



ESG Policy 2024

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ESG philosophy

At LGT Capital Partners (LGT CP), we believe investors, and asset managers investing on their behalf, have a responsibility to make their investments in a way that effectively supports a sustainable society. At the core of our commitment to help our clients achieve their financial objectives is a conviction that financial objectives can be achieved by investing responsibly.

We value the importance of integrating Environmental, Social, and Governance (“ESG”) factors into our investment and risk processes and fundamentally believe this is aligned with the aim of achieving long-term positive financial performance for our investors. We also recognise and value the fact that this will help to improve the companies we invest in and enhance behavior in a wide range of markets and industries. It may also have a positive societal impact beyond the financial markets.

Our philosophy is based on the view that economic performance goals and sustainability goals are not in conflict, as we generally expect portfolios that adhere to high ESG standards may outperform over the long term. While we emphasize the importance of a long-term sustainable business activity, we also appreciate the complexity and multitude of dimensions which need to be implemented.

We support a generally accepted framework as a way to help the financial sector to standardize, measure and compare sustainability strategies. Accordingly, LGT CP has joined various organizations and industry bodies that support the sustainable development of the financial industry, the foremost being UNPRI and the Net Zero Asset Managers initiative. LGT CP adheres to business conduct rules and international standards, including the United Nations Global Compact (UNGC), United Nations Universal Declaration of Human Rights (UDHR), the OECD Principles of Corporate Governance. We have also adopted the Sustainable Development Goals (SDGs). The SDGs are a set of sustainability objectives that nearly all investors agree on, with a focus on improving the quality of life, combatting climate change and conserving the environment.

In line with those goals, we believe that investments in companies with high ESG standards can add long-term value for our investors while also creating a positive impact on the environment and society. At the same time, we aim to minimize the negative impact of our investments on the SDGs. While LGT CP has a strong focus on a holistic ESG assessment, it also takes very concrete actions, wherever useful and relevant. For example, we exclude investments in companies associated with controversial weapons (anti-personnel mines, biological & chemical weapons, cluster weapons, or nuclear weapons) and in businesses related to thermal coal. The thermal coal exclusion is aimed at combating climate change and shifting our investments to support an energy supply that is consistent with net zero emissions by 2050 or sooner.

Active ownership is an integral part of LGT CP’s engagement approach. Where applicable and permissible under our investment mandates, we exercise our voting rights and closely follow the SRI Proxy Voting Guidelines provided by the Institutional Shareholder Services Incorporated (“ISS”). As part of this collective of 1,500 investors, we aim to have a more significant impact on the accountability of large corporations, their management and actions. We also use our influence as an investor to encourage third-party managers in our portfolios to integrate ESG factors into their investment decision-making.

At LGT CP, we invest into a multitude of different assets and asset classes (which include but are not limited to equities, fixed income, private equity, private debt, hedge funds and ILS) and need to adapt our general approach to ESG and sustainability according to the specifications and requirements of each asset class. We implement our investments through a direct investment approach or in partnership with a selected number of third-party managers/General Partners, which results in differing transparency and access levels into the underlying exposures. This requires us to use different methodologies for the implementation of our ESG/Sustainability criteria.

This document explains LGT CP’s overall approach to integrating ESG criteria into the investment process, as well as the basic ESG governance setup. The detailed steps and requirements for ESG integration are laid out in separate instructions on the level of the individual business unit. Those contain detailed process description as well as further details on the investment process, decision-making, ESG monitoring, reporting and risk management.

Long-term commitment to ESG

Our long-term focus and sustainable investment principles are a core element of our corporate culture and our investment beliefs. We are convinced that investing successfully requires a long-term approach, which includes a strong commitment to ESG principles. This applies to the investment solutions we deliver to our clients as well as to our business overall.

LGT CP's long-held commitment to ESG began in 2003, when we first began integrating a responsible investment clause into the governing documents of our investment programs. It authorized us to exclude investments that are substantially exposed to arms-related activities, violations of human rights, irresponsible treatment of the natural environment or other non-ethical business activities or conduct.

