

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

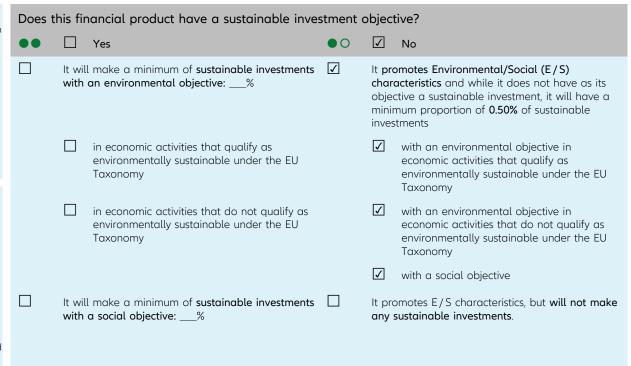
Legal entity identifier: 529900EL0UX56DMCFI02

# 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 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 social characteristics. The Fund achieves this as follows:

- In a first step, environmental and social characteristics are promoted by applying exclusion criteria that exclude from the investment universe of the Fund direct investments in certain issuers that are involved in controversial environmental or social business activities. As part of this process, the investment manager excludes investee companies from the investment universe if they are found to have committed severe violations of good governance practices, as well as principles and guidelines such as the United Nations Global Compact Principles, the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.
- In a second step, for at least 50% of the Fund's assets, the investment manager selects from the remaining investment universe direct investments based on sustainability criteria and funds ("Target Funds") that promote environmental or social characteristics or that have sustainable investment objectives. Target Funds are counted towards that 50% if they provide information in accordance with Article 8 or Article 9 of the Sustainable Finance Disclosure Regulation (SFDR). Direct investments are counted towards that 50% if the investment manager manages them using a different approach and they qualify as investments in accordance with Article 8 or 9 SFDR.
- Additionally, the investment manager will maintain a minimum percentage of 0.50% of the Fund's net asset value (NAV) in sustainable investments and a minimum percentage of 0.01% of the Fund's NAV in investments aligned with the EU Taxonomy.

No reference benchmark has been designated for achieving the environmental and/or social characteristics promoted by the Fund.



Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained. The details and methodologies of each step are described in the section "What investment strategy does this financial product follow?"

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

The following sustainability indicators are used to measure the achievement of the Fund's environmental and/or social characteristics and are reported at the end of the financial year:

- Confirmation that the 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) throughout the Fund's financial year.
- The actual percentage of the Fund's assets invested in direct investments selected from a sustainability perspective and in Target Funds that promote environmental or social characteristics or that have sustainable investment objectives. If the investment manager decides to invest directly in fixed-income securities or equity securities selected from a sustainability perspective, compliance with the relevant binding element is reported.
- Percentage of sustainable investments at the end of the financial year.
- Percentage of Taxonomy-aligned investments at the end of the financial year.
- 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?

The objectives of the sustainable investments that are partially pursued with this financial product cover a broad range of environmental and social themes. To this end, the investment manager refers to, among others, the United Nations Sustainable Development Goals (SDGs)[1] and the objectives of the EU Taxonomy, namely: climate change mitigation, adaptation to climate change, sustainable use and protection of water and marine resources, transition to a circular economy, pollution prevention and control and the protection and restoration of biodiversity and ecosystems.

The investment manager measures the contribution of the sustainable investments to the attainment of the objectives on the basis of their own methodology, as follows:

- An issuer's business activities are categorized into revenue streams from various business segments, based on external data. If the available segmentation of business activities is not detailed enough, the investment manager determines the allocation. Then the business activities are reviewed internally to see whether they make a positive contribution to an environmental or social objective. The revenue share of each business activity that contributes positively to an environmental or social objective is assigned to sustainable investments, provided that the issuer meets the Do No Significant Harm (DNSH) assessment and adheres to good governance principles.
- For issuers whose business activities consist of at least 20% sustainable investments and who are either in transition to a net-zero pathway or already aligned with a net-zero pathway, the investment manager increases the calculated proportion of sustainable investments allocated to the issuers concerned by 20 percentage points. Issuers are considered to be on a net-zero pathway if they (1) have achieved net zero, (2) are aligned with net zero or (3) are in the process of aligning with net zero. Issuers that (4) have committed to net zero or (5) are not aligned with net zero are not considered to be in transition or aligned with a net-zero pathway.
- For securities that finance specific projects ("Project Bonds") contributing to environmental or social objectives, the entire investment is considered to contribute to environmental and/or social objectives. However, these investments are also subject to a DNSH and good governance assessment, either at the issuer level or, in some cases, at the project level.
- The share of sustainable investments for each issuer and each project bond is weighted based on the percentage of the portfolio invested in these issuers or project bonds. The individual weighted proportions of sustainable investments across all issuers and Project Bonds are aggregated to determine the overall proportion of sustainable investments in the Fund.

