

Template – Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a of Regulation (EU) 2019/2088 and Article 6, paragraph 1 of Regulation (EU) 2020/852

#### Product name:

### VermögensManagement Wachstum

Legal entity identifier: 529900EL0UX56DMCFI02

#### Environmental and/or social characteristics

#### Sustainable investment

means an investment in an economic activity that contributes to an environmental or social objective, provided that this investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852 establishing a list of environmentally sustainable economic activities. That Regulation does not include a list of socially sustainable economic activities. Sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.





# What environmental and/or social characteristics are promoted by this financial product?

Vermögensmanagement Wachstum (the "Fund") promotes a broad range of environmental and/or social characteristics. The Fund invests at least 50% of its assets following the "Multi Asset Sustainability Strategy" which includes, but is not limited to, various sustainability strategies of the Management Company and/or is invested in Green Bonds and/or Social Bonds and/or Sustainability Bonds and/or SFDR Target Funds as defined in Articles 8 and 9 ("SFDR Target Funds").

Depending on the sustainability strategy chosen by the Investment Manager, the environmental and/or social characteristics promoted may include environmental, social, human rights, governance and business conduct factors or investments in companies offering solutions which achieve positive environmental and social results.

In addition, sustainable minimum exclusion criteria apply.

No benchmark has been defined for measuring whether the environmental and/or social characteristics promoted by the Fund are attained.

• What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?

As part of the Multi Asset Sustainability Strategy, the Investment Manager will allocate at least 50% of the Fund assets to various sustainability approaches.

Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.



The following sustainability indicators are used to measure the attainment of the environmental and/or social characteristics, which are reported on at the end of the financial year:

- The actual percentage of the Fund assets that was invested in Green Bonds and/or Social Bonds and/or Sustainability Bonds and/or SFDR Target Funds and/or in shares and/or fixed-interest securities following the Multi Asset Sustainability Strategy.
- If the Investment Manager decides to invest directly in fixed-interest securities or share certificates as part of the multi-asset sustainability strategy, compliance with the relevant binding element is reported.
- Confirmation that the following exclusion criteria have been met (with the exception of cash, derivatives, external target funds and internal target funds that do not pursue a sustainable strategy).
- What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

Sustainable investments contribute to environmental and/or social objectives, for which the Investment Manager uses as reference frameworks, among others, the UN Sustainable Development Goals (SDGs), as well as the objectives of the EU Taxonomy:

- 1. Climate change mitigation
- 2. Climate change adaptation
- 3. The sustainable use and protection of water and marine resources
- 4. The transition to a circular economy
- 5. Pollution prevention and control
- 6. The protection and restoration of biodiversity and ecosystems

The assessment of the positive contribution to the environmental or social objectives was based on a proprietary framework that combines quantitative elements with qualitative inputs from internal research. The methodology first applies a quantitative breakdown of a security issuer into its business units. The qualitative element of the framework is an assessment as to whether business activities make a positive contribution to an environmental or a social objective.

To calculate the positive contribution on the Fund level, the turnover share of each issuer attributable to business activities that contributes to environmental and/or social objectives is considered, provided that the issuer satisfies the Do No Significant Harm ("DNSH") and Good Governance principles, and an asset-weighted aggregation is performed as a second step. Moreover, for certain types of securities that finance specific projects that contribute to environmental or social objectives, the overall investment is considered to contribute to environmental and/or social objectives, but also for these a DNSH as well as a Good Governance check for issuers are performed.

How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?

In order to ensure that sustainable investments do not significantly harm any other environmental and/or social objectives, the Investment Manager leverages the PAI indicators to identify significantly harmful issuers. Significance thresholds have already been established for this purpose. Issuers not meeting the significance threshold can be engaged for a limited time period to remediate the adverse impacts. Otherwise, if the issuer does not meet the defined significance thresholds twice subsequently or in case of a failed engagement, it does not pass the DNSH assessment. Investments in securities of issuers that do not pass the DNSH assessment are not counted as sustainable investments.

