Operating Principles for Impact Management

Disclosure Statement

August 2024
UBS Group AG

Foreword

UBS is a founding signatory to the Operating Principles for Impact Management and a member of its Advisory Board since inception. As such, we are excited to see the Impact Principles supported by 180 signatories from 40 different countries today.

Financial institutions - including asset owners, asset managers and intermediaries - play a critical role in enabling institutional, corporate and private investors to incorporate sustainability and impact across their activities from operations to philanthropy to investments. The Impact Principles are critical to this work as the industry standard and framework for the management of investments for intentional impact.

The acquisition of the Credit Suisse Group – a fellow signatory to the Operating Principles for Impact Management – made 2023 an exceptional year in our firm's history. We completed the first-ever combination of two global systemically important financial institutions and have embarked on a major program to integrate the two banks. Our impact investing frameworks are no exception.
We have made significant progress in aligning our frameworks for the combined firm and will continue with this alignment in 2024 and beyond.

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Overview

UBS Group AG is a founding signatory to the Operating Principles for Impact Management (the "Impact Principles").

This Disclosure Statement affirms that UBS Group AG's Global Wealth Management and Asset Management divisions conduct their impact investing activities in alignment with the Impact Principles. Total assets under management in alignment with the Impact Principles (the Covered Assets) is USD 11.5 billion as of December 31, 2023. The Covered Assets only include investment solutions for our private and institutional clients that have been evaluated as meeting the requirements of our impact assessment framework for the "impact investing" label. They include both internally managed products from UBS Asset Management as well as products from third party fund managers.

On 12 June 2023, UBS Group AG acquired Credit Suisse Group AG, succeeding by operation of Swiss law to all assets and liabilities of Credit Suisse Group AG, and became the direct or indirect shareholder of all of the former direct and indirect subsidiaries of Credit Suisse Group AG. UBS Group AG is a holding company and conducts substantially all of its operations through UBS AG, and subsidiaries thereof. UBS aims to substantially complete the integration of Credit Suisse into UBS by the end of 2026. The Disclosure Statement does not include impact investing assets by legacy Credit Suisse entities, which will be addressed in future disclosures, once the alignment of the impact management frameworks between the two firms has been completed.

UBS Global Wealth Management is a leading truly global wealth manager, with over USD 3.9. trillion of invested assets as of December 31, 2023. We provide tailored advice and solutions to wealthy families and individuals around the world. Sustainable and impact investing is a core part of the advice and solutions UBS provides to its wealth management clients globally.

UBS Asset Management is a large-scale, diversified asset manager with USD 1.6 trillion of invested assets as of December 31, 2023. We offer investment capabilities and styles across all major traditional and alternative asset classes to institutions, wholesale intermediaries and wealth management clients globally. Sustainable and impact investing is also a core part of the investment capabilities UBS Asset Management provides to its clients.

Principle 1

Define strategic impact objective(s), consistent with the investment strategy.

The Manager shall define strategic impact objectives for the portfolio or fund to achieve positive and measurable social or environmental effects, which are aligned with the Sustainable Development Goals (SDGs), or other widely accepted goals. The impact intent does not need to be shared by the investee. The Manager shall seek to ensure that the impact objectives and investment strategy are consistent; that there is a credible basis for achieving the impact objectives through the investment strategy; and that the scale and/or intensity of the intended portfolio impact is proportionate to the size of the investment portfolio.

At UBS, we have been focusing on impact for years, both in the context of the investment space and of our own activities. We were among the very first banks to shine a light on the importance of the SDGs – and specifically on what it takes to make them investable. And we were one of the founding signatories of both the Operating Principles for Impact Management and the UN-backed Principles for Responsible Banking in 2019. In 2020 we joined the Banking for Impact Working Group and were a founding member of the Net Zero Asset Manager Initiative. In 2021 we became a founding signatory to the Net Zero Banking Alliance and the Glasgow Financial Alliance for Net Zero. We are actively engaged in industry developments, including through working with the Impact Frontiers and the Global Impact Investing Network on evolving impact management and measurement frameworks. As of 31st December 2023, UBS managed USD 292bn of assets in sustainable investing more broadly.

