Sustainability related disclosures pursuant to Article 10 of Regulation (EU) 20192088 in conjunction with Article 24 of Delegated Regulation (EU) 20221288

The subject of this document is mandatory information on the environmental and/or social characteristics of this fund. It is not promotional material. This information is required by law in order to transparently explain the environmental and/or social characteristics promoted by the fund.

UI - Aktia Sustainable Corporate Bond Fund

ISIN / WKN: LU2619348928 / A3EE68; LU2459309410 / A3DHNC; LU2459309501 / A3DHND; LU2459309683 / A3DHNE; LU2459309766 / A3DHNF; LU2459309840 / A3DHNG

The fund is managed by Universal-Investment-Luxembourg S.A. (the “management company“)

a) „Summary“

‘No significant harm to the sustainable investment objective’

The decision making process of the fund takes into account sustainability risks and - factors and main Principle Adverse Impact-indicators (PAI). The evaluation is made using both own and external tools, through which different sustainability risks and -factors can be identified and reviewed diversely in the decision making process. These tools are also used to identify sustainability risks and PAI's before investment decisions and also in reporting after investment.

‘Sustainable investment objective of the financial product’

This (Sub)Fund has sustainable investments as its objective within the meaning of Article 9 Disclosure Regulation.The fund has sustainable investment as its objective within the meaning of Article 9 of the Disclosure Regulation. The objective of the (Sub)Fund is to make a positive net impact through investing in ICMA compliant sustainable corporate bonds and/or EUGBS (European Union Green Bond Standard) corporate bonds where the use of proceeds is used to finance environmental projects (green bonds), social projects (social bonds), the combination of these (sustainability bonds) or sustainability linked bonds. The positive impact focuses on four sustainability themes that address the global and local fields of action: Environment, Society, Knowledge and Health. Aktia examines issuers and bonds true impact using net impact model of The Upright Project. The Model analyses three parts of the value chain: internal impact; upstream impacts and downstream impacts. Aktia consider both instrument level and company level net impact. The (Sub)Fund only invests in ICMA compliant sustainable corporate bonds and/or EUGBS (European Union Green Bond Standard) corporate bonds which use of proceeds have an overall positive net impact. The use of proceeds for the instruments used may include e.g. green energy, energy efficiency, social housing or other environmental or social projects. The investment universe comprises all bonds that meet the Aktia’s Responsible Investment Policy and fund’s ESG screening criteria and have undergone fundamental analysis within the sustainability themes. In Aktia, investment decisions and portfolio management are based on overall, in-debt analysis and views of positive and negative factors, including ESG and impact, aiming to achieve the best possible return on the chosen risk level.

Investment strategy

The fund is based on a transparent and stringent investment process. The entire process is characterised by an interdisciplinary cooperation of several competence teams of the contractual partner. In Aktia, investment decisions and portfolio management are based on overall, in-debt analysis and views of positive and negative factors, including ESG and impact. The analysis is based on the integration of sustainability aspects (such as activity-based screening and norm-based screening) into the issuer analysis and the identification of the positive impact to sustainability themes.

Proportion of investments

The asset allocation of the (Sub)Fund and the extent to which the (Sub)Fund has direct or indirect exposures in investee entities can be found in the investment strategy and the investment principles.

This (Sub)Fund has sustainable investments as its objective within the meaning of Article 9 Disclosure Regulation. The minimum proportion of sustainable investments is 80% of the value of the (Sub) Fund´s assets.

The (Sub) Fund will make a minimum of 65% in sustainable investments with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy.

The (Sub) Fund will make a minimum 2% of sustainable investments with a social objective.

Cash for liquidity management and derivatives for hedging purposes.

For "Not sustainable investment" that are not part of the (Sub) Fund's sustainability strategy, there are no binding criteria to consider minimum environmental and/or social safeguards. This is either due to the nature of the assets, where at the time of the preparation of the (Sub) Fund´s documents there are no legal requirements or standard market procedures on how to consider minimum environmental and/or social safeguards for such assets or investments are specifically excluded from the sustainability strategy, which are then also not subject to the consideration of minimum environmental and/or social safeguards.

‘Monitoring of the sustainable investment objective’

Initially, the sustainable investment objective and the sustainability indicators are reviewed in a qualitative manner by the ESG Office of Universal Investment. Compliance with the investment limits, based on the individual sustainability strategy, is measured and monitored daily by Investment Controlling of the management company and additionally by the portfolio manager (for outsourced portfolio management mandates). Internal controls are carried out by portfolio management and risk controlling.