How have the indicators for adverse impacts on sustainability factors been taken into account?

All mandatory PAI indicators are considered either as part of the application of the exclusion criteria or through thresholds on a sectoral or absolute basis. Significance thresholds were defined that refer to qualitative or quantitative criteria.

In the absence of data for some PAI indicators, the DNSH assessment for the following indicators for companies may use equivalent data points to assess the PAI indicators: Share of consumption and production of non-renewable energy, activities that adversely affect biodiversity, emissions to water and lack of procedures and mechanisms to monitor compliance with UNGC principles and OECD Guidelines for Multinational Enterprises; for government issuers: GHG intensity and investee countries subject to social violations. In the case of securities financing specific projects contributing to environmental or social objectives, appropriate data can be used at project level to ensure that sustainable investments

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.



do not materially negatively affect other environmental and/or social objectives. The Investment Manager will endeavour to increase data coverage for PAI indicators with low data coverage by communicating with issuers and data providers. The Investment Manager will regularly check whether the availability of data has increased to such an extent that the assessment of such data can be included in the investment process.

How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?

The Investment Manager's sustainable minimum exclusion list screens out companies based on their involvement in controversial practices that violate international norms. The core normative framework consists of the Principles of the UN Global Compact, the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles for Business and Human Rights. Securities issued by companies that severely violate these frameworks are removed from the investment universe.

The EU Taxonomy sets out a "do no significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



## Does this financial product consider principal adverse impacts on sustainability factors?

☐ Yes

✓ No

The Fund takes into account PAI indicators in the DNSH assessment for the part counted as sustainable investment, However, the overall Fund does not mitigate the PAI indicators, as it has a high proportion of external target funds and the Fund management's approach to the external target fund regarding the exclusion criteria will probably differ from that of the Investment Manager, for example with regard to the calculation method, underlying data and threshold values.



### What investment strategy does this financial product follow?

The investment strategy of VermögensManagement Wachstum consists of investment in a broad range of assets (e.g. equities, bonds and alternative asset classes) that may exhibit environmental or social characteristics, in accordance with the Multi-Asset Sustainability Strategy (the "MAS strategy"). The weighting of each asset class may fluctuate and is adjusted to the Fund management's current appraisal of the global capital markets.

A Fund managed under the MAS strategy invests (i) in equities and/or (ii) in fixed-income securities of companies that have either environmental and/or social characteristics and/or pursue activities that contribute to an environmental or social objective, and/or (iii) in green bonds and/or (iv) in social bonds and/or (v) in sustainability bonds and/or (vi) in SFDR target funds.

In the case of direct investments in shares and/or debt securities, the Investment Manager of the Fund may, within the framework of the application of the MAS Strategy, choose one or more of the following strategies that promote environmental and/or social characteristics and/or pursue activities that contribute to an environmental or social objective:

- SRI strategy

The Fund or Strategy promotes environmental and social characteristics by incorporating environmental, social, human rights, governance and business conduct factors into the Fund's investment process through a best-inclass approach. This includes assessing companies or government issuers on the basis of an SRI rating used to build the portfolio.

- SDG-Aligned and SDG-Aligned Type A Strategy

The sustainable investment objective of the Fund or Strategy is to invest in the shares and/or fixed income securities of companies that offer solutions generating positive environmental and social results, which are assessed on the basis of the contribution of the companies' results to achieving one or more of the SDGs or

#### The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.



other sustainable investment objectives, which the Investment Manager of the Fund can also define and to which the companies contribute.

- Green Bond Strategy

The sustainable investment objective of the Fund or Strategy is to mobilize capital markets to transition to a low-carbon society, preserve natural capital and adapt to climate change. The Fund or Strategy invests primarily in green bonds that finance climate change mitigation or adaptation projects or other environmental sustainability projects, in particular in the following areas: Energy efficiency, renewable energy, raw materials, water and soil, waste management, reduction of greenhouse gas emissions, conservation of biodiversity or circular economy.