Our sustainability strategy is guided by our goal to be the financial provider of choice for clients who wish to mobilize capital toward the achievement of the 17 United Nations (UN) Sustainable Development Goals (SDGs) and the orderly transition to a low-carbon economy. This demonstrates our focus on making UBS a force for enabling capital to drive positive, long-term change for people and planet.

Measuring and analyzing impact has become another major focus of companies, investors, governments and regulators. Investors want to know how well investments align to their preferences, whether they are capturing significant long-term opportunities and whether they are aimed at addressing the challenges framed by the SDGs. A clear focus on sustainability outcomes and tangible impact is what will define and differentiate our sustainable practices in the coming years. UBS made an explicit public commitment at the 2017 World Economic Forum Annual Meeting to mobilize USD 5 billion of private investors' capital into SDG-related impact investments over the subsequent five-year period. This goal was achieved a year early in 2020.

Our wealth management business aims to be a leader in sustainable investing for private clients. We offer both targeted and diversified impact investing solutions with the objective of enabling private investors to address social and environmental challenges across multiple thematic areas through their capital. These solutions are sourced from third-party fund managers, as well as from our asset management platform. Our process for sourcing, evaluating and onboarding impact investing solutions incorporates extensive review of an investment strategy's intent, ability and relevance to drive measurable progress toward the SDGs and/or specific impact themes. We assess fund managers' theory of change, the extent to which impact objectives are clearly articulated and embedded into investment and portfolio management processes, and the robustness of impact measurement and management systems. This impact assessment is performed by UBS Chief Investment Office and goes hand-in-hand with our commercial and financial due-diligence processes. It is based on an evidence-based discussion with the managers via interviews, frameworks review, case studies and other activities. Similar to other due diligence findings, the impact evaluation is debated as part of our research and investment committee processes. We also track capital invested by our clients toward the SDGs and impact themes that we identify in independent research publications.

Our asset management business launched a global impact listed equity strategy (UBS Engage for Impact) in 2017. The strategy has an explicit goal: to create positive environmental and social impact under the themes of food, health, water, climate and people empowerment, while generating competitive financial returns. The impact program draws on an innovative research collaboration which UBS Asset Management launched in 2015 in partnership with a large client and with leading universities to develop a standard for measuring and reporting on listed equities' impact. In 2024, we initiated a collaboration with a not-for-profit initiative and industry participants to build on this knowledge to develop outcomes methodologies that can be used for investment decisions. Our stewardship activities and engagement with key portfolio companies serve as the key driver behind impactful outcomes, particularly in our UBS Engage for Impact strategy. We are continuing to evolve our approach to measuring and reporting on sustainability outcomes of our portfolio companies.

Our aim is also to be a leader in enabling investors to mobilize private and institutional capital to target climate change mitigation and adaptation while supporting the transition to a low-carbon economy. This builds on our commitment made at the 2020 WEF meeting in Davos to provide clients with a range of investment products across asset classes which can help them transition their assets towards a lower carbon future.

Principle 2

Manage strategic impact on a portfolio basis.

The Manager shall have a process to manage impact achievement on a portfolio basis. The objective of the process is to establish and monitor impact performance for the whole portfolio, while recognizing that impact may vary across individual investments in the portfolio. As part of the process, the Manager shall consider aligning staff incentive systems with the achievement of impact, as well as with financial performance.

Our purpose as a firm is "Reimagining the power of investing. Connecting people for a better world." To help us maximize our impact and direct capital to where it is needed most, we are focusing on three key areas to drive the sustainability transition: planet, people, partnerships.

Planet first: We acknowledge that achieving the orderly transition to a low-carbon economy is highly ambitious. Nonetheless, we are committed to doing our part, which is why the shift to a lower-carbon future is a priority for UBS and a key focus of our sustainability strategy. In order to protect our clients' assets and those of our firm from the impacts of climate change and loss of biodiversity, we are focused on managing the risks related to climate and natural capital. However, at the same time, we recognize that the low-carbon transition also presents consequential opportunities.

People matter: As a large, diverse and inclusive organization with a global presence, we want to use our influence to help people advance. We do this through our interactions with each other, the communities in which we operate and our other stakeholders. We also believe this approach can support the creation of a diverse, equitable and inclusive society and help build a virtuous cycle of viable, long-term economic and social development.