[1]https://sdgs.un.org/goals

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?

To assess whether sustainable investments do not significantly harm other environmental and/or social objectives, the investment manager applies Principal Adverse Impact (PAI) indicators to sustainability factors.



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

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

All mandatory PAI indicators are considered as follows:

- Investments in issuers that violate exclusion criteria related to controversial weapons, serious breaches of principles and guidelines such as the United Nations Global Compact Principles, the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights or sovereign issuers with an insufficient Freedom House Index rating, are excluded and do not pass the Do No Significant Harm (DNSH) assessment. The exclusion criteria are detailed in the section "What are the binding elements of the investment strategy used to select investments in order to achieve each of the environmental or social characteristics promoted by this financial product?"
- Thresholds are set for all PAI indicators, except for the "share of non-renewable energy consumption and production," which is indirectly reflected in other PAI indicators.

Specifically, the investment manager has taken the following steps:

- Establishing materiality thresholds to identify issuers with highly adverse impacts. Issuers are assessed against these thresholds at least semi-annually. Depending on the indicator, thresholds are set either relative to the sector, as absolute values, or based on events or situations where companies are reported to have negative environmental, social or governance (ESG) impacts (controversies). The investment manager may engage with issuers that do not meet these materiality thresholds to provide them with an opportunity to address adverse impacts.
- Weighting of the PAI indicator based on the level of confidence in the quality of available data, which is used to calculate an overall DNSH (Do No Significant Harm) score relevant to the issuer. The overall DNSH score is determined based on the threshold for each PAI indicator and the confidence weighting. A company is considered to have failed the DNSH assessment if its overall DNSH score is one or higher. If an issuer fails to meet the overall DNSH score twice consecutively, or if engagement efforts are unsuccessful, it is deemed to have failed the DNSH assessment. Investments in securities of issuers that fail the DNSH assessment are not classified as sustainable investments.
- In certain cases where backwards- or forward-looking information does not align with the DNSH assessment, the investment manager may override the DNSH assessment. Such decisions are made by an internal decision-making committee composed of representatives from functions such as Investments, Compliance and Legal.

The data collection for PAI indicators is insufficient. Where applicable, equivalent data points are used for the assessment of PAI indicators when applying the DNSH assessment. This applies to the following indicators for corporate issuers: share of non-renewable energy consumption and production, activities that negatively impact biodiversity-sensitive areas, emissions into water and lack of processes and compliance mechanisms to monitor compliance with UN Global Compact Principles and the OECD Guidelines for Multinational Enterprises; for sovereign issuers: GHG Intensity and investee countries and countries that are affected by social violations. In the case of Project Bonds, relevant data at the project level may be used to ensure that sustainable investments do not significantly harm other environmental and/or social objectives. The investment manager will seek to improve data coverage for PAI indicators with limited data availability by engaging with issuers and data providers. The investment manager will regularly assess whether data availability has improved sufficiently to incorporate the evaluation of such data into 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 exclusions described by the investment manager in the section "What investment strategy does this financial product follow?" exclude companies that have committed serious violations of any of the following frameworks: Principles of the UN Global Compact, OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

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 investment manager does not consider PAI indicators to be binding elements of the Fund.



auides investment decisions based on

investment objectives

and risk tolerance.

factors such as

## What investment strategy does this financial product follow?

The Fund's investment objective is to achieve a combination of income and long-term capital growth in line with The investment strategy the environmental and social characteristics promoted by the Fund. For this purpose, the Fund invests in various asset classes (e.g. equities, bonds or alternative asset classes). The weighting of each asset class may fluctuate and is based flexibly on the portfolio management's current appraisal of the global capital markets. It is geared towards a growth-oriented portfolio over the medium to long term. The Fund's general investment strategy is described in the prospectus.

