

Vontobel

# Erklæring om de viktigste negative effekter (Principal Adverse Impacts, PAI) av investeringsbeslutninger på bærekraftsfaktorer

Vontobel

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**Finansmarkedsaktør:** Vontobel Holding AG (Identifikator for juridisk enhet: 529900G69W5VR3DDPW23)**Sammendrag**

Vontobel Holding AG tar hensyn til de viktigste negative effektene av sine investeringsbeslutninger på bærekraftsfaktorer. Denne erklæringen er den konsoliderte erklæringen om de viktigste negative effektene på bærekraftsfaktorer til følgende datterselskaper av Vontobel Holding AG:

<b>Finansmarkedsaktører innenfor omfanget av SFDR:</b>	<b>Identifikator for juridisk enhet</b>
Bank Vontobel AG	549300L7V4MGECYRM576
Bank Vontobel Europe AG	529900KKJ9XOK6WO4426
Vontobel Asset Management S.A.	529900LO1T9ADP03SQ41
Vontobel Asset Management S.A., Milan Branch	-
Vontobel Wealth Management SIM S.p.A.	815600EEA65C5119FF38
<b>Finansmarkedsaktører utenfor omfanget av SFDR:</b>	
Vontobel Asset Management AG	549300FM29R281J1VG65
TwentyFour Asset Management LLP	R7PBZAZDQSEPFEF1VM14
Vontobel Asset Management Inc.	529900PRE50EJ9PW6187
Vontobel Swiss Financial Advisers AG	67FTM1PK7URN4JC4C454
Vontobel. (Hong Kong) Ltd.	529900RXGFTT3SZOTG70
Vontobel Asset Management Australia Pty. Limited	529900386ZA62ZNOWW30

Dette dokumentet dekker informasjon om de forskriftsmessige leveranser som kreves av forordning (EU) 2019/2088 («SFDR») og spesifisert av kommisjonens delegerede forordning (EU) 2022/1288 («SFDR Regulatory Technical Standards» eller «SFDR RTS») artikkel 4, om hvordan de ovenfor oppførte juridiske enhetene til Vontobel («Vontobel») tar hensyn til de viktigste negative effekter (PAI) på bærekraftsfaktorer i investeringsbeslutninger.

Denne erklæringen om de viktigste negative effektene på bærekraftsfaktorer dekker referanseperioden fra 1. januar til 31. desember 2025.

Vontobel bruker en aktiv tilnærming til kapitalforvaltning i flere virksomheter, der hver virksomhet i Vontobel-konsernet tilpasser sin egen investerings- og ESG-tilnærming (miljømessige, sosiale og forretningssetiske forhold) i samsvar med kravene til aktivaklassene som den investerer i og sin egen bærekraftsstrategi. Graden og måten PAI vurderes på, avhenger blant

annet av investeringsstrategien og tilgjengeligheten av pålitelige data. Tilnærmingen som brukes for å vurdere PAI avhenger av indikatorens art, så vel som av den spesifikke konteksten til investeringen som forårsaker den negative effekten.

PAI-indikator 1.14 (se tabellen nedenfor) vurderes for alle finansielle produkter ved å ekskludere selskaper som er involvert i produksjon eller salg av kontroversielle våpen (antipersonellminer, klaseammunisjon, kjemiske våpen, biologiske våpen, ikke-detekterbare fragmenter, brannbomber og blindende laservåpen). I tillegg overvåkes PAI-indikatorer 1.10 og 3.14 for å begrense eksponering mot selskaper som bryter UN Global Compact og OECDs retningslinjer for flernasjonale selskaper. Vontobel setter ikke spesifikke mål for andre indikatorer. Årlige endringer i disse indikatorene kommer primært fra markedsbevegelsene til underliggende aktiva, metodiske justeringer fra vår dataleverandør eller endringer i datadekningen.