- Green Transition Strategy

The Fund or Strategy promotes environmental and/or social characteristics by mobilizing capital markets for transition to a low-carbon society, preservation of natural capital and adaptation to climate change.

KPI Strategy (absolute)

A Fund or certain asset managed in accordance with the Sustainability Key Performance Indicator (Absolute) Strategy ("KPI Strategy (Absolute")) promotes environmental objectives by pursuing an investment objective that relates to an environmental performance indicator ("Sustainability KPI") to create transparency in terms of the targeted measurable sustainability outcome. The Sustainability KPI in this sense is the weighted average of the greenhouse gas intensity of the Fund's portfolio. When applying the KPI Strategy (Absolute), the objective is to improve the weighted average greenhouse gas intensity of the Fund's portfolio annually by a predetermined level by the end of the Fund's financial year.

- KPI Strategy (relative)

A Fund or certain asset managed in accordance with the Sustainability Key Performance Indicator (Relative) Strategy ("KPI Strategy (Relative")) promotes environmental objectives by pursuing an investment objective that relates to an environmental performance indicator ("Sustainability KPI") to create transparency in terms of the targeted measurable sustainability outcome. The "Sustainability KPI" in this sense is the weighted average of the greenhouse gas intensity of the Fund's portfolio. When applying the KPI Strategy (Relative), the objective is to ensure that the weighted average greenhouse gas intensity of the Fund's portfolio is lower than the weighted average greenhouse gas intensity of the Fund's benchmark.

- ESG Score Strategy

A Fund or Strategy managed under the ESG Score Strategy promotes environmental, social and governance factors in the context of the application of the ESG Score Strategy. The ESG Score strategy aims to measure a company's resilience to long-term risks in the three areas of environment, social affairs and corporate governance. ESG areas are taken into account by outperforming the weighted average ESG score of issuers whose shares the Fund has acquired compared to the weighted average ESG score of issuers that are part of the Fund's benchmark.

- KPI Strategy (Absolute Threshold)

A fund or strategy managed in accordance with the strategy for sustainable key indicators with an absolute threshold (the "KPI Strategy (Absolute Threshold)") aims to achieve a specific minimum allocation for sustainable investments. Sustainable investments are investments in economic activities that contribute to environmental and/or social objectives for which the Investment Manager uses the UN Sustainable Development Goals (SDGs) and the objectives of the EU Taxonomy as a reference framework.

The Fund's general investment approach is described in the prospectus.

• What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

A Fund managed under the Multi Asset Sustainability Strategy ("MAS Strategy") invests in (i) shares and/or debt securities of companies that have either environmental and/or social characteristics and/or activities that contribute to an environmental or social objective, and/or invests (ii) in green bonds and/or social bonds and/or in sustainability bonds and/or (iii) in SFDR target funds. Overall, the Investment Manager is required to invest at least 50% of the Fund's assets in SFDR target funds and/or in shares and/or bonds in accordance with the MAS strategy.

- Application of the following minimum sustainable exclusion criteria for direct investments (excluding cash, derivatives, external and internal target funds which do not pursue a sustainable strategy):
- Securities issued by companies that, as a result of following problematic practices in the areas of human rights, labour rights, the environment and corruption, seriously violate principles and guidelines



such as the principles of the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights;

- Securities issued by companies that are involved with controversial weapons (anti-personnel mines, cluster munitions, chemical weapons, biological weapons, depleted uranium, white phosphorus and nuclear weapons);
- Securities issued by companies that generate more than 10% of their turnover from weapons and military equipment and services;
- Securities issued by companies that generate more than 10% of their turnover from the extraction of thermal coal;
- Securities issued by utility companies that generate more than 20% of their turnover from coal;
- Securities issued by companies involved in the production of tobacco, and securities issued by companies that are involved in the distribution of tobacco with more than 5% of their turnover;

Direct investments in government issuers with an inadequate Freedom House Index rating are excluded.

The minimum exclusion criteria with regard to sustainability are based on information from an external data provider and are coded in the context of pre- and post-trade compliance. The review is carried out at six month intervals, at least.

