

# Website product disclosure for financial products that promote environmental or social characteristics or have sustainable investments as their objective

*Disclosure under Article 10 of the SFDR Regulation and in accordance with Chapter IV, Section I (Articles 24-36) and with Chapter IV. Section 2 (Articles 37-49) of the SFDR RTS regulation*

## Allianz Life Programs Euro (Allianz Életprogramok - Euró)

Part A) Disclosure under Article 10 of the SFDR Regulation and in accordance with Chapter IV, Section I (Articles 24-36) of the SFDR RTS regulation

### BKE - Secure Bond EUR Fund

#### a) Summary

Under Article 10 of Regulation (EU) No 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (hereinafter: SFDR Regulation) and Delegated Regulation EU 2022/1288 of 6 April 2022 supplementing Regulation EU 2019/2088), Allianz Hungária Zrt. (hereafter referred to as the "insurer") shall present the following information and publish and maintain it on its website as part of the pre-contractual disclosure, if the product promotes environmental or social characteristics or a combination of these in terms of sustainability risks as defined in the SFDR Regulation, or if the companies selected for investment purposes follow good corporate governance practices or the product has the objective of sustainable investment:

- a) a description of the environmental or social characteristics or the sustainable investment objective;
- b) information on the methodologies used to assess, measure and monitor the environmental or social characteristics or the impact of the sustainable investments selected for the financial product, including its data sources, screening criteria for the underlying assets and the relevant sustainability indicators used to measure the environmental or social characteristics or the overall sustainable impact of the financial product;
- c) the information referred to in Articles 8 and 9 of the SFDR Regulation;
- d) the information referred to in Article 11 of the SFDR Regulation.

This website disclosure for the Secure Bond Euro Asset Fund (BKE) describes investments that promote environmental and social characteristics and sustainable investment objectives. This Communication contains a description of the investments made in the Secure Bond Euro Asset Fund (BKE) to promote environmental and social characteristics and sustainable investment objectives. As stated in the investment policy of the Secure Bond Euro Asset Fund (BKE), the objective of the Asset Fund is: Achieve returns in line with market returns by offering a very low risk investment opportunity.

The Asset Fund achieves the above objective by investing in investment grade, primarily short and medium term Eurobonds. Longer maturity assets may be included provided that their characteristics are consistent with the nature of the portfolio. The portfolio of the Fund may also include bank deposits, bank money and short-term Hungarian government bonds. The Fund Manager may also implement the investment strategy by purchasing, using all or part of the assets of the Asset Fund, securities of collective investment schemes managed by fund managers with a sound background, whose investment strategy is substantially the same as the strategy of the Asset Fund.

The BKE is considered a **low-risk investment** with a high probability of achieving a positive return over the medium term. The BKE's assets are invested partly or entirely in foreign currencies (mainly the euro).

The environmental and social characteristics of the fund, as well as the investments aimed at promoting sustainable investment objectives, are determined by the investments of the Underlying Fund within the Asset Fund (BKE). The Underlying Fund invested in another fund (hereinafter: Master Fund), so both the Underlying Fund and the Asset Fund were valued through this additional Master Fund. Accordingly, while BKE promotes environmental and/or social characteristics and does not have as its objective a sustainable investment, it will have a minimum proportion of sustainable investments. The Master Fund takes into account a broad range of environmental, social, human rights, governance and/or business conduct factors (“sustainability factors”) by applying exclusion criteria and selecting from the investment universe that remains following application of the exclusion criteria those corporate issuers that perform better in their sector in terms of sustainability aspects. In the case of government issuers, issuers that generally perform better in terms of sustainability aspects are selected. Based on these exclusion criteria, the Master Fund (thus the Underlying -, and the Asset Fund) takes into account indicators for principal adverse impacts (PAI). The Investment Manager of the Master Fund excludes companies that are involved in controversial environmental or social business activities or that commit serious violations of good governance practices as well as principles and guidelines such as the principles of the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights. Sustainability indicators have been defined for the Master Fund (thus, for the Underlying -, and the Asset Fund) to measure the attainment of its environmental and/or social characteristics. The sustainability indicators are derived from the binding elements defined for the Master Fund. The binding elements are monitored in upstream and downstream compliance systems to ensure sufficient due diligence and as assessment criteria for compliance with the Master Fund’s environmental and/or social characteristics. For each sustainability indicator, a methodology, based on different data sources, was set up in order to ensure accurate measurement and reporting of the indicators. No reference benchmark for measuring the attainment of the environmental and/or social characteristics promoted by the Master Fund (thus by the Underlying -, and the Asset Fund) has been defined.