For finansielle produkter innenfor omfanget av SFDR rapporterer Vontobel om de vurderte PAI-indikatorene i produktenes periodiske rapporter, med mindre annet er angitt i produktets juridiske dokumentasjon. Vontobel tar hensyn til informasjon som rapporteres av tredjeparts kollektive investeringordninger, men disse kan være begrenset, noe som betyr at Vontobels evne til å vurdere PAI-er for investeringer i tredjeparts kollektive investeringsordninger kan være begrenset. Der det er aktuelt, prioriteres PAI-er i henhold til de bærekraftige målene eller egenskapene til det finansielle produktet.

Den pre-kontraktuelle dokumentasjonen for finansielle produkter som bruker investeringsstrategier for å fremme miljømessige og/eller sosiale egenskaper (Art. 8 SFDR) eller som har bærekraftig investering som investeringsmål (Art. 9 SFDR), kan inneholde ytterligere informasjon om hvordan slike finansielle produkter tar hensyn til PAI i investeringsbeslutninger på bærekraftsfaktorer.

Effektiviteten til Vontobels metodikk for å vurdere PAI-eksponering er underlagt tilstrekkelig datakvalitet og datadekning. Vontobel innhenter de nødvendige PAI-målingene fra tredjeparts dataleverandører og kan bruke proprietære kilder der det er hensiktsmessig for å vurdere negative effekter på finansproduktnivå. Datakilder inkluderer tredjeparts dataleverandører, nyhetsvarsler og selve utstederne. Hvis pålitelig tredjepartsdata ikke er tilgjengelig, kan Vontobel foreta rimelige estimater eller antagelser.

Der Vontobel identifiserer at en investering har en kritisk og dårlig forvaltet påvirkning på et av de vurderte PAI-områdene, og ingen tegn til avhjelpende tiltak eller forbedringer har blitt observert, skal Vontobel iverksette tiltak. Handlingsmekanismer kan inkludere ekskludering, aktivt eierskap (stemmegivning og/eller engasjement), tilting eller evaluering og løpende overvåking av utstederen, der det er hensiktsmessig («ESG-integrasjon»).

PAI-tallene vist i seksjon 1. nedenfor er basert på data fra MSCI ESG Research LLC<sup>1</sup> («MSCI») og gjelder alle investeringer foretatt av Vontobel, uavhengig av om de tar hensyn til PAI i investeringsbeslutninger eller ikke. Beskrivelsen av handlingene som er utført i tabellen i avsnitt 1. refererer til handlingene utført av finansielle produkter som tar hensyn til disse PAI-er.

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<sup>1</sup> MSCI ESG Research LLC er et datterselskap av MSCI Inc. Se <https://www.msci.com/notice-and-disclaimer-for-reporting-licenses>.

## 1. Description of the principal adverse impacts on sustainability factors

Indicators applicable to investments in investee companies								
Adverse sustainability indicator	Metric	Impact [2025]	Impact [2024]	Impact [2023]	Impact [2022]	Explanation	Actions taken, and actions planned and targets set for the next reference period	
CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS								
<b>Greenhouse gas emissions</b>	<b>1. GHG emissions</b>	Scope 1 GHG emissions (tCO <sub>2</sub> e)	3'957'358.29	3'727'802.45	3'594'836.89	3'933'097.36	Vontobel did not set a specific target with regard to the adverse sustainability indicators. Annual changes in the indicators result primarily from market movements of the underlying assets, methodological adjustments made by our data provider, or changes in data coverage. These factors limit direct comparability across years.  A methodological adjustment by our data provider explains part of the changes in <b>PAI indicators 1.2 and 1.3</b> . For more information, see section 5.	Some or all the following actions were taken for some financial products according to article 8 SFDR and article 9 SFDR in relation to the corresponding PAI indicator:  active ownership, tilting, ESG integration, exclusion.  These actions are also planned to be taken for the next reference period.  Vontobel did not set overall specific targets with regard to the adverse sustainability indicators for the next reference period. Targets set at the level of individual financial products remain unaffected.
		Scope 2 GHG emissions (tCO <sub>2</sub> e)	1'266'136.12	1'228'036.74	1'084'093.90	1'012'959.33		
		Scope 3 GHG emissions (tCO <sub>2</sub> e)	36'544'795.85	31'302'594.72	30'313'895.00	24'600'745.89		
		Total GHG emissions (tCO <sub>2</sub> e)	41'534'997.66	36'254'704.77	34'992'494.31	29'546'789.74		
	<b>2. Carbon footprint</b>	Carbon footprint (tCO <sub>2</sub> e per EUR million invested)	261.69	234.87	256.72	228.77		
<b>3. GHG intensity of investee companies</b>	GHG intensity of investee companies (tCO <sub>2</sub> e per EUR million revenue)	418.19	475.45	548.05	589.78			
<b>4. Exposure to companies active in the fossil fuel sector</b>	Share of investments in companies active in the fossil fuel sector (%)	4.98%	4.43%	4.53%	4.13%			