• What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The Fund does not undertake to reduce the volume of investment concerned by a certain minimum rate.

• What is the policy to assess good governance practices of the investee companies?

Principles of good corporate governance are taken into account by filtering out companies based on their involvement in controversies relating to international standards consistent with the four good governance practices: sound management structures, employee relations, remuneration of staff and tax compliance. Companies with significant deficiencies in one of these areas are not eligible for investment. In certain cases, issuers identified as in doubt are included in a watchlist. These companies appear on the watchlist when the Investment Manager believes that a commitment from the Fund can lead to improvements or when they find that the company is taking corrective action. The companies on the watchlist remain eligible for investment unless the Investment Manager believes that the commitment or corrective action of the company does not result in the intended solution to the problem.

In addition, the Fund's Investment Manager has committed to maintaining an open dialogue on corporate governance, voting rights and general sustainability issues with the companies in which they invest prior to shareholder meetings (on a regular basis in the case of direct investments in shares). The Fund's Investment Manager's approach to voting rights and corporate commitment is set out in the Management Company's stewardship statement.



#### What is the asset allocation planned for this financial product?

Asset allocation describes the share of investments in specific assets.

Good governance practices include sound

employee relations,

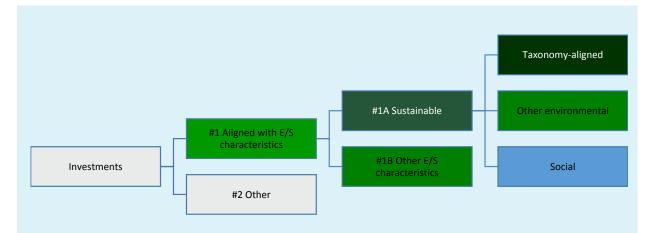
remuneration of staff

and tax compliance.

management structures,

At least 50% of Fund assets is used to meet the environmental or social characteristics promoted by this Fund. A low portion of the Fund may contain assets that do not promote environmental or social characteristics. Examples of such instruments are derivatives, cash and deposits, some target funds and investments with temporarily divergent or absent environmental, social or good governance qualifications or investments outside of the specified quota to be invested as part of the Multi Asset Sustainability Strategy. At least 0.50% of the Fund's assets are invested in sustainable investments. The minimum percentage of investments aligned with the EU Taxonomy is 0.01%. The Investment Manager does not commit to a minimum of environmentally sustainable investments that are not aligned with the EU Taxonomy. The Investment Manager does not commit to a minimum of socially sustainable investments. Although the Fund does not commit to a minimum of environmentally or socially sustainable investments, such investments can be freely allocated under the total public commitment of the Sustainable Investment Fund (min. 0.50%).





- **#1** Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.
- **#2** Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category #1 Aligned with E/S characteristics covers:

- The sub-category #1A Sustainable covers sustainable investments with environmental or social objectives.
- The sub-category #1B Other E/S characteristics covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.
- How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

Not applicable



# To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The Taxonomy-aligned investments include debt and/or equity in environmentally sustainable economic activities aligned with the EU Taxonomy. The minimum proportion of investments aligned with the EU taxonomy is 0.01%. Taxonomy-aligned data was provided by an external data provider. The Investment Manager has assessed the quality of such data. The data will not be subject to an assurance provided by auditors or a review by third parties. The data will not reflect data in sovereign bonds. There is currently no recognised method of determining the proportion of Taxonomy-aligned activities in sovereign bond investments.

The Taxonomy-aligned activities in this disclosure are based on the share of revenue. The precontractual figures default to using revenue as a financial measure in accordance with legal requirements and due to the fact that complete, verifiable or up-to-date data is even less available for CAPEX and/or OPEX as a financial measure.

Taxonomy-aligned data is only in rare cases data reported by companies in accordance with the EU Taxonomy. The data provider has derived Taxonomy-aligned data from other available equivalent public data.

