.                     |  |  |
|             |   |  |  |
|             |   |  |  |
| Indicator   | Funds classified under MiFID II                                       |  |  |
| Description | Investments are made in target funds which, according to Article 2    |  |  |
|             | no. 7 of Delegated Regulation (EU) 2017/565 (as amended by Delegat-   |  |  |
|             | ed Regulation 2021/1253) (MiFID II) show or correspond to a combina-  |  |  |
|             | tion of   |  |  |
|             | (a) Minimum proportion in environmentally sustainable investments     |  |  |
|             | within the meaning of Article 2 number 1 of Regulation (EU) 2020/852; |  |  |
|             | (b) Minimum proportion in sustainable investments within the          |  |  |
|             | meaning of Article 2 number 7 of Regulation (EU) 2019/2088;           |  |  |
|             | (c) A consideration of the most significant adverse impacts on sus-   |  |  |
|             | tainability factors or a combination thereof.                         |  |  |
| Methodology | Verification that the funds comply with at least one of the require-  |  |  |
|             |   |  |  |
|             | ments (a) to (c) described above under MiFID II.                      |  |  |

 What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

Not relevant for this fund.

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-cor-

ruption and anti-bribery

matters.

• How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?

Not relevant for this fund.

 How have the indicators for adverse impacts on sustainability factors been taken into account?

Not relevant for this fund.

I – How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:

Not relevant for this fund.

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



Does this financial product consider principal adverse impacts on sustainability factors?

Yes

X No



#### What investment strategy does this financial product follow?

I-AM ETFs-Portfolio Select invests in investment funds with different investment focuses. At least 51% of the value of the fund is invested in units of exchange-traded funds. Up to 49% of the value of the fund may be invested in other units. These shall exclusively be money market funds.

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The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

The selection of target funds is based on qualitative and quantitative criteria and on the principle of sustainability. Funds that promote ecological or social characteristics and observe the principles of corporate governance or strive for sustainable investment are considered sustainable. Particular care is taken to ensure that investments are made exclusively in target funds that are classified as funds in accordance with Article 8 or 9 of Regulation (EU) 2019/2088 on sustainability-related disclosure requirements in the financial services sector and are promoted as such.

To the mandated manager Impact Asset Management GmbH, sustainability means responsible entrepreneurial action for long-term economic success in harmony with the environment and society. Sustainability is a central component of its business policy. With regard to the sustainable products it manages, the manager pays attention – in line with the United Nations' definition of sustainability – to a balanced investment that allows the needs of today's generation to be met without restricting those of the future ones. Sustainability in the investment process is achieved through full ESG integration, short for Environment, Social and Governance.

The composition of the portfolio as well as the ESG scores, exclusions and other sustainability factors of the underlying assets are reviewed both at the time the investment decision is made and on an ongoing basis.

The assessment of the social and environmental characteristics of the investments is based on information from specialised external data providers as well as on own analyses conducted by internal analysts.

 What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

The selection of target funds is based on qualitative and quantitative criteria and on the principle of sustainability. Funds that promote ecological or social characteristics and observe the principles of corporate governance or aim for sustainable investment are considered sustainable. Particular care is taken to ensure that investments are made exclusively in target funds that are classified as funds in accordance with Article 8 or 9 of Regulation (EU) 2019/2088 on sustainability-related disclosure requirements in the financial services sector and are promoted as such. There is no target fund screening.

The selection of target funds is therefore based on the following criteria in order to ensure that issuers that do not take sufficient account of sustainability principles ("ESG") are excluded from the outset from the target fund investments:

• The positive criteria are based, on the one hand, on legal provisions and on the other hand on E (Environmental), S (Social) and G (Governance) criteria. For example, a classification as Article 8 or Article 9 products according to the Disclosure Regulation is essential for target funds.

- The negative criteria are intended to filter out those target funds whose assets
  include a corresponding portion in ethically or morally questionable industries
  (including controversial weapons, coal, shale gas, tobacco), violate global
  standards (UN Global Compact, ILO core labour standards) or are involved in
  serious controversies. Negative criteria do not always mean a full exclusion of a
  business segment or practice. In some cases, thresholds have been set in terms of
  materiality.
- What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

Not relevant for this fund.

• What is the policy to assess good governance practices of the investee companies?

