

Sustainability-related precontractual information

NOVIS „SENSUM“ (GTC-20180924)

Legal Background

This information is based on the Sustainable Finance Disclosure Regulation ("SFDR").¹

NOVIS „SENSUM“ (GTC-20180924) promotes environmental or social characteristics; these characteristics are subject to investing and holding NOVIS Sustainability Insurance Fund during the holding period of the financial product. Further information related to these characteristics is available in the annex to this document called ***Environmental and/or social characteristics***.

List of the available investment options and its category as defined by SFDR:

Investment option name	Promotes environmental or social characteristics ²	Has sustainable investment as its goal ³
NOVIS Fixed Income Eszközalap	No	No
NOVIS Global Select Eszközalap	No	No
NOVIS Sustainability Eszközalap	Yes	No
NOVIS ETF Részvény Eszközalap	No	No
NOVIS Gold Eszközalap	No	No
NOVIS Vállalkozói Eszközalap	No	No
NOVIS Jelzálog Eszközalap	No	No
NOVIS Family Office Eszközalap	No	No
NOVIS World Brands Eszközalap	No	No
NOVIS Digital Assets Eszközalap	No	No

Sustainability risk policies

Based on Article 3 (1) of the SFDR, we would like to inform you about policies on the integration of sustainability risks in our investment decision-making process:

Investment decisions are performed by our investment committee based on all available information about financial instruments which are either already used as underlying assets of our internal funds or which are being considered as potential additions. Such available information also includes the instruments' alignment with environmental, social and governance ("**ESG**") factors and sustainability criteria.

¹ 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.

² Investment option that qualifies as a financial product referred to in Article 8 (1) of SFDR because it promotes environmental or social characteristics.

³ investment options that qualifies as a financial product referred to in Article 9 (1), (2) or (3) of SFDR because it has sustainable investment as its objective and an index has been designated as a reference benchmark.

Our investment decisions are mainly oriented on delivering investment return to our clients while adopting wide risk diversification. In order to achieve wide diversification of assets, we use investment funds for majority of our investments. However, indirect investing via investment funds weakens our ability to evaluate sustainable risks and we need to rely to a large extent on methodology and investment decisions of asset managers of these investment funds. Therefore, ESG and sustainability risks generally are not a dominant factor in making our investment decisions.

To specifically address sustainability risks while maintaining our investment philosophy based on indirect investments, we launched NOVIS Sustainability Insurance Fund, an internal insurance fund under Slovakian law which invests in underlying financial instruments. In NOVIS Sustainability Insurance Fund, adherence with strict corporate governance rules, environmental and social criteria (ESG) according to the Principles of Responsible Investment created under the auspices of the United Nations is one of the eligibility criteria for underlying financial instruments. By way of example, we evaluate the documentation provided by asset managers or issuers of financial instruments to assess, whether and with what extent the underlying investment funds include investment into companies:

- focused on resolution of environmental problems;
- that operate in areas such as efficient energy, environment, health and improvements social and demographic problems;
- which demonstrate long-term growth prospects and good stewardship, i.e long-term management of companies in the interests of all stakeholders and broader society. This includes not only environmental, social and governance issues faced by a company, but also whether the company will add value to society over the long run and if it exhibits a responsible culture.

For more information on the NOVIS Sustainability Insurance Fund, please see the document "Sustainability-related precontractual information".

Impacts of sustainability risks on the returns of the financial product

We are aware of the fact that sustainability risks can have a negative impact on the returns of investments. The sustainability risks encompass a numerous and heterogenous group of environmental, social and governance events. Besides, legislative initiatives and regulations that target sustainable risks are being introduced in quickening pace all over the globe and their effects will only become apparent in the longer term. Therefore, it is challenging to foresee and quantify the possible impacts of sustainability risks on the returns. Our current approach relies on broad diversification of assets. Our investment options (NOVIS Internal Funds) offered within this financial product do not focus on a particular region or industry, thus reducing potential impacts of adverse development. For example our investment options do not specialize on investments into sectors that are currently under significant pressure, such as oil industry, automotive or mining industry.

You can find this information as well as other additional related information on our website <https://www.novis.eu/hu/a-novis-fenntarthatosaggal-kapcsolatos-informacioi>.

Bratislava, 10 March 2021