

Chartered Investment

Sustainability-related Disclosures under Articles 3, 4 and 5 SFDR

October 2026

Introduction

Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (OJ L 317, 9 December 2019, p. 1 – Sustainable Finance Disclosure Regulation, "**SFDR**") establishes transparency requirements concerning the integration of sustainability risks, the consideration of adverse sustainability impacts and sustainability-related information on financial products. Additional requirements are set out, in particular, in Commission Delegated Regulation (EU) 2022/1288.

Chartered Investment Germany GmbH ("**CIG**") is subject to these requirements in its capacity as a financial adviser, namely an investment firm providing investment advice (Article 2, points (5) and (11)(d), SFDR). The following disclosures relate to CIG in this capacity and to its investment advisory activities.

Information on the general ESG@Chartered sustainability initiative and the group-wide ESG Policy is available on Chartered Investment's website under Sustainability & ESG Policy or directly from CIG's ESG Desk. This general information is distinct from the regulatory disclosures below.

Transparency of policies on the integration of sustainability risks

(Art. 3(2) SFDR)

Sustainability risks are environmental, social or governance events or conditions that, if they occur, could have an actual or potential material negative impact on the value of an investment (Article 2, point (22), SFDR). Examples include physical climate risks, risks arising from the transition to a lower-emission economy, serious violations of human or labour rights, and shortcomings in corporate governance.

CIG considers sustainability risks in its investment advice as part of its examination and assessment of the risks associated with an investment. The assessment focuses on the potential economic effects on the investment

concerned. Its scope and depth depend, in particular, on the nature and complexity of the financial instrument, the characteristics of the issuer and, where applicable, the underlying assets.

Sustainability risks are identified and assessed as part of due diligence on products and transactions. This involves analysing available information on the issuer, the product structure and the underlying investments. Data and assessments from external providers may also be used. The assessment takes account of the information's relevance, timeliness and any apparent limitations. Missing or incomplete information is not treated as evidence that sustainability risks are absent.

Identified material sustainability risks inform the risk assessment and the preparation of the investment recommendation. Depending on the nature and significance of the risk, additional reviews or referral to the relevant internal functions, including the Product Approval Committee where appropriate, may be required. Risks that cannot be adequately assessed, or that are incompatible with the client's investment objectives and risk tolerance, may lead CIG to refrain from making a recommendation.

Insights gained through CIG's product design activities for issuers are taken into account to the extent that they are relevant to the investment advice concerned. Any ongoing review depends on the nature and scope of the agreed advisory services.

Alignment with general sustainability objectives, including the United Nations Sustainable Development Goals, complements CIG's approach to sustainability. It does not replace the assessment of the financial significance of sustainability risks for the investment concerned.

No consideration of adverse impacts of investment advice on sustainability factors

(Art. 4(5)(b) SFDR in conjunction with Art. 13 of Commission Delegated Regulation (EU) 2022/1288)

CIG does not currently consider the principal adverse impacts of investment decisions on sustainability factors ("Principal Adverse Impacts", "PAIs") in its investment advice.

Sustainability factors include environmental, social and employee matters, respect for human rights, and anti-corruption and anti-bribery matters (Article 2, point (24), SFDR). PAIs concern the adverse effects of investments on these factors.

CIG has taken this decision having regard to its size, the nature and scale of its activities, and the characteristics of the financial instruments on which it provides investment advice. The decision is based, in particular, on limitations in the availability, reliability and comparability of the information required to consider PAIs systematically.

For parts of the investment universe covered by CIG's advice, the necessary information on issuers and underlying investments is not available with sufficient coverage and quality. Available ESG data and general sustainability assessments do not consistently support a reliable assessment against the relevant PAI indicators. CIG has therefore not yet introduced a corresponding procedure for considering PAIs in its investment advice.

This decision does not affect the integration of sustainability risks. While sustainability risks concern potential negative effects on the value of an investment, PAIs concern the adverse effects of the investment on the environment and society. The use of ESG information to assess financial risks does not, in itself, constitute consideration of PAIs.

Likewise, the applicable requirements under securities law to ascertain and take account of clients' sustainability preferences as part of the suitability assessment remain unaffected.

CIG reviews its decision regularly and whenever there are material changes in the relevant circumstances. In doing so, it considers, in particular, the availability and quality of relevant data and changes in the investment universe covered by its advice. No firm date has currently been set for introducing the consideration of PAIs. Should CIG change its decision, these disclosures will be updated accordingly.

Transparency of the remuneration policy in relation to the integration of sustainability risks

(Art. 5 SFDR)

CIG's remuneration policy is designed to support the safeguarding of clients' interests and sound risk management. This includes the integration of material sustainability risks into investment advice.

The remuneration principles do not provide incentives to recommend financial instruments or arrange transactions in financial instruments that are inconsistent with the client's investment objectives or risk tolerance. They are also designed to prevent material sustainability risks from being disregarded in pursuit of short-term financial benefits and to prevent the relevant review procedures from being circumvented.

The internal requirements governing proper investment advice and risk assessment apply irrespective of whether, or to what extent, the activity concerned generates a financial benefit for CIG or its employees. The remuneration structure is designed to prevent inappropriate risk-taking, including in relation to sustainability risks.

When reviewing its remuneration principles, CIG considers their consistency with its internal requirements for the integration of sustainability risks.

Closing remarks

This publication fulfils the entity-level disclosure obligations under Articles 3, 4 and 5 SFDR. It does not constitute an investment recommendation or an offer to

acquire a financial instrument. It does not replace any required pre-contractual or product-level disclosures.

CIG keeps the published information up to date and reviews it regularly and whenever there are material changes to the underlying procedures or circumstances. Amendments to the information disclosed under Articles 3 and 5 SFDR are explained on the same website in accordance with Article 12(2) SFDR.

As at October 2026 (Version 1.3)