‘Methodologies’

The manager examines issuers and bonds true impact using net impact model of Upright Project. Aktia considers both instrument level and company level net impact. The fund only invests in ICMA conform sustainable corporate bonds or EUGBS (European Union Green Bond Standard) corporate bonds which use of proceeds have an overall positive net impact. For analysing net impact of the issuers and bond, data model of the Finnish based innovation company the Upright Project is used. Net Impact ratio is divided into four dimensions of society, knowledge, health and

environment including total of nineteen impact categories. Model analyses three parts of the value chain: internal impact; upstream impacts and downstream impacts. Net impact ratio is defined as (positive impacts - negative impacts) / positive impacts. The maximum value for net impact ratio is 100 %, representing a theoretical company with no negative impacts. The minimum value is minus infinity. Only bonds with the net impact ratio > 0% are eligible for investment.

The manager examines UN Global Compact principles using ISS ESG and do not invest in issuers with verified breach in norm-based screening. ISS ESG monitors companies according to the criteria based on the UN Global Compact principles. The ISS ESG screening includes three categories: no violations (green), possible problem (amber), verified breach (red). Companies in the category "red" are excluded from the investment universe.

The manager uses Morningstar/Sustainanalytics ESG data as the primary source for company and sector exclusion and to examine ESG factors and risks. Secondary sources for ESG data are Bloomberg and internal analysis to ensure complete data coverage.

'Data sources and processing'
ISS-ESG, Upright Project, Morningstar/Sustainalytics, Bloomberg and internal research using company reported data.

'Limitations to methodologies and data'

The information produced by our service providers is based on the best information available. The fund only invests in labelled, use-of-proceeds corporate bonds or alike instruments with a sustainability goal that are aligned with ICMA-principles or equalent market standards, such as EU GBS. Some of the data is related to the issuer and not bond specific (e.g. carbon footprint or carbon intensity and PAI-indicators). Data availability and data quality by service providers will develop as companies develop their sustainability reporting and meet the requirements set by the regulation (e.g. Disclosure Regulation, CSRD). The attainment of the sustainable investment objective is secured by using additional qualitative and quantitative methods as comprehensively as possible if data limitations exist.

Data sources vary depending on the asset class and according to the regulatory definitions at given time. The investment horizon, goals and other regulations regarding the portfolio's investment universe also affect the consideration of sustainable investments.

Investments without data coverage are not allowed.

'Due diligence'

Through the establishment and application of written policies and procedures effective arrangements are in place to ensure that investment decisions made on behalf of the (Sub)Fund are consistent with its objectives, investment strategy and, where applicable, risk limits.

'Engagement policies'

As far as possible for the fund holdings, the engagement policy of the Management Company is exercised in the form of voting.

'Attainment of the sustainable investment objective'

No index has been designated as a reference benchmark to attain the sustainable investment objective of the (Sub)Fund.

b) „No significant harm to the sustainable investment objective"

The decision making process of the fund takes into account sustainability risks and - factors and main Principle Adverse Impact-indicators (PAI). The evaluation is made using both own and external tools, through which different sustainability risks and -factors can be identified and reviewed diversely in the decision making process. These tools are also used to identify sustainability risks and PAI's before investment decisions and also in reporting after investment.

Portfolio's investments are monitored on a regular basis. ESG data from Morningstar/Sustainanalytics and ISS ESG is used as part of our investment analysis to assess the DNSH principle and the requirements for the issuers to meet the minimum social safeguards and good corporate governance. The data is used to consider e.g. ESG risks, controversies and norm-based screening. In addition, ISS ESG is used for stewardship activities such as pooled engagement and carbon data, physical and transition risks related to climate change and for climate scenario analysis. Adverse impacts are considered with the data by Morningstar/Sustainanalytics and Upright Project. Based on the ESG analysis of our external ESG data providers, all companies are identified that are involved in particularly serious ESG controversies, risks or norm-breaches. As part of ESG integration and impact analysis, portfolio management also engages with companies on their approach to ESG and sustainability issues and related questions. Within the framework of a structured engagement process, existing and/or potential ESG controversies as well as other ESG-relevant aspects are addressed. Through this engagement process, portfolio management can determine whether a company or issuer recognises existing and/or potential issues and develop strategies to address them, as well as identify ESG/sustainability opportunities. In the case of serious ESG controversies, risks or norm-breaches, the portfolio management applies direct engagement with the company, in order to analyse the controversy with the company, influence company to take actions and make a final decision to continue investment or divestment based on this. Aktia's ESG committee, compromising members of Aktia Asset Management's units, can support portfolio managements in the process and final investment decisions.

