



# Sustainability risk policy of IPCconcept

A company of DZ PRIVATBANK

**IPC**concept

## **Our responsibility**

We have our cooperative tradition to thank for our mission not only to contribute to the well-being of society, but also to specifically address sustainability issues. At IPConcept, we aim to reconcile economic success with ecological and social challenges. To this end, we combine long-term business goals with the aspiration to create value – for investors, business partners, employees and society.

## **Living sustainability**

Like our parent company, DZ PRIVATBANK, we have been committed to integrating sustainable aspects into the company since 2012 as part of the sustainability market initiative launched by the DZ BANK Group. Since then, we have drawn up joint guidelines for our suppliers and service providers so that we can review them in terms of social and environmental issues. A common code of conduct forms the basis for the employees of the DZ BANK Group.

As a third party management company, we accompany our business partners over the entire life cycle of the funds. This naturally also includes support in the implementation of ESG strategies with different priorities – tailor-made for the corresponding fund concept. As a third party management company, we also assume responsibility for risk management and thus for identifying, measuring and managing sustainability risks that affect the investment strategies of our business partners.

This sustainability risk policy of IPConcept (Luxemburg) S.A. (hereinafter "IPConcept") describes how sustainability risks are taken into account in the investment decision-making process. IPConcept defines sustainability risk (ESG risk) as **E**nvironmental, **S**ocial or **G**overnance events or conditions, the occurrence of which could have an actual or potential material adverse effect on the value of the investment.

The sustainability risk policy is regularly reviewed and updated. Interested parties can obtain the latest version of the sustainability risk policy from the website [www.ipconcept.com](http://www.ipconcept.com).

### **Our principles**

IPConcept attaches great importance to sustainability risks and takes them into account in its investment decision-making process. To this end, IPConcept has integrated an ESG framework that defines exclusion criteria and determines the ESG risk assessment of any risks that may arise and their potential impact on returns, with the support of external data providers. In order to guarantee the highest level of transparency, IPConcept is in contact with the respective asset managers.

The sustainability risk policy applies to IPConcept in its function as an asset management company. IPConcept aims to ensure that all asset managers incorporate ESG risk considerations – ex ante – into the investment decision-making process and reviews these regularly.

The consideration of ESG risks in the process is monitored by the Management Board member responsible for portfolio management. ESG integration is implemented by the relevant portfolio manager, who manages it in accordance with the fund's ESG characteristics and general ESG risk considerations.

Consequently, the consideration of sustainability risk is part of IPConcept's investment approach and is integrated into the due diligence process, thus ensuring that it is evaluated and monitored.

### **Monitoring and reporting**

The monitoring of the ex-ante integration of ESG risk considerations is based on a regular due diligence process carried out for all asset managers. The information and indicators to be reported depend on the fund in question. IPConcept does not expect the asset manager to use the same methodology for assessing sustainability risks, if any.

The emergence of any ex-post ESG risks is monitored by IPConcept as part of its risk management oversight responsibilities.

### **Adverse sustainability impacts**

Owing to insufficient data availability to identify and weight the main adverse sustainability impacts and indicators as well as pending legal provisions, IPConcept has decided not to consider the adverse sustainability impacts for the time being, in accordance with Article 4(1)(b) of the EU Disclosure Regulation 2019/2088. As soon as the legal requirements have been determined and sufficient data quality is available, IPConcept will review these and plan any implementations.

Status of all the information,  
images and explanations:  
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