This document summarises the methods for assessing and applying the environmental and social aspects and the information to be disclosed on investments under the legislation.<sup>1</sup>

Information under Article 11 of the SFDR Regulation:

The Secure Bond Euro Asset Fund (BKE) is a product within the meaning of Article 8(1) of the SFDR Regulation and is therefore included in the periodic reports of the insurer,

- a) the extent to which environmental or social characteristics are met in the case of a financial product;
- b) if the financial product falls within the scope of Article 6 of Regulation (EU) 2020/852, the following information:

The “do no significant harm” principle applies only to investments underlying a financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

The insurer shall disclose that information annually in writing in the official language of the Member State of the commitment, in accordance with Article 185(6) of Directive 2009/138/EC.

The information required under Article 8 of the SFDR Regulation is set out in Annex 9 to the General Terms and Conditions.

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<sup>1</sup>REGULATION (EU) No 2019/2088 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 November 2019 on sustainability disclosures in the financial services sector & COMMISSION DELEGATED REGULATION (EU) 2022/1288 of 6 April 2022 supplementing Regulation (EU) 2019/2088 of the European Parliament and of the Council with regard to regulatory technical standards specifying the details of the content and presentation of the information in relation to the principle of ‘do no significant harm’, specifying the content, methodologies and presentation of information in relation to sustainability indicators and adverse sustainability impacts, and the content and presentation of the information in relation to the promotion of environmental or social characteristics and sustainable investment objectives in pre-contractual documents, on websites and in periodic reports

# EKE - European Bond EUR Fund

## a) Summary

Under Article 10 of Regulation (EU) No 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (hereinafter: SFDR Regulation) and Delegated Regulation EU 2022/1288 of 6 April 2022 supplementing Regulation EU 2019/2088), Allianz Hungária Zrt. (hereafter referred to as the "insurer") shall present the following information and publish and maintain it on its website as part of the pre-contractual disclosure, if the product promotes environmental or social characteristics or a combination of these in terms of sustainability risks as defined in the SFDR Regulation, or if the companies selected for investment purposes follow good corporate governance practices or the product has the objective of sustainable investment:

- a) a description of the environmental or social characteristics or the sustainable investment objective;
- b) information on the methodologies used to assess, measure and monitor the environmental or social characteristics or the impact of the sustainable investments selected for the financial product, including its data sources, screening criteria for the underlying assets and the relevant sustainability indicators used to measure the environmental or social characteristics or the overall sustainable impact of the financial product;
- c) the information referred to in Articles 8 and 9 of the SFDR Regulation;
- d) the information referred to in Article 11 of the SFDR Regulation.

This Disclosure describes the European Bond EUR Asset Fund (EKE) investments that promote environmental and social characteristics and sustainable investment objectives.

As stated in the investment policy of the European Bond EUR Asset Fund (EKE) the objective of the Fund is: to achieve a return above the euro bond market average by investing primarily in euro-denominated bonds.

The European Bond EUR Asset Fund (EKE) invests primarily in euro-denominated government bonds issued by European countries, as well as corporate bonds, bonds issued by credit institutions and mortgage bonds. The manager may also invest in euro-denominated corporate bonds issued by the European subsidiaries of non-European companies and may hold part of the assets in euro bank deposits in order to achieve its objective.

The portfolio of the asset fund may also include bank account money, bank deposits and short-term Hungarian government bonds. The Fund Manager may also implement the investment strategy by purchasing, using all or part of the assets of the Asset Fund, securities of collective investment schemes managed by fund managers with a sound background, whose investment strategy is identical in all material respects to the strategy of the Asset Fund.

The EKE is considered a **low-risk investment** over the long term. However, due to the longer average maturity of the EKE, the risk of the asset fund is higher than that of asset funds investing in shorter-dated securities, and the price of the units of the EKE may fall in the short term. The assets of the EKE are invested partly or entirely in foreign currencies (mainly in euro).

