

Sustainability Disclosure

according to Regulation (EU) 2019/2088 and Regulation (EU) 2020/852

1. General remarks

The present document contains the legally required disclosures of Früh & Partner Asset Management Ltd. (FP) according to Regulation (EU) 2019/2088 (SFDR) and—where applicable—according to Regulation (EU) 2020/852 (Taxonomy Regulation).

FP is a financial market participant that provides its customers with asset management/portfolio management and investment advisory services. Within the scope of these services, FP offers various investment strategies (income, growth, opportunity). When necessary in the statements below, a distinction will be made between these varied offerings. FP generally classifies the asset management and investment advisory services it offers as financial products under Article 6 of the SFDR and does not promote any environmental or social characteristics (no Article 8 products) nor pursue any sustainable investment objectives (no Article 9 products).

The present document is provided to interested parties within the framework of contract initiation as pre-contractual information. Since the content of the present document will be adapted from time to time, in particular, in order to comply with statutory or other regulatory requirements, the current version is always accessible via the FP website.

2. Handling sustainability risks (Art. 3 SFDR)

Sustainability risks are events or conditions from the environmental, social and governance (ESG) spheres, the occurrence of which can have actual or potentially material adverse effects on the value of the investments. Sustainability risks can affect all known types of risk (e.g., general price risk, operational risk, liquidity risk and currency risk) and contribute as a factor towards the materiality of these types of risk.

FP considers sustainability risks exclusively to the extent that they may appear financially material within the scope of the general risk analysis. FP does not pursue a standalone sustainability or ESG strategy and does not conduct a systematic or comprehensive assessment of ESG factors.

Due to the available data and the varying methodologies in the market, it is possible that sustainability risks may not be fully identified. Sustainability risks may have a negative effect on the performance of investments.

3. Statement on the non-consideration of adverse effects on sustainability factors

FP currently does not consider the adverse effects of investment decisions on sustainability factors (Principal Adverse Impacts, PAI) within the meaning of Article 4 SFDR.

Reasoning: This decision is based in particular on (i) the limited availability and comparability of relevant data, (ii) the diverse quality of data across different issuers/asset classes, and (iii) the scope and nature of the services provided by FP.

FP reviews this decision on a regular basis and reserves the right to adjust its approach in the event of changes in the data or legal situation.

4. Transparency of the compensation policy in connection with consideration of sustainability risks

FP's compensation policy is designed to support sound and effective risk management. Insofar as sustainability risks are considered financially material within the scope of the general risk analysis, the compensation policy is consistent with the consideration of such risks.

The compensation policy does not create incentives to ignore sustainability risks or to take on unreasonably high risks. Details regarding the compensation policy are set out in the relevant internal regulations.

5. Product-related disclosure for asset management and investment advice (Article 6 SFDR)

The asset management and investment advisory services provided by FP are classified as financial products according to Article 6 SFDR. Investment decisions and recommendations are primarily based on traditional financial criteria (e.g., risk/return, liquidity, diversification). Sustainability risks—insofar as they are identified as financially material—may be incorporated into the overall assessment of risks and opportunities.

FP does not pursue a sustainable investment strategy with these services and does not promote environmental or social characteristics. It should be noted that sustainability risks may negatively affect the value of an investment.

6. Taxonomy Regulation (EU) 2020/852 – Notice for Article 6 products

Since FP does not offer or promote financial products that promote environmental or social characteristics (Article 8 SFDR) or aim at sustainable investments (Article 9 SFDR), the taxonomy-related mandatory product disclosures under Articles 5 and 6 of the Taxonomy Regulation are not applicable.

For Article 6 financial products, the following notice applies according to Article 7 of the Taxonomy Regulation:

The investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

7. Update

This disclosure is updated as needed and in the event of significant regulatory changes.

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