

Swisscanto (LU) Money Market Fund

Swisscanto (LU) Money Market Fund

(hereinafter the “Fund”)

An investment fund under Luxembourg law

Sales Prospectus July 2023

This Sales Prospectus is to be read in conjunction with the latest annual report (or semi-annual report if the latter was published after the last annual report). These reports are an integral part of this Sales Prospectus and, in conjunction with it, form the basis for all subscriptions of Fund units. They can be obtained free of charge from all sales agents.

Only the information contained in this Sales Prospectus and in one of the publicly accessible documents referred to therein is deemed to be valid and binding. If you are in any doubt about the content of this Sales Prospectus, you should consult someone who can give detailed information about the Fund.

The German version of this Sales Prospectus is authoritative; the Management Company and the Depositary may, however, recognise translations authorised by them into the languages of countries in which Fund units are offered and sold as binding on themselves and on the Fund in respect of the units sold to investors in these countries.

Units of the Fund may not be offered, sold or delivered within the United States of America or to persons deemed to be US persons under Regulation S of the US Securities Act of 1933 or the US Commodity Exchange Act, as amended.

Management and administration

Management Company, Central Administration

Swisscanto Asset Management International S.A.
6, route de Trèves, L-2633 Senningerberg.

Swisscanto (LU) Money Market Funds Management Company S.A. was founded as a public limited company with its registered office in Luxembourg on 26 November 1990, and is established for an indefinite period. Effective 1 July 2011, Swisscanto (LU) Money Market Funds Management Company S.A. was merged with Swisscanto Asset Management International S.A. (the “Management Company”) and will from now on be operated under the name Swisscanto Asset Management International S.A.

The Articles of Association of Swisscanto (LU) Money Market Funds Management Company S.A. were published in their original version in the “Mémorial C,

Recueil des Sociétés et Associations” , the official gazette of the Grand Duchy of Luxembourg (hereinafter the “Mémorial”), of 29 December 1990. The current version of the Articles of Association of Swisscanto Asset Management International S.A. dated 5 June 2023 has been filed with the Luxembourg Trade and Companies Register (RCS), where it is available for inspection. The Management Company is registered with the RCS under registration no. B 121.904.

The object of the Management Company is the collective portfolio management of one or more Luxembourg and/or foreign undertakings for collective investment in transferable securities (“UCITS”) subject to Directive 2009/65/EC, as amended, and of other Luxembourg or foreign undertakings for collective investment which do not come under the scope of said Directive, including specialised investment funds pursuant to the provisions of the Act of 13 February 2007 on specialised investment funds (“UCIs”), and in accordance with the provisions of the Act of 17 December 2010 on undertakings for collective investment, as amended (“UCI Act”).

The paid-up capital of the Management Company amounts to CHF 220,000 and is fully held by Swisscanto Holding AG, Zurich. Swisscanto Holding AG is wholly owned by Zürcher Kantonalbank, Zurich.

In accordance with the UCI Act and the applicable administrative provisions of the Luxembourg supervisory authority (Commission de Surveillance du Secteur Financier, CSSF), the Management Company has adequate and appropriate organisational structures and internal control mechanisms in place. In particular, it shall act in the best interests of the funds or sub-funds and ensure that conflicts of interest are avoided, that resolutions are complied with, procedures are followed and that the holders of units in the funds and sub-funds managed are accorded fair treatment.

The Management Company also manages the following funds, among others:

- Swisscanto (LU)
- Swisscanto (LU) Equity Fund
- Swisscanto (LU) Bond Fund
- Swisscanto (LU) Portfolio Fund

Board of Directors

Chairman:

Hans Frey, Switzerland

Managing Director Swisscanto Fondsleitung AG, Zurich

Members:

- Richard Goddard, Luxembourg
Independent Company Director, The Directors' Office,
Luxembourg
- Roland Franz, Luxembourg
Managing Director Swisscanto Asset Management
International S.A., Luxembourg
- Anne-Marie Arens, Luxembourg
Independent Company Director, Luxembourg

Management

Members:

- Roland Franz, Luxembourg
- Jasna Ofak, Luxembourg
- Michael Weiß, Germany

Portfolio Manager

Zürcher Kantonalbank

Bahnhofstrasse 9, 8001 Zurich, Switzerland

Zürcher Kantonalbank was founded in Zurich in 1870 as an independent public-law institution of the canton of Zurich. It has many years of experience in asset management. The exact execution of duties is governed by an asset management agreement concluded between Swisscanto Asset Management International S.A. and Zürcher Kantonalbank.

The Portfolio Manager is entitled to remuneration at the customary rates. This will be paid by the Management Company out of the all-in fee that is due to it and charged to the Fund. The Portfolio Manager is charged with investment of the Fund assets in the best interests of the unitholders. It shall act in accordance with the provisions of the law and the contractual conditions. The Management Company takes ultimate responsibility for the actions of the Portfolio Manager.

The Asset Management Agreement may be terminated at any time subject to a period of notice of six months.

Depository, Principal Paying Agent, Registrar, Transfer Agent

CACEIS Investor Services Bank S.A.

14, Porte de France, L-4360 Esch-sur-Alzette, Luxembourg

Depository and Principal Paying Agent

The Management Company has appointed CACEIS Investor Services Bank S.A. (hereinafter "the Bank"), a public limited company under Luxembourg law with its registered office at 14, Porte de France, L-4360 Esch-sur-Alzette, as Depository and Principal Paying Agent (hereinafter the "Depository") with the following duties:

- a) safekeeping of assets,
- b) monitoring functions,
- c) monitoring of cash flows and
- d) Principal Paying Agent functions.

In accordance with the UCI Act and the Depository and Principal Paying Agent Agreement concluded between the Management Company, acting on behalf of the Fund, and the Depository, of 18 March 2016 (the "Depository Agreement"). The Depository Agreement has been concluded for an indefinite period and may be terminated by either party at the end of any calendar month by giving 90 days' written notice.

CACEIS Investor Services Bank S.A., which was established in 1994 under the name "First European Transfer Agent", is registered with the RCS under registration no. B-47192. It holds a banking licence under the Luxembourg Act of 5 April 1993 on the financial services sector and specialises in depository, fund management and related services. As at 31 October 2022, it had equity capital of approximately EUR 1,171,602,732.

The assets of the Fund are held in safekeeping by the Depository. The function of Depository is governed by the statutory provisions, the Depository Agreement and the Management Regulations. The Depository acts independently of the Management Company and exclusively in the best interests of the unitholders.

The Depository has been authorised by the Management Company to delegate its safekeeping duties to the following: (i) third parties in the case of other assets and (ii) sub-depositaries in the case of financial instruments. It is also authorised to open accounts with these sub-depositaries.

An up-to-date description of the custody functions delegated by the Depository and an up-to-date list of the third parties and sub-depositaries appointed may be obtained on request from the Depository or via the following link:
<http://gmi.rbcits.com/rt/gss.nsf/Royal+Trust+Updates+Minij/53A7E8D6A49C9AA285257FA8004999BF?opendocument>

When performing its duties under the UCI Act and the Depository Agreement, the Depository shall act honestly, transparently, professionally, independently and exclusively in the interests of the Fund and its investors.

The Depository's monitoring functions include ensuring that:

- the issue, redemption and conversion of units by the Management Company, or by the Management

Swisscanto Asset Management

International S.A.

Company acting on behalf of the Fund, are carried out in accordance with the UCI Act and the Management Regulations;

- the value of the units is calculated in accordance with the UCI Act and the Management Regulations;
- the instructions of the Management Company, acting on behalf of the Fund, are executed unless they conflict with the Management Regulations;
- in the case of transactions involving the Fund' s assets, all amounts are transferred to the Fund within the normal time limits;
- the Fund' s net income is appropriated in accordance with the UCI Act and the Management Regulations.