The environmental and social characteristics of the fund, as well as the investments aimed at promoting sustainable investment objectives, are determined by the investments of the underlying fund within the EKE Asset Fund. Accordingly, while EKE promotes environmental and/or social characteristics and does not have as its objective a sustainable investment, it will have a minimum proportion of sustainable investments. The underlying fund takes into account a broad range of environmental, social, human rights, governance and/or business conduct factors ("sustainability factors") by applying exclusion criteria and selecting from the investment universe that remains following application of the exclusion criteria those corporate issuers that perform better in their sector in terms of sustainability aspects. In the case of government issuers, issuers that generally perform better in terms of sustainability aspects are selected. Based on these exclusion criteria, the underlying fund (thus the Asset Fund) takes into account indicators for principal adverse impacts (PAI). The Investment Manager of the underlying fund excludes companies that are involved in controversial environmental or social business activities or that commit serious violations of good governance practices as well as principles and guidelines such as the principles of the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights. Sustainability indicators have been defined for the underlying fund (thus, for the Asset Fund) to measure the attainment of its environmental and/or social characteristics. The sustainability

indicators are derived from the binding elements defined for the underlying fund. The binding elements are monitored in upstream and downstream compliance systems to ensure sufficient due diligence and as assessment criteria for compliance with the underlying fund's environmental and/or social characteristics. For each sustainability indicator, a methodology, based on different data sources, was set up in order to ensure accurate measurement and reporting of the indicators. No reference benchmark for measuring the attainment of the environmental and/or social characteristics promoted by the underlying fund (thus by the Asset Fund) has been defined.

This document summarises the methods for assessing and applying the environmental and social aspects and the information to be disclosed on investments under the legislation.<sup>2</sup>

Information under Article 11 of the SFDR Regulation:

The European Bond EUR Asset Fund (EKE) is a product within the meaning of Article 8(1) of the SFDR Regulation and is therefore included in the periodic reports of the insurer,

- a) the extent to which environmental or social characteristics are met in the case of a financial product;
- b) if the financial product falls within the scope of Article 6 of Regulation (EU) 2020/852, the following information:

The "do no significant harm" principle applies only to investments underlying a financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

The insurer shall disclose that information annually in writing in the official language of the Member State of the commitment, in accordance with Article 185(6) of Directive 2009/138/EC.

The information required under Article 8 of the SFDR Regulation is set out in Annex 9 to the General Terms and Conditions of the insurance product.

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<sup>2</sup>REGULATION (EU) No 2019/2088 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 November 2019 on sustainability disclosures in the financial services sector & COMMISSION DELEGATED REGULATION (EU) 2022/1288 of 6 April 2022 supplementing Regulation (EU) 2019/2088 of the European Parliament and of the Council with regard to regulatory technical standards specifying the details of the content and presentation of the information in relation to the principle of 'do no significant harm', specifying the content, methodologies and presentation of information in relation to sustainability indicators and adverse sustainability impacts, and the content and presentation of the information in relation to the promotion of environmental or social characteristics and sustainable investment objectives in pre-contractual documents, on websites and in periodic reports

# FRE - Sustainable Growth Stock EUR Fund

## a) Summary

Under Article 10 of Regulation (EU) No 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (hereinafter: SFDR Regulation) and Delegated Regulation EU 2022/1288 of 6 April 2022 supplementing Regulation EU 2019/2088), Allianz Hungária Zrt. (hereafter referred to as the "insurer" ) shall present the following information and publish and maintain it on its website as part of the pre-contractual disclosure, if the product promotes environmental or social characteristics or a combination of these in terms of sustainability risks as defined in the SFDR Regulation, or if the companies selected for investment purposes follow good corporate governance practices or the product has the objective of sustainable investment:

- a) a description of the environmental or social characteristics or the sustainable investment objective;
- b) information on the methodologies used to assess, measure and monitor the environmental or social characteristics or the impact of the sustainable investments selected for the financial product, including its data sources, screening criteria for the underlying assets and the relevant sustainability indicators used to measure the environmental or social characteristics or the overall sustainable impact of the financial product;
- c) the information referred to in Articles 8 and 9 of the SFDR Regulation;
- d) the information referred to in Article 11 of the SFDR Regulation.

This website disclosure for the Sustainable Growth Stock EUR Asset Fund (FRE) describes investments that promote environmental and social characteristics and sustainable investment objectives.

According to the investment policy of the Sustainable Growth Stock EUR Asset Fund (FRE), the objective of the asset fund is: to achieve high returns over the long term by investing in equities of companies with sustainable growth business practices in global equity markets.