<b>5. Share of non-renewable energy consumption and production</b>	Share of non-renewable energy consumption and non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage of total energy sources (%)	49.93%	48.26%	45.20%	50.79%	Vontobel did not set a specific target with regard to the adverse sustainability indicators. Annual changes in the indicators result primarily from market movements of the underlying assets, methodological adjustments made by our data provider, or changes in data coverage. These factors limit direct comparability across years.	Please note that the numbers published in the Impact columns are on a best-effort basis and that currently, for these PAI indicators, data availability and/or quality is limited. Vontobel monitors the availability and quality of data for the PAI and might consider the data available while assessing investment risks and opportunities.
<b>6. Energy consumption intensity per high impact climate sector</b>	Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector (GWh / EUR million revenue)  NACE Sectors: <sup>2</sup> A: Agriculture, forestry and fishing B: Mining and quarrying C: Manufacturing D: Electricity, gas, steam and air conditioning supply E: Water supply; sewerage; waste management and remediation activities F: Construction G: Wholesale and retail trade; repair of motor vehicles and motorcycles H: Transporting and storage L: Real estate activities	A: 2.92 B: 0.89 C: 0.20 D: 2.26 E: 0.90 F: 0.05 G: 0.07 H: 0.93 L: 0.15	A: 0.21 B: 0.96 C: 0.17 D: 2.54 E: 0.89 F: 0.03 G: 0.04 H: 0.76 L: 0.13	A: 0.79 B: 2.27 C: 0.30 D: 3.05 E: 3.61 F: 0.00 G: 0.02 H: 0.94 L: 0.13	A: 0.94 B: 2.66 C: 0.25 D: 3.79 E: 1.28 F: 0.00 G: 0.01 H: 1.60 L: 0.11	Methodological adjustments by our data provider explain part of the changes in <b>PAI indicators 1.5 and 1.6</b> . For more information, see section 5.  Reported figures for <b>PAI indicator 1.6</b> can be distorted due to a low number of companies in individual NACE sectors.	Vontobel did not set overall specific targets with regard to the adverse sustainability indicators for the next reference period. Targets set at the level of individual financial products remain unaffected.

<sup>2</sup> NACE : *Nomenclature statistique des activités économiques dans la Communauté européenne* / standard European nomenclature of productive economic activities.

<b>Biodiversity</b>	<b>7. Activities negatively affecting biodiversity-sensitive areas</b>	Share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas (%)	7.48%	6.62%	0.04%	0.01%	<p>Vontobel did not set a specific target with regard to the adverse sustainability indicators. Annual changes in the indicators result primarily from market movements of the underlying assets, methodological adjustments made by our data provider, or changes in data coverage. These factors limit direct comparability across years.</p> <p>Methodological adjustments by our data provider explain part of the changes in <b>PAI indicators 1.7 to 1.9</b>. For more information, see section 5.</p>	<p>Some or all the following actions were taken for some financial products according to article 8 SFDR and article 9 SFDR in relation to the corresponding PAI indicator:</p> <p>active ownership, tilting, ESG integration, exclusion.</p> <p>These actions are also planned to be taken for the next reference period.</p> <p>Vontobel did not set overall specific targets with regard to the adverse sustainability indicators for the next reference period. Targets set at the level of individual financial products remain unaffected.</p>
<b>Water</b>	<b>8. Emissions to water</b>	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average (metric tons / EUR million invested)	0.00	0.00	0.47	0.79	<p>Data coverage for <b>PAI indicator 1.8</b> is below 10%.</p>	<p>Please note that the numbers published in the Impact columns are on a best-effort basis and that currently, for these PAI indicators, data availability and/or quality is limited. Vontobel monitors the availability and quality of data for the PAI and might consider the data available while assessing investment risks and opportunities.</p>
<b>Waste</b>	<b>9. Hazardous waste and radioactive waste ratio</b>	Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average (metric tons / EUR million invested)	1.39	1.17	1.41	0.10	<p>Vontobel did not set overall specific targets with regard to the adverse sustainability indicators for the next reference period. Targets set at the level of individual financial products remain unaffected.</p>	<p>Vontobel did not set overall specific targets with regard to the adverse sustainability indicators for the next reference period. Targets set at the level of individual financial products remain unaffected.</p>

INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS								
Social and employee matters	<b>10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises</b>	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises (%)	0.15%	0.23%	0.51%	0.62%	Vontobel did not set a specific target with regard to the adverse sustainability indicators. Annual changes in the indicators result primarily from market movements of the underlying assets, methodological adjustments made by our data provider, or changes in data coverage. These factors limit direct comparability across years.	Vontobel aims to invest in companies that comply with the UN Global Compact principles and the OECD Guidelines for Multinational Enterprises. If a company is identified as potentially non-compliant through our screening process, an internal assessment is conducted and potential actions are evaluated.  Please refer to section 2.1.2 for more information.
	<b>11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises</b>	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance/complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises (%)	1.39%	1.30%	42.58%	46.96%	For <b>PAI indicator 1.10</b> , Vontobel avoids exposure to companies violating internationally recognized standards.  Methodological adjustments by our data provider explain part of the changes in <b>PAI indicators 1.11 and 1.12</b> . For more information, see section 5.	Some or all the following actions were taken for some financial products according to article 8 SFDR and article 9 SFDR in relation to the corresponding PAI indicator:  active ownership, tilting, ESG integration, exclusion.  These actions are also planned to be taken for the next reference period.  Vontobel did not set overall specific targets with regard to the adverse sustainability indicators for the next reference period. Targets set at the level of individual financial products remain unaffected.
	<b>12. Unadjusted gender pay gap</b>	Average unadjusted gender pay gap of investee companies (ratio in %)	11.77%	7.06%	3.03%	2.29%		Please note that the numbers published in the Impact columns are on a best-effort basis and that currently, for this PAI indicator, data availability and/or quality is limited. Vontobel monitors the availability and quality of data for the PAI and might consider the data available while assessing investment risks and opportunities.  Vontobel did not set overall specific targets with regard to the adverse sustainability indicators for the next reference period. Targets set at the level of individual financial products remain unaffected.

	<b>13. Board gender diversity</b>	Average ratio of female to male board members in investee companies, expressed as a percentage of all board members (ratio in %)	44.39%	42.52%	40.63%	38.08%	Vontobel did not set a specific target with regard to the adverse sustainability indicators. Annual changes in the indicators result primarily from market movements of the underlying assets, methodological adjustments made by our data provider, or changes in data coverage. These factors limit direct comparability across years.	Some or all the following actions were taken for some financial products according to article 8 SFDR and article 9 SFDR in relation to the corresponding PAI indicator:  active ownership, tilting, ESG integration, exclusion.  These actions are also planned to be taken for the next reference period.  Vontobel did not set overall specific targets with regard to the adverse sustainability indicators for the next reference period. Targets set at the level of individual financial products remain unaffected.
	<b>14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)</b>	Share of investments in investee companies involved in the manufacture or selling of controversial weapons (%)	0%	0%	0%	0%	Vontobel excludes controversial weapons.	Vontobel intends to keep the share of investments in investee companies involved in the manufacture or selling of controversial weapons at 0% in the next reference period.  Please refer to section 2.1.1. for more information.
<b>Indicators applicable to investments in sovereigns and supranationals</b>								
	<b>Adverse sustainability indicator</b>	<b>Metric</b>	<b>Impact [2025]</b>	<b>Impact [2024]</b>	<b>Impact [2023]</b>	<b>Impact [2022]</b>	<b>Explanation</b>	<b>Actions taken, and actions planned and targets set for the next reference period</b>
<b>Environmental</b>	<b>15. GHG intensity</b>	GHG intensity of investee countries (tCO2e per EUR million GDP)	19.32	18.99	24.73	25.29	Vontobel did not set a specific target with regard to the adverse sustainability	Some or all the following actions were taken for some financial products according to article 8 SFDR and article 9