Partnerships bring it together: The sustainability-related challenges our world faces cannot be solved by one organization alone. That is why we partner with other thought leaders and standard setters to unite around common goals that can drive change on a global scale.

The focus on the sustainability transition has been integrated across our business:

UBS has identified the SDGs as a key framework for impact on an overall portfolio and individual investment basis, and provides regular updates on its strategic impact priorities and assets under management as part of the Group Annual Report and annual Sustainability Report. UBS aims to consistently integrate strategic impact considerations on platform level, in aggregate, within its own actively managed impact solutions and across third-party fund management partners whose impact investing solutions are offered to private clients.

Our wealth management business has established governance and frameworks that seek to ensure impact is systematically incorporated throughout the investment process for all impact investing solutions, including research and strategy development, investment sourcing, approvals, and ongoing monitoring. We actively engage with impact fund management partners about ex-ante, ongoing and realized impact for each strategy and how they intend to address SDG targets and align to identified impact themes, seeking to encourage rigor and consistency while recognizing that individual managers employ differing approaches to impact measurement and management. In 2022, we further formalized this approach by forming a dedicated impact measurement and management working group with all fund managers that provide dedicated engagement strategies in public equities and bonds on our platform, and in 2023 the group delivered on its first internal reporting enhancements. To enable strategic management and active monitoring of impact at the platform level, we require fund management partners to provide regular data and reporting on impact expectations and progress on an individual investment and portfolio level, which we then use to assess gaps in the overall impact offering.

Managing impact within our asset management business' actively managed listed fund strategies and portfolios entails a process where impact, sustainability and financial criteria are all evaluated in the portfolio construction process. The selection set (investable universe) is narrowed down to securities whose products and services are deemed to generate a positive impact on the environment and human health via a mapping of companies' revenues with specific impactful technologies and standardized assesesment of impact dimensions (product impact potential and engagement impact potential). This impact assumption is verified with a qualitative analysis performed for candidates for the portfolio. Where appropriate, the portfolio manager also defines SDGs-engagement objectives against which the impact of individual investments will be assessed. Impact achievements are measured through proprietary impact models as well as achievement of impact engagement targets that are set out at the time of investment.

We believe in the power of aligning employee incentive compensation with the achievement of sustainability objectives. Sustainability-related objectives have been embedded in our Pillars and Principles since they were established in 2011 and therefore feature in our performance and compensation conversations. To maintain focus on these important topics, our Group CEO and all other Group Executive Board members have specific sustainability-aligned goals under Pillars and Principles, including governance and risk management, talent management and diversity, client satisfaction and corporate responsibility. All Board of Directors' committees have specific responsibilities pertaining to sustainability matters, e.g., the Compensation Committee is responsible for sustainability-related compensation topics, the Risk Committee supervises the integration of sustainability in risk management, the Governance and Nominating Committee supports the Board in establishing best practices in corporate governance and the Audit Committee has oversight of the control framework underpinning sustainability-related metrics. Within our asset management business, KPIs focused on sustainability integration were implemented for investment analysts and portfolio managers throughout active equities and fixed income in 2019. These incentives were established to ensure the successful implementation of the sustainable investment integration strategy. We recognize the difficulty in aligning financial incentives to sustainability and impact across a large diversified business, but continue to consider softer mechanisms, such as integration of dedicated objectives within our performance management frameworks.

Principle 3

Establish the Manager's contribution to the achievement of impact.

The Manager shall seek to establish and document a credible narrative on its contribution to the achievement of impact for each investment. Contributions can be made through one or more financial and/or non-financial channels1. The narrative should be stated in clear terms and supported, as much as possible, by evidence.

[1] For example, this may include: improving the cost of capital, active shareholder engagement, specific financial structuring, offering innovative financing instruments, assisting with further resource mobilization, creating long-term trusted partnerships, providing technical/ market advice or capacity building to the investee, and/or helping the investee to meet higher operational standards.

