In accordance with the European Union's understanding of sustainability, sustainability should not be limited solely to ecological aspects but should consider the entire ESG spectrum (Environment, Social, and Governance). Anker Capital Management AG (ACM) is subject to disclosure obligations under the Sustainable Finance Disclosure Regulation (SFDR), Articles 5 to 8 of the Taxonomy Regulation, and Delegated Regulation (EU) 2022/1288. To fulfill these disclosure obligations, we disclose the following:

Sustainability Strategy (Article 3 SFDR):

Sustainability risks can directly influence the value of investments by amplifying other relevant risks, such as market risk, credit and counterparty risk, liquidity risk, legal risk, reputational risk, or operational risk. Sustainability risks can lead to significant deterioration of a company's financial profile, profitability, or reputation, thereby negatively affecting its value. Failure to consider sustainability factors in investment management can have adverse impacts on the environment (e.g., climate, water, biodiversity), social interests, and employee concerns, and may hinder efforts against corruption and bribery. Despite some sustainability principles inherently influencing corporate governance and strategic direction, ACM declares that sustainability criteria are explicitly not considered as part of its business activities to avoid legal disadvantages.

ACM operates in two main areas:

1. **Portfolio Management Services** for selected institutional and professional clients. This activity aligns with the specific investment objectives of clients, where ACM plays an executive role based on client-selected criteria. To date, sustainability criteria have not been central or part of the services provided. ACM does not plan to accept future clients where sustainability criteria play a significant role in their strategy.

2. **Portfolio Management for Licensed and Regulated Collective Investment Products** according to predefined investment policies. Sustainability factors do not play a significant role in the current investment strategies. The focus remains on other factors when compiling the investment universe and selecting products.

Performance-related remuneration based on investment decisions that consider sustainability factors and risks does not impact the company's success. Including sustainability criteria would neither be appropriate nor practical given the company's business strategy and would unreasonably restrict the range of products for which services are provided.

Therefore, ACM does not consider sustainability in accordance with Article 4(1)(b) or Article 5(b) of SFDR, and this is not planned under the current business strategy.

Sustainability Risks in Relation to the Remuneration Policy:

ACM's remuneration policy aligns with its corporate philosophy, strategy, values, goals, and long-term interests. The inclusion of sustainability risks does not affect the remuneration policy.

The remuneration policy ensures no incentives for excessive risk-taking. Employees are primarily compensated through fixed salary components, as outlined in their employment contracts. Variable remuneration in the form of bonuses is possible. For specific employees, performance-based remuneration components may be considered. In such cases, the employee's role (e.g., whether they perform control functions) and the principle that performance criteria for such remuneration must be long-term are considered. An appropriate balance between fixed and variable components is always ensured, with fixed components constituting the majority.

While neutral toward sustainability criteria, the remuneration policy supports proper management of sustainability risks. It avoids incentives for excessive risk-taking and aligns with customer interests, ensuring no incentives for frequent buying and selling of financial instruments. Overall, the remuneration system is designed to prevent conflicts of interest, including those related to sustainability risks.

Transparency on the Consideration of Sustainability Risks (Pre-contractual Information and Explanations):

As ACM's business strategy does not include aligning its investment decisions or those related to its activities with sustainability aspects, these are not separately considered in pre-contractual or other phases. Given ACM's exclusively professional client base, it is assumed they can adequately assess such risks.

ACM does not offer insurance advisory services. Investment advisory services are not currently part of its strategy. Upon request, additional details on sustainability topics can be provided to clients.

Transparency on Adverse Sustainability Impacts at the Financial Product Level:

ACM does not issue financial products. Sustainability components of financial products are not of significant importance in ACM’s services and are not highlighted in marketing. Information under Articles 8 and 9 SFDR for specific financial instruments can be obtained from the prospectus or issuer information, enabling professional clients to evaluate if the product falls within the scope of Articles 8 and 9 SFDR.

ACM does not consider adverse impacts of investment decisions on sustainability factors (Article 4 SFDR, Articles 12 and 13 of Delegated Regulation (EU) 2022/1288).

The information provided above is kept up to date in accordance with Article 12 SFDR.

Dated November 2024