



Disclosure on sustainability in accordance with Regulation (EU) 2019/2088 and Regulation (EU) 2020/852

1. General

The new EU Regulation 2019/2088 on sustainability-related disclosure requirements in the financial services sector (Sustainable Finance Disclosure Regulation; SFDR for short) and EU Regulation 2020/852 on the establishment of a framework to facilitate sustainable investment (Taxonomy Regulation; TR for short) aim to integrate sustainability criteria (so-called ESG criteria: environment, social and governance) into business or investment decisions. PRIME Fund Solutions AG fulfils the disclosure obligations with this document.

This document is intended as pre-contractual information for potential clients. The latest version is available at any time on the PRIME Fund Solutions AG website.

2. Consideration of sustainability factors

Investment decisions can have a particularly negative impact on the environment and the fight against corruption and bribery. PRIME Fund Solutions AG endeavours to fulfil its responsibility as a financial market participant and to contribute to avoiding such adverse effects at company level. Furthermore, the company endeavours to always make investment decisions in a highly professional manner and in the best interests of its clients, based on its market knowledge, experience and access to research, as well as on the basis of a medium or long-term investment horizon.

We analyse the ESG criteria during the investment process. If sustainability risks arise, they are assessed in terms of their financial impact and taken into account in the risk assessment as part of the investment process. Sustainability risks are ESG risks in particular, which can have a negative impact on the value of the investments.

Sustainability risks can have a negative impact on the return, profitability or reputation of issuers. PRIME Fund Solutions AG does not take into account the EU criteria for environmentally sustainable economic activities in its investment strategies. At present, the investment strategies do not take into account any adverse effects on sustainability risks.

3. Remuneration policy and integration of sustainability risks

The company offers transparency and consistency in its remuneration strategy. There are no performance-related fees or sales-based commissions. Rather, all employees are remunerated with a fixed fee, which ensures that the remuneration structure does not encourage risk-taking in relation to sustainability risks. Consequently, the company



believes that its remuneration policy is compatible with the integration of such risks.

4. Marketing communication

The Company ensures that its marketing communications do not contradict the information disclosed in accordance with the SFDR.

5. Publication and timeliness

The Company will ensure that any information it publishes in relation to SFDR is kept up to date and if such information is amended, a clear explanation of that amendment will be disclosed accordingly.

Status: 18/06/2024