Our wealth management business offers investment options for mobilizing private capital into impact investments that address a range of social and environmental challenges while seeking to generate market-rate financial returns. We contribute to the achievement of impact through multiple channels, including: actively identifying and developing investment solutions to address specific capital gaps in SDG-related or other high-impact thematic areas; consistently advocating for robust impact measurement and management approaches by fund management partners and the industry broadly; encouraging fund management partners to become signatories to the Impact Principles; supporting the success of underlying investee companies through strategic introductions and promotion; and mobilizing additional private capital through publications, education, events and other initiatives designed to catalyze advisor and client interest in impact investing. The wealth management business also rigorously evaluates impact fund management partners' contribution to impact and additionality as part of our due diligence and onboarding of third party investment solutions, and advocate for continuous improvement through regular engagement and dialogue on individual deals and overall impact approach. Our creation of an ongoing working group with fund managers in our discretionary portfolios who are focused on measurable outcomes as a result of active shareholder and bondholder engagement, is a good example of our contribution as an asset allocator.

Our asset management business seeks to contribute to the achievement of impact through allocating capital to companies that already have a positive impact on the society and / or environment as well as long-term corporate engagement with companies in its portfolio oriented around supporting the SDGs. Asset Management evaluates prospective investments' engagement potential during due diligence evaluating the accessibility of management for engagement, receptiveness to engagement goals and likelihood of engagement success. Engagement milestone and outcomes are captured in an engagement dashboard. The impact created through our engagements could be qualitative as well as quantitative. As UBS is most likely not the only investor in a listed company and engaging with management, it is difficult to solely attribute the impact achieved to UBS. However, our process to set objectives and track success over time, allow us to better understand the impact achieved during the engagement period. Our engagement activities are designed to help the invested companies generate additional positive impact on specific social and environmental goals, and to help improve the financial performance of the companies through reducing risks and realizing opportunities.

Principle 4

Assess the expected impact of each investment, based on a systematic approach.

For each investment the Manager shall assess, in advance and, where possible, quantify the concrete, positive impact[1] potential deriving from the investment. The assessment should use a suitable results measurement framework that aims to answer these fundamental questions: (1) What is the intended impact? (2) Who experiences the intended impact? (3) How significant is the intended impact?[2] The Manager shall also seek to assess the likelihood of achieving the investment's expected impact.

In assessing the likelihood, the Manager shall identify the significant risk factors that could result in the impact varying from ex-ante expectations. In assessing the impact potential, the Manager shall seek evidence to assess the relative size of the challenge addressed within the targeted geographical context. The Manager shall also consider opportunities to increase the impact of the investment. Where possible and relevant for the Manager's strategic intent, the Manager may also consider indirect and systemic impacts. Indicators shall, to the extent possible, be aligned with industry standards[3] and follow best practice[4].

Our wealth management business' impact assessment process for potential solutions for private clients includes an evaluation of ex-ante expected impact, where possible, and an evaluation of an impact fund manager's ability to realize that impact. It is based around four core criteria: intent, measurement, verification, and the manager's alignment to the Impact Principles. We expect the manager to have robust processes around development of the impact thesis and theory of change for each investment, and for impact discussions to be integrated into the core investment process via the investment committee and deal teams. We utilize the Impact Management Platform's (IMP) five dimensions of impact to assess expected impact of a given investment, in addition to evaluating the efficacy of the manager's impact management system to support achievement of impact at the solution and underlying investment level, the likelihood of achieving that impact, and any likely impact risks. While we do not mandate the use of specific metric sets, we evaluate whether the manager's approach to impact measurement and management is aligned with industry standards and best practices.

Intent	There must be a **stated** and **explicit intention** to generate positive social and/or environmental impact in addition to sustainable financial performance.
Measurement	The outcomes of the investment should be tied to **specific metrics**, and measured against a base case or benchmark.
Verification	There must be **evidence** that the invested capital itself is **positively correlated** with the intended outcome after excluding other exogenous factors.
Manager's alignment to the Operating Principles for Impact Management	There must be an **overall alignment** of the impact management approach and processes to the Principles, even if the fund manager is not a signatory to the framework.

1 Focus shall be on the material social and environmental impacts resulting from the investment. Impacts assessed under Principle 4 may also include positive ESG effects derived from the investment.
2 Adapted from the Impact Management Project, now Impact Frontiers (www.impactfrontiers.org).
3 Industry indicator standards include HIPSO (indicators.ifipartnership.org/about); IRIS (iris.thegiin.org); GIIRS (b- analytics.net/giirsfunds); GRI (www.globalreporting.org/Pages/default.aspx); and SASB (www.sasb.org), among others.
4 International best practice indicators include SMART (Specific, Measurable, Attainable, Relevant, and Timely), and SPICED (Subjective, Participatory, Interpreted & communicable, Cross-checked, Empowering, and Diverse & disaggregated), among others.