Engagement is made in the name of the portfolio management and not in the name of the fund.

The fund's decision-making process takes into account sustainability risks and factors as well as the main adverse sustainability effects (PAI). As assessment methods, Aktia uses both its own tools and those developed by external service providers, which enable the identification and comprehensive examination of various sustainability risks and factors in the investment decision-making process. These tools are used as part of the decision-making process to identify sustainability risks and the main adverse sustainability effects before investment decisions, as well as to report them after investments.

Key international agreements and norms, such as the UN Declaration of Human Rights and other UN agreements, the UN Sustainable Development Goals (UN Sustainable Development Goals), ILO agreements, and OECD guidelines for multinational companies create Aktia's value base for responsible investing. To evaluate these as part of the investment process, Aktia uses data from external service providers.

Fund utilises norm based screening (to the extent that it is available from potential investment targets as part of the investment process and monitoring). Norm-based screening is based on UN Global Compact principles.

c) „Sustainable investment objective of the financial product“

This (Sub)Fund has sustainable investments as its objective within the meaning of Article 9 Disclosure Regulation.
The fund has sustainable investment as its objective within the meaning of Article 9 of the Disclosure Regulation. The objective of the (Sub)Fund is to make a positive net impact through investing in ICMA compliant sustainable corporate bonds and/or EUGBS (European Union Green Bond Standard) corporate bonds where the use of proceeds is used to finance environmental projects (green bonds), social projects (social bonds), the combination of these (sustainability bonds) or sustainability linked bonds. The positive impact focuses on four sustainability themes that address the global and local fields of action: Environment, Society, Knowledge and Health. Aktia examines issuers and bonds true impact using net impact model of The Upright Project. The Model analyses three parts of the value chain: internal impact; upstream impacts and downstream impacts. Aktia consider both instrument level and company level net impact. The (Sub)Fund only invests in ICMA compliant sustainable corporate bonds and/or EUGBS (European Union Green Bond Standard) corporate bonds which use of proceeds have an overall positive net impact. The use of proceeds for the instruments used may include e.g. green energy, energy efficiency, social housing or other environmental or social projects. The investment universe comprises all bonds that meet the Aktia's Responsible Investment Policy and fund's ESG screening criteria and have undergone fundamental analysis within the sustainability themes. In Aktia, investment decisions and portfolio management are based on overall, in-debt analysis and views of positive and negative factors, including ESG and impact, aiming to achieve the best possible return on the chosen risk level.

d) „Investment strategy“

The fund is based on a transparent and stringent investment process. The entire process is characterised by an interdisciplinary cooperation of several competence teams of the contractual partner. In Aktia, investment decisions and portfolio management are based on overall, in-debt analysis and views of positive and negative factors, including ESG and impact. The analysis is based on the integration of sustainability aspects (such as activity-based screening and norm-based screening) into the issuer analysis and the identification of the positive impact to sustainability themes.
The investment process of the fund states that the governance principles of companies the fund invests in are analyzed before investment and are monitored after investment. Good governance practice is analyzed accordring to Aktia's guidelines set in the principles of sustainable investment through ESG integration (evaluating sustainability factors) and norm based screening such as the violation of UNGC, ILO or OECD principles. Service provider's ESG data is used as part of fund's investment analysis to assess the DNSH principle and the requirements for the issuers to meet the minimum social safeguards and good corporate governance.

e) „Proportion of investments“

The asset allocation of the (Sub)Fund and the extent to which the (Sub)Fund has direct or indirect exposures in investee entities can be found in the investment strategy and the investment principles.

This (Sub)Fund has sustainable investments as its objective within the meaning of Article 9 Disclosure Regulation. The minimum proportion of sustainable investments is 80% of the value of the (Sub) Fund´s assets.

The (Sub) Fund will make a minimum of 65% in sustainable investments with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy.