<b>Social</b>	<b>16. Investee countries subject to social violations</b>	Number of investee countries subject to social violations (absolute number and relative number divided by all investee countries), as referred to in international treaties and conventions, United Nations principles and, where applicable, national law (count and % of investee countries)	5.00 3.86%	5.75 4.53%	5.25 4.27%	6.50 5.36%	indicators. Annual changes in the indicators result primarily from market movements of the underlying assets, methodological adjustments made by our data provider, or changes in data coverage. These factors limit direct comparability across years.  A methodological adjustment by our data provider explains part of the changes in <b>PAI indicator 1.16</b> . For more information, see section 5.	SFDR in relation to the corresponding PAI indicator:  active ownership, tilting, ESG integration, exclusion.  These actions are also planned to be taken for the next reference period.  Vontobel did not set overall specific targets with regard to the adverse sustainability indicators for the next reference period. Targets set at the level of individual financial products remain unaffected.
<b>Indicators applicable to investments in real estate assets</b>								
<b>Adverse sustainability indicator</b>		<b>Metric</b>	<b>Impact [2025]</b>	<b>Impact [2024]</b>	<b>Impact [2023]</b>	<b>Impact [2022]</b>	<b>Explanation</b>	<b>Actions taken, and actions planned and targets set for the next reference period</b>
<b>Fossil fuels</b>	<b>17. Exposure to fossil fuels through real estate assets</b>	Share of investments in real estate assets involved in the extraction, storage, transport or manufacture of fossil fuels	n/a	n/a	n/a	n/a	n/a	Not applicable given investment universe of our financial products.
<b>Energy efficiency</b>	<b>18. Exposure to energy-inefficient real estate assets</b>	Share of investments in energy-inefficient real estate assets	n/a	n/a	n/a	n/a		
<b>Other indicators for principal adverse impacts on sustainability factors</b>								
<b>Additional climate and other environment-related indicators</b>								
<b>Adverse sustainability indicator</b>		<b>Adverse impact on sustainability factors (qualitative or quantitative)</b>						<b>Metric</b>
<b>Indicators applicable to investments in investee companies</b>								
<b>CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS</b>								
<b>Water, waste and material emissions</b>	<b>14. Natural species and protected areas</b>	1. Share of investments in investee companies whose operations affect threatened species (%) 2. Share of investments in investee companies without a biodiversity protection policy	1. 2.90% 2. No data available	1. 5.26% 2. No data available	1. 3.43% 2. No data available	1. 2.12% 2. No data available	Vontobel did not set a specific target with regard to the adverse sustainability indicators. Annual changes in the indicators result primarily from market movements of the underlying assets,	Please note that the numbers published in the Impact columns are on a best-effort basis and that currently, for this PAI indicator, data availability and/or quality is limited. Vontobel monitors the availability and quality of data for the PAI and might consider the data available while

		covering operational sites owned, leased, managed in, or adjacent to, a protected area or an area of high biodiversity value outside protected areas					methodological adjustments made by our data provider, or changes in data coverage. These factors limit direct comparability across years.	assessing investment risks and opportunities.  Vontobel did not set overall specific targets with regard to the adverse sustainability indicators for the next reference period. Targets set at the level of individual financial products remain unaffected.
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**Additional indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters**

INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS

Adverse sustainability indicator	Adverse impact on sustainability factors (qualitative or quantitative)	Metric
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**Indicators applicable to investments in investee companies**