Our asset management business has developed a research and investment process to encompass all the dimensions of impact with analytical frameworks, scorecards and impact measurement tools. We developed frameworks for impact measurement and verifiability in conjunction with experts in the disciplines of public health and environmental science. We assess product impact potential and engagement potential for each investment during our research process to develop our impact investment thesis. The impact investment thesis includes an analysis of the impactful products and services and the linkage to the fund's theory of change, the company's management of environmental and social risks (potential negative impacts) as well as engagement opportunities to reduce risk and enhance opportunities, using our SDG engagement framework. The engagement objectives will be tested against management receptiveness and goals will be further refined. To contextualize the impact of invested companies' products, we leverage data-based, science-informed and standardized impact measurement models; focused on social and environmental impacts in order to identify companies that generate a positive impact. These are also complemented by company-reported impact information, which are becoming more and more available. This information provides a baseline for assessing whether and how much an invested company's impact continues to improve over time. For example, we will measure the hospitalizations avoided due to the diabetes drugs that a company will sell. This holistic investment thesis is revised on an annual basis and engagement goals revisited as required.

Principle 5

Assess, address, monitor, and manage potential negative impacts of each investment.

For each investment the Manager shall seek, as part of a systematic and documented process, to identify and avoid, and if avoidance is not possible, mitigate and manage Environmental, Social and Governance (ESG)[1] risks. Where appropriate, the Manager shall engage with the investee to seek its commitment to take action to address potential gaps in current investee systems, processes, and standards, using an approach aligned with good international industry practice[2]. As part of portfolio management, the Manager shall monitor investees' ESG risk and performance, and where appropriate, engage with the investee to address gaps and unexpected events.

Our wealth management business assesses the systems and processes of potential impact fund management partners for identifying and addressing sustainability-related risks of underlying investments. The assessment is based on an extensive sustainability-related due diligence process that specifically addresses what the potential negative impacts are and how the manager's processes and practices are geared to address such impacts. While in some investments, managing potential negative impacts is largely driven by regulatory or other requirements, we specifically assess what is done above and beyond such requirements to minimize such risks. The assessment goes hand-in-hand with active conversations and ongoing dialogue with fund managers throughout the life of investments on reported incidents as well as processes for avoiding or mitigating such risks to support the overall achievement of impact and commercial success.

Our asset management business has adopted standard processes for identifying and documenting sustainability-related risks for the companies in which it invests. We have developed an ESG Risk Dashboard with proprietary methodology (incorporating both internal and external data) to monitor ESG Risk across multiple dimensions; the dashboard enables investment teams to integrate ESG Risk data into the research and investment process. The Dashboard allows analysts and portfolio managers to identify companies/ issuers with significant ESG risks via the "UBS ESG Risk Signal". The ESG Risk Signal combines data points from several external research sources based on a proprietary methodology. It provides investment teams with a structured, holistic view of ESG risks across four different dimensions, allowing for industry relative comparisons as well as the identification of outliers (absolute risk, governance, controversies). If one or more of the dimension pillars fail against the thresholds set, the issuer is flagged for ESG risks by the signal. Where risks are identified, the companies are either not investable for sustainable and impact strategies or mitigation strategies are implemented in the form of stewardship activities and active engagement. Through engagement, we work with our investee companies, and collaborate with management to reduce negative impact and optimize positive impact. These approaches are outlined in our Responsible Investment and Stewardship Policies.[3]

[1] The application of good ESG management will potentially have positive impacts that may or may not be the principal targeted impacts of the Manager. Positive impacts resulting from ESG matters shall be measured and managed alongside with, or directly embedded in, the impact management system referenced in Principles 4 and 6.

[2] Examples of good international industry practice include: IFC's Performance Standards (www.ifc.org/performancestandards); IFC's Corporate Governance Methodology (www.ifc.org/cgmethodology), the United Nations Guiding Principles for Business and Human Rights (www.unglobalcompact.org/library/2); and the OECD Guidelines for Multinational Enterprises (http://mneguidelines.oecd.org/themes/human-rights.htm).