In addition, the Depositary ensures that cash flows are properly monitored in accordance with the UCI Act and the Depositary Agreement.

Conflicts of interest on the part of the Depositary

Conflicts of interest may arise from time to time between the Depositary and its agents; for example, if the agent is a group company that receives a fee for other custody services that it provides for the Fund. On the basis of the applicable laws and ordinances, the Depositary continuously monitors potential conflicts of interest that may arise during the performance of its function. All potential conflicts of interest identified are dealt with in accordance with the Depositary' s conflicts of interest policy, which is in turn subject to the laws and ordinances applicable to financial institutions according to the Act of 5 April 1993 on the financial services sector.

Other potential conflicts of interest may arise on account of the fact that the Depositary and/or its group companies provide other services for the Fund, the Management Company and/or third parties. Thus, the Depositary and/or its group companies may act as depositary and/or manager of other funds. There is therefore a risk that the business activities of the Depositary or its group companies are exposed to (potential) conflicts of interest with the Fund, the Management Company and/or other funds on behalf of which the Depositary (or one of its group companies) is acting.

The Depositary has formulated and implemented a conflicts of interest policy, the primary aim of which is to:

- identify and analyse situations that could give rise to potential conflicts of interest;
- record, manage and monitor conflicts of interest by means of:
 - functional and hierarchical segregation to ensure that the Depositary' s duties as depositary are

performed separately from any potentially conflicting duties;

- taking preventative measures to avoid any type of activity that could give rise to conflicts of interest, such as:
 - the Depositary and any third party to which depositary duties have been delegated shall refuse any investment management role;
 - the Depositary shall decline any delegation of compliance and risk management duties;
 - the Depositary has established an effective escalation process to ensure that regulatory breaches are reported to the compliance department, which in turn reports material breaches to the company management and Board.
 - the Depositary has its own specialised audit department that performs risk assessments independently and objectively as well as evaluates internal control procedures and administrative processes in terms of suitability and efficiency.

Based on the aforementioned, the Depositary confirms that no potential conflict of interests has been identified.

The current conflicts of interest policy is available from the Depositary on request or via the following link: https://www.rbcits.com/AboutUs/CorporateGovernance/p_InformationOnConflictsOfInterestPolicy.aspx

The Depositary is entitled to remuneration at the customary rates. This will be paid by the Management Company out of the all-in fee that is due to it and charged to the Fund.

Registrar and Transfer Agent:

The Management Company has delegated its duties as the Fund' s registrar and transfer agent (the "Registrar and Transfer Agent") to CACEIS Investor Services Bank S.A. under the Investment Fund Services Agreement of 1 July 2021. The Central Administration Agreement has been concluded for an indefinite period and may be terminated by either party by giving 90 days' written notice.

The Registrar and Transfer Agent is responsible for processing subscription and redemption orders, managing the unit register, and accepting unit certificates that are returned for the purpose of replacement or redemption.

The Fund' s Registrar and Transfer Agent is responsible for taking appropriate measures to ensure compliance with the regulations governing the prevention of money laundering in accordance with the legislation in force in the Grand

Duchy of Luxembourg and observing and implementing the circulars of the Luxembourg supervisory authority.

Depending on the individual subscription or transfer application, the detailed identification of the client may not be necessary provided that the application is made through a financial institution or authorised financial service provider and that this party is simultaneously established in a country that operates rules equivalent to those under the Luxembourg Money Laundering Act. A list of countries that operate rules equivalent to those under the Luxembourg Money Laundering Act is available on request from the Registrar and Transfer Agent.

The Registrar and Transfer Agent is entitled to remuneration at the customary rates. This will be paid by the Management Company out of the all-in fee that is due to it and charged to the Fund.

Fund accounting and net asset value (NAV) calculation

Swisscanto Asset Management International S.A.
6, route de Trèves, L-2633 Senningerberg.

The Management Company shall perform tasks relating to fund accounting and NAV calculation. These functions essentially comprise fund accounting and calculation of the net asset value of fund units, the preparation of the fund's annual and semi-annual reports and the presentation to the auditor of the annual and semi-annual reports under the terms of Luxembourg law and in accordance with the requirements of the Luxembourg supervisory authority. These tasks will be carried out by Swisscanto Fondsleitung AG as service provider and will be the responsibility of the Management Company.

Independent auditors:

Ernst & Young S.A.
35E, Avenue John F. Kennedy, L-1855 Luxembourg

Specific provisions governing the sale of units in Germany, Austria and Liechtenstein

Information regarding the Paying and Information Agent for unitholders in Germany are provided on page 23.1 of this Sales Prospectus.

Information regarding the Paying and Information Agent for unitholders in Austria are provided on page 23.2 of this Sales Prospectus.

Information regarding the Paying and Information Agent for unitholders in Liechtenstein are provided on page 23.3 of this Sales Prospectus.

Overview of sub-fund distribution authorisation abroad: An overview of countries, in which the sub-funds of the Swisscanto (LU) Money Market Fund are authorised, can be found on the website www.swisscanto.com.

Swisscanto (LU) Money Market Fund Details

1 General Information about the Fund

1.1 Legal aspects

The Swisscanto (LU) Money Market Fund (hereinafter the "Fund") is an open-ended investment fund under Luxembourg law and was established on 26 November 1990. The Fund is managed by the Luxembourg public limited company Swisscanto Asset Management International S.A. CACEIS Investor Services Bank S.A. has been entrusted with the duties of Depositary.

The Fund was opened for subscription on 26 November 1990 under the common name Swissca MM Fund was subject to the provisions of Part II of the Luxembourg Act of 30 March 1988 on undertakings for collective investment.

Since 13 February 2004, under the name Swissca MM Fund, the Fund has been subject to the statutory provisions of Part I of the Act on undertakings for collective investment, as applicable at the time. The fund has operated under the name Swisscanto (LU) Money Market Fund since 1 January 2005. It is subject to the UCI Act and to the specific provisions of Regulation (EU) 2017/1131 of the European Parliament and of the Council of 14 June 2017 on money market funds (the "MMFs Regulation").

The Management Company is subject to section 15 of the UCI Act.

The portfolios and other assets of the Fund are managed by the Management Company as a discrete pool of assets in the interests and for the account of the unitholders.

The Fund assets in their entirety are jointly owned by all the investors, who hold equal entitlements in proportion to their holdings. The assets of the Fund are separate from those of the Management Company. The Management Regulations make no provision for a meeting of unitholders. By subscribing for or acquiring units, the unitholder agrees to abide by the Management Regulations.

Unitholders, their heirs and other beneficiaries may not demand the dissolution, division or merger of the Fund.

The Fund is not limited in terms of duration or total assets. The financial year ends on 31 March of each year.

The Management Company would like to make investors aware of the fact that unitholders may not assert all their investor rights directly against the Fund as they are not registered in the Fund's register of unitholders in their own name. Since investors may only invest in the Fund via an

intermediary, who acquires the investment in its name but on behalf of the investor, it is possible that not all rights pertaining to the investment can be upheld directly against the Fund by the unitholder. Investors are advised to inform themselves of their rights.

The Management Regulations of the Fund were published for the first time on 26 November 1990 in the "Mémorial". A number of amendments have been made, which were carried out in accordance with the Management Regulations. A notice of the most recent amendment is published in the electronic platform for companies and associations (*Recueil Electroniques des Sociétés et Associations*, hereinafter "RESA"). The current version of the Management Regulations dated 21 July 2023 has been filed with the RCS, where it is available for inspection.