According to the investment policy of the Sustainable Growth Stock EUR Asset Fund (FRE), the underlying fund manager selects equities of companies committed to sustainable economic development, i.e. the long-term preservation of natural resources, with a high degree of diversification across geographic and industry sectors.

The asset fund may also contain cash and deposits and short-term Hungarian government bonds. The manager may also implement the investment strategy by purchasing, using all or part of the assets of the asset fund, securities of collective investment schemes managed by fund managers with a sound background, whose investment strategy is identical in material elements to the strategy of the asset fund.

Given that the fund invests in a specific segment of the economy, FRE is considered a medium-risk investment. For this reason, the price of FRE units may fall in the short and medium term, sometimes very sharply. However, with a higher risk than that of the equity markets in developed economies, it is possible to obtain higher, sometimes superior, returns over the medium to long term. FRE's assets are invested partly or entirely in foreign currencies.

Information on the methodology used to assess, measure and monitor the sustainable investment impact or environmental or social characteristics of the financial product selected, including its data sources, the screening criteria of the underlying instruments and the appropriate sustainability indicators used to measure the overall sustainability impact or environmental or social characteristics of the financial product.

The environmental and social characteristics of the fund, as well as the investments aimed at promoting sustainable investment objectives, are determined by the investments of the underlying fund within the FRE Asset Fund. Accordingly, while FRE promotes environmental and/or social characteristics and does not have as its objective a sustainable investment, it will have a minimum proportion of sustainable investments. The underlying fund takes into account a broad range of environmental, social, human rights, governance and/or business conduct factors ("sustainability factors") by applying exclusion criteria and selecting from the investment universe that remains following application of the exclusion criteria those corporate issuers that perform better in their sector in terms of sustainability aspects. In the case of government issuers, issuers that generally perform better in terms of sustainability aspects are selected. Based on these exclusion criteria, the underlying fund (thus the Asset Fund) takes into account indicators for principal adverse impacts (PAI). The Investment Manager of the underlying fund excludes companies that are involved in controversial environmental or social business activities or that commit serious

violations of good governance practices as well as principles and guidelines such as the principles of the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights. Sustainability indicators have been defined for the underlying fund (thus, for the Asset Fund) to measure the attainment of its environmental and/or social characteristics. The sustainability indicators are derived from the binding elements defined for the underlying fund. The binding elements are monitored in upstream and downstream compliance systems to ensure sufficient due diligence and as assessment criteria for compliance with the underlying fund's environmental and/or social characteristics. For each sustainability indicator, a methodology, based on different data sources, was set up in order to ensure accurate measurement and reporting of the indicators. No reference benchmark for measuring the attainment of the environmental and/or social characteristics promoted by the underlying fund (thus by the Asset Fund) has been defined.

This document summarises the methods for assessing and applying the environmental and social aspects and the information to be disclosed on investments under the legislation.<sup>3</sup>

Information under Article 11 of the SFDR Regulation:

The Sustainable Growth Stock EUR Asset Fund (FRE) is a product within the meaning of Article 8(1) of the SFDR Regulation and is therefore included in the periodic reports of the insurer,

- a) the extent to which environmental or social characteristics are met in the case of a financial product;
- b) if the financial product falls within the scope of Article 6 of Regulation (EU) 2020/852, the following information:

The "do no significant harm" principle applies only to investments underlying a financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

The insurer shall disclose that information annually in writing in the official language of the Member State of the commitment, in accordance with Article 185(6) of Directive 2009/138/EC.

The information required under Article 8 of the SFDR Regulation is set out in Annex 9 to the General Terms and Conditions of the insurance product.

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<sup>3</sup>REGULATION (EU) No 2019/2088 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 November 2019 on sustainability disclosures in the financial services sector & COMMISSION DELEGATED REGULATION (EU) 2022/1288 of 6 April 2022 supplementing Regulation (EU) 2019/2088 of the European Parliament and of the Council with regard to regulatory technical standards specifying the details of the content and presentation of the information in relation to the principle of 'do no significant harm', specifying the content, methodologies and presentation of information in relation to sustainability indicators and adverse sustainability impacts, and the content and presentation of the information in relation to the promotion of environmental or social characteristics and sustainable investment objectives in pre-contractual documents, on websites and in periodic reports

