

Sustainability factors and sustainability risks

Direct investments in the investment funds of TCM Investment Funds / Intereffekt Investment Funds (the Funds) are screened against the 10 criteria from the United Nations Global Compact Rules. These are criteria in the areas of human rights, labor, the environment and corruption. For this screening, Trustus Capital Management has entered into a partnership with the renowned company Sustainalytics, which specializes in analyzes for sustainable investing. Companies that violate the set criteria are removed from the portfolio. Companies active in the arms, tobacco and adult industry are excluded in advance.

As of March 10, 2021, new European regulations will come into force regarding the provision of information about sustainability in the financial services sector. The aim of this law is to harmonize and make sustainability policy transparent. Trustus is in favor of this. At present, the elaboration of the law is not yet complete and the practical elaboration is unclear. That is why we first indicate that the investment policy is not specifically aimed at the selection of sustainable investments. The return effects of sustainability risks are often difficult to estimate, as are unfavorable effects on sustainability factors. Both are therefore not explicitly included in the investment policy. The Funds aim to qualify as a “light green” investor in the course of 2021, with some of its products promoting environmental and social attributes.

In connection with the above, the following risk paragraph has been added to the prospectus of the Funds as of March 10, 2021:

Sustainability Risk

The funds do not actively promote ESG Characteristics/Sustainability Factors and do not maximize portfolio alignment with Sustainability Factors, however they remain exposed to Sustainability Risks. As part of the review performed, it is considered that the investments to be made are not likely to be affected by sustainability risks and that those risk are not relevant in the context of relevant policies, [i.e., that if any such risk arises, it is not likely to have a more materially adverse effect on the Company’s returns than any other normal market or external risk]. Investors should note that it is very difficult to assess with any reasonable certainty whether there exists, or the likely outcome of, any sustainability risk on the investments and/or the risk of occurrence of any such risk. Therefore, the investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

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Trustus Capital Management B.V.