In 2009, LGT CP launched its dedicated sustainable bond and equity offerings. In the same year, we also launched our proprietary ESG analytics tool, the LGT ESG Cockpit. Since 2013, LGT CP has published its own annual ESG Report, which analyzes the activities of several hundred alternative investment managers worldwide to assess the improvements made in ESG practices. It also highlights examples of ESG best practices across various portfolios in private markets, liquid alternatives, insurance-linked securities, equities and bonds.

In addition, the firm became an early signatory to the Principles for Responsible Investment (PRI) in 2008. In 2018, one of the firm's Managing Partners, Tycho Sneyers, was elected to the PRI board, and he was re-elected for a second term in 2021.

Early mover and continuous development of ESG processes



1 UN Principles for Responsible Investment 2 Launch of dedicated LGT sustainable funds and LGT ESG Cockpit 3 Task Force on Climate-related Financial Disclosures 4 "A guide to ESG implementation in private equity" (GPs = General Partners) 5 Tycho Sneyers, Managing Partner at LGT Capital Partners, joins PRI Board 6 "From ESG to SDGs – the road ahead", a survey of investors in alternatives 7 Sustainable Finance Action Plan (SFAP)

Source: LGT Capital Partners

ESG implementation across asset classes

LGT CP takes a holistic approach to ESG considerations in the various asset classes and has a focus on selecting investments that reflect the firm's commitment to high standards on ESG issues. Regarding the implementation of ESG considerations into the investment process, different approaches are used, depending on the investment style and asset class, which are further explained below. For example, in connection with the management and operation of certain investment mandates, LGT CP (and/or the investors in such mandates) may be subject to laws that regulate the manner in which ESG considerations may be incorporated into investment processes. Where applicable and notwithstanding anything herein to the contrary, LGT CP intends to incorporate ESG considerations into the investment process in a manner that complies with such laws and regulations. Further, when required by any such laws and regulations, LGT CP intends to pursue risk adjusted returns without concessionality to ESG considerations.

Direct Investments into public securities

Wherever LGT CP portfolios invest directly into individual public securities (like equities or bonds), any security analysis, security selection, and portfolio decision, as well as a potential exclusion, must include ESG credentials, risks and attributes of the single security and its issuer.

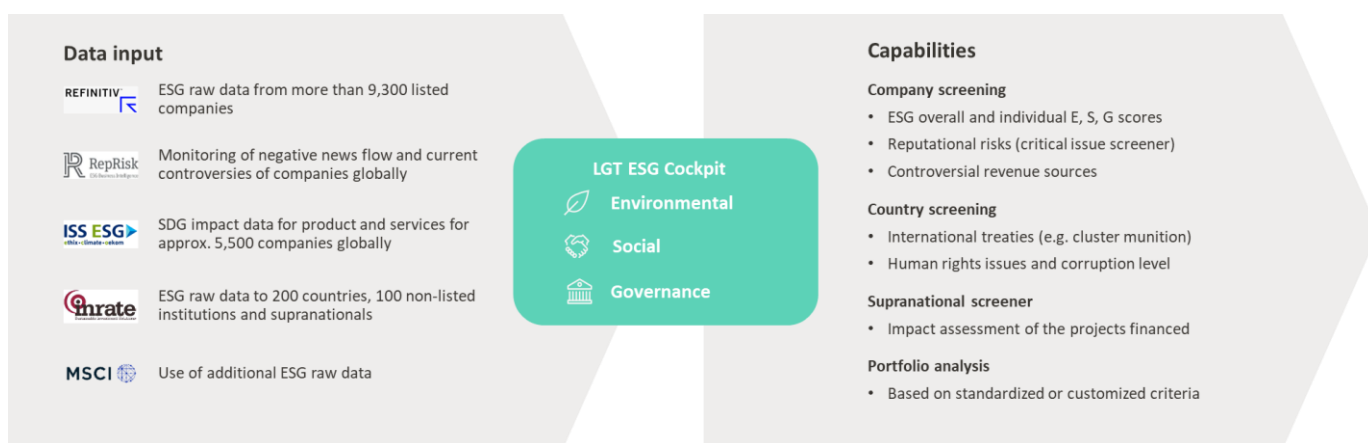
The first step of the investment process for our sustainable strategies is negative screening. Companies that generate income from tobacco, gambling, arms, pornography, nuclear power production, thermal coal production, oil and gas activities or that are UN Global Compact violators are excluded. The remaining and still diverse universe is then scored on ESG using our proprietary