The following applies with regard to the environmental and social characteristics of the investment strategy:

 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?

In a first step, the investment manager applies the following exclusion criteria (subject to the exceptions described below), i.e. does not invest directly in securities issued by companies that:

- have committed serious violations of principles and guidelines such as the United Nations Global Compact (UN GC) Principles, the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.
- that develop, produce, use, maintain, offer for sale, distribute, store or transport controversial weapons (e.g. nuclear weapons not covered by the Treaty on the Non-Proliferation of Nuclear Weapons (also known as the "Non-Proliferation Treaty"), anti-personnel mines, cluster munitions, chemical weapons, biological weapons, depleted uranium and white phosphorus),
- derive more than 10% of their revenue from thermal coal mining.
- operate in the utilities sector and derive more than 20% of their revenue from coal.
- are involved in tobacco production or derive more than 5% of their revenue from tobacco distribution.

Direct investments in securities issued by sovereign issuers classified as "Not Free" in the Freedom House Index[3] are excluded.

The investment manager applies exclusion criteria to specific issuers based on information from external data providers and, in certain circumstances, internal research. The assessment of issuers against exclusion criteria is conducted at least semi-annually. Under certain circumstances, the Investment Manager may override the information received. Decisions in this regard are made by an internal decision-making committee comprising representatives from Investments, Compliance and Legal, for example. Further details on external data providers and the ability to override certain information can be found in the respective product information document on the SFDR website.

The exclusion criteria are not systematically applied to Target Funds. Consequently, Target Funds may hold investments in their portfolios that do not comply with the exclusion criteria.

In a second step, the investment manager selects from the remaining investment universe direct investments based on sustainability criteria and Target Funds that promote environmental or social characteristics or that have sustainable investment objectives.

Specifically, the investment manager allocates at least 50% of the Fund assets to assets and/or Target Funds, identified in accordance with various approaches described below, that promote environmental or social characteristics (disclosure in accordance with Article 8 of the Disclosure Regulation ("SFDR")) or that have sustainable investment objectives (disclosure in accordance with Article 9 SFDR). The investment manager may change the allocation of the Fund's assets to Target Funds or change one or more of the approaches at any time following the general investment strategy set out in the prospectus.



### The different approaches are:

- Own valuation method: If this approach is chosen for part of the Fund, the investment manager for that part of the Fund will select from the remaining investment universe those corporate issuers that perform better in their sector based on a score for environmental, social, governance and business practices ("sustainability factors"). In the case of government issuers, those that generally perform better in terms of sustainability aspects are selected. Issuers are assigned an individual score by the Investment Manager. The score starts at 0 (lowest value) and ends at 4 (highest value). The score represents an internal rating that the investment manager assigns to a private or government issuer. The scores are reviewed at least twice a year. Data coverage and minimum score requirements are set for the part of the Fund following this approach to ensure compliance with the promoted environmental or social characteristics.
- GHG emission intensity: If this approach is chosen for part of the Fund, the investment manager evaluates the investments (excluding cash and derivatives) according to the greenhouse gas intensity ("GHG emission intensity") of the investee companies, provided that such data is available. On this basis, the investment manager manages that part of the Fund in such a way that (1) the GHG emission intensity decreases over time, calculated on the basis of the GHG emission intensity at the respective end of the Fund's financial year, or that (2) that part of the Fund has a lower GHG emission intensity than the benchmark used for this approach.
- SDG compliant: If this approach is chosen for part of the Fund, the investment manager primarily selects (for the part of the Fund following this approach) issuers from the remaining investment universe that offer products or services that are likely to make a positive environmental and social contribution. Environmental or social contributions cover a wide range of areas for which the investment manager uses as reference frameworks, among others, the UN Sustainable Development Goals (SDGs) and the objectives of the EU Taxonomy. The investment manager measures the contribution of the sustainable investments to the attainment of the objectives on the basis of their own methodology: This approach sets a minimum percentage that must be invested in sustainable investments.
- Green bonds: If this approach is chosen for part of the Fund, the investment manager primarily selects (for the part of the Fund following this approach) securities from the remaining investment universe that finance climate change mitigation and adaptation projects. Green bonds are defined in the prospectus. The investment manager 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.
- ESG score: If this approach is chosen for part of the Fund, the investment manager evaluates how issuers within the remaining investment universe perform in terms of ESG characteristics. On this basis, the investment manager manages the part of the Fund following this approach such that the portfolio's performance in terms of ESG characteristics is better than the performance of the benchmark used for this approach.
- Share of sustainable investments: If this approach is chosen for part of the Fund, the investment manager commits to investing (for the portion of the assets following this approach) a minimum share in sustainable investments. The details and methodologies for determining sustainable investments are described in the section "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?"
- Net-Zero Alignment share: If this approach is chosen for part of the Fund, the investment manager invests a minimum percentage, which will increase over time, in issuers that have set themselves the objective of achieving and taken measures to achieve the Paris Agreement target[4]. The target of the Paris Agreement is hold the increase in the global temperature to well below 2°C. This requires a fixed greenhouse gas emissions budget and achieving net-zero emissions, which means that the remaining emissions must be offset by carbon removal by around 2050 ("net zero"). The investment manager has developed a method to assess issuers' obligations, their objectives and their ability to achieve the net-zero target.