<b>Human rights</b>	<b>14. Number of identified cases of severe human rights issues and incidents</b>	Number of cases of severe human rights issues and incidents connected to investee companies on a weighted average basis (count)	0.04	0.03	0.02	0.01	Vontobel avoids exposure to companies violating internationally recognized standards.	Vontobel aims to invest in companies that comply with the UN Global Compact principles and the OECD Guidelines for Multinational Enterprises. If a company is identified as potentially non-compliant through our screening process, an internal assessment is conducted and potential actions are evaluated.  Please refer to section 2.1.2. for more information
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**2. Description of policies to identify and prioritize principal adverse impacts on sustainability factors**

Vontobel's ESG Investing and Advisory Policy details how Vontobel integrates Sustainability Risks and Principal Adverse Sustainability Impacts in its investment decisions. In particular, it explains our governance structure and the responsibility for the implementation of this policy across our business divisions.

It builds on internationally recognized standards for due diligence and reporting, in particular the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. In addition, Vontobel adheres to voluntary due diligence, and reporting standards, including UN Global Compact principles (UNGCI) and GRI's sustainability reporting framework. Local rules may apply as appropriate.

This policy reflects Vontobel's current approach, and Vontobel expects that this policy will evolve over time to reflect changes in business practices, business structures, technology, and the law. This policy is reviewed at least annually. The last iteration of this policy was approved by an executive committee of Vontobel Holding AG in August 2025 and is available at: <https://am.vontobel.com/en/esg-investing>.

## **2.1. Methodology to identify and prioritize principal adverse impacts on sustainability factors**

Vontobel applies an active multi-boutique asset management approach, whereby each boutique within Vontobel tailors its investment and ESG approach independently according to the requirements of the asset classes in which it invests and its own sustainability strategy. The degree and the way the PAI are considered depend on factors such as the investment strategy and the availability of reliable data. The approach applied to consider the PAI depends on the nature of the indicator, as well as on the specific context of the investment that is causing the adverse impact.

For financial products in scope of SFDR, Vontobel reports on the considered PAI indicators in the products' periodic reports, unless stated otherwise in the product legal documentation. Vontobel takes into consideration the information reported by third party collective investments which may be limited and, therefore, the ability of Vontobel to consider PAI for investments into third party collective investments may be limited. Where applicable, PAI are prioritized given the sustainable objectives or characteristics of the financial product.

The pre-contractual documentation for financial products that have investment strategies designed to promote environmental and / or social characteristics (Art. 8 SFDR) or have Sustainable Investment as their investment objective (Art. 9 SFDR) may contain further information on how such financial products consider PAI of their investment decisions on sustainability factors.

As a minimum standard for all financial products, Vontobel prioritizes excluding companies involved in controversial weapons (PAI indicator 1.14) and avoiding exposure to companies violating internationally recognized standards such as the UN Global Compact and OECD Guidelines for Multinational Enterprises (PAI indicators 1.10 and 3.14).

### **2.1.1. Controversial weapons (PAI indicator 1.14)**

Vontobel prohibits investments in manufacturers / producers of controversial weapons. Vontobel considers the following weapon types as controversial weapons:

- anti-personnel mines (Ottawa Treaty, 1997)
- cluster munitions (Convention on Cluster Munitions, 2008)
- chemical weapons (Chemical Weapons Convention, 1997)
- biological weapons (Biological Weapons Convention, 1975)
- non-detectable fragments (Protocol I of the Convention on Certain Conventional Weapons, 1980)
- incendiary weapons (Protocol III of the Convention on Certain Conventional Weapons, 1980), and
- blinding laser weapons (Protocol IV of the Convention on Certain Conventional Weapons, 1980)

The list of prohibited companies is made available by the Vontobel Corporate Responsibility team to all staff responsible for investments on a quarterly basis.

### **2.1.2. Critical controversies and breaches of international norms (PAI indicators 1.10 and 3.14)**

Critical controversies and breaches of international norms (collectively 'Critical ESG Events') are often related to Principal Adverse Sustainability Impacts, such as significant negative impact on the environment, forced labor or child labor. Moreover, these instances can signal insufficient management of sustainability risks by a company or a government and excessive harm to society or the environment, which is beyond the tolerance of many of Vontobel's investors and stakeholders.

To identify and monitor Potential Critical ESG Events (PCEE), Vontobel investment teams are informed by ESG data and assessment methodologies provided by external ESG data providers such as MSCI or Sustainalytics. The ESG assessment methodology of such providers typically takes into account the UN Guiding Principles on Business and Human Rights,

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the OECD Guidelines for Multinational Enterprises, the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work, the ILO Core Conventions, and the UN Global Compact (UNGC). The methodology focuses on severity—defined by the nature and scale of the alleged impact—and further considers the company's role and the case status. A full description of the respective ESG rater's methodology can be found on their webpages.

The data obtained from third-party data providers may be incomplete, inaccurate or unavailable. As a result, there exists a risk of incorrectly assessing a security or issuer, resulting in the incorrect inclusion or exclusion of a security.

To properly understand the impact and validity of PCEE, investment teams conduct their own research to assess their impact on the relevant portfolio and on wider stakeholders. Securities of issuers will be excluded when Vontobel confirms Critical ESG Events and determines that the issuer's activities cause excessive harm to society or the environment, such as through violations of international norms and standards mentioned above, or as a result of involvement in critical controversies, including those related to governance matters.

However, Vontobel recognizes that excluding such issuers may not always be the best approach to mitigate the adverse effects of their activities. In these cases, Vontobel will monitor these issuers, where it believes that reasonable progress can be attained, for example, through active ownership activities (see section 3 for more detail).

## **2.2. Responsibility for the implementation of those policies**

Dedicated investment managers within the Vontobel legal entities are responsible for the management of investment solutions considering PAI based on their specific investment approaches and processes, including ongoing evaluation and monitoring of ESG factors within their defined risk and investment frameworks. As an active multi-boutique asset manager, each boutique tailors its investment and ESG approach independently according to the requirements of the asset classes in which it invests and its own sustainability strategy.

## **2.3. Data sources and associated margin of error**

Vontobel investment teams have recourse to a broad range of data sources. Vontobel does not rely on a single source of information, and Vontobel strives to build a holistic picture on trends and companies. On top of data directly made available by issuers and other publicly available data, Vontobel considers data from different sources, including leading ESG data providers like MSCI or Sustainalytics, but also insights from sell-side broker services. Where Vontobel identifies a need, Vontobel may use a local or a specialist ESG data provider to enhance Vontobel insights. The data provider currently selected for the calculation of PAI metrics is MSCI.

In some cases, the information related to an indicator may be insufficient. Thus, fact-finding engagement may be conducted directly by Vontobel investment specialists and ESG analysts. This involves actively requesting information on ESG aspects, either where such information is not available at all, or where insufficient information has been provided in response to Vontobel questions. The data obtained from MSCI or companies may be incomplete, inaccurate, or in some instances unavailable. As a result, there exists a risk of incorrectly assessing a security or issuer, resulting in the incorrect inclusion or exclusion of a security.

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## **3. Engagement policies**

Vontobel considers engagement to be an important element of its investment activities. Vontobel uses both direct engagements, which are undertaken by Vontobel investment and ESG professionals, as well as indirect engagements, which are undertaken by professional proxy voting and engagement service providers (proxy agents).

Vontobel believes in the direct contact between investee company management teams and investment professionals, such as portfolio managers and analysts who have the specific expert knowledge and understanding of the context in which the company has been selected as an investment. For this reason, Vontobel does not have an engagement team on group level formulating an engagement plan for certain adverse impacts caused by investments made by Vontobel. The investment managers and the management companies can be supported by proxy agents in their engagement activities and decision-making processes.

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Reasons to engage with an investee company may include: business strategy, corporate governance issues, change in the capital structure, remuneration issues, and identified environmental and social risks.

Engagement includes ongoing communications between the investment team and / or proxy agent and the management teams of investee companies and can range from ongoing updates and questioning of the current and future business model, to engagement on specific issues that may cover ESG concerns, such as PAI caused by the investee company. In certain circumstances, engagement could be escalated through additional meetings with the management and dialogue with the board chairman and non-executive directors. Vontobel investment teams and / or ESG analysts (or Vontobel proxy agents) may also join collaborative engagement platforms to leverage wider investment pressure on certain topics.