ESG scoring tool, the LGT ESG Cockpit. This enables us to assess the ESG performance of companies or sovereigns expressed in a numerical ESG score ranging from 0 to 100, which ultimately results in a ranking. For companies, we exclude the bottom 25% at this stage and focus only on the remaining 75% of the universe. By focusing on this segment, we include companies that already score high in ESG performance and those that have upside potential, while excluding those that lack commitment.

LGT's ESG Cockpit is an in-house developed, state-of-the-art tool. Based on a multitude of ESG raw data from a variety of providers, the tool enables the scoring of over 40 KPIs (key performance indicators), as well as measurement of environmental footprints, SDGs, a net zero by 2050 alignment etc. Furthermore, LGT's ESG Cockpit enables the comparison of the ESG performance of companies, portfolios, sectors and regions. The tool enables portfolio managers and analysts to understand and analyze the ESG scoring of the investable securities as well as the overall ESG footprint of a portfolio. Lastly, the tool allows for a continuous monitoring of the ESG quality of a security and an entire portfolio. In addition, the ESG data used for the ESG Cockpit, which is provided by independent, external data providers, is periodically checked for plausibility to ensure that it is up-to-date and correct by means of several verification steps.

Any regulatory requirements, such as the consideration of principal adverse impacts ("PAI") of investment decisions on sustainability factors or restrictions, can be applied within this concept to further steer the portfolio towards specific ESG targets.

LGT ESG Cockpit – powerful, flexible and state-of-the-art



Source: LGT Capital Partners, Refinitiv, RepRisk, ISS ESG, inrate, MSCI

Investments via third party managers

A substantial part of our investments is done via third-party managers through either dedicated managed accounts or commingled pools. These investments are also subject to an ESG evaluation and a sustainability risk assessment – both initially and on an ongoing basis, for the duration of the period we hold an investment or pursue a particular investment strategy.

ESG and sustainability considerations are evaluated prior to each investment, using a proprietary due diligence questionnaire which we require each manager to answer. When evaluating the answers, we focus on understanding and confirming the manager's ESG strategy and the way ESG and sustainability risks are being included in the firm's overall philosophy, business and specifically the investment processes. In this assessment, managers are scored on four key areas of ESG practice shown in the illustration below:



Source: LGT Capital Partners

The managers must explain their approach to ESG, with answers being probed and verified. The results of the ESG assessment are then integrated into investment recommendations and final investment decisions. Managers receive a score of 1 to 4 (where 1 = excellent and 4 = insufficient) on each of the four areas, resulting in an overall rating for the manager, which is then documented in LGT CP's monitoring system. This facilitates effective and continuous monitoring of managers on ESG over time. It also helps to identify those who are ESG leaders, as well as those who need further encouragement in deepening their commitment to ESG. In principle, we do not invest with managers that have a 4-rating for their ESG approach. Active engagement is also part of the monitoring process of third-party managers, as the scoring process is repeated on a yearly basis.

In line with regulatory requirements (and in cases where investments with third-party managers are implemented via an individual managed account, thus granting LGT CP full access and transparency), the above described ESG rating process is complemented with a bottom-up analysis of the portfolio constituents using available data and/or the ESG cockpit process. The additional insights serve to enhance ESG reporting in more detail and to further confirm or challenge the manager's ESG rating and to identify sustainability risks.