1.1.1 Liquidation

The Management Company is entitled to dissolve the Fund or individual sub-funds at any time. The Fund must be dissolved and liquidated if its total net assets fall short of a quarter of the statutory minimum requirement for fund assets for more than six months. If the net assets of a sub-fund fall below CHF 500000 or the equivalent in another currency, or should economic, legal or monetary circumstances change, the Management Company may decide to dissolve a sub-fund, merge sub-funds or incorporate a sub-fund into another open-ended investment fund in accordance with Part I of the UCI Act.

The decision to dissolve or liquidate the Fund will be published in the RESA and in at least two other newspapers, including the "Luxemburger Wort". From the day on which the dissolution and liquidation decision is made, no further units will be issued or redeemed. In the event of the dissolution and liquidation of a sub-fund, this applies only to the sub-fund in question. Upon liquidation, the Management Company will realise the Fund assets in the best interests of the unitholders and will instruct the Depositary to distribute the net liquidation proceeds to the unitholders in proportion to their holdings. Any liquidation proceeds that could not be distributed to the unitholders at the end of the liquidation process will be deposited with the *Caisse de Consignation* in Luxembourg until their distribution becomes statute-barred.

1.1.2 Merger

The Management Company may, by decision of the Board of Directors and, insofar as applicable, in accordance with the conditions and procedures cited in the UCI Act and in the pertinent administrative regulations, merge the Fund or, as the case may be, one or more sub-funds of the Fund with an existing or jointly established sub-fund, or other Luxembourg funds or sub-funds, either by dissolution

without winding up, or by continuing to exist until all liabilities are discharged.

No provision is made for a merger with an investment fund established under a law other than that of Luxembourg.

Unitholders are entitled, within 30 days, to demand either that their units be redeemed or, as the case may be, converted into units of another fund or sub-fund which has a similar investment policy and which is managed by the same management company or by another company with which the Management Company is associated, either through common management or control, or by way of a significant direct or indirect holding, without incurring more costs than those retained by the Fund or sub-fund to cover the dissolution costs.

Insofar as applicable, in accordance with the conditions and procedures cited in the UCI Act and in the pertinent administrative regulations, unitholders will be informed in good time of any merger.

1.2 Structure of the Fund

Under a single investment fund ("umbrella"), the Fund offers investors sub-funds that invest in first-class money market instruments, broken down by currency. Together, the sub-funds constitute the Fund. Every investor participates in the Fund through participation in a sub-fund. In relations between unitholders, each sub-fund is regarded as a discrete pool of assets in its own right. The rights and duties of the unitholders of a given sub-fund are separate from those of the unitholders of the other sub-funds. Each sub-fund is also regarded as a separate fund with regard to the investments and investment policy under section 2.

The Management Company may resolve at any time to set up additional sub-funds. The Management Company will notify the unitholders of this and amend the Sales Prospectus accordingly.

All sub-funds of this Fund are classified as a variable net asset value money market fund (VNAF MMF) within the meaning of the MMFs Regulation. They are to be treated as standard MMFs within the meaning of Article 2(15) of the MMFs Regulation.

1.3 Unit classes

The Board of Directors is authorised to create additional unit classes at any time. The Board of Directors may also decide, where appropriate for economic or legal reasons, to cancel a unit class and to exchange the outstanding units within a sub-fund for units in another unit class. Such resolutions on the part of the Board of Directors will be published in

accordance with the provisions laid down in Article 14 of the Management Regulations.

An overview of the active unit classes is available free of charge from the Management Company and is also published on the website www.swisscanto.com.

1.4. Distinctive features of unit classes

The unit classes differ in terms of the following characteristics:

- investor base,
- appropriation of net income,
- reference currency,
- currency hedging and
- fee rates.

1.4.1. Investor base or characteristics of the unit classes

The investor base of the unit classes are as follows:

a) Class A units

Class A units are open

- to all investors and
- may be offered by all distributors.

For class A units, an all-in fee is charged to the Fund assets.

b) Class B units

Class B units are offered to all investors

- who have concluded a written investment advisory or other agreement with a cooperation partner that includes authorisation for class B units, and
- provided a cooperation agreement exists between the cooperation partner and a company in the Swisscanto Group.

For class B units, an all-in fee is charged to the Fund assets.

c) Class C units

Class C units are offered to all investors

- who have concluded a written, long-term investment advisory agreement with a cooperation partner that includes authorisation for class C units, and
- provided a cooperation agreement exists between the cooperation partner and a company in the Swisscanto Group.

For class C units, an all-in fee is charged to the Fund assets.

d) Class D units

Class D units are only open

- to institutional investors as defined in section 1.4.1 j) of this Sales Prospectus and
- may be offered by all distributors.

For class D units, an all-in fee is charged to the Fund assets

e) Class F units

Class F units are

- open to all investors of the sub-fund Swisscanto (LU) Money Market Fund Responsible CHF and
- may be offered by all distributors.

For class F units, an all-in fee is charged to the Fund assets.

f) Class G units

Class G units are only open to investors that meet the following conditions:

- The investors are institutional investors as defined in section 1.4.1. j) of this Sales Prospectus.
- The investors have concluded a written, continuing investment agreement with a bank or other professional entity operating in the financial sector.
- Banks and other professional entities operating in the financial sector may only offer or subscribe to the units for the account of a third party if a corresponding cooperation agreement exists with a company in the Swisscanto Group.

For class G units, an all-in fee is charged to the Fund assets.

g) Class M units

Class M units are offered only to investors

- who have concluded a written, continuing investment advisory agreement with Zürcher Kantonalbank that includes authorisation for the unit classes listed above, and
- provided Zürcher Kantonalbank has concluded a cooperation agreement with a company in the Swisscanto Group.

The Management Company is compensated by Zürcher Kantonalbank, Zurich, for the management of the Fund (i.e. running the Fund, asset management as well as distribution and other costs that arise, if compensation is made for such costs; in particular, fees and costs of the Depositary) not by the all-in fee but by the remuneration set out in the above investment advisory agreement. No all-in fee is therefore charged to the Fund assets.

h) Class N units

Class N units are open to investors that are acting for their own account and meet the following conditions:

- The investors are institutional investors as defined in section 1.4.1. j) of this Sales Prospectus.
- The investors have concluded an individual investment agreement or individual discretionary management agreement with Zürcher Kantonalbank or a cooperation partner of Zürcher Kantonalbank.
- Cooperation partners can only offer the units if a corresponding cooperation agreement exists with Zürcher Kantonalbank.

In addition, class N units are open to investors that meet the following conditions:

- The investors are institutional investors as defined in section 1.4.1. j) of this Sales Prospectus.
- The investors have concluded a service agreement (written asset management agreement, written advisory agreement, written investment agreement or other written service agreement) with a bank or a company in the Swisscanto Group.
- Banks can only offer or subscribe to the units for the account of a third party if a corresponding cooperation agreement exists with a company in the Swisscanto Group.

The Management Company is compensated for the management of the Fund (i.e. running the Fund, asset management, distribution and other costs that arise, if compensation is made for such costs; in particular, fees and costs of the Depositary) not by the all-in fee, but by the remuneration set out in the above agreements between the investor, on the one hand, and Zürcher Kantonalbank or a cooperation partner of Zürcher Kantonalbank, a company in the Swisscanto Group or a bank, on the other. No all-in fee is therefore charged to the Fund assets.

i) Class S units

Class S units are only

- open to Swisscanto Asset Management International S.A. or
- other management companies that have concluded a cooperation agreement with Swisscanto Asset Management International S.A.

Class S units are issued in the corresponding currency (unit of account), initially in the amount of 100,000 (JPY 10,000,000); no all-in fee is charged.