Good governance practices are assessed through the orientation on positive and negative criteria as well as the classification of the target funds in accordance with Article 8 or 9 of Regulation (EU) 2019/2088 on sustainability-related disclosure requirements in the financial services sector.

# Good governance practices include sound management structures, employee relations,

remuneration of staff and

tax compliance.



#### What is the asset allocation planned for this financial product?

The assets of the fund are divided into different categories in the chart below. The respective share of the fund's assets is shown as a percentage. "Investments" covers all assets that can be acquired for the fund.

Category "#1 Geared towards ecological or social characteristics" comprises those assets that are transacted within the framework of the investment strategy to achieve the promoted ecological or social characteristics.

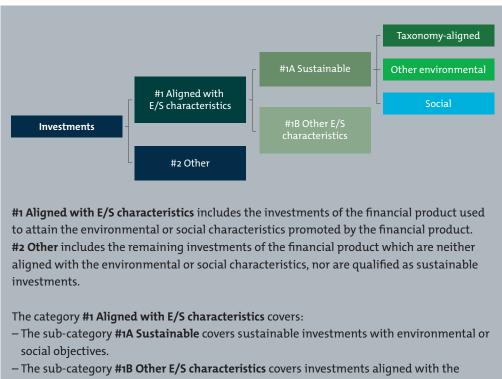
Category "#2 Other investments" includes, for example, derivatives, bank deposits or financial instruments for which there is not enough data to be able to assess it for the sustainable investment strategy of the fund.

Category "#1A Sustainable investments" includes sustainable investments as defined in Article 2 Item 17 of the Disclosure Regulation. This includes investments that can be used to pursue "taxonomy-compliant" environmental goals, "other environmental goals" and social goals ("Social"). Category "#1B Other environmental or social characteristics" includes investments that target environmental and social characteristics, but do not qualify as sustainable investment.

Asset allocation describes the share of investments in specific assets. Taxonomy-aligned activities are expressed as a share of:

- turnover reflecting the share of revenue from green activities of investee companies
- capital expenditure (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- operational expenditure (OpEx) reflecting green operational activities of investee companies.

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- environmental or social characteristics that do not qualify as sustainable investments.
  - How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

Not relevant for this fund.

To comply with the EU Taxonomy, the criteria for fossil gas include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.



#### To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

At this point in time, the company does not yet have any reported and reliable data to be able to bindingly determine ecologically sustainable economic activities in accordance with the requirements as set forth in Article 3 of the Taxonomy Regulation. The minimum share of taxonomy-compliant investments is therefore reported as zero per cent (0%).

| • | Does the financial product invest in fossil gas and/or nuclear energy related activities |
|---|--|
|   | that comply with the EU Taxonomy¹?   |

|   | Yes: |               |                   |
|---|------|---------------|-------------------|
|   |      | In fossil gas | In nuclear energy |
| × | No   |               |                   |

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds. 1. Taxonomy-alignment of 2. Taxonomy-alignment of investments including investments excluding sovereign bonds\* sovereign bonds\* 0% 0% Taxonomy-aligned Taxonomy-aligned Other investments 100% Other investments 100% \* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.

#### **Enabling activities**

directly enable other activities to make a substantial contribution to an environmental objective.

#### Transitional activities are

activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance. • What is the minimum share of investments in transitional and enabling activities?

At this point in time, the company does not yet have any reported and reliable data to be able to bindingly determine ecologically sustainable economic activities in accordance with the requirements as set forth in Article 3 of the Taxonomy Regulation. The minimum share of taxonomy-compliant investments is therefore reported as zero per cent (0%).



are sustainable investments with an environmen-

tal objective that **do not take into account the criteria** for environmentaly sustainable economic activities under the EU
Taxonomy.



What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

Not relevant for this fund.

Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

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#### What is the minimum share of socially sustainable investments?

Not relevant for this fund.



What investments are included under "#2 Other", what is their purpose and are there any minimum environmental or social safeguards?

Hedging instruments, investments for diversification purposes, investments for which no data is available, or cash for liquidity management purposes.



#### Where can I find more product specific information online?

#### Further product-specific information is available at:

DE0005322218 - I-AM ETFs-Portfolio Select EUR (t) (ampega.de)
DE000A1C4DQ3 - I-AM ETFs-Portfolio Select CZK (t) (ampega.de)
DE000A1J3AF7 - I-AM ETFs-Portfolio Select EUR P1 (ampega.de)