## AKE - Active Managed Balanced EUR Fund

### a) Summary

Under Article 10 of Regulation (EU) No 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (hereinafter: SFDR Regulation) and Delegated Regulation EU 2022/1288 of 6 April 2022 supplementing Regulation EU 2019/2088), Allianz Hungária Zrt. (hereinafter referred to as the "insurer" ) shall present the following information and publish and maintain it on its website as part of the pre-contractual disclosure, if the product promotes environmental or social characteristics or a combination of these in terms of sustainability risks as defined in the SFDR Regulation, or if the companies selected for investment purposes follow good corporate governance practices or the product has the objective of sustainable investment:

- a) a description of the environmental or social characteristics or the sustainable investment objective;
- b) information on the methodologies used to assess, measure and monitor the environmental or social characteristics or the impact of the sustainable investments selected for the financial product, including its data sources, screening criteria for the underlying assets and the relevant sustainability indicators used to measure the environmental or social characteristics or the overall sustainable impact of the financial product;
- c) the information referred to in Articles 8 and 9 of the SFDR Regulation;
- d) the information referred to in Article 11 of the SFDR Regulation.

This Disclosure describes the investments made in the Active Managed Balanced Euro Asset Fund (AKE) to promote environmental and social characteristics and sustainable investment objectives.

As set out in the investment policy of the Active Managed Balanced Euro Asset Fund (AKE), the objective of the Asset Fund is: to achieve returns through a so-called "multi-asset" asset allocation strategy, mainly by allocating investments between equity and bond instruments that are executable in line with the capital market outlook.

The Active Managed Balanced Euro Asset Fund (AKE) invests in a wide range of asset classes, primarily in the global equity market and the European bond and money market. Investments in developing countries and investment grade assets not recommended for investment are limited in the asset fund.

The investment objective of the Fund is to seek to outperform a benchmark index of predominantly European bonds and global equities over the medium term. The equity exposure of the Fund may lead to a profit above the average market return over the long term. By adding emerging market or high yield (i.e. not recommended for investment) securities, the return of the fund can be further enhanced. However, there is a risk of increased volatility (fluctuations in value) in developing countries, high yield investments and equities. Foreign currency investments may result in both foreign exchange gains and losses. The strategic asset allocation and risk management of the Fund is based on a risk-adjusted value basis. However, this does not guarantee that losses will not occur. In order to manage interest rate risk and to provide liquidity, the portfolio of the Fund may include bank deposits or cash in bank accounts. The Fund Manager may also implement the investment strategy by purchasing, using all or part of the assets of the Asset Fund, securities of collective investment schemes managed by fund managers with a sound background whose investment strategy is substantially the same as that of the Asset Fund.

The Asset Fund is considered a **medium-low risk** investment which is expected to generate returns above the market return level. As the average maturity of the asset fund is longer than that of asset funds investing in short-term securities, the price of the units may fall in the short term.

The environmental and social characteristics of the fund, as well as the investments aimed at promoting sustainable investment objectives, are determined by the investments of the underlying fund within the AKE Asset Fund. Accordingly, while AKE promotes environmental and/or social characteristics and does not have as its objective a sustainable investment, it will have a minimum proportion of sustainable investments. The underlying fund takes into account a broad range of environmental, social, human rights, governance and/or business conduct factors ("sustainability factors") by applying exclusion criteria and selecting from the investment universe that remains following application of the exclusion criteria those corporate issuers that perform better in their sector in terms of sustainability aspects. In the case of government issuers, issuers that generally perform better in terms of sustainability aspects are selected. Based on these exclusion criteria, the underlying fund (thus the Asset Fund) takes

into account indicators for principal adverse impacts (PAI). The Investment Manager of the underlying fund excludes companies that are involved in controversial environmental or social business activities or that commit serious violations of good governance practices as well as principles and guidelines such as the principles of the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights. Sustainability indicators have been defined for the underlying fund (thus, for the Asset Fund) to measure the attainment of its environmental and/or social characteristics. The sustainability indicators are derived from the binding elements defined for the underlying fund. The binding elements are monitored in upstream and downstream compliance systems to ensure sufficient due diligence and as assessment criteria for compliance with the underlying fund's environmental and/or social characteristics. For each sustainability indicator, a methodology, based on different data sources, was set up in order to ensure accurate measurement and reporting of the indicators. No reference benchmark for measuring the attainment of the environmental and/or social characteristics promoted by the underlying fund (thus by the Asset Fund) has been defined.