The remuneration due to the Management Company and its agents for running the Fund, asset management and, if applicable, distribution is not charged to the Fund assets but is paid separately on the basis of an individual agreement or arrangement between Swisscanto Asset Management International S.A. and the investor.

j) Institutional investors

The following are deemed to be institutional investors:

- banks and other professional entities operating in the financial sector, whether acting for their own account or acting on behalf of other institutional investors or on behalf of non-institutional clients under a discretionary management agreement;
- public entities that invest their own assets;
- insurance and reinsurance companies;
- pension schemes;
- industrial, commercial and group finance companies;
- undertakings for collective investment;

- holding companies or similar companies whose shareholders are all institutional investors;
- family holding companies or similar entities whose purpose is to hold financial investments for very high net worth individuals or families;
- holding companies or similar entities that, in view of their structure and business dealings, possess genuine intrinsic value independently of the beneficial owners as well as hold significant financial investments.

1.4.2 Appropriation of net income

Furthermore, the unit classes differ in terms of the appropriation of net income.

Unit classes with an “A” as the second letter of their name, e.g. AA or MA CHF, are issued as distribution units. Under Article 12 of the Management Regulations, the Management Company will decide, after closing the annual accounts, whether and to what extent distributions are to be made on distribution units. The intention is to pay out the majority of earnings on distribution units.

Unit classes with a “T” as the second letter of their name, e.g. AT or MT CHF, are issued as accumulation units. No distributions are planned for these unit classes. After the deduction of general costs, net income will be used to increase the net asset value of the units (accumulation).

1.4.3 Reference currency

If the reference currency of a unit class differs from the sub-fund’s currency of account, three letters representing the abbreviation of the relevant currency are suffixed to the name of the unit class.

Unit classes whose reference currency differs from the sub-fund’s currency of account can therefore be distinguished as follows:

- unit classes with “CHF” as the last three letters of their name, e.g. AT CHF or MA CHF, have the Swiss franc (CHF) as reference currency for the unit class concerned, or
- unit classes with “EUR” as the last three letters of their name, e.g. AT EUR or MA EUR, have the euro (EUR) as reference currency for the unit class concerned.

1.4.4 Currency hedging

The unit classes differ in terms of currency hedging:

unit classes with an “H” as the third letter of their name, e.g. ATH CHF or MAH CHF, are unit classes for which systematic currency hedging is conducted. This means currency fluctuations between the currencies of the currency classes and the currencies of account of the sub-funds are, for the most part, hedged.

For all other unit classes, no currency hedging is conducted at unit-class level.

1.4.5 Fee rates

The unit classes differ in terms of the maximum fee rates that are charged annually to the relevant unit class. The maximum annual all-in fee, management fee and administration fee for each sub-fund are stated in the table below.

Sub-fund name		Currency of account	Unit classes	Max. Agency fee	Max. annual all-in fee (AIF) ¹	Max. annual flat management fee ¹	Max. annual flat administration fee ¹
1.	Swisscanto (LU) Money Market Fund Responsible AUD	AUD	A	2.0%	0.80%	0.65%	0.20%
			B	2.0%	0.60%	0.50%	0.20%
			C	2.0%	0.55%	0.45%	0.20%
			D	2.0%	0.50%	0.40%	0.10%
			G	2.0%	0.40%	0.35%	0.10%
			M	2.0%	0.00%	0.00%	0.00%
			N	2.0%	0.00%	0.00%	0.00%
			S	2.0%	0.00%	0.00%	0.00%
2.	Swisscanto (LU) Money Market Fund Responsible CHF	CHF	C	2.0%	0.55%	0.45%	0.20%
			D	2.0%	0.50%	0.40%	0.10%
			F	2.0%	0.60%	0.50%	0.20%
			G	2.0%	0.40%	0.35%	0.10%
			M	2.0%	0.00%	0.00%	0.00%
			N	2.0%	0.00%	0.00%	0.00%
			S	2.0%	0.00%	0.00%	0.00%
3.	Swisscanto (LU) Money Market Fund Responsible EUR	EUR	A	2.0%	0.80%	0.65%	0.20%
			B	2.0%	0.60%	0.50%	0.20%
			C	2.0%	0.55%	0.45%	0.20%
			D	2.0%	0.50%	0.40%	0.10%
			G	2.0%	0.40%	0.35%	0.10%
			M	2.0%	0.00%	0.00%	0.00%
			N	2.0%	0.00%	0.00%	0.00%
			S	2.0%	0.00%	0.00%	0.00%
4.	Swisscanto (LU) Money Market Fund Responsible USD	USD	A	2.0%	0.80%	0.65%	0.20%
			B	2.0%	0.60%	0.50%	0.20%
			C	2.0%	0.55%	0.45%	0.20%
			D	2.0%	0.50%	0.40%	0.10%
			G	2.0%	0.40%	0.35%	0.10%
			M	2.0%	0.00%	0.00%	0.00%
			N	2.0%	0.00%	0.00%	0.00%
			S	2.0%	0.00%	0.00%	0.00%

¹The all-in fee is made up of two components: the flat management fee and the flat administration fee. The sum of the flat management fee and flat administration fee booked may not exceed the rate for the maximum all-in fee. The fees booked are reported in the annual and semi-annual reports.

1.5 Investor profile

All sub-funds are primarily intended for private investors. The sub-funds also issue classes of units which are reserved for institutional investors. Due to its investment policy, which is strongly geared towards money market investments, and the relatively low fluctuations in value that this entails, the Fund is particularly suitable for investors with a short-term investment horizon or for investors who consciously wish to invest in money markets.

However, investors are expressly advised that, in spite of the investment policy that is geared towards money market instruments, changes in the net asset value may be triggered by a number of factors, including, but not limited to fluctuations in interest rates and currencies.

1.6 Risk notice

1.6.1 General information

The net asset value of the units may rise or fall. They are not a guaranteed investment. When redeeming their units, unitholders may therefore receive less than they originally paid for them. The risk of loss of the investment shall be borne by the unitholder. There is no guarantee of a return on investment.

An investment in an MMF is different from a deposit.

The Fund does not rely on external support to guarantee its liquidity or keep the net asset value per unit stable.

Owing to their shorter term, money market instruments generally have lower price risks arising from changes in interest rates than capital market investments. As a result of this reduced investment risk, there is generally lower income potential.

1.6.2 Interest-bearing investments

Nevertheless, it must be emphasised that even money market instruments are subject to risks. The prices of money market instruments may both rise and fall against the original price. This depends, in particular, on the development of money and capital markets, and on the specific developments affecting the issuers in question.

The credit risk associated with an investment in money market instruments cannot be completely eliminated, even with careful selection.

In addition to the general market risks that are associated with financial investments, there exists a counterparty risk and the currency and transfer risk inherent in foreign investments.

The risk is reduced in that, in accordance with the investment policy, the investments ensure a reasonable distribution of risk.

With regard to forward transactions, investors should note that the temporary rights acquired from forward transactions may expire or may be impaired, and that the risk of loss is not determinable and may also exceed any collateral provided.

1.6.3 Risks associated with OTC transactions

Over-the-counter (OTC) transactions are associated with the following additional risks:

there is no organised market, which can lead to problems in selling financial instruments acquired on the OTC market to third parties; individual agreements may make settlement of contractual obligations difficult or expensive (liquidity risk); the financial gains of the OTC transaction would be at risk in the event of the counterparty's insolvency (counterparty risk).

1.6.4 Sustainability risks

Sustainability risks may be environmental, social or governance events or conditions, the occurrence of which could have an actual or potential material adverse effect on the value of the investment.

1.7 Risk management procedure

The Management Company will apply a risk management procedure for the Fund and each sub-fund in compliance with the UCI Act and other applicable provisions, in particular CSSF Circular 11/512. As part of the risk management procedure, the overall risk of the sub-fund is measured and monitored using the commitment approach. This approach entails converting positions in derivatives into the corresponding underlying positions.

1.8 Historical performance

For the historical performance of the sub-funds, see the Key Investor Information Documents ("KIID").