Moreover, the investment manager commits to investing at least 0.50% of the Fund's net asset value (NAV) in sustainable investments. The investment manager also commits to ensuring that at least 0.01% of the Fund's NAV is aligned with the EU Taxonomy.



[3] The relevant country's classification can be found in the Freedom House Index (https://freedomhouse. org/countries/freedom-world/scores) in the "Total Score and Status" column within the "Global Freedom Scores" section.

[4] https://www.un.org/en/climatechange/paris-agreement

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 commit to reducing the scope of investments considered before the application of the investment strategy by a specific minimum percentage.

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

Companies are excluded if they are proven to have violated established standards that align with the four principles of good governance: robust management structures, employee relationships, employee remuneration and compliance with tax regulations. The data on excluded companies is based on information provided by external data providers and, in certain cases, internal research. Under certain circumstances, the investment manager may override the information received. Such decisions are made by an internal decision-making committee composed of representatives from functions such as Investments, Compliance and Legal.

In addition, the Investment Manager actively promotes dialogue with the potential investee companies about matters relating to governance. This is done, among other reasons, in order to prepare voting decisions in advance of shareholders' meetings (regularly in the case of direct investments in equities). When making voting decisions, the investment manager also considers broader sustainability aspects. Further information about the Investment Manager's approach to the exercise of voting rights and engagement with companies is set out in the Management Company's stewardship statement.



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

The asset allocation section describes which portfolio assets the investment manager is required to use to promote environmental or social characteristics:

- The investment manager commits to investing at least 50% of the Fund's net assets in direct investments selected from a sustainability perspective and/or in Target Funds that promote environmental or social characteristics or that have sustainable investment objectives, as described in the section "What investment strategy does this financial product follow?" (#1 Aligned with E/S characteristics).
- At least 0.50% of the Fund's net asset value (NAV) is allocated to sustainable investments (#1A Sustainable Investments).
- At least 0.01% of the Fund's NAV is allocated to sustainable investments that are aligned with the EU Taxonomy.

The Investment Manager does not commit to a minimum share of environmentally sustainable investments that are not aligned with the EU Taxonomy, nor to a minimum share of sustainable investments with a social objective; however, such investments may be freely allocated within the framework of the disclosed total commitment of the Fund for sustainable investments (at least 0.50%).

Good governance practices include sound

employee relations,

remuneration of staff

and tax compliance.

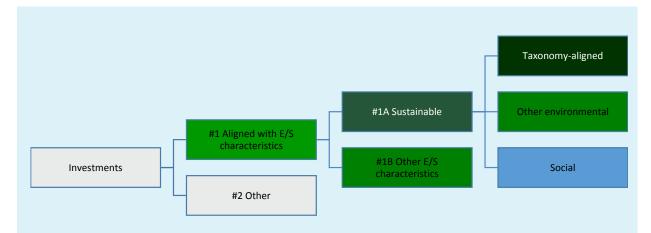
management structures,

investments in specific

describes the share of

Asset allocation





- **#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.

