# onemarkets

# UC European Equity Stars Fund Website Disclosure

# 1. NO SUSTAINABLE INVESTMENT OBJECTIVE

This financial product promotes environmental and social characteristics but does not have as its objective sustainable investments. However, it commits to making a minimum of 30% of sustainable investments in accordance with Article 2(17) of SFDR.

# 2. THE ENVIRONMENTAL AND / OR SOCIAL CHARACTERISTICS PROMOTED BY THE FUND

The Sub-Fund promotes a broad range of environmental and social characteristics in line with the Investment Manager's sustainability strategy. It does not pursue sustainable investment as its primary objective but integrates ESG considerations throughout the investment process.

In the **ecological area**, climate protection and the protection of natural ecosystems are important investment principles. Investments are avoided in economic activities that are particularly detrimental to these environmental goals, such as coal extraction and power generation, oil and gas extraction using problematic methods (e.g. fracking) or in particularly sensitive ecosystems (e.g. arctic oil) to do. On the other hand, companies that are working on improving their greenhouse gas footprint and do not endanger biodiversity in their sphere of influence are to be funded.

In the **social sphere**, investments are made to respect human rights, fight corruption, gender equality and overcoming discrimination. This is to be achieved through a catalogue of criteria based on the Universal Declaration of Human Rights and the principles of the UN Global Compact. This also includes avoiding investments in companies that produce weapons. In addition, investments in the following controversial business areas are avoided: tobacco, pornography and gambling.

To assess these characteristics, the Investment Manager applies a two-step screening process.

# 3. INVESTMENT STRATEGY

The Sub-Fund primarily invests in equities and equity-equivalent securities, with a focus on companies that meet strict environmental, social, and governance (ESG) criteria. The strategy is implemented through direct investments in individual securities, with the possibility of investing in equity-focused investment funds. The Sub-Fund does not use derivatives to attain environmental or social characteristics.

The investment process is guided by a two-step ESG integration framework developed by the Investment Manager:

#### Negative screening – exclusions:

The Investment Manager has defined following exclusion criteria for the Sub-Fund:

- 1. Companies with serious violations of the UN Global Compact principles in the areas of human rights, labour standards, environmental protection and anti-corruption
- 2. Companies that are active in controversial business areas and generate revenues from these activities:
  - Companies manufacturing, maintaining, or trading controversial and/or morally unacceptable weapons, as identified through the international obligations, treaties and legislations.



- Companies involved in thermal coal production and/or production of energy from thermal coal which derive from these businesses more than 5% of their consolidated revenues. It's also requested a mandatory phase out by 2028.
- Companies involved in controversial fuel production and companies that extract hydrocarbons with controversial techniques or in areas with high environmental impact.
- Companies involved in the tobacco production or distribution which derive from these businesses more than 5% of their consolidated revenues.
- Companies involved in the nuclear energy production which derive from these businesses more than 5% of their consolidated revenues.
- Companies involved in the weapons production or distribution which derive from these businesses more than 10% of their consolidated revenues.
- Companies involved in the gambling business which derive from these businesses more than 15% of their consolidated revenues.
- Companies involved in the adult entertainment business which derive from these businesses more than 15% of their consolidated revenues.
- Companies that are associated with certain controversial mining sectors and do not comply with international norms and standards.

Supplementary exclusions:

In addition to the Sub-Fund's binding strategy elements described above, a set of mandatory exclusions applicable to all funds and complementary exclusions applicable to funds as per EU Regulation 2019/2088 art. 8, are defined and set out in the Structured Invest's ESG Exclusion Framework, which can be found here: Structured Invest ESG Exclusion Framework.

#### **Positive screening**

First, the taxonomy compliant activities, as defined in Regulation (EU) 2020/852, are collected for all investments.

Second, the Investment Manager identifies other environmental and social investments based on its own defined criteria.

A company that meets all of the following positive factors in addition to the exclusion criteria is considered to be an investment "with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy":

- Companies with a below-average greenhouse gas emission intensity PAI<sup>1</sup> 3 from Table 1 for companies set the
  total greenhouse gas emissions (tons of CO2 equivalent) in relation to sales. This indicator is compared with a
  reference value, which corresponds to the mean value of the investment universe. If the reference value is not
  reached, then this criterion is met.
- Companies that initiate initiatives to reduce CO2 emissions in accordance with the Paris Agreement PAI 4 from Table 2 evaluates companies based on the targets set in terms of reducing greenhouse gas emissions in order to achieve climate targets.
- Companies with above-average overall performance in climate change mitigation or adaptation This is assessed by the Investment Manager's data provider using a proprietary scoring model: The Carbon Risk Rating.