The (Sub) Fund will make a minimum 2% of sustainable investments with a social objective.
Cash for liquidity management and derivatives for hedging purposes.
For "Not sustainable investment" that are not part of the (Sub) Fund's sustainability strategy, there are no binding criteria to consider minimum environmental and/or social safeguards. This is either due to the nature of the assets, where at the time of the preparation of the (Sub) Fund´s documents there are no legal requirements or standard market procedures on how to consider minimum environmental and/or social safeguards for such assets or investments are specifically excluded from the sustainability strategy, which are then also not subject to the consideration of minimum environmental and/or social safeguards.

f) „Monitoring of the sustainable investment objective“

The sustainable investment objective pursued by the (Sub)Fund and the sustainability indicators used to measure the attainment of the sustainable investment objective is subject to an initial qualitative review by the ESG Office of Universal Investment against the strategy pursued (a) upon the launch of a (Sub)Fund to be classified as an Article 9 fund in accordance with the Disclosure Regulation, (b) upon a fund transfer from another management company or (c) upon a change of classification to an Article 9 fund. The individual sustainability strategy of the (Sub)Fund is contractually agreed and laid down in the fund documentation. Compliance with the investment limits, based on the individual sustainability strategy, is measured and monitored daily by the Investment Controlling department of the Management Company and additionally the portfolio manager in the case of outsourced portfolio management mandates. MSCI data as well as the portfolio manager's own research or data from third-party providers are used, whereby the portfolio manager's research is checked by Investment Controlling.
The control of outsourced portfolio management companies takes place initially when the portfolio managers are appointed and on an ongoing basis, e.g. by means of specific ESG reports.

g) „Methodologies“

The manager examines issuers and bonds true impact using net impact model of Upright Project. Aktia considers both instrument level and company level net impact. The fund only invests in ICMA conform sustainable corporate bonds or EUGBS (European Union Green Bond Standard) corporate bonds which use of proceeds have an overall positive net impact. For analysing net impact of the issuers and bond, data model of the Finnish based innovation company the Upright Project is used. Net Impact ratio is divided into four dimensions of society, knowledge, health and environment including total of nineteen impact categories. Model analyses three parts of the value chain: internal impact; upstream impacts and downstream impacts. Net impact ratio is defined as (positive impacts - negative impacts) / positive impacts. The maximum value for net impact ratio is 100 %, representing a theoretical company with no negative impacts. The minimum value is minus infinity. Only bonds with the net impact ratio > 0% are eligible for investment.
The manager examines UN Global Compact principles using ISS ESG and do not invest in issuers with verified breach in norm-based screening. ISS ESG monitors companies according to the criteria based on the UN Global Compact principles. The ISS ESG screening includes three categories: no violations (green), possible problem (amber), verified breach (red). Companies in the category "red" are excluded from the investment universe.
The manager uses Morningstar/Sustainanalytics ESG data as the primary source for company and sector exclusion and to examine ESG factors and risks. Secondary sources for ESG data are Bloomberg and internal analysis to ensure complete data coverage.
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h) „Data sources and processing“

ISS-ESG, Upright Project, Morningstar/Sustainalytics, Bloomberg and internal research using company reported data.
The Upright net impact model is a mathematical model of the economy that produces continuously updated estimates of the net impact of e.g. companies, products, services or funds. It utilizes an information integration algorithm that consolidates data from humanity’s accumulated scientific knowledge and public statistical databases. The model considers both costs and gains, and provide their net sum in a fashion that figures for different issuers are comparable within and across industries capturing the whole value chain. Morningstar/Sustainanalytics analyses exposure to ESG (environmental, social and goveranance) factors, that could pose a financially material risk, and is used as the primary source for company and sector exclusion.
ISS ESG monitors companies according to the criteria based on the UN Global Compact principles. The ISS ESG screening includes three categories: no violations (green), possible problem (amber), verified breach (red).
Bloomberg has an extensive database of ESG data and is used as a secondary source for ESG data. For analysis regarding the compliance with PAB exclusions Bloomberg is the primary data source.
If the data from the above mentioned data sources are not sufficient the manager uses internal analysis of company reported data for that part of the analysis.
Data quality is ensured by active monitoring and analysis added with other qualitative and quantitative approaches of portfolio management. Also active conversation with data providers is a measure taken to ensure quality of data. Data from service provider is processed within the portfolio management team where internal tools are being used to analyse the data quantitatively and qualitatively.

i) „Limitations to methodologies and data“

The information produced by our service providers is based on the best information available. The fund only invests in labelled, use-of-proceeds corporate bonds or alike instruments with a sustainability goal that are aligned with ICMA-principles or equalent market standards, such as EU GBS. Some of the data is related to the issuer and not bond specific (e.g. carbon footprint or carbon intensity and PAI-indicators). Data availability and data quality by service providers will develop as companies develop their sustainability reporting and meet the requirements set by the regulation (e.g. Disclosure Regulation, CSRD). The attainment of the sustainable investment objective is secured by using additional qualitative and quantitative methods as comprehensively as possible if data limitations exist.