Investments in private companies

Private equity co-investments:

1. **ESG screening** – in the initial phase, we assess and evaluate the investment opportunity, undertaking an ESG screening to identify risks and opportunities early in the process. We use an ESG matrix to ensure consistency in approach, which includes a review of the company's business model and its products and services. We also carry out a materiality review of the various ESG factors, using Sustainability Accounting Standards Board (SASB) materiality maps for different industries and sectors. This analysis is combined with a consideration of any ESG controversies identified by our risk monitoring solution, which tracks more than 100,000 online information sources in 23 languages. Furthermore, we assess the carbon footprint of the company using available data or public market industry averages as a proxy for the company's actual footprint. In a final step, the team considers LGT CP's ESG assessment of the private equity manager. Each of these factors is quantitatively scored, culminating in an ESG rating for the company, based on a scale of 1 to 4 (where 1 indicates a low ESG risk and 4 indicates high risk).
2. **ESG due diligence** – ahead of the final IC meeting, the team conducts a detailed analysis of ESG-related due diligence reports. This often comprises environmental due diligence, a legal and compliance review and human resources due diligence. When the team identifies an ESG-sensitive issue, it seeks the advice of the Firm's ESG Committee, which is subsequently reflected in the final investment recommendation. The summarized findings are part of the input for the final investment committee meeting, which includes the ESG score for the company developed during the screening process (as described above). Each year certain co-investment opportunities are not pursued at this stage due to ESG findings.
3. **Ongoing monitoring** – in the context of the regular monitoring activities of the investments, the investment team monitors ESG aspects of the investment and follows up as required. This includes monitoring for ESG controversies, as described in Step 1. We also collect ESG key performance indicators (KPIs) for our investments, which provides us with insights on where companies and management teams are focusing and what indicators are relevant to our portfolio companies. The KPIs are based on the ESG Data Convergence Project and requirements from sustainable regulations. Annual comparison shows how the KPIs develop over time.

Direct private debt investments:

1. **Assess ESG matters at the company level** – investment team evaluate the investment opportunity using a six-factor ESG scoring model that assesses each element on a scale of 1 to 4, with the final ESG risk score calculated as a weighted average (1 being the best outcome; 4 the worst) of all six factors. Specifically, the team looks at:
 - a) Proprietary macro due diligence – including the screening of controversies, identified ESG sensitivities and ESG assessment of the sponsor.
 - b) Impact assessment – an assessment of the SDG impact, negative or positive as well as an examination if the company aligns with the mandatory PAI indicators
 - c) Proprietary LGT CP Micro Due Diligence – use of the LGT PD climate resilience framework, CO2 assessment to systematically consider climate change risks, while assessing the materiality of these risks for any given business. In addition, the SASB framework is used for a materiality review of the various ESG factors.
2. **Negotiating ESG reporting provisions in transaction documentation** – we negotiate ESG reporting provisions, which are typically included in the term sheet and subsequently in the loan agreements. Such provisions are generally in line with the sponsor's ESG requirements. These include reporting on 15 different ESG-related key performance indicators (KPIs), ranging from carbon footprint to net job creation statistics, diversity metrics, training practices, board composition and practices, and other indicators. The carbon footprint reporting includes total carbon emissions (metric tons of CO2 per year) as well as the company's CO2 intensity (emissions per million euros invested).
3. **Monitoring of ESG performance** – we begin monitoring the ESG performance of a portfolio company as soon as the investment closes, and we continue to track it throughout the holding period. Alongside the ESG KPIs we collect, we also monitor the company for ESG controversies with a risk monitoring solution. All issues addressed during monitoring are logged into an ESG assessment template in our investment monitoring database, which the deal team uses as a starting point for ESG engagement with companies.

Impact investments (in private markets)

Impact investments are characterised by an explicit intention to generate positive, measurable social and/or environmental impact alongside a financial return. LGT CP sees strong alignment between positive, sustainable impact and risk-adjusted returns. For our impact investments, we target commercial private markets/private equity returns in investments with business models that generate a clear and measurable positive impact.

The impact investment process follows two parallel streams: in-depth investment due diligence and deep impact due diligence.

The process ensures:

1. A consistent approach in impact verification and underwriting
2. Minimizing unconscious biases, ensuring both the impact and financial investment recommendation stand independently without sacrificing impact or returns
3. Deep functional expertise for respective work streams

LGT CP has developed a proprietary Impact Management Framework for carrying out due diligence on impact investment opportunities. Towards this end, we use an Impact Scorecard to assess both positive impact and impact risks, arriving at an impact score for each potential investment. We focus on four areas:

- Alignment – how aligned is the investment thesis with the SDGs? What is the strategy? Which SDGs is the investment opportunity targeting?
- Reach – what is the scale of the investment proposition? The depth? And what systemic change might there be?
- Inclusiveness – how affordable is the proposition to the wider consumer base? What access does it have to customers? What is the need for the offering?
- Risk – what are the exit options when it comes to responsibility? Any execution risks? Any ESG risks?