<sup>&</sup>lt;sup>1</sup> In this document, PAI refers to "Principle Adverse Impact" indicators, which are outlined in tables 1 – 3 of Annex I of the Regulatory Technical Standards to the Sustainable Finance Disclosure Regulation EU (2019/2988)



• Companies with a positive impact score in achieving the 17 United Nations Sustainable Development Goals – This is assessed by the Investment Manager's data provider using the SGD Solution Score.

Those companies that do not meet all the environmental positive criteria are now assessed with regard to social positive criteria: investments "with a social objective". This means that an investment can only be considered ecological or social if, in addition to the exclusion criteria, a company also meets all of the following criteria and is not already included among the environmental investments:

- Companies with internal human rights compliance processes PAI 9 from Table 3.
- Companies that have procedures and mechanisms in place to monitor compliance with the principles of the UN Global Compact and the OECD Guidelines for Multinational Enterprises – PAI 11 from Table 1.
- Companies that have at least one third of their supervisory board occupied by women PAI 13 from Table 1.
- Companies with a positive impact score in achieving the 17 United Nations Sustainable Development Goals This is assessed by the Investment Manager's data provider using the SGD Solution Score.

#### **Exclusions**

In addition to the Sub-Fund's Investment Manager's binding exclusion elements described above, a set of mandatory exclusions applicable to all funds and complementary exclusions applicable to funds as per EU Regulation 2019/2088 art. 8, are defined and set out in the Structured Invest's ESG Exclusion Framework, which can be found here: Structured Invest ESG Exclusion Framework.

#### Good governance

To uphold good governance standards, the Investment Manager excludes companies that seriously violate the principles of the UN Global Compact. Issuers that lack adequate governance processes or have committed significant abuses in this area are not eligible for investment.

The Sub-Fund also applies an active engagement strategy aimed at two key outcomes:

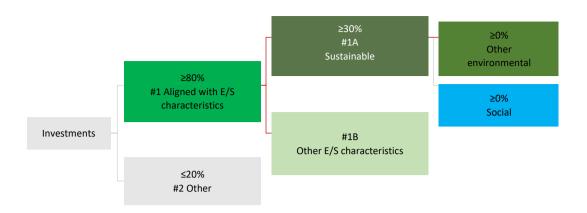
- Active engagement: Companies that exhibit severe violations of the UN Global Compact are excluded from the
  investment universe. However, the Investment Manager may engage with these issuers to encourage corrective
  action, with the goal of making them investable again in the future.
- **Proactive measures:** For companies already included in the investment universe, the Investment Manager works collaboratively with other investors to promote continuous improvement in ESG practices. This helps ensure that these companies maintain high governance standards over time.

# 4. PROPORTION OF INVESTMENTS

The Sub-Fund's investments are at least 80% aligned with E/S characteristics (#1 Aligned with E/S characteristics) and up to 20% are classified as Other investments (#2 Other). At least 30% are allocated to Sustainable investments (#1A Sustainable) and the remainder will be invested aligned with other environmental and/or social characteristics (#1B Other E/S characteristics).

0% of assets are invested aligned with an environmental objective of the EU Taxonomy.





#### 5. MONITORING OF ENVIRONMENTAL OR SOCIAL CHARACTERISTICS

Structured Invest (SI) monitors the handling and monitoring of sustainability risks. Among the different risks deriving from ESG matters the risks for a company which arise climate change poses a significant risk to the long-term financial sustainability of a company. Therefore, a better understanding of the potential impacts of sustainability risks is in the best interest of the investors.

Additionally, the Sub-Fund has defined sustainability indicators and good governance standards (see relevant sections above) that are determining the selection of the investments that contribute to the promoted environmental and social characteristics. The Management Company facilitates and independent review of respective investment restrictions deriving from the above-described investment criteria. Compliance with investment restrictions is reviewed and ensured on a daily basis.