Does the financial product invest in fossil gas and/or nuclear energy related activities that	t
comply with the EU Taxonomy 1?	

☐ Yes:	
☐ In fossil gas	☐ In nuclear energ
✓ No	

The Fund does not seek Taxonomy-aligned investments in fossil gas and/or nuclear energy. Nevertheless, it may happen that, as part of the investment strategy, it also invests in companies that are also active in these areas. Further information on such investments are disclosed in the annual report, where relevant.

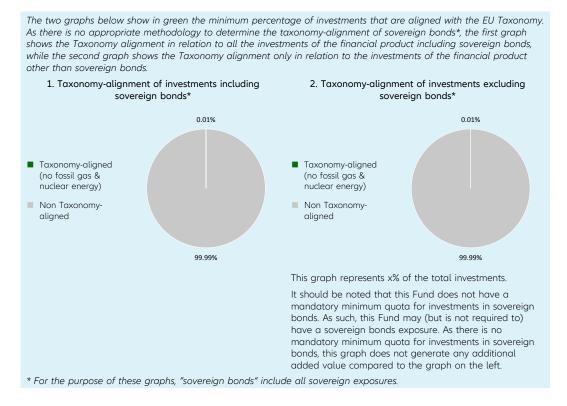
Taxonomy-aligned

activities are expressed as a share of:
- turnover reflecting the share of revenue from green activities of investee companies
- capital expenditure (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy

<sup>&</sup>lt;sup>1</sup> Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



- operating expenditure (OpEx) reflecting green operational activities of investee companies



Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

#### • What is the minimum share of investments in transitional and enabling activities?

The Investment Manager does not undertake to split the minimum Taxonomy orientation into transition and enabling activities and its own performance.



# What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

Taxonomy-aligned investments are considered to be a subcategory of sustainable investments. If an investment is not Taxonomy-aligned because the activity does not or is not yet covered by the EU Taxonomy or the positive contribution is not substantial enough to meet the screening criteria of the Taxonomy, such an investment can still be considered an environmentally sustainable investment if all the criteria are met. The Investment Manager does not commit to a minimum of environmentally sustainable investments that are not aligned with the EU Taxonomy. The overall share of sustainable investments may also include investments with an environmental objective in economic activities that are not considered environmentally sustainable under the EU Taxonomy and, while the Fund is unable to commit to a minimum share of environmentally or socially sustainable investments, such investments may be freely allocated to the total public commitment of the Sustainable Investment Fund (min. 0.50%).



are sustainable investments with an environmental objective that do not take into account the criteria for environmentally sustainable economic activities under the EU Taxonomy.





### What is the minimum share of socially sustainable investments?

The Investment Manager defines sustainable investments based on internal research, which uses, among others, the UN Sustainable Development Goals (SDGs), as well as the objectives of the EU Taxonomy as reference frameworks. The Investment Manager does not commit to a minimum of socially sustainable investments, as the SDGs include both environmental and social objectives. The overall share of sustainable investments may also include investments with a social objective and, while the Fund is unable to commit to a minimum share of environmentally or socially sustainable investments, such investments may be freely allocated to the total public commitment of the Sustainable Investment Fund (min. 0.50%).



### What investments are included under "#2 Other", what is their purpose and are there any minimum environmental or social safeguards?

Investments in cash, target funds or derivatives can be included under "#2 Other". Derivatives can be used for efficient portfolio management (including risk hedging) and/or investment purposes, and target funds to benefit from a specific strategy. There are no minimum environmental or social requirements for these investments.



Reference benchmarks

whether the financial

characteristics that they

product attains the

promote.

Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

No reference benchmark has been designated for the purpose of attaining the environmental and social characteristics promoted by the sub-fund.

 How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?

Not applicable

are indexes to measure environmental or social

> How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?

Not applicable

- How does the designated index differ from a relevant broad market index? Not applicable
- Where can the methodology used for the calculation of the designated index be found? Not applicable



#### Where can I find more product specific information online?

More product-specific information can be found on the website: https://regulatory.allianzgi.com/SFDR