Sustainability-Related Disclosures

ANKER Capital Management AG

Information pursuant to Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector (SFDR)

1. General Information

ANKER Capital Management AG (hereinafter "ACM") is an asset management company authorized and regulated by the Financial Market Authority Liechtenstein (FMA) in accordance with the Liechtenstein Asset Management Act (VVG).

ACM provides portfolio management services for professional and institutional clients, as well as portfolio management services for collective investment products within the scope of the respective defined investment policy.

ACM does not pursue investment strategies that are explicitly geared towards promoting environmental or social characteristics or achieving sustainable investment objectives. Sustainability criteria constitute neither separate investment objectives nor binding selection criteria within ACM's general investment strategy.

The following information explains ACM's approach to sustainability-related matters within the meaning of the SFDR.

2. Approach to Sustainability Risks (Art. 3 SFDR)

Sustainability risks are environmental, social, or governance (ESG) events or conditions that, if they occur, could cause an actual or potential material negative impact on the value of an investment.

Sustainability risks can particularly impact market, credit, counterparty, liquidity, legal, reputational, and operational risks, thereby adversely affecting the value of individual investments.

ACM's investment decisions are guided by financial and economic criteria, as well as by the agreed investment objectives and investment strategies of the clients or the investment policy of the collective investment products under management.

ACM does not systematically integrate sustainability risks as independent criteria into its investment decision-making process. There is no separate ESG assessment framework, nor are there binding ESG screening procedures or sustainability-related investment restrictions.

This approach aligns with ACM's current business strategy, which does not provide for a specific sustainability-oriented focus.

Irrespective of this, sustainability-related events or conditions may have financial implications for individual investments. Such impacts can occur even if no explicit ESG investment strategy is pursued.

3. No Consideration of Principal Adverse Impacts of Investment Decisions on Sustainability Factors (Art. 4 SFDR)

ACM does not consider the principal adverse impacts of its investment decisions on sustainability factors (Principal Adverse Impacts – PAI) within the meaning of Article 4(1)(b) SFDR.

This refers, in particular, to potential negative impacts of investment decisions on environmental, social and employee matters, respect for human rights, and anti-corruption and anti-bribery matters.

The decision not to consider PAIs is based on the nature, scope and scale of ACM's business activities, as well as its existing investment strategy, which does not pursue specific sustainability goals.

A systematic identification, assessment, and monitoring of such impacts would require additional sustainability-related data, assessment methodologies, and monitoring procedures that are currently not part of ACM's investment process.

Furthermore, a systematic consideration of PAIs is not envisioned under the current business strategy for the future.

The non-consideration of PAIs does not imply that sustainability risks cannot have financial consequences on the value of individual investments.

4. Sustainability Risks within the Remuneration Policy (Art. 5 SFDR)

ACM's remuneration policy aligns with the corporate strategy, the long-term interests of the company and its clients, and the principles of sound risk management.

Employee remuneration consists predominantly of fixed salary components. Variable remuneration may be granted taking into account the respective function, the long-term interests of the company, and the avoidance of conflicts of interest.

ACM does not use separate sustainability-related performance targets or ESG metrics as a basis for determining remuneration.

Sustainability risks are not integrated into the remuneration policy as independent criteria. However, the remuneration policy is designed to ensure it does not encourage excessive risk-taking or create conflicts of interest.

5. Pre-contractual Disclosures on Sustainability Risks (Art. 6 SFDR)

ACM does not pursue specific sustainability-oriented investment objectives in its portfolio management activities and does not utilize a separate ESG assessment process.

Sustainability risks are not systematically included as independent criteria in the investment decision-making processes. This is consistent with the established business strategy and the pursued investment objectives, where financial and economic factors take precedence.

Nevertheless, sustainability-related events or conditions may negatively affect investment performance and returns. The nature and extent of such impacts depend, in particular, on the respective financial instruments, portfolios, and investment strategies.

Information regarding the non-consideration of sustainability risks, as well as explanations of their potential impact on returns, must be disclosed within the framework of the respective pre-contractual information pursuant to Art. 6 SFDR.

For collective investment schemes, the corresponding product-related disclosures are to be made in the relevant fund documentation, taking into account the responsibilities of the respective fund management company or alternative investment fund manager (AIFM).

6. Product-Level Sustainability-Related Disclosures (Art. 7 to 9 SFDR)

ACM does not currently offer individual portfolio management strategies explicitly designed to promote environmental or social characteristics within the meaning of Art. 8 SFDR, or sustainable investment objectives within the meaning of Art. 9 SFDR.

Furthermore, ACM performs portfolio management functions for collective investment schemes in accordance with their defined investment policies.

The regulatory classification of these collective investment schemes, as well as their sustainability-related product information, are set out in the respective fund documentation and the applicable regulatory requirements.

ACM does not consider the principal adverse impacts of its investment decisions on sustainability factors. The reasons for this are explained under Section 3.

To the extent that ACM is subject to disclosure obligations under Art. 7(2) SFDR for the financial products concerned, the non-consideration, including its justification, must also be disclosed in the respective pre-contractual information.

Insofar as the respective financial products do not fall under Art. 8 or 9 SFDR, no corresponding sustainability characteristics or sustainable investment objectives are promoted for them.

7. Review and Updates (Art. 12 SFDR)

ACM reviews these disclosures and updates them as necessary, particularly in the event of material changes to its business activities, investment strategy, or applicable regulatory requirements.

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