1.9 Credit quality assessment

As part of the asset management of the sub-funds, the Portfolio Manager appointed by the Management Company (Zürcher Kantonalbank) applies an internal credit quality assessment procedure for determining the credit quality of money market instruments, taking into account the issuer of the instrument and the characteristics of the instrument itself. The requirements of the MMFs Regulation and Commission Delegated Regulation (EU) 2018/990 of

10 April 2018 amending and supplementing Regulation (EU) 2017/1131 of the European Parliament and of the Council with regard to simple, transparent and standardised (STS) securitisations and asset-backed commercial papers (ABCPs), requirements for assets received as part of reverse repurchase agreements and credit quality assessment methodologies, shall be complied with.

The internal credit quality assessment procedure has been set up by the Portfolio Manager and approved by the Management Company with regard to compliance with the regulatory requirements for MMFs. The purpose of this procedure is to determine whether the credit quality of a money market instrument receives a favourable assessment.

Those responsible for applying the procedure shall be independent of those responsible for managing the assets of the sub-funds. They shall report to the head of department responsible for monitoring the procedure. Together they are under the supervision of the Portfolio Managers.

The Management Company is responsible for evaluating the quality and appropriateness of the credit quality assessment procedure.

The issuers and characteristics of the instruments shall be taken into account by the persons responsible when applying the procedure. The consistent application of the procedure allows relevant information on the credit quality of money market instruments to be obtained and kept up-to-date. It shall ensure that the information used in applying the internal credit quality assessment procedure is of sufficient quality, up-to-date and from reliable sources. The procedure shall be based on prudent, systematic and continuous assessment methodologies

Measures are to be adopted and implemented to ensure that the internal credit quality assessment is based on a thorough analysis of the information that is available and pertinent, and includes all relevant driving factors that influence the creditworthiness of the issuer and the credit quality of the instrument.

The internal procedure is to be monitored on an ongoing basis by the Management Company to ensure that it is adequate and a faithful representation of the creditworthiness of the instrument. All credit quality assessments shall be reviewed at least annually.

While there is to be no mechanistic over-reliance on external ratings in accordance with the MMFs Regulation, the Portfolio Manager shall undertake a credit quality

assessment for a money market instrument to use as a basis for its investment decisions.

The credit quality assessment methodologies shall be reviewed at least annually by the Portfolio Manager to determine whether they remain appropriate for the current portfolio and external conditions. Where the Portfolio Manager identifies errors in the credit quality assessment methodology or in its application, it shall immediately correct those errors.

When changes are made to the internal credit quality assessment procedure, all affected internal credit quality assessments must be reviewed as soon as possible.

The credit quality assessment shall take into account at least the following criteria:

- the quantification of the credit risk of the issuer and of the relative risk of default of the issuer and of the instrument;
- qualitative indicators on the issuer of the instrument, including in the light of the macroeconomic and financial market situation;
- the short-term nature of money market instruments;
- the asset class of the instrument;
- the type of issuer distinguishing at least between different categories of issuer;
- for structured financial instruments, the operational and counterparty risk inherent within the structured financial transaction;
- the liquidity profile of the instrument.

In addition to the factors and general principles referred to above, warnings and indicators may be taken into account when determining the credit quality of a money market instrument within the meaning of section 2.3.2(g) of this Sales Prospectus.

Credit quality is assessed on the basis of the above-mentioned criteria. An asset is given a positive assessment once (1) the categories of issuer have been analysed, whereby the depth of the analysis may vary depending on the borrower, (2) qualitative indicators such as the financial market situation and sovereign risk have been taken into account, (3) a credit recommendation has been formulated at asset class level (e.g. money market instruments, derivatives or deposits with credit institutions), (4) this recommendation has been documented, and (5) this recommendation has undergone the internal quality assurance procedure and been ratified so that a positive assessment can be given for the asset in question.

2 Investment objective and investment policy

2.1 Investment objective

The Fund's primary investment objective is to achieve a positive performance while taking into account the security of the Fund's assets. For this purpose, the assets of each sub-fund shall be invested in money market instruments issued or guaranteed by borrowers with good credit ratings, and in demand deposits and time deposits in accordance with the principle of risk diversification and pursuant to the MMFs Regulation.

The investment objective of sub-funds is non-sustainable investment within the meaning of 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 (hereinafter "SFDR").

2.2 Sub-fund-specific investment policy

2.2.0 General information

The sub-funds are classified as standard variable net asset value money market funds (VNAF MMFs) in accordance with the MMFs Regulation.

Each sub-fund invests 100% of its net assets in instruments within the meaning of the MMFs Regulation, where at least 80% of these are denominated in the currency indicated in the sub-fund's name. The exchange rate risk of investments denominated in a currency other than the currency of account is hedged as best as possible against the currency of account.

2.2.1 Sustainability policy

For sub-funds with "Responsible" in the name, one of the approaches followed by the asset manager is to integrate the specific aspects of environmental, social and governance ("ESG") issues into the investment process. This means that business sustainability criteria are systematically considered during the investment selection process.

The asset manager uses third-party data and proprietary qualitative and quantitative research in this process. The asset manager also uses this analyses to anticipate developments in the area of sustainability and take investment decisions on this basis.

Given that (i) a progressive approach to sustainability criteria can have a positive impact and (ii) sustainability risks may have a negative impact on returns, the aim of this procedure is to quantify ESG opportunities and ESG risks in order to be able to take account of these in the investment process.

A sustainability approach also includes the definition of exclusions for business activities that the asset manager judges to be particularly risky from a sustainability perspective, including, for example, the securities of

companies connected to the manufacture of controversial weapons.

The exclusions are updated on an ongoing basis to reflect new circumstances and information.

In principle, the approach ensures that investments are not made in companies that do not have good corporate governance procedures.

In addition, the asset manager focuses its investment activity on reducing greenhouse gases, with the aim of making a material contribution to mitigating climate change. Greenhouse gases are measured based on their relative global warming potential as the carbon dioxide equivalent (CO₂e).

Sub-funds that implement a sustainable approach also consider principal adverse impacts (PAIs) on sustainability indicators. The mandatory indicators from Annex 1 of Regulation (EU) 2019/2088 are used for this purpose. Any relevant information in this respect shall be disclosed in the annual report.

The reference values listed in the table under 2.2.2 are not for investments under this approach. However, the asset manager selects from the investment universe the securities that fulfil the requirements.

The sub-funds that follow the responsible approach fall within Article 8 of the SFDR. Further details on the implementation of the approach can be found in the respective sub-fund annex to the Sales Prospectus.

Further information on the product-related sustainability policy can also be found on the website of the relevant sub-fund: <https://products.swisscanto.com/products>.

2.2.2 Information on the benchmark indices

a) Administrators of the benchmark indices

Pursuant to Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds (the "Benchmark Regulation"), benchmark administrators must appear in the Register of administrators and benchmarks maintained by ESMA in accordance with Article 36 of the Benchmark Regulation. The benchmark indices cited in this Sales Prospectus are managed by authorised or registered administrators.

b) Use of benchmark indices within the investment policy

The securities in the sub-funds listed in the following table are selected on a discretionary basis using a consistent investment process ("active management").

When composing the portfolios of the individual sub-funds, the selection and weighting of securities is focussed on companies included in the benchmark indices cited in the

table. The extent of deviation from these benchmark indices is also shown in the table.

The investment policy of these sub-funds is guided by and aims to outperform the listed benchmark indices. Based on the market situation and risk assessments, the asset manager may at any time actively over- or underweight individual securities or sectors to a greater or lesser extent, deviating in both directions from the relevant benchmark indices.

c) Use of an internal procedure in the event of the discontinuation of the benchmark index, or material changes thereto

If a benchmark index is no longer provided by the administrator or is subject to material changes, the Management Company has developed a protocol enabling it to maintain the sub-fund's investment policy, continuing without a benchmark index until a switch to another suitable benchmark index can be made. The protocol is available free of charge from the Management Company and can be requested in paper or electronic format.

