HBMPartners

Information Statement

On Website Disclosure Obligations under Articles 3, 4 and 5 of the Sustainability Disclosures Regulation

Issued by **HBM Partners AG** (the “**Company**”)

In respect of **HBM UCITS (LUX) FUNDS** (the “**Fund**”)

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Sustainable Finance Transparency

The European Union has introduced a series of legal measures (the primary one being the Sustainable Finance Disclosures Regulation (Regulation (EU) 2019/2088)) (the “**Sustainability Disclosures Regulation**” or "**SFDR**") requiring firms that manage investment funds to provide transparency on how they integrate sustainability considerations into the investment process with respect to the investment funds they manage.

This Information Statement has been prepared for the purpose of meeting the disclosure requirements in Articles 3, 4 and 5 of SFDR, that is, specifically, the disclosure requirements applicable to us as a firm with regard to our policy on the integration of sustainability risks in the investment decision-making process.

What is a Sustainability Risk?

In this context a sustainability risk is considered to be an environmental, social or governance event or condition that, if it occurs, could cause an actual or potential material negative impact on the value of an investment.

How We Integrate Sustainability into the Investment Decision-Making Process

We do not currently integrate sustainability risks into the investment decision-making process.

Nevertheless, due to the nature of the HBM Global Biotechnology Fund and HBM Global Healthcare Fund (the “**Sub-Funds**”), we consider the Sub-Funds to be an inherently social investor by virtue of the well-being (social) factor of investing in the Healthcare/Life Science sector. In addition, we conduct a post-trade screening with ISS-Data Desk.

Consideration of Principal Adverse Impacts of Investment Decisions on Sustainability Factors

SFDR supplemented by Commission Delegated Regulation (EU) 2022/1288 (“**CDR**”) requires the Company to make a “comply or explain” decision whether to consider the principal adverse impacts (“**PAI**”) of its investment decisions on sustainability factors, in accordance with a specific regime outlined in SFDR. PAIs are described as impacts that result, or might result, in negative effects on sustainability factors, such as environmental, social and employee matters, respect for human rights, anti-corruption or anti-bribery matters.

Following careful evaluation of the requirements of the PAI regime under Article 4 of the SFDR and Article 4 of the CDR, the Company has decided not to currently consider the principal adverse impacts of its investment decisions on sustainability factors. The Company has opted against doing so, primarily because of the lack of consistent, accessible and accurate data available to comply with the reporting requirements, and an agreed framework for reporting across the industry. For these reasons, the Company will maintain the position of not considering principal adverse impacts on sustainability factors until such time as it feels it has the necessary data and framework to be able to make these considerations meaningfully and report on them clearly. The Company will review this position regularly and will update investors accordingly with relevant information should this position change.

How Our Remuneration Policy is Consistent with the Integration of Sustainability Risks

The Company has prepared a remuneration policy (the "**Remuneration Policy**") consistent with the remuneration requirements set out in the law of 17 December 2010 relating to undertakings for collective investment as amended from time to time (the "**2010 Law**") and related regulatory guidance and which is designed to (i) promote sound and effective risk management; and (ii) discourage excessive risk taking. For the purpose of the Remuneration Policy, "remuneration", consists of all forms of payments or benefits made directly by, or indirectly but on behalf of, the Company in exchange for professional services rendered by its Identified Staff (being the individuals at the Company who have a material impact on the risk profile of the Fund it manages).

Remuneration can be divided into:

a) fixed remuneration (payments or benefits without consideration of any performance criteria, "salary"); and
b) variable remuneration (additional payments or benefits depending on performance or, in certain cases, other contractual criteria, "bonus")

Both components of remuneration (fixed and variable) will consist exclusively of monetary payments or benefits (such as cash, shares, etc.) but no non-monetary benefits (such as discounts, etc.).

For the avoidance of doubt, the Company does not integrate the consideration of sustainability risks into its Remuneration Policy, given that the Company does not integrate sustainability risks into its investment decisions.

Further Information

This Information Statement is issued for information purposes only.

This Information Statement is not intended as investment advice and is not an offer or a recommendation about managing or investing assets and should not be used as the basis for any investment decision.

The information contained herein is current as of the date of issuance and is subject to change without notice.

We do not make any express or implied warranties or representations as to the completeness or accuracy or accept responsibility for errors.

No risk management technique can guarantee the mitigation or elimination of risk in any market environment.

Past performance is not a guarantee or a reliable indicator of future results and an investment could lose value. All investments involve risk, including the possible loss of capital.

HBM Partners AG has its registered office at Bundesplatz 1, CH-6300 Zug, Switzerland.

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HBM Partners AG is authorised in Switzerland and regulated by the Swiss Financial Market Supervisory Authority ("**FINMA**").