The deal team assesses a range of information collected in the due diligence to compile the answers to the questions. The responses must be rooted in evidence and evolve through multiple iterations as the team progresses with diligence and builds insights into the investment opportunity. The sources of information consist of the manager in the transaction, company management, third-party due diligence providers, industry experts as well as various other sources in the LGT CP network.

Investments in Insurance-linked Strategies (ILS)

ILS as an asset class is highly exposed to climate change risks. An increase in likelihood and/or severity of weather-related natural disasters has a significant impact on insured losses. On the other hand, the (re-)insurance industry, including the ILS industry, are creating financial incentives that encourage societies to adapt to a changing climate. Providing reinsurance capital in the form of ILS encourages insurers to work with homeowners on mitigating risk through better construction techniques and preventative measures. Our ESG framework for counterparty due diligence applies a four-step process that helps to identify and engage with companies that are resilient to a wide range of ESG-related risks and that have a pro-active approach towards managing environmental factors in their business. It starts with an ESG scoring of the counterparty, using LGT ESG Cockpit. The next step is to collect the counterparty's feedback to put the ESG score into perspective of the company's business activity. The third step is to review the ESG score on a frequent basis and to monitor changes over time. The fourth step is to make counterparties with a deteriorating ESG profile aware of the issue and take action if necessary. The ESG due diligence framework helps to identify potential business or reputational risks and leads to the exclusion of counterparties with substantial ESG risks.

Portfolio considerations

LGT CP's ESG Policy applies in principle to all LGT CP portfolios, but with a varying degree of adaption, depending on regulatory requirements, the ambition level of LGT CP and/or individual portfolios and further specific agreements with investors. The specific implementation also depends on the nature of a specific mandate and whether it is implemented via direct investment or third-party managers. Products and portfolios which adopt a more rigorous ESG standard and target to comply with SFDR Article 8 or 9 will follow a specific due diligence process, involving a review and evaluation of a range of ESG factors prior to making any investments. Specific requirements and steps are described in the relevant business units' investment instruction.

Risk management

Risk management is an integral part of LGT CP's investment and ESG-process. Sustainability risks form an important dimension of our risk management philosophy. For the integration of sustainability risks, we follow two approaches. First, we monitor compliance with restrictions set by regulators, clients or other external and internal rules and guidelines on an ex-post basis. Second, we help, support and challenge the investment units in the performance of their tasks by modeling and testing risks in the portfolios and all underlying exposures on an ex-ante basis. Both approaches integrate ESG and sustainability risks.

- Post-investment monitoring of ESG restrictions and guidelines

- The Risk Management team employs tools and processes to measure and monitor ESG restrictions in the portfolios. This includes verification of compliance with exclusion lists and the correct implementation and adoption of rules, guidelines and restrictions to reach certain ESG qualifications (e.g. to fulfill SFDR requirements or to meet the standards of the
- Net Zero Emissions by 2050 Scenario (NZE). Where specific benchmarks or further KPIs and criteria have been agreed, Risk Management also ensures adherence to such standards. In the case of third-party managers, Risk Management will also review and test the managers' ratings that result from the annual ESG monitoring and execute the bottom-up rating of portfolios, to the extent transparency is available.
- Pre-investment analysis of managers and testing of portfolios
- Risk Management will, particularly for third party managers, integrate and analyse a manager's ESG rating in the portfolio before the final investment committee decision, in order to ensure that only managers with an appropriate and suitable ESG process are approved for a portfolio. Especially for portfolios that adopt a more rigorous ESG standard, such as "ESG promoting products" under Article 8 SFDR and/or "Sustainable products" under Article 9 SFDR, managers will have to adhere to both rigorous standards and high-portfolio ESG scorings.
- Modeling of climate risk in multi-asset portfolios
- Risk Management together with the Quantitative Research team is continuously monitoring the robustness of LGT CP's key multi-asset portfolios and analyzing the impact of various risk factors under stress scenarios. A specific risk scenario has been developed to model the effects of climate change on the various asset classes to gain a better understanding of the effects and offering a better basis for asset allocation decisions.