	Sub-fund name	Benchmark index ²	Deviation from the benchmark index
1.	Swisscanto (LU) Money Market Fund Responsible AUD	• FTSE 3-Month Australian Dollar Eurodeposit	moderate
2.	Swisscanto (LU) Money Market Fund Responsible CHF	• FTSE 3-Month Swiss Franc Eurodeposit	moderate
3.	Swisscanto (LU) Money Market Fund Responsible EUR	• FTSE 3-Month Euro Eurodeposit	moderate
4.	Swisscanto (LU) Money Market Fund Responsible USD	• FTSE 3-Month US Dollar Eurodeposit USD	moderate

2.3 Provisions applicable to all sub-funds

2.3.0 General portfolio information

- Each sub-fund is restricted to holding a portfolio of investments with a weighted average maturity³ of no more than six months, with floating-rate investments using the next date of the interest rate adjustment as the final maturity date for calculating the individual residual maturities of the investments and the weighted average maturity of the portfolio.
- Each sub-fund is further restricted to holding a portfolio of investments with a weighted average life⁴ of no more than 12 months, with floating-rate investments using the final maturity date for calculating the weighted average life of the portfolio.
- At least 7.5% of the net assets of each sub-fund shall be comprised of daily maturing assets or cash which can be withdrawn by giving prior notice of one working day.

Each sub-fund is not to acquire any asset other than a daily maturing asset when such acquisition would result in it investing less than 7.5% of its portfolio in daily maturing assets.

- At least 15% of the net assets of each sub-fund shall be comprised of weekly maturing assets or cash which can be withdrawn by giving prior notice of five working days. Each sub-fund is not to acquire any asset other than a weekly maturing asset when such acquisition would result in it investing less than 15% of its portfolio in weekly maturing assets. For this purpose, money market instruments or units or shares of other money market funds may be included in weekly maturing assets up to a limit of 7.5%, provided that they can be redeemed and settled within five working days.
- When calculating the WAL for securities, including structured financial instruments referred to in point (b),

² The benchmark index may be currency-hedged depending on the unit class currency.

³ Weighted Average Maturity (WAM)

⁴ Weighted Average Life (WAL)

a standard MMF shall base the maturity calculation on the residual maturity until the legal redemption of the instruments. However, in the event that a financial instrument embeds a put option, a standard MMF may base the maturity calculation on the exercise date of the put option instead of the residual maturity, but only if all of the following conditions are fulfilled at all times:

- the put option is able to be freely exercised by the standard MMF at its exercise date;
- the strike price of the put option remains close to the expected value of the instrument at the exercise date;
- the investment strategy of the standard MMF implies that there is a high probability that the option will be exercised at the exercise date.

2.3.1 Authorised investments are:

a) Money market instruments

The Fund can invest in money market instruments, including financial instruments issued or guaranteed separately or jointly by the European Union (EU); the national, regional and local administrations of the Member States of the EU or their central banks; the European Central Bank; the European Investment Bank; the European Investment Fund; the European Stability Mechanism; the European Financial Stability Facility; a central authority or central bank of a third country; the International Monetary Fund; the International Bank for Reconstruction and Development; the Council of Europe Development Bank; the European Bank for Reconstruction and Development; the Bank for International Settlements or any other relevant international financial institution or organisation to which one or more Member States belong.

Money market instruments are either admitted to trading on a regulated market within the meaning of Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments (MiFID II) or traded on another recognised and regulated market that operates regularly and is open to the public in a member state of the European Union (EU) or a state in Europe, Africa, Asia, Oceania or America. The Fund may also invest in money market instruments that are not traded on a stock exchange or on another regulated market, provided that the issuer of these instruments is subject to regulations protecting investors and investments, and provided that these money market instruments satisfy the requirements laid down in the MMFs Regulation.

Eligible money market instruments must have a legal maturity at issuance of 397 days or less, and a residual maturity of 397 days or less. The Fund shall also be allowed to invest in money market instruments with a residual maturity until the legal redemption date of less than or equal to 2 years, provided that the time

remaining until the next interest rate reset date is 397 days or less.

The issuer of the money market instrument and the quality of the money market instrument must have received a favourable assessment in accordance with the internal credit quality assessment procedure (section 1.9). This shall not apply to money market instruments issued or guaranteed by the Union, a central authority or central bank of a Member State, the European Central Bank, the European Investment Bank, the European Stability Mechanism or the European Financial Stability Facility.

b) Deposits with credit institutions

The Fund may invest in sight deposits and time deposits provided that all of the following conditions are fulfilled:

- The deposit is repayable on demand or is able to be withdrawn at any time;
- The deposit matures in no more than 12 months;
- The credit institution has its registered office in a Member State or, where the credit institution has its registered office in a third country, it is subject to prudential rules considered equivalent to those laid down in Union law.

Obligors must be top-rated banks.

c) Derivative financial instruments ("derivatives")

The Fund may invest in derivative financial instruments ("derivatives"), including equivalent cash-settled instruments that are traded on one of the regulated markets described above and/or derivative financial instruments that are not traded on a stock exchange ("OTC derivatives"), provided that:

- the underlyings are instruments as defined in Article 13 of the MMFs Regulation, interest rates, exchange rates, currencies or indices replicating the above-mentioned underlyings in which the MMF may invest in accordance with the investment objectives stated in its founding documents;
- the derivative instrument serves exclusively to hedge the interest rate or exchange rate risks inherent in other investments of the MMF;
- the counterparties in OTC derivatives transactions are institutions subject to prudential supervision in one of the categories authorised by the CSSF; and
- the OTC derivatives are reliably and verifiably valued on a daily basis and can be sold, liquidated or closed out by a countertrade at the initiative of the MMF at any time at fair value.

d) Investments in other MMFs

The Fund may invest in units or shares of other MMFs in accordance with the MMFs Regulation.

2.3.2 Investment restrictions

The following rules must be observed for sub-fund investments:

- a) Generally, a sub-fund may not invest more than 5% of its assets in money market instruments issued by a single body.
- b) Up to 10% of a sub-fund's net assets may be invested in sight and time deposits made with the same credit institution.
- c) By way of derogation from point (a), a sub-fund may invest up to 10% of its assets in money market instruments issued by the same body provided that the total value of such money market instruments from issuers in which it invests more than 5% of its net assets does not exceed 40% of the value of the net assets of any sub-fund.
- d) Investments must not confer rights on the Management Company that enable it to exert significant influence over an issuer's operations.
- e) Notwithstanding the limits laid down in points (a) and (b), a sub-fund may invest no more than 10% of its assets in bonds issued by a single credit institution that has its registered office in a Member State and is subject by law to special public supervision designed to protect bond-holders. In particular, sums deriving from the issue of those bonds shall be invested in accordance with the law in assets which, during the whole period of validity of the bonds, are capable of covering claims attaching to the bonds and which, in the event of failure of the issuer, would be used on a priority basis for the reimbursement of the principal and payment of the accrued interest. Where a sub-fund invests more than 5% of its assets in the bonds that satisfying the above requirements issued by a single body, the total value of those investments shall not exceed 40% of the value of the net assets of the sub-fund.
- f) Notwithstanding the limits laid down in points (a) and (b), a sub-fund may invest a maximum of 20% of its net assets in bonds issued by a single credit institution if the covered bonds are of extremely high quality and meet the corresponding requirements of Regulation (EU) No 575/2013 of the European Parliament and of the Council on prudential requirements for credit institutions and investment firms, including any investments in assets within the meaning of point (g). Should a sub-fund invest more than 5% of its net assets in such bonds, the combined value of these investments may not exceed 60% of the sub-fund's net assets.

