

Sustainable Financial Disclosure Regulation

Alpinum Investment Management AG ("**Company**") ensures that it becomes an investment manager that formally and practically wants to implement a responsible investment approach to incorporate ESG criteria in its investment analysis as well as decision-making process wherever possible. External & internal ESG ratings may be used which are based on information and opinion covering the environmental, social and governance data within a universe including investments.

The Company aims to apply exclusions to filter its investment universe and to complement the wider responsible investment policy by avoiding activities that may represent significant and unacceptable risk, providing limits for sectors with higher environmental risk and types of activities. The investment team verifies whether an investment opportunity is connected to a particular industry or conducts its business operations, which they believe is unethical, unsustainable, or unsocial.

Engagement is part of the Company's beliefs that it can encourage and influence positive corporate behaviour surrounding sustainability risks and follows an engagement approach by actively engaging with the managers of our existing and potential investments to learn what they do in relation of responsible investing whenever possible. The investment team will record internally all findings about their process and positioning in terms of ESG relevant issues and clearly communicate that the integration of ESG aspects into the investment process is important and bring it to their attention if they do not pursue any ESG aspects in their business operations.

As a signatory of the UN-supported PRI, the Company is obliged to report on certain ESG topics through the entire value chain and it therefore provides an annual report which is available on the PRI data portal. An annual report could e.g. disclose the potential negative/neutral/positive impact consolidated through investment in portfolios and show how the progress of ESG risks and application of ESG best practices should result in improving metrics over time.

Currently, all of the funds we manage are classified as Article 6 (SFDR) and do not pursue any sustainability goals.