Compliance

The Compliance team contributes to the risk management framework and monitors the alignment of LGT CP's activities with regulatory requirements, including sustainability regulatory aspects and LGT CP's internal policies with sustainability elements (e.g. conflict of interest directive and client suitability assessment procedures). Compliance plays a key role in the periodic quality review of products (e.g. marketing material review process, products promoting environmental or social characteristics and funds with sustainable investment objectives). Part of the review is verifying whether the fund remains consistent with the ESG preferences (where relevant) of the targeted clients (target market) as well as whether the ESG statements made in the marketing material are in line with the fund's orientation (such as its SFDR classification) according to the offering documentation.

Climate Action commitments

LGT CP joined the Net Zero Asset Managers initiative in March 2021, which aims to galvanize the asset management industry to commit to a goal of net zero emissions by 2050 or sooner. By joining the initiative, we have committed ourselves to transparent and rigorous accountability. As part of our Climate Action initiative, several strategies are aligned with the goal of net zero greenhouse gas emissions by 2050. Our climate action strategy is built on the three main pillars: 1) “mitigation” aimed at tackling the causes and minimizing the possible impacts of climate change, (2) “adaption” focused on taking advantage of any opportunities that arise and, (3) “integration” considering climate-related factors across decision levels. We take concrete actions either bottom-up through stringent security selection or top-down through reallocation of capital between asset classes.

Our main levers to take portfolio adjustments are the following:

1. Carbon budgeting: reducing exposures to single companies or entire sectors, especially those whose emission pathways are fundamentally inconsistent with the goals of net zero emissions by 2050.
2. Investing into climate solutions: for example through allocation to green bonds and the renewable infrastructure segment. Additionally, our investment teams continue to identify investments that can make a positive contribution to mitigating climate change.
3. Active ownership: engaging with companies held in our direct strategies and with our managers is a key focus. By actively using our voice, through both engagement and voting, we can help drive the necessary change.
4. Reallocating capital: direct away from concentrated transition and physical risks into strategies and sectors that are much richer in sustainable and climate-related investment opportunities. Based on our scenario framework, we aim to avoid concentrated climate-risk allocations and build climate- resilient portfolios.

The specific approach to implementation in a portfolio depends on:

- the nature of the asset class or the particular guidelines of a mandate
- the availability of relevant data and robust methodologies
- whether it is implemented through direct investments or third-party managers

We continue to work on these dimensions as we progress towards our goal of aligning portfolios with the emission pathway Net Zero Emissions by 2050 Scenario (NZE) from the International Energy Agency (IEA). With this approach, we aim to make a meaningful contribution to mitigating the damaging effects of climate change, while also enabling investors to benefit from attractive opportunities that arise from the ensuing changes to the global economy.

Governance and disclosures

Board of Directors (BoD)

The BoD of LGT CP is responsible for defining the required ESG/ sustainability standards, and monitoring their implementation. The board is informed on ESG topics by the Executive Committee (see below) on a regular basis.

Executive Committee (EC)

The EC of LGT CP and the involved Fund Management Companies and/or Alternative Investment Fund Managers are responsible for the implementation of the prescribed standards defined by the board and the monitoring of legal and regulatory requirements and compliance with this policy. The EC and a member of the involved Fund Management Companies and/or Alternative Investment Fund Manager are informed on ESG topics by the ESG Committee (ESGC, see below) on a regular basis.

ESG Committee (ESGC) and various ESG subcommittees (ESGSC)

The ESGC is responsible for executing the EC's decisions and coordinating policies and procedures across investment management, reporting, risk management and client services. The ESGC meets monthly and reports regularly to the EC. LGT CP has established dedicated subcommittees within the ESGC to focus on specific areas, including Liquid Markets, Private Markets, Policy & Governance, Climate Action, ESG Regulation, Corporate Social Responsibility (CSR) as well as Diversity, Equity and Inclusion (DEI).