- g) Notwithstanding point (a) and subject to the approval of the CSSF, up to 100% of the net assets of a sub-fund may be invested in money market instruments issued or guaranteed by the EU; the national, regional and local administrations of the Member States of the EU or their central banks; the European Central Bank; the European Investment Bank; the European Investment Fund; the European Stability Mechanism; the European Financial Stability Facility; a central authority or central bank of a third country; the International Monetary Fund; the International Bank for Reconstruction and Development; the Council of Europe Development Bank; the European Bank for Reconstruction and Development; the Bank for International Settlements or any other relevant international financial institution or organisation to which one or more Member States belong, provided that:
 - the sub-fund holds money market instruments from at least six different issues; and
 - the money market instruments from a single issuer do not exceed 30% of the net assets of a sub-fund.

All sub-funds intend to make use of this exemption and invest more than 5% and up to 100% of their respective net assets in money market instruments of one of the institutions listed in the previous paragraph. All sub-funds will comply with the risk diversification requirements.

- h) In the case of transactions involving OTC derivatives, the risk exposure per counterparty may not exceed 5% of the net assets of a sub-fund where the counterparty is a credit institution pursuant to the UCI Act.
- i) Subject to the limits under point (h) and notwithstanding the limits laid down in points (a) and (b) above, each sub-fund may invest a maximum of 15% of its net assets with a single institution in a combination of the following:
 - money market instruments from this institution
 - deposits with this institution
 - risks arising from transactions in OTC derivatives acquired from this institution.
- j) No more than 10% of the net assets of a sub-fund in units or shares of other MMFs within the meaning of the MMFs Regulation, provided that the MMF in which units or shares are to be acquired is not permitted, under the terms of their founding documents, to invest more than 10% of their fund assets in the units or shares of other MMFs and does not hold any units in the investing sub-fund.

A sub-fund may not invest more than 5% of its net assets in units or shares of a single MMF.

The sub-fund may acquire units or shares of other money market funds that are managed directly or indirectly by the Management Company or by a company with which it is associated, either through common management or control, or by way of a direct or indirect holding of more than 10% of the capital or votes.

The Management Company and the other company may not charge any issue or redemption fees in this regard.

- k) The overall risk arising from the use of derivative financial instruments may not exceed 100% of the net assets of a sub-fund and therefore the overall risk of the sub-fund may not exceed a total of 200% of the net assets of a sub-fund on a lasting basis. With regard to investments in derivative financial instruments, the overall risk of the corresponding underlyings, provided they are not index-based derivatives, may not exceed the limits given under points (b), (c), (e), (h), (i) and (j).
- l) Companies belonging to a group for the purposes of preparing consolidated accounts in accordance with Directive 2013/34/EC of the European Parliament and of the Council of 26 June 2013 on the annual financial statements, consolidated financial statements and related reports of certain types of undertakings or with recognised international accounting rules, shall be included in the calculation of the investment limits in accordance with points (a), (b), (c), (h), and (i).
- m) A sub-fund may not hold more than 10% of the money market instruments issued by a single body. These restrictions do not apply to money market instruments issued or guaranteed by the EU; the national, regional and local administrations of the Member States of the EU or their central banks; the European Central Bank; the European Investment Bank; the European Investment Fund; the European Stability Mechanism; the European Financial Stability Facility; a central authority or central bank of a third country; the International Monetary Fund; the International Bank for Reconstruction and Development; the Council of Europe Development Bank; the European Bank for Reconstruction and Development; the Bank for International Settlements or any other relevant international financial institution or organisation to which one or more Member States belong, provided that the conditions laid down in point (g) above are fulfilled.

Should the limits laid down in section 2.3.2 be exceeded unintentionally, priority must be given to bringing

investments down to below the set percentages while safeguarding the interests of unitholders. Unless it is stated specifically that they relate to the assets of the Fund in their entirety, the percentage restrictions stated above refer to the assets of each individual sub-fund. These restrictions do not apply in the event that subscription rights are exercised.

Irrespective of their obligation to ensure compliance with the principle of risk diversification, newly authorised sub-funds may, in accordance with section 2.3.2, deviate from the investment restrictions for a period of six months following their authorisation.

2.3.3 Unauthorised investments

The Fund may not:

- a) make investments other than those mentioned in section 2.3.1;
- b) short sell the following instruments: money market instruments and units in other money market funds;
- c) have direct or indirect exposure to equities, real estate or commodities, including via derivatives, certificates representing them, indices based on them, or any other means or instrument that would give an exposure to them;
- d) enter into securities lending or borrowing agreements or any other transactions that would encumber the assets of the Fund or any of its sub-funds;
- f) take out or grant loans or act as guarantor for third parties.

The Management Company may determine further investment restrictions at any time in the interests of the unitholders, provided such restrictions are necessary to comply with the laws and regulations of the countries in which the Fund's unit certificates are offered and sold.

2.3.4 Investment techniques and instruments

a) Repos and reverse repos

The Management Company does not enter into securities repurchase agreements.

- b) Each sub-fund may enter into forward exchange transactions and may use currency options, financial futures, forward rate agreements, interest rate and currency swaps and similar instruments if these transactions relate directly to the assets of the relevant sub-fund and serve to hedge currency and interest rate risks. Transactions effected in a single currency per sub-fund may not exceed the market value of all assets in that sub-fund denominated in that currency, nor may they exceed the maturity of the assets on the date on which those transactions are concluded.

c) Within the scope of the investment policy, the Board of Directors may pledge a sub-fund's assets or transfer ownership thereof as collateral in connection with transactions involving derivative financial instruments.

d) Collateral management

d1) The risk positions that arise for a counterparty as a consequence of transactions involving OTC derivatives will be combined for the purpose of calculating the thresholds of counterparty risk exposure as set out in Article 17 of the MMFs Regulation.

d2) If a sub-fund engages in transactions in OTC derivatives, counterparty risk exposure may, in accordance with ESMA's CESR/10-788 (CESR's Guidelines on Risk Measurement and the Calculation of Global Exposure and Counterparty Risk for UCITS), be reduced by accepting collateral insofar as it satisfies the following criteria.

d2.1) The following assets are accepted as eligible collateral:

- Cash and sight deposits which are denominated in the reference currency of a sub-fund and are deposited with legal entities pursuant to Article 41(f) of the MMFs Regulation.

d2.2) Safekeeping of collateral

The collateral received is held by the Depositary and its sub-depositaries on accounts separate from the assets.

d2.3) Cash collateral

The Management Company is not permitted to reinvest cash collateral.
The cash collateral must be denominated in the base currency.

d2.4) Correlation

The collateral accepted by the sub-fund must be issued by a legal entity which is independent of the counterparty and has no high correlation with the performance of the counterparty.

d2.5) Operational and legal risks in connection with collateral management must be calculated, controlled and reduced through the risk management process.

d2.6) The sub-fund may realise accepted collateral at any time without conferring with the counterparty or requiring the latter's approval.

3 Participation in the Fund

3.1 Conditions for the issue, redemption and conversion of units

Units in a sub-fund are issued or redeemed on each bank business day in Luxembourg. A "bank business day" is any normal bank business day (i.e. days on which the banks are open during normal business hours in Luxembourg) with the exception of individual non-statutory holidays in Luxembourg. "Non-statutory holidays" are days on which banks and financial institutions are closed. Units are not issued or redeemed on days on which the exchanges of the main countries in which the sub-funds invest are closed, or if the sub-funds' assets cannot be properly valued. No issues or redemptions take place on days on which the Management Company has decided not to calculate the net asset value as described in section 3.6.