This document summarises the methods for assessing and applying the environmental and social aspects and the information to be disclosed on investments under the legislation.<sup>4</sup>

Information under Article 11 of the SFDR Regulation:

The Active Managed Balanced Euro Asset Fund (AKE) is a product within the meaning of Article 8(1) of the SFDR Regulation and is therefore included in the periodic reports of the insurer,

- a) the extent to which environmental or social characteristics are met in the case of a financial product;
- b) if the financial product falls within the scope of Article 6 of Regulation (EU) 2020/852, the following information:

The "do no significant harm" principle applies only to investments underlying a financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

The insurer shall disclose that information annually in writing in the official language of the Member State of the commitment, in accordance with Article 185(6) of Directive 2009/138/EC.

The information required under Article 8 of the SFDR Regulation is set out in Annex 9 to the General Terms and Conditions of the insurance product.

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<sup>4</sup>REGULATION (EU) No 2019/2088 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 November 2019 on sustainability disclosures in the financial services sector & COMMISSION DELEGATED REGULATION (EU) 2022/1288 of 6 April 2022 supplementing Regulation (EU) 2019/2088 of the European Parliament and of the Council with regard to regulatory technical standards specifying the details of the content and presentation of the information in relation to the principle of 'do no significant harm', specifying the content, methodologies and presentation of information in relation to sustainability indicators and adverse sustainability impacts, and the content and presentation of the information in relation to the promotion of environmental or social characteristics and sustainable investment objectives in pre-contractual documents, on websites and in periodic reports

## AHE - Active Managed Yield-Seeking EUR Fund

### a) Summary

Under Article 10 of Regulation (EU) No 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (hereinafter: SFDR Regulation) and Delegated Regulation EU 2022/1288 of 6 April 2022 supplementing Regulation EU 2019/2088), Allianz Hungária Zrt. (hereafter referred to as the "insurer") shall present the following information and publish and maintain it on its website as part of the pre-contractual disclosure, if the product promotes environmental or social characteristics or a combination of these in terms of sustainability risks as defined in the SFDR Regulation, or if the companies selected for investment purposes follow good corporate governance practices or the product has the objective of sustainable investment:

- a) a description of the environmental or social characteristics or the sustainable investment objective;
- b) information on the methodologies used to assess, measure and monitor the environmental or social characteristics or the impact of the sustainable investments selected for the financial product, including its data sources, screening criteria for the underlying assets and the relevant sustainability indicators used to measure the environmental or social characteristics or the overall sustainable impact of the financial product;
- c) the information referred to in Articles 8 and 9 of the SFDR Regulation;
- d) the information referred to in Article 11 of the SFDR Regulation.

This Disclosure describes investments that promote environmental and social characteristics and sustainable investment objectives for the Active Managed Yield-Seeking Euro Fund (AHE).

As set out in the investment policy of the Active Managed Yield-Seeking Euro Fund (AHE), the objective of the Asset Fund is to achieve income through a "multi-asset" asset allocation strategy, mainly by allocating investments between equity and bond instruments, which can be executed in line with the capital market outlook, with a predominance of equity investments.

The Active Managed Yield-Seeking Euro Fund (AHE) invests in a broad range of asset classes, primarily in the global equity market and the European bond and money markets. Investments in emerging markets and investment grade assets that are not recommended for investment are limited. The investment objective of the Fund is to seek to outperform a benchmark index of predominantly European bonds and global equities over the medium term. The equity exposure of the Fund may lead to a profit above the average market return over the long term. By adding emerging market or high-yield (i.e. not recommended for investment) securities, the return of the fund can be further enhanced. However, there is a risk of increased volatility (fluctuations in value) in developing countries, high yield investments and equities. Foreign currency investments may result in both foreign exchange gains and losses. The strategic asset allocation and risk management of the Fund is based on a risk-adjusted value basis. However, this does not guarantee that losses will not occur. In order to manage interest rate risk and to provide liquidity, the portfolio of the Fund may include bank deposits or cash in bank accounts. The Fund Manager may also implement the investment strategy by purchasing, using all or part of the assets of the Asset Fund, securities of collective investment schemes managed by fund managers with a sound background whose investment strategy is substantially the same as that of the Asset Fund.

The Asset Fund is considered a **medium-low risk** investment which is expected to generate returns above the market return level. As the average maturity of the asset fund is longer than that of asset funds investing in short-term securities, the price of the units may fall in the short term.