To ensure execution, communication and reporting on ESG issues, dedicated ESG roles ensure that ESG topics are part of the agenda of the business unit management team meetings. The Chief Risk Officer and the other employees of the Risk Management & Compliance department are actively involved in the ESGC and can attend the respective ESGSCs.

- **ESG Policy & Governance SC:** responsible for ESG policies & standards and interpretation, validity and adequacy of ESG approaches between business units, high level interpretation of regulatory rules
- **Liquid Markets SCs:** responsible for process and implementation within liquid asset classes, methodological aspects, further development of the ESG Cockpit
- **Private Markets SC:** covers ESG topics related to private markets, including manager ratings, ESG implementation in direct investments
- **Climate Action SC:** responsible for climate related topics, specific emission reduction targets, and climate risk framework
- **Diversity, Equity & Inclusion SC:** responsible for all diversity and inclusion topics
- **ESG Regulation SC:** Initiate, coordinate, advise, oversee and challenge implementation of ESG regulation and ESG initiatives across our business units, investment products and firm.
- **Corporate Social Responsibility (CSR):** Initiate, coordinate, advise, oversee and challenge implementation of CSR initiatives across the firm.

Disclosure and reporting

On its website, LGT CP publishes and maintains company-level information and respective statements about:

- the policies on the integration of sustainability risks in its investment decision-making process
- whether and how the firm considers principal adverse impacts ("PAIs") of investment decisions on sustainability factors
- how its remuneration policies are consistent with the integration of sustainability risks. In the event of any changes of the above-mentioned policies, the respective disclosures must be updated without undue delay.

Furthermore, LGT CP publishes and maintains the LGT CP website and/or www.fundinfo.com with all product-level related information, such as the pre-contractual disclosures with regards to Article 6, 8 and/or 9 SFDR.

Monitoring

The EC of LGT CP monitors compliance with the legal and regulatory requirements and compliance with this directive. The BoD is informed on a regular basis by the EC.

Education

The importance of ESG integration to LGT CP as a firm and in our investment process is reflected in the fact that LGT CP employees are expected to continuously enhance their skills, knowledge and expertise around ESG topics. Towards that end, we typically address ESG topics at least twice a year in our firm wide offsite in January and August, where the latest ESG trends, techniques and strategies are discussed. We also organize separate ESG training sessions for new team members, including investment professionals, throughout the year.

We also conduct an internal ESG education program to help enhance knowledge and understanding of ESG topics among our staff. The ESG education sessions focus on current topics that are relevant for all employees, given that we want everyone to understand the importance of ESG for our Firm. The training modules, along with further supporting documents, are available for all employees at any time on our intranet.

In addition, employees can also undertake external training and gain ESG-related qualifications, such as the CFA Institute's Certificate in ESG Investing, which has generated significant interest among LGT CP employees.

Performance Management Process (PMP)

The importance of integrating ESG factors for LGT CP as a firm and our investment behavior is reflected in the fact that LGT CP promotes the sustainable behavior of employees as part of the regular performance management process (PMP), using defined sustainability targets and financial incentives in the overall assessment.

To implement this goal, LGT CP has included overarching ESG targets in the process of the regular PMP, which are further specified and broken down by the respective line managers depending on the business area and function.

Hence, LGT CP expects all staff to show awareness of the Firm's ESG & Sustainability strategy and in particular:

- to minimize their professional carbon footprint to the extent possible
- within their professional reach, to generally promote the accomplishment of the SDGs

Disclosure and reporting

On the LGT CP website, LGT CP publishes and maintains company-level related information and respective statements about:

- the policies on the integration of sustainability risks in its investment decision-making process
- whether and how LGT CP considers principal adverse impacts ("PAIs") of investment decisions on sustainability factors
- how its remuneration policies are consistent with the integration of sustainability risks

In the event of any changes of the above-mentioned policies, the respective disclosures must be updated without undue delay.

Furthermore, LGT CP publishes and maintains the LGT CP website and/or www.fundinfo.com with all product-level related information such as the pre-contractual disclosures with regards to Article 6, 8 and/or 9 SFDR.

Monitoring

The EC of LGT CP monitors compliance with the legal and regulatory requirements and compliance with this directive. The BoD is informed on an annual basis by the EC.

Important information

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