

# GAM PRINCIPAL ADVERSE IMPACTS STATEMENT

March 2021

## Principal adverse sustainability impacts statement

GAM Investments considers the principal adverse impacts of investment decisions on sustainability factors.

As investors, we recognise the importance of considering the impacts that our investment decisions have on the environment and society and are committed to use our influence to encourage companies to focus on long-term, sustainable value creation.

This statement covers all UCITS management companies, Alternative Investment Fund Managers, and investment firms within GAM Holding AG ('GAM Investments' or 'we'), that fall under the definition of Financial Market Participants and/or Financial Advisers within Art. 2 of EU Regulation 2019/2088 ("SFDR).

## Description of principal adverse sustainability impacts

Principal adverse impacts are the most significant negative impact of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters. We consider, in particular, climate change impacts, relating to GHG emissions along a company's value chain, and any serious breaches of the ten UN Global Compact principles in the areas of human rights, labour rights, the environment and anti-corruption. We exclude companies involved in the manufacturing of controversial weapons (anti-personnel mines, cluster munitions, biological and chemical weapons, incendiary (white phosphorous), laser-blinding and/or non-detectable fragments) through our global exclusion policy.

## Description of policies to identify and prioritise principal adverse sustainability impacts

Our Responsible Investment Policy outlines how we integrate environmental, social and governance (ESG) issues into our investment decisions. This includes the consideration of principal adverse sustainability impacts. As active investors, we use fundamental analysis, supported by independent ESG data and research, recognised NGO sources, and our own engagement with companies, to identify, evaluate and prioritise these.

## Engagement policies

We view engagement as key to fulfilling our duty to be a good steward of our clients' assets. Our Engagement Policy outlines our approach to voting, engagement and escalation. Our dominant approach focuses on developing a one-to-one dialogue with targeted investee companies, which can be a one-off or multi-year, and exercising our voting rights where we are a shareholder. We also participate in collaborative engagement with other investors where we consider this to be effective.

## References to international standards

We support international standards, codes and guidelines relating to sustainability issues. These include the ten UN Global Compact principles which are derived from the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention Against Corruption. We also support the Paris Agreement on climate change, the OECD Principles of Corporate Governance, national corporate governance and stewardship codes and the International Corporate Governance Network (ICGN) Global Governance Principles in the areas of governance, and the international conventions on cluster munitions, anti-personnel mines, biological and chemical weapons.

### Important information

This document is provided for information purposes only and does not contain any personal recommendations for a particular course of action, service or product. Any information, opinions or assessments contained in this document are based on current economic, market and regulatory conditions and are subject to change without notice. No liability shall be accepted for the accuracy or completeness of the information contained in this document, or for any action taken in reliance thereon.