The Management Company is entitled at its own discretion within the scope of its distribution activities to reject subscription orders and to temporarily or permanently suspend or limit the sale of units to natural persons or legal entities in certain countries or regions, or to permit subscriptions for specific sums of money. The Management Company may also repossess units at any time if they are in the possession of unitholders who are not permitted to acquire or hold units or particular classes of units.

The Management Company does not permit any market timing or activities which might be deemed equivalent to market timing. It reserves the right to refuse subscription and conversion orders from an investor whom the Management Company suspects of engaging in such activities, as well as to take the necessary steps in order to protect the other investors in the Fund.

Units are issued, redeemed and converted on the basis of orders received by the Depositary during usual local business hours but by no later than 15:00 Luxembourg time on a Luxembourg bank business day (order date). The net asset value used for the calculation of the issue, redemption and conversion price is calculated on the following valuation day. Orders received after such time will be treated in the same way as those received on the following bank business day. Subscriptions, redemptions and conversions are therefore effected on the basis of an unknown net asset value (forward pricing).

The individual valuation principles are described in the following paragraph.

3.2 Net asset value, issue, redemption and conversion prices

In accordance with the Management Regulations and in accordance with section 3.1, the net asset value (NAV) of the units is calculated by the Management Company for each separate sub-fund on each bank business day in Luxembourg.

The net asset value of a unit in a sub-fund or of a unit class is – unless stated otherwise in this Sales Prospectus – expressed in the sub-fund's currency of account and is calculated by dividing the net assets of the sub-fund or the unit class by the number of units of that sub-fund or unit class in circulation.

The net asset value is rounded to the nearest 0.01 of the unit of account.

The net assets of a given sub-fund or unit class correspond to the difference between the total assets of that sub-fund or unit class and the total liabilities that are attributable to it.

The total net assets of the Fund are expressed in CHF and correspond to the difference between the total assets of the Fund and its total liabilities. For the purpose of this calculation, the net assets of each sub-fund are converted into CHF, if they are not already expressed in CHF, and totalled.

- a) The assets of each sub-fund or unit or share class shall be valued by using mark-to-market whenever possible after valuation.

When using mark-to-market:

- the asset of the sub-fund shall be valued at the more prudent side of bid and offer unless the asset can be closed out at mid-market;
- only good quality market data shall be used; such data shall be assessed on the basis of all of the following factors:
 - the number and quality of the counterparties;
 - the volume and turnover in the market of the asset of the MMF;
 - the issue size and the portion of the issue that the sub-fund plans to buy or sell.

- b) Where use of mark-to-market is not possible or the market data is not of sufficient quality, an asset of the sub-fund shall be valued conservatively by the Management Company by using mark-to-model. The model shall accurately estimate the intrinsic value of the asset, based on all of the following up-to-date key factors:

- the volume and turnover in the market of the asset of the MMF;
- the issue size and the portion of the issue that the MMF plans to buy or sell;
- Market risk, interest rate risk, credit risk attached to the asset.

- c) Liquid funds and fiduciary and fixed-term deposits will be valued at their nominal value plus accrued interest.
- d) For each sub-fund, the securities that are denominated in a currency other than that of the sub-fund are converted into the sub-fund currency at the relevant mean exchange rate. Futures contracts concluded for the purpose of hedging currency risks are taken into consideration in the conversion.
- e) Units and shares of other MMFs shall be valued at their last published net asset value. If no net asset value is available, only buying and selling prices, the units of such MMFs may be valued at the mean value of these buying and selling prices. Should no current prices be available, the Management Company will make a valuation according to other criteria, to be determined by the Board of Directors. The Management Company will base its calculation on the probable selling price, the level of which will be estimated with due care and to the best of the Management Company's knowledge.
- f) Derivatives which are traded neither on a stock exchange nor on another regulated market will be valued at a market value (fair value) which is appropriate given a careful assessment which takes into account all of the relevant circumstances.

If, as a result of exceptional circumstances, the aforementioned valuation criteria cannot be applied or appear to be unsuitable, the Management Company is entitled to temporarily use other appropriate valuation criteria for the total Fund assets or the assets of a sub-fund.

In exceptional circumstances, additional valuations may be made on one and the same day and will apply to issues and redemptions on that day.

In the event of a large volume of redemption orders, the Management Company may value the units of the sub-fund in question on the basis of the sales prices received in the requisite asset sales transactions.

The Management Company may, at its discretion, accept contributions in kind for full or partial subscriptions. In such cases, the contribution in kind must comply with the investment policy and restrictions of the sub-fund. In

addition, such investments will be audited by an auditor assigned by the Management Company; the audit will be available for inspection. Costs incurred in connection with the contribution in kind will be borne by the relevant investor.

3.3 Sale of units

Payment of the issue price must be made within three bank business days after receipt of the drawing order; however, the Management Company is entitled to extend this period to a maximum of five days if the three-day period proves to be too short. Issue prices are rounded down to the nearest currency unit.

The following are charged on the issue of units:

- an agency fee which goes to the intermediary. The maximum agency fee payable for each sub-fund or unit class is set out in the table in section 1.2 “Structure of the Fund” .
- for conversions from one sub-fund to another within the same umbrella fund or from one unit class to another unit class within the same sub-fund, the intermediary may not charge an agency fee;
- any taxes and duties charged in connection with the issue;

The corresponding number of units will be transferred to investors immediately after payment of the purchase price in the corresponding amount. The Board of Directors is authorised to accept subscriptions for specific sums of money and, on this basis, consent to the issue of fractions of units of up to four decimal places. In such cases, the Management Company has the power to authorise one of the sales or paying agents to confirm the subscription of units to the unitholders in writing.

Only registered units shall be issued. They are not issued as physical certificates; they exist purely as book entries.

Physical bearer units which were not deposited by 18 February 2016 under the Act of 28 July 2014 on the mandatory deposit of bearer shares and units amending the Act of 10 August 1915 on commercial companies have been cancelled and the amounts corresponding to the value of these units deposited with the Caisse de Consignation until the holder demands their payment.

Subscribers should note that they must present proof of identity to the agent receiving their subscription, unless they are known personally to the agent. This ruling is intended to help combat the laundering of money originating from criminal activities, in particular the drugs trade.

3.4 Redemption of units

In principle, the Management Company will redeem units of the Fund at any time on a bank business day at the redemption price, against surrender of the corresponding unit certificates.

Since care must be taken that there are sufficient liquid assets in the Fund, payments on Fund units will usually be made within five bank business days after calculation of the redemption price, unless transfer of the redemption amount to the country in which the redemption has been applied for proves to be impossible owing to statutory provisions, such as foreign exchange and payment restrictions, or as a result of other circumstances beyond the control of the Depositary.

The units are redeemed in the currency of the sub-fund. No charge is made for redemption. Any taxes due on the redemption will be deducted from the redemption price. Redemption prices are rounded down to the nearest currency unit.

In the event of a large volume of redemption orders, the Depositary and the Management Company may decide to postpone the execution of redemption orders until the necessary assets of the Fund have been sold, without undue delay. Priority must subsequently be given to these deferred redemption orders.

The unit in question expires upon payment of the redemption price.

3.5 Conversion of units

Unitholders in each sub-fund are entitled to convert some or all of their units into units of another sub-fund offered for subscription at no charge, or to convert units of one class into another class within the same sub-fund. Such conversions may be undertaken on any day on which the net asset value of the sub-fund is calculated. The subscription requirements for a particular unit class must also be fulfilled in the case of the conversion of units from one class to another. Investors must submit a conversion application to the Management Company for at least 10 units of a sub-fund or unit class and surrender the unit certificates, if any were issued. Conversion is subject to the same time limits as for the issue and redemption of the sub-funds in question. No agency fee is charged for conversