HAUCK & AUFHÄUSER FUND SERVICES

ESG Charter

October 2025

1 Introduction

This charter is a foundational document that outlines the principles, values, and objectives of our organization concerning environmental, social, and governance (ESG) issues. It serves as a guide for actions and decision-making, ensuring that all activities at Hauck & Aufhäuser Fund Services S.A. (hereinafter referred to as “HAFS” or “us”) align with the established principles of sustainability and social responsibility.

Our ESG Charter is an integral part of our corporate strategy, reflecting our commitment to placing these values at the forefront of our operations. It provides a clear framework for integrating ESG criteria into our business processes, ensuring that we meet stakeholder expectations while actively contributing to addressing global challenges.

By implementing this charter, we commit to protecting the environment, promoting social equity, and ensuring transparent, ethical corporate governance. Our goal is to shape a sustainable future that benefits both present and future generations, while maintaining our focus on achieving economic objectives.

1.1 Regulatory background

The European Union has established a robust regulatory framework to guide ESG practices, prominently featuring the so-called “EU Taxonomy Regulation” (Regulation (EU) 2020/852) and the so-called “Sustainable Finance Disclosure Regulation”, known as “SFDR” (Regulation (EU) 2019/2088).

The EU Taxonomy provides a classification system for environmentally sustainable activities, aiming to create a common language for investors and companies. It sets out criteria for economic activities that significantly contribute to environmental objectives, such as climate change mitigation and biodiversity protection, while laying down criteria to ensure that other environmental objectives are not significantly harmed. This regulation also lays out a disclosure mechanism for companies’ eligibility of and alignment with these criteria, fostering transparency and comparability in the industry.

The SFDR on the other hand enhances transparency in the area of sustainable finance by requiring so-called financial market participants to disclose sustainability-related information. It mandates both entity-level and product-level disclosures, focusing on how sustainability risks are integrated into investment decisions and how principal adverse impacts of investment decisions are considered.

Together, these regulations, including their delegated acts and related regulatory guidance, form a comprehensive framework serving as the foundation of our ESG Charter that incorporates transparency, accountability and best practice, as well as compliance with sustainability standards.

In Luxembourg, the luxembourgish national competent authority (“NCA”), the “Commission de surveillance du secteur financier” (“CSSF”), has over time reinforced ESG supervision through SFDR-related data collections and the roll-out of targeted guidelines. Since 2023, the CSSF requires management companies to submit detailed ESG-/sustainability-related information (covering pre-contractual, periodic and website disclosures) via dedicated data collection exercises. Key guidelines implemented by the CSSF to further enhance the supervision of industry practices include the Circular CSSF 24/863, incorporating the ESMA Guidelines on funds’ names using ESG or sustainability-related terms (ESMA34-1592494965-657) and the CSSF FAQ Sustainable Finance Disclosure Regulation (SFDR) in its most recent version.

2 Vision, Strategy, Mission and Commitment

2.1 Vision and Strategy

Vision:

Our vision is to position ourselves as a leader in ESG advisory, driving positive ESG outcomes through our expert knowledge. We aim to create long-term value for our clients while contributing to a more sustainable and equitable world.

Strategy:

1. Integration of ESG Factors:
   Facilitate ESG considerations into every stage of the investment process, from due diligence to portfolio management, ensuring that all investment decisions consider sustainability criteria.

2. Risk Management:
   Develop robust frameworks to identify and manage ESG-related risks, enhancing the resilience and stability of investment portfolios.

3. Active Engagement:
   Engage actively with portfolio companies to promote sustainable practices and encourage transparency in ESG reporting.

4. Transparency and Reporting:
   Commit to promote clear and comprehensive reporting on ESG data, providing investors with superior insights.

5. Education and Collaboration:
   Educate stakeholders and partners on the importance of ESG considerations and collaborate with industry leaders to advance sustainable investment practices.

6. Continuous Improvement:
   Regularly review evolving global standards and best practices, ensuring that we remain at the forefront of regulatory developments.

By implementing this vision and strategy, we strive to achieve superior investment support while aiming for a meaningful impact on society and the environment.

2.2 Mission

As a management company and as a service provider to the financial sector, we are dedicated to supporting responsible investments through offering advisory services that support our clients in defining an ESG strategy, as well as in collecting and reporting the required ESG Data.

Transparency is central to our approach, and we ensure comprehensive reporting on ESG data. Additionally, we educate our clients on the importance of ESG considerations and provide them with the tools and information that is necessary in the context of sustainability matters.

2.3 Commitment

At HAFS we recognize that sustainable investment is not only essential for society and ultimately the well-being of our planet, but also fundamental to long-term success. We therefore commit to integrate ESG principles into every facet of our operations and uphold the highest standards of governance and transparency. As proud signatories of the UN Principles for Responsible Investment (“UN PRI”), we are dedicated to aligning our strategies and practices with these globally recognized frameworks.

We actively collaborate with national initiatives, such as the local labelling agency LuxFLAG. These collaborations enable us to obtain an independent external assessment of our efforts, providing stakeholders with additional transparency on our practice of meeting local and international standards.

We pledge to engage with our stakeholders, set ambitious ESG goals, and regularly review and enhance our practices to ensure that we adopt trends. By doing so, we aim to contribute positively to the communities we serve and the global sustainability agenda in general. Furthermore, we are eager to adopt latest reporting standards, providing clear and comprehensive disclosures of ESG performance.

This commitment is strongly supported by our highest management bodies, ensuring that ESG principles are embedded at the core of our business.

3 ESG Integration

HAFS is dedicated to advancing sustainable investment practices within the financial services sector. As a service provider signatory to the UN PRI, we play a crucial role in facilitating responsible investment and supporting our clients. This ESG Charter, complemented by relevant policies and procedures, outlines our commitment to integrating ESG considerations as a whole into our services and operations.

3.1 Facilitation of sustainable Investment

Objective: To empower our clients to integrate ESG factors into their investment processes, enhancing long-term value creation and risk management.

Approach:

- Provide clients with access to comprehensive ESG data and analytics to inform investment decisions;
- Develop tools and resources that enable clients to identify and capitalize on ESG opportunities;
- Collaborate with clients to promote sustainable investment practices across the industry.

3.2 Alignment with the UN Principles for Responsible Investment (PRI)

Objective: To align our services with the UN PRI, reinforcing our commitment to responsible investment facilitation.

Approach:

- Assist clients in incorporating ESG issues into their investment analysis and decision-making processes;
- Support active ownership strategies through engagement and voting services;
- Promote acceptance and implementation of the UN PRI among our clients and partners.

3.3 Governance Excellence

Objective: To maintain high standards of governance and ethical conduct in our services.

Approach:

- Ensure transparency and accountability in our operations and client interactions;
- Uphold ethical standards and integrity across all business activities;
- Foster a culture of compliance and continuous improvement in governance practices.

3.4 Transparency and Reporting

Objective: To provide clear and comprehensive reporting on our ESG activities and progress.

Approach:

- By embedding SFDR into our ESG framework, we are dedicated to providing clear and comprehensive disclosures about how we manage sustainability risks and opportunities;
- By integrating the EU Taxonomy Regulation into our ESG framework, we ensure that our financial products are classified according to standardized criteria for environmental sustainability, providing stakeholders with clear insights into the environmental impact of our investments;
- By maintaining a comprehensive ESG reporting framework that effectively communicates our performance and initiatives, publishing regular reports on achievements and challenges in ESG integration, and engaging with stakeholders for feedback to continuously enhance our reporting practices.

4 Final remark

We are committed to the continuous improvement and adaptation of our ESG Charter. This involves closely monitoring emerging ESG trends and actively seeking stakeholder feedback to ensure our principles and practices remain relevant and effective. By fostering a culture of ongoing learning and responsiveness, we aim to enhance our ESG-/sustainability-impact and to align with and promote best practices when it comes to sustainable finance.

Documents related to the ESG Charter

- Remuneration policy
- ESG policy
- Sustainability Risk policy
- Principal Adverse Impact strategy

Relevant ESG documents can be found under the following link:

Rechtliche Hinweise - Hauck & Aufhäuser – Kompetenz, die bleibt – Flexibilität, die gewinnt