The environmental and social characteristics of the fund, as well as the investments aimed at promoting sustainable investment objectives, are determined by the investments of the underlying fund within the AHE Asset Fund. Accordingly, while AHE promotes environmental and/or social characteristics and does not have as its objective a sustainable investment, it will have a minimum proportion of sustainable investments. The underlying fund takes into account a broad range of environmental, social, human rights, governance and/or business conduct factors ("sustainability factors") by applying exclusion criteria and selecting from the investment universe that remains following application of the exclusion criteria those corporate issuers that perform better in their sector in terms of sustainability aspects. In the case of government issuers, issuers that generally perform better in terms of sustainability aspects are selected. Based on these exclusion criteria, the underlying fund (thus the Asset Fund) takes

into account indicators for principal adverse impacts (PAI). The Investment Manager of the underlying fund excludes companies that are involved in controversial environmental or social business activities or that commit serious violations of good governance practices as well as principles and guidelines such as the principles of the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights. Sustainability indicators have been defined for the underlying fund (thus, for the Asset Fund) to measure the attainment of its environmental and/or social characteristics. The sustainability indicators are derived from the binding elements defined for the underlying fund. The binding elements are monitored in upstream and downstream compliance systems to ensure sufficient due diligence and as assessment criteria for compliance with the underlying fund's environmental and/or social characteristics. For each sustainability indicator, a methodology, based on different data sources, was set up in order to ensure accurate measurement and reporting of the indicators. No reference benchmark for measuring the attainment of the environmental and/or social characteristics promoted by the underlying fund (thus by the Asset Fund) has been defined.

This document summarises the methods for assessing and applying the environmental and social aspects and the information to be disclosed on investments under the legislation.<sup>5</sup>

Information under Article 11 of the SFDR Regulation:

The Active Managed Yield-Seeking Euro Fund (AHE) is a product within the meaning of Article 8(1) of the SFDR Regulation and is therefore included in the periodic reports of the insurer,

- a) the extent to which environmental or social characteristics are met in the case of a financial product;
- b) if the financial product falls within the scope of Article 6 of Regulation (EU) 2020/852, the following information:

The "do no significant harm" principle applies only to investments underlying a financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

The insurer shall disclose that information annually in writing in the official language of the Member State of the commitment, in accordance with Article 185(6) of Directive 2009/138/EC.

The information required under Article 8 of the SFDR Regulation is set out in Annex 9 to the General Terms and Conditions of the insurance product.

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<sup>5</sup>REGULATION (EU) No 2019/2088 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 November 2019 on sustainability disclosures in the financial services sector & COMMISSION DELEGATED REGULATION (EU) 2022/1288 of 6 April 2022 supplementing Regulation (EU) 2019/2088 of the European Parliament and of the Council with regard to regulatory technical standards specifying the details of the content and presentation of the information in relation to the principle of 'do no significant harm', specifying the content, methodologies and presentation of information in relation to sustainability indicators and adverse sustainability impacts, and the content and presentation of the information in relation to the promotion of environmental or social characteristics and sustainable investment objectives in pre-contractual documents, on websites and in periodic reports

## Part B) Disclosure under Article 10 of the SFDR Regulation and in accordance with Chapter IV, Section 2 (Articles 37-49) of the SFDR RTS regulation

### **KLE - Climate and Environmental Protection Stock EUR Fund**

Under Article 10 of Regulation (EU) No 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (hereinafter: SFDR Regulation) and Delegated Regulation EU 2022/1288 of 6 April 2022 supplementing Regulation EU 2019/2088), Allianz Hungária Zrt. (hereafter referred to as the "insurer") shall present the following information and publish and maintain it on its website as part of the pre-contractual disclosure, if the product promotes environmental or social characteristics or a combination of these in terms of sustainability risks as defined in the SFDR Regulation, or if the companies selected for investment purposes follow good corporate governance practices or the product has the objective of sustainable investment:

- a) a description of the environmental or social characteristics or the sustainable investment objective;
- b) information on the methodologies used to assess, measure and monitor the environmental or social characteristics or the impact of the sustainable investments selected for the financial product, including its data sources, screening criteria for the underlying assets and the relevant sustainability indicators used to measure the environmental or social characteristics or the overall sustainable impact of the financial product;
- c) the information referred to in Articles 8 and 9 of the SFDR Regulation;
- d) the information referred to in Article 11 of the SFDR Regulation.

