

Pursuant to EU 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 (the “SFDR”), the Zeus Asset Management SA is required to disclose the manner in which Sustainability Risks (as defined hereafter) are integrated into the investment decisions and the results of the assessment of the likely impacts of Sustainability Risks on the returns of the undertakings for collective investments in transferable securities (UCITS) under management. Sustainability risk is an environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of the investments made by the Sub-Funds (“Sustainability Risk”).

At Zeus Asset Management SA (the “Company”) we are aware of the importance of the environmental, social or governance (“ESG”) framework and the necessity of integrating its principles in our daily management operations. Nevertheless, as of today the Company does not consider the principal adverse impacts of the investments of the UCITS under its management on sustainability factors.

Currently, the legal and regulatory framework regulating sustainable investments is still evolving with legal texts still in draft form. Unit publication and entry into force of such legal texts different approach may be applied. The selection and weighting in determining whether an investment is a sustainable investment or otherwise, could be subject to different approach in the market. Therefore, investors should note that sustainable investments which would prima facie appear substantially similar, could be considered differently. The evolving legal framework in relation to the ESG and the SFDR could also potentially lead to some tax credit or incentives which may differ among EU members’ state. Furthermore, investors are to note that ESG index are not always reliable and do not always constitute a meaningful indicator of an investment strategy’s contribution to the achievement of the ESG goals.

The UCITS under management primarily invests in transferable securities (shares and bonds) without focus on the impacts of the investee companies and projects on sustainability factors. Where the UCITS under management invests in Money Market Instruments, the Company does not deem the impacts of such investments relevant to sustainability factors. The investment objectives of the products under the management by the Company, are mainly to achieve capital growth. The Company may set up the relevant processes to take into account Sustainability Risks and the principal adverse impacts for the UCITS under management and intends to re-evaluate the relevance of acquiring such expertise by the end of 2021.