 $\square$  In fossil gas  $\square$  In nuclear energy

- 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?

Derivatives are not used to promote the environmental or social characteristics of the Fund.



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

The investment manager commits to a minimum proportion of 0.01% of sustainable investments aligned with the EU Taxonomy.

EU Taxonomy-aligned investments include debt and/or equity holdings in environmentally sustainable economic activities that comply with the EU Taxonomy. EU Taxonomy-aligned data is 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. This data does not cover sovereign bonds. There is currently no recognised methodology of determining the proportion of Taxonomy-aligned activities in sovereign bond investments.

Taxonomy-aligned activities in this disclosure are based on revenue share. In only a few cases, taxonomy-aligned data is derived from company-reported EU Taxonomy data. If companies do not report data, the data provider derives taxonomy-aligned data from other available equivalent public sources.

Does the financial product invest in fossil gas and/or nuclear energy related activities tha
comply with the EU Taxonomy ¹?
☐ Yes:

The investment manager does not pursue investments in EU Taxonomy-aligned fossil gas and/ or nuclear energy activities. However, the investment manager may invest in companies that are also active in these sectors. Further information may be provided as part of the annual reporting process.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds,

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
- operating expenditure

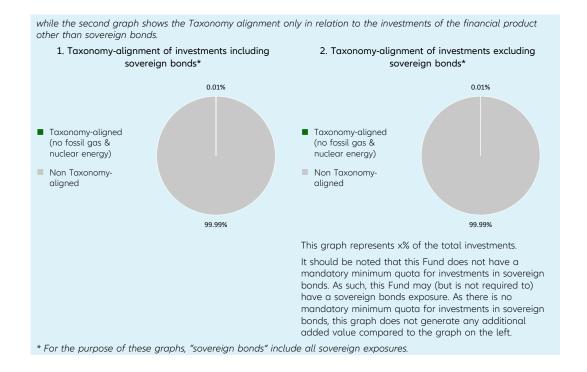
(OpEx) reflecting green

Taxonomy-aligned

<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.



operational activities of investee companies



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.

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

# are activities for which low-carbon alternatives are not yet available greenhouse gas

Transitional activities

and among others have emission levels corresponding to the best performance.



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

The investment manager does not commit to a minimum proportion of environmentally sustainable investments 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. Although the Fund does not commit to a minimum proportion of environmentally sustainable investments that are not aligned with the EU Taxonomy, such investments may still be freely allocated within the Fund's disclosed overall commitment to sustainable investments (at least 0.50% of the Fund's assets).



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 does not commit to a minimum of socially sustainable investments. Sustainable investments may also include investments with a social objective. Although the Fund does not commit to a minimum proportion of socially sustainable investments, such investments may still



be freely allocated within the Fund's disclosed overall commitment to sustainable investments (at least 0.50% of the Fund's assets).



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

The instruments categorized under "#2 Other" are permissible assets as defined in the Fund prospectus. These include cash and cash equivalents, target funds, permitted asset classes and derivatives that do not specifically promote environmental or social characteristics. The Fund may use derivatives, which always fall under the category "#2 Other Investments", for hedging, liquidity management, efficient portfolio management and investment purposes. These investments do not have any environmental or social minimum safeguards.



Reference benchmarks

are indexes to measure whether the financial

environmental or social characteristics that it

product attains the

promotes.

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, the investment manager has not designated a reference benchmark to assess the alignment of the Fund with the environmental and/or social characteristics it promotes.

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

A reference benchmark is not used to assess compliance with the environmental or social characteristics promoted by this financial product.

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

A reference benchmark is not used to assess compliance with the environmental or social characteristics promoted by this financial product.

- How does the designated index differ from a relevant broad market index?
  - A reference benchmark is not used to assess compliance with the environmental or social characteristics promoted by this financial product.
- Where can the methodology used for the calculation of the designated index be found?

A reference benchmark is not used to assess compliance with the environmental or social characteristics promoted by this financial product.



# Where can I find more product specific information online?

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

03. November 2025