#### 6. METHODOLOGIES

The Investment Manager applies a structured and research-driven methodology to manage the Sub-Fund, combining financial analysis with a robust sustainability framework. The investment process integrates both qualitative and quantitative assessments to identify companies that align with the Sub-Fund's environmental and social characteristics. The Investment Manager continuously monitors the ESG profile of all securities in the portfolio, particularly those contributing to the minimum proportion of sustainable investments. This monitoring is supported by data from ISS ESG, a leading sustainability research provider, and is supplemented by internal analysis and third-party sources such as broker research, credit ratings, and financial media.

#### 7. DATA SOURCES AND PROCESSING

#### Data sources

To evaluate and monitor the environmental and social characteristics of the Sub-Fund's investments, the Investment Manager relies on a combination of proprietary analysis and external data sources. The primary external provider is **ISS ESG**, a globally recognized sustainability research firm with expertise in ESG ratings, climate data, and impact assessments.

The Investment Manager continuously monitors the ESG profile of all portfolio holdings. Data is reviewed and updated regularly to reflect new information and developments in the market. While the Investment Manager does not influence the methodology or completeness of third-party data, it ensures that the data used is robust and aligned with international standards.

Where data gaps exist—particularly for certain Principal Adverse Impact (PAI) indicators—the Investment Manager acknowledges these limitations and plans to integrate additional indicators as data availability improves.

#### Measures taken to ensure data quality

ESG data providers are subject to a review of their business model, research process, technical expertise, data coverage, quality assurance mechanisms, and prevention of conflicts of interests.

#### Processing



Once ESG data is integrated into the systems, the Investment Manager conducts quality controls on an on-going basis to detect and address issues that may negatively affect data usage.

#### Proportion of data that are estimated

The proportion of estimated data varies between research providers and geographies.

#### 8. LIMITATIONS TO METHODOLOGIES AND DATA

Key limitations to methodologies of the Investment Manager may include a lack of data coverage and/or quality.

To overcome these issues, the methodologies are informed by reliable sources gathered from diverse reputable third-party research providers that are experts in their areas. In addition, the Investment Manager retains the right to deviate from third-party information on a case-by-case basis in instances where it is deemed incorrect or incomplete.

#### 9. DUE DILIGENCE

Schoellerbank Invest AG applies a structured and transparent due diligence process to the underlying assets of financial products that promote environmental or social characteristics. This process is embedded in the firm's sustainability strategy and is aligned with the requirements of the EU Sustainable Finance Disclosure Regulation (SFDR).

#### **Internal Due Diligence Controls:**

- Investment decisions are guided by a proprietary ESG framework that integrates environmental, social, and governance factors into the selection and monitoring of assets.
- ESG risks and opportunities are assessed using both qualitative and quantitative criteria, with a focus on long-term value creation and risk mitigation.
- The investment process includes regular internal reviews and oversight by sustainability committees to ensure consistency with the firm's ESG objectives and regulatory obligations.

# **External Due Diligence Controls:**

• Schoellerbank Invest AG collaborates with external ESG data providers and research partners to validate internal assessments and enhance the robustness of its sustainability analysis.

#### **Engagement and Monitoring:**

- Active ownership is a key component of the due diligence process. Schoellerbank engages with issuers to encourage sustainable business practices and improved ESG performance.
- Ongoing monitoring ensures that investments continue to meet the defined environmental or social characteristics, with adjustments made as necessary in response to material changes.

#### 10. ENGAGEMENT POLICIES

Schoellerbank Invest AG integrates engagement into its ESG investment strategy through a structured and collaborative approach. The firm participates in norm-based engagement programs, particularly through its partnership with ISS ESG, targeting companies that are involved in actual or alleged breaches of internationally recognized standards such as the UN Global Compact. These engagements are designed to encourage companies to improve their ESG practices and disclosure, especially in cases of systematic or severe controversies. Schoellerbank monitors these situations closely and may engage directly or through collaborative channels to promote remediation. If a company fails to demonstrate progress or continues to violate key sustainability principles, it may be excluded from the investment universe. This engagement policy reflects Schoellerbank's commitment to ethical investing and responsible stewardship.

More information on Schoellerbank's engagement strategy can be found under the following link: <u>Schoellerbank Invest AG:</u> Engagement Strategie.



# 11. DESIGNATED REFERENCE BENCHMARK

The Sub-Fund does not have a reference benchmark that has been designated for the purpose of attaining the environmental or social characteristics promoted by the Sub-Fund.