[3] See https://www.ubs.com/global/en/assetmanagement/capabilities/sustainable-investing.html

Principle 6

Monitor the progress of each investment in achieving impact against expectations and respond appropriately.

The Manager shall use the results framework (referenced in Principle 4) to monitor progress toward the achievement of positive impacts in comparison to the expected impact for each investment. Progress shall be monitored using a pre-defined process for sharing performance data with the investee. To the best extent possible, this shall outline how often data will be collected; the method for data collection; data sources; responsibilities for data collection; and how, and to whom, data will be reported. When monitoring indicates that the investment is no longer expected to achieve its intended impacts, the Manager shall seek to pursue appropriate action[1]. The Manager shall also seek to use the results framework to capture investment outcomes[2].

[1] Actions could include active engagement with the investee; early divestment; adjusting indicators/expectations due to significant, unforeseen, and changing circumstances; or other appropriate measures to improve the portfolio's expected impact performance.
[2] Outcomes are the short-term and medium-term effects of an investment's outputs, while the outputs are the products, capital goods, and services resulting from the investment. Adopted from OECD-DAC (www.oecd.org/dac/).

Our wealth management business regularly monitors progress toward the impact and financial objectives of the impact investing solutions on its platform. We require impact fund management partners to provide annual impact reporting at a minimum, and we conduct regular update calls on a quarterly and ad-hoc basis to monitor progress on commercial and impact objectives. Ongoing dialogue with fund managers about portfolio-level and investment-level results enables evaluation of reported impact and discussion of what actions are being taken to address impact and financial performance. During monitoring, debate progress towards impact outcomes on a quarterly basis, re-convene ad-hoc when a new investment is made to discuss the impact thesis and potential measurement, and engage on metrics and measurement as part of the annual impact reporting.

Our asset management business has an established process for evaluating the expected impact of each engagement that it undertakes, assessing progress made on engagement activities over time. The investment team assesses the opportunity for broadening the impact of companies candidates for the portfolio with SDG-engagement. The goals are defined pre-investment, recorded in our investment research library and further refined after discussion with management. Progress is assessed throughout the life of the investment while engagement goals are adjusted throughout the life of the investment also; ensuring that continuous progress takes place and that changes in the business are reflected. Escalation tools are available when expected impact can no longer be achieved. Our asset management business has also worked with academics to develop impact measurement methodology and is now collaborating with other organizations to contribute towards impact measurement best practices and standards.

Identify	Identify opportunities **where companies can act on the SDGs:** Detailed analysis of E&S risk management and opportunities Identify gaps: key areas where the company could act on the SDGs
Set goals	Set **company-specific engagement goals** using the UBS SDG Engagement Framework: Top-down: Where can a company make a difference to an SDG considering its market position? Bottom-up: Where can a company improve its impact on the SDGs considering its current practices?
Track progress	Track progress over time on pre-set milestones
Measure impact	**Report engagement and impact progress**

Principle 7

Conduct exits considering the effect on sustained impact.

When conducting an exit,[1] the Manager shall, in good faith and consistent with its fiduciary concerns, consider the effect which the timing, structure, and process of its exit will have on the sustainability of the impact.

Our wealth management business emphasizes with impact fund management partners our expectations around the importance of impact considerations and the sustainability of the targeted impact as part of the exit decision process for underlying investments. We engage actively with partners on portfolio development and seek to proactively discuss impact implications of anticipated exits on a case-by-case basis, while recognizing that they control the decision as investment manager. We expect that fund managers will follow through on commitments to prioritize impact objectives alongside financial objectives on an individual investment and portfolio basis, including upon exit. Failure to credibly deliver on these impact expectations will factor into the overall decision to work with a fund manager on future impact investing offerings and/or could lead to removing our impact investing designation from the strategy.

Our asset management business considers the effect on sustained impact upon selling a position. The exit ideally occurs when targeted engagement outcomes have been achieved but can also take place when the investment thesis weakens due to factors beyond the control of our engagement activities. Considerations at exit include the likelihood of the expected impact being achieved without UBS's ongoing engagement activities. This assessment is performed qualitatively and checked against specific milestones in the investment thesis. Our learnings are factored into future investments in the company and potential future engagements with the management team.

[1] This may include debt, equity, or bond sales, and excludes self-liquidating or maturing instruments.

