

**Sustainable Finance Disclosure Regulation**

**Financial Market Participant disclosure of**

**MultiConcept Fund Management S.A.**

## Transparency of sustainability risk policies

*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") Article 3, financial market participants shall publish on their websites information about their policies on the integration of sustainability risks in their investment decision-making process.*

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 ("Sustainability Risk").

Such risk is principally linked to climate-related events resulting from climate change (the so-called physical risks) or to the society's response to climate change (the so-called transition risks), which may result in unanticipated losses that could materially affect value of investments. Social events (e.g. inequality, inclusiveness, labour relations, investment in human capital, accident prevention, changing customer behaviour, etc.) or governance shortcomings (e.g. recurrent significant breach of international agreements, bribery issues, products quality and safety, selling practices, etc.) may also translate into sustainability risks.

The materiality of sustainability risks is determined by the likelihood, magnitude and time-horizon of the risk materializing.

The impacts following the occurrence of a Sustainability Risk may be numerous and vary depending on the specific risk, region and asset class. In general, where a Sustainability Risk occurs in respect of an asset, there will be a negative impact on, or entire loss of, its value.

MultiConcept Fund Management S.A. (LEI 529900YGI27KIZCZWQ50) ("MultiConcept") believes that the integration of material environmental, social and governance (ESG) factors in financial analysis and investment decision is an important part of the investment process and may reduce risks and lead to improved investment outcomes over time.

As sustainability risks differ between asset classes and investment styles, they are defined at portfolio level, in particular in the sustainability risk profile of the fund.

## **No consideration of adverse impacts of investment decisions on sustainability factors at legal entity level within the meaning of Article 4 of the Sustainable Finance Disclosure Regulation of the European Union (EU) 2019/2088.**

MultiConcept does not consider adverse impacts of investment decisions on sustainability factors ("PAI") at legal entity level within the meaning of Article 4 of the Sustainable Finance Disclosure Regulation of the European Union (EU) 2019/2088.

MultiConcept in most cases delegates the portfolio management function of the funds under management to third party portfolio managers and as such does not currently have access to sufficient ESG information for determining and weighting with adequate accuracy the negative sustainability effects across all its delegated portfolio managers. Therefore, MultiConcept does not consider adverse impacts of investment decisions on sustainability factors ("PAI") at legal entity level within the meaning of Article 4 of the Sustainable Finance Disclosure Regulation of the European Union (EU) 2019/2088. However, delegated portfolio managers may consider PAI for certain investment funds as outlined in the applicable product documentation.

In certain exceptional cases MultiConcept undertakes the portfolio management function of the funds under management. The PAI reporting requirement under Article 4 SFDR necessitates however the consideration of all assets under management. Since many of the funds managed by MultiConcept do not promote environmental or social characteristics, nor have a sustainable investment objective, they are not subject to any detailed reporting on sustainability metrics under SFDR. For those funds, MultiConcept is therefore currently of the view that PAI reporting is less relevant and not reflective of the way those funds are either operated or sold to investors.

## Transparency of remuneration policies in relation to the integration of sustainability risks

*According to SFDR Article 5, financial market participants shall include in their remuneration policies information on how those policies are consistent with the integration of sustainability risks, and shall publish that information on their websites.*

The policy on the integration of sustainability risks into our remuneration process is at UBS Group level. MultiConcept Compensation Policy reflects this approach and is compliant with the requirements of SFDR. Details are available at: <https://www.credit-suisse.com/media/assets/microsite/docs/multiconcept/integration-of-sustainability-risk-considerations-in-the-remuneration-process.pdf>

## Review of disclosures

*SFDR Article 12 requires financial market participants to ensure that any information published in accordance with Article 3, 5, or 10 is kept up to date. Where a financial market participant amends such information, a clear explanation of such an amendment shall be published on the same website.*

The following table explains the amendments on disclosures related to SFDR Articles 3 and 5. Information regarding Art. 10 is available on [MultiConcept - Our Funds](#)

**Table of revisions**

Date	Article	Explanation of amendments
10.03.2021	All	Disclosures according to SFDR Level 1 requirements
02.07.2024		Regular review – no changes required for SFDR Level 2 requirements
30.01.2025		Update of logo and references to UBS integration ongoing work

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