

**Art. 4 para. 1 SFDR****Transparency of Adverse Sustainability Impacts**

Currently, Quoniam Asset Management GmbH ([Quoniam](#)) does not consider adverse impacts of investment decisions on sustainability factors pursuant to SFDR (Sustainable Finance Disclosure Regulation). Due to the fact that the relevant data that has to be used to determine and weight the adverse impacts on sustainability is not yet sufficiently available in the market. As soon as we have confidence in the data availability by data provider and further regulatory standards were clarified, we will begin to disclose the adverse impact. Since 2020, Quoniam has been measuring water and waste footprints for all entities, in addition to the ESG (Environmental, Social and Governance) rating and CO<sub>2</sub> footprint. The waste footprint includes waste categories such as landfill, recycling, incineration and nuclear. Quoniam reports these individual ecological footprints transparently within its ESG reporting.

With regard to the consideration of the adverse impacts of investment decisions on sustainability factors, Quoniam Asset Management GmbH will evaluate the implementation and expansion of PAI (Principal Adverse Impact) on a quarterly basis as part of the meetings of the Socially Responsible Investing Committee (SRI Committee). The publication of the technical standards for SFDR, as well as the quality and coverage of the data for measuring adverse impacts play a significant role here for Quoniam, as a quantitative asset manager.