Principle 8

Review, document, and improve decisions and processes based on the achievement of impact and lessons learned.

The Manager shall review and document the impact performance of each investment, compare the expected and actual impact, and other positive and negative impacts, and use these findings to improve operational and strategic investment decisions, as well as management processes.

Our wealth management business actively monitors and documents impact performance, reviewing regular impact reporting from fund management partners and engaging with them on a regular and ad-hoc basis to assess actual and realized impact against ex-ante expectations. We use these learnings to identify gaps in impact areas addressed as well as in assessment and monitoring practices. We continuously review and modify our impact investing governance and processes on the basis of evolving industry best practice and learnings from these ongoing interactions with fund management partners and underlying investments. For example, in order to enhance our evaluation of partner practices, we have evolved our impact due diligence framework in recent years to incorporate explicitly the Impact Management Project's five dimensions and to more accurately reflect the tenets of the Operating Principles for Impact Management.

Our asset management business reports overall portfolio level outcome metrics and select case studies to review impact. Monthly engagement meetings are held to reflect on progress and exchange knowledge of best practices in impact investing. We continue to evolve our processes and measurement methodologies to improve operational and strategic investment decisions, as well as management processes. We actively participate in various industry initiatives to contribute to and enhance industry standardization.

Principle 9

Publicly disclose alignment with the Impact Principles and provide regular independent verification[1] of the alignment.

The Manager shall publicly disclose, on an annual basis, the alignment of its impact management systems with the Impact Principles and, at regular intervals, arrange for independent verification of this alignment. The conclusions of this verification report shall also be publicly disclosed. These disclosures are subject to fiduciary and regulatory concerns.

This Disclosure Note re-affirms the alignment of UBS Group AG's procedures with the Impact Principles and is updated annually.

The information contained in this Disclosure Statement has not been verified or endorsed by the Global Impact Investing Network ("the GIIN") or the Secretariat or Advisory Board. All statements and/or opinions expressed in these materials are solely the responsibility of the person or entity providing such materials and do not reflect the opinion of the GIIN. The GIIN shall not be responsible for any loss, claim or liability that the person or entity publishing this Disclosure Statement or its investors, Affiliates (as defined below), advisers, employees or agents, or any other third party, may suffer or incur in relation to this Disclosure Statement or the impact investing principles to which it relates. For purposes hereof, "Affiliate" shall mean any individual, entity or other enterprise or organization controlling, controlled by, or under common control with the Signatory.

The third independent verification report on the alignment of UBS Group AG with the Operating Principles for Impact Management has been completed on July 16, 2024 and is available as a separate document. This verification is performed on a regular basis at no later than two-year intervals, or earlier in the event of material change to our impact management processes.

Information on the current independent verifier is as follows: BlueMark (a subsidiary of Tideline Advisors, LLC). BlueMark has office locations in London, UK; New York, NY; and Portland, OR; and is headquartered at 154 W 14th St, 2nd Floor, New York, NY 10011, USA. As per BlueMark: "BlueMark, a Delaware-registered public benefit company, is a leading provider of impact verification services in the impact investing market. BlueMark was founded with a mission to "strengthen trust in impact investing" and to help bring more accountability to the impact investment process. BlueMark has conducted this verification with an independent and unconflicted team experienced in relevant impact measurement and management issues. BlueMark has implemented a Standard of Conduct requiring our employees to adhere to the highest standards of professional integrity, ethics, and objectivity in their conduct of business activities."

[1] The independent verification may be conducted in different ways, i.e., as part of a financial audit, by an independent internal impact assessment committee, or through a portfolio/fund performance evaluation. The frequency and complexity of the verification process should consider its cost, relative to the size of the fund or institution concerned, and appropriate confidentiality

Rounding | Numbers presented throughout this report may not add up precisely to the totals provided in the tables and text. Percentages and percent changes are calculated on the basis of unrounded figures. Information about absolute changes between reporting periods, which is provided in text and which can be derived from figures displayed in the tables, is calculated on a rounded basis.

Tables | Within tables, blank fields generally indicate that the field is not applicable or not meaningful, or that information is not available as of the relevant date or for the relevant period. Zero values generally indicate that the respective figure is zero on an actual or rounded basis. Percentage changes are presented as a mathematical calculation of the change between periods.