

As of 21 March 2022

Principles for considering sustainability risks

Sustainability risks are environmental, social or governance events or conditions that, if they occur, may have a real or potential material adverse effect on the value of an investment.

The funds managed by Tuleva are passively managed. The fund manager does not make investment decisions regularly and the funds invest according to a model portfolio. Therefore, Tuleva funds cannot make investments with a sustainability objective or impact investments. However, Tuleva funds take sustainability risks into account in their investment selection process. Tuleva identifies and analyses sustainability risks as part of the risk management process. Tuleva ensures that the investment funds in which Tuleva invests have been evaluated and selected through a sustainability assessment process. Tuleva does not invest in funds that do not consider sustainability risks or do not meet minimum safeguards.

Information on the most significant adverse effects of investment decisions on sustainability factors

Tuleva does not currently take into account the most significant adverse effects on sustainability factors when making investment decisions.

Potential negative impacts on sustainability factors are minimised through the application of the exclusion criteria set out in the ESG strategy for BlackRock funds.

Tuleva aims to systematically increase the share of sustainable investments in its portfolios, and the investment policy of the funds is developed accordingly.

In the future, Tuleva intends to take into account the most significant adverse effects when making investment decisions and to disclose relevant information in accordance with applicable regulatory requirements.

Engagement policy

Tuleva does not apply engagement policies.

Remuneration principles regarding the consideration of sustainability risks

Tuleva's remuneration policy has due regard for sustainability risks.