Where these engagements do not progress in the direction that the investment team believes is in the best interests of shareholders or the shareholding is insufficient for an effective escalation on a standalone basis, other options are considered, including, but not limited to:

- voting against resolutions at shareholder meetings
- collaborating with other institutional investors, and / or
- selling some or all of the investment in the context of the value proposition of the investment as a whole

Our Voting and Engagement policies provide further details on our voting and engagement processes. They do not explicitly reference PAI indicators as defined under the SFDR RTS, nor do they address their reduction. The policies can be found on our webpage: <https://am.vontobel.com/en/esg-investing>.

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#### **4. References to international standards**

As a global investment firm, Vontobel aims to empower investors with the necessary knowledge, tools and investment options to consider sustainability in building better futures. We achieve this by contributing to the UN's SDGs and, since 2017, committing to the UN Global Compact principles. The UN Global Compact is a strategic initiative of the United Nations for companies, such as Vontobel, that commit themselves to aligning their business activities and strategies with ten universally accepted principles covering human rights, labor standards, environmental protection, and anti-corruption. Through these efforts we aim for our impact to be proportionate to our reach whilst promoting key sustainability principles. In addition to the UN Global Compact, Vontobel works in industry associations in order to advance ESG investing practices and is an active participant in several initiatives such as the UN Principles for Responsible Investment (PRI) or the Global Impact Investing Network (GIIN). An overview of all initiatives and memberships can be found at [www.vontobel.com/ratings-memberships](http://www.vontobel.com/ratings-memberships).

Vontobel uses forward-looking climate scenarios to monitor and assess how physical and transition risks affect our assets under management. This assessment utilizes MSCI's Climate Value-at-Risk (Climate VaR) for physical and transition risk assessment, which incorporates scenario analysis. The scenarios used are provided by the Network for Greening the Financial System (NGFS) and include the orderly "Net Zero 2050", the disorderly "Delayed Transition", and the Hot House "NDCs" scenarios. The NGFS scenarios were initially designed and released in 2020 and are updated periodically as NGFS issues new vintages. More information on climate risk monitoring can be found in Vontobel's Sustainability Report 2025.

The list below shows a selection of international standards considered in investment decisions:

- UN Global Compact (PAI indicators 1.10 and 3.14)
- OECD Guidelines for Multinational Enterprises (PAI indicators 1.10 and 3.14)
- United Nations Declaration of Human Rights (PAI indicators 1.10 and 3.14)
- Convention on Cluster Munitions (PAI indicator 1.14)

Please refer to section 2.1. for more details about the methodology used to measure adherence to international standards. Additional information about the standards is available in our ESG Investing and Advisory Policy available at <https://am.vontobel.com/en/esg-investing>.

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## 5. Historical comparison

Except for PAI indicator 1.14, Vontobel does not set specific targets with regard to the PAI indicators. Annual changes observed between 2022 and 2025 result primarily from three factors: market movements of the underlying assets, methodological adjustments by our data provider, and changes in data coverage. These factors limit direct comparability across years.

Between 2022 and 2025, our data provider implemented several updates to improve alignment with regulatory requirements and enhance data accuracy. These updates include:

- **2024**
    - o **PAI indicators 1.5, 1.6, 1.9 and 1.12:** the methodology incorporated estimated values alongside reported values.
    - o **PAI indicator 1.7:** the methodology included a wider range of factors for identifying companies with activities that negatively impact biodiversity-sensitive areas.
    - o **PAI indicator 1.8:** to better align with regulatory criteria, the methodology considered only the amount of emissions of actual pollutants or effluents emitted to water by the company.
    - o **PAI indicator 1.11:** the methodology considered a broader range of factors related to human rights policies, including due diligence processes and grievance mechanisms.
  - **2023**
    - o **PAI indicator 1.16:** the methodology was updated to calculate based on unique countries rather than on unique issuers.
    - o **PAI indicators 1.2 and 1.3:** the methodology required all the GHG scope 3 emissions to be reported or estimated to calculate the intensities.
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