This Disclosure describes investments that promote environmental and social characteristics and sustainable investment objectives for the Climate and Environmental Protection Stock EUR Fund (KLE).

As set out in the investment policy of the Climate and Environmental Protection Stock EUR Fund (KLE), the objective of the Asset Fund is to achieve long-term capital growth through a diversified portfolio of equity or equity-related investments in companies that are expected to directly or indirectly benefit from developments addressing environmental challenges, such as climate change.

The Asset Fund was launched in October 2024 and invests a significant portion of its assets in an Underlying Fund, meaning that its environmental and social characteristics and investments promoting sustainable investment objectives are essentially determined by the investments of the Underlying Fund. As the Asset Fund was not yet operational for a significant part of the Underlying Fund's financial year under review, and due to its start-up and growth phase, the proportion of cash and liquid assets in its portfolio may have temporarily exceeded the target ratio set out in the prospectus, therefore no proportional adjustment has been made. Accordingly, the disclosure pursuant to Article 10 of the SFDR for 2024 is based entirely on the sustainability disclosure of the Underlying Fund. The Underlying Fund invests in companies that provide environmental solutions and contribute to social outcomes. These companies are part of its proprietary investment universe and engage in economic activities considered environmentally or socially sustainable. Thus, the primary objective of the Underlying Fund (thus, of the Asset Fund) is to achieve sustainable investments, which includes the commitment to ensure that a specified minimum portion of the portfolio composed of sustainable investments. These are screened to ensure that they do not significantly harm any social or environmental investment objectives. The asset allocation of the Underlying Fund is presented in the form of a chart that holds a specification of the minimum percentage of environmental and/or social sustainable investments that the fund commits to invest into. Specific sustainability indicators will be used to measure the attainment of the sustainable investment objective of the Underlying Fund in accordance with the methodologies described below. Internal limit monitoring systems run pre- and post-trade screenings for the holdings. Internal and external data sources and data providers are used to ensure that the Underlying Fund is invested in accordance with the sustainable investment objective. Data received from external providers may be complemented by internal research and analysis. The asset manager of the Underlying Fund aims to mitigate limitations to data sources by applying solid due diligence measures in relation to external data providers, and manual verification processes. It undertakes a range of engagement activities on behalf of its clients to encourage improved ESG practices. There is

no reference benchmark designated for the purpose of attaining the sustainable investment objective of the Underlying Fund (thus, of the Asset Fund).

To maintain liquidity, the Asset Fund 's portfolio may also include bank deposits and cash held in bank accounts. The Manager may also execute the investment strategy by purchasing securities of collective investment schemes managed by reliable asset managers, using the assets of the Asset Fund partially or entirely, whose investment strategies are substantially aligned with the strategy of the Asset Fund.

The Asset Fund is considered a **medium-high risk** investment, which is expected to achieve returns exceeding the market yield level. As a result, the unit price of the Asset Fund may decrease in the short and medium term.

This document summarises the methods for assessing and applying the environmental and social aspects and the information to be disclosed on investments under the legislation.<sup>6</sup>

Information under Article 11 of the SFDR Regulation:

The Climate and Environmental Protection Stock EUR Fund (KLE). is a product within the meaning of Article 9(1) of the SFDR Regulation and is therefore included in the periodic reports of the insurer,

- a) the specifics concerning the achievement of the sustainable investment objective for the financial product;
- b) if the financial product falls within the scope of Article 5 of Regulation (EU) 2020/852, the following information:

The information required under Article 9 of the SFDR Regulation is set out in Annex 9 to the General Terms and Conditions of the insurance product.

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<sup>6</sup>REGULATION (EU) No 2019/2088 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 November 2019 on sustainability disclosures in the financial services sector & COMMISSION DELEGATED REGULATION (EU) 2022/1288 of 6 April 2022 supplementing Regulation (EU) 2019/2088 of the European Parliament and of the Council with regard to regulatory technical standards specifying the details of the content and presentation of the information in relation to the principle of 'do no significant harm', specifying the content, methodologies and presentation of information in relation to sustainability indicators and adverse sustainability impacts, and the content and presentation of the information in relation to the promotion of environmental or social characteristics and sustainable investment objectives in pre-contractual documents, on websites and in periodic reports