Data sources vary depending on the asset class and according to the regulatory definitions at given time. The investment horizon, goals and other regulations regarding the portfolio's investment universe also affect the consideration of sustainable investments.

Investments without data coverage are not allowed.

j) „Due Diligence“

The (Sub)Fund’s underlying assets are managed by the Management Company exclusively in the interest of the investors and in accordance with strict statutory and regulatory requirements.
Before the assets are acquired, portfolio management checks whether the asset can be acquired in accordance with the legal and contractual requirements. Effective arrangements are in place through the establishment and application of written policies and procedures to ensure that investment decisions made on behalf of the (Sub)Fund are consistent with its objectives, investment strategy, the investment principles and, where applicable, risk limits. After the assets have been acquired, a further corresponding daily check is carried out by the investment controlling department of the Management Company and on an ongoing basis by the portfolio manager. The internal control of these due diligence obligations is carried out in the risk controlling department as the second line of defence and at a downstream level by the internal audit department as the third line of defence.
The control of outsourced portfolio managers is carried out by means of ISAE or comparable reports. These reports are evaluated by subject matter experts of the Management Company within the framework of outsourcing controlling. Before commencing business activities in new products or new markets, including the acquisition of assets, the Management Company ensures that the associated risks and the impact on the overall risk profile of the (Sub)Fund are appropriately captured, measured, monitored and managed.

When complying with their respective duties, the Management Company, the portfolio manager, in case the investment decision making is outsourced, or, if applicable, an appointed investment advisor, take into account sustainability risks.
The (Sub)Fund's underlying assets are under the independent supervision, safekeeping and monitoring of the depositary.

k) „Engagement policies“

As far as possible for the fund holdings, the engagement policy of the Management Company is exercised in the form of voting. In order to safeguard the interests of the investors in the managed (Sub)Funds and to fulfil the associated responsibility, the Management Company shall exercise the shareholder and creditor rights from the shareholdings held in the managed (Sub)Funds in the interests of the investors. The decision-making criterion for the exercise or non-exercise of voting rights for the Management Company shall be the interests of the investors and the integrity of the market as well as the benefit for the investment fund concerned and its investors.
The Management Company shall base its domestic voting on voting guidelines (“Voting Guidelines “). These Voting Guidelines shall be considered as the basis for the responsible management of the capital and the rights of the investors.
For votes abroad, the Management Company shall use to the respective country-specific guidelines of Glass Lewis, which take into account the local framework conditions. In addition, the Glass Lewis Guidelines “Environmental, Social & Governance (“ESG “) Initiatives “ are applied to the specific country guidelines and are used as a matter of priority. The application of these guidelines ensures that the voting criteria are country-specific and based on transparent and sustainable corporate governance policies as well as other environmental and social criteria aimed at the long-term success of the companies held by investment funds (so-called portfolio companies).
These voting standards used are based on the interests of the (Sub)Funds managed by the Management Company and are therefore in principle applied to all (Sub)Funds, unless it is necessary to deviate from these voting guidelines for individual (Sub)Funds in the interest of investors, market integrity or the benefit for the respective investment fund.
The Management Company shall publish the principles of its participation policy and an annual participation report on its website.
The portfolio manager, if the portfolio management is outsourced, or an appointed investment adviser, if applicable, may take further action to attain the sustainable investment objective as part of their corporate engagement activities. However, this engagement is not done on behalf of the (Sub)Fund.

l) „Attainment of the sustainable investment objective “

No index has been designated as a reference benchmark to attain the sustainable investment objective of the (Sub)Fund.

m) „Document version“

Version	Date	Description
1.0	01.01.2023	First Version
2.0	01.12.2023	Update Strategy
3.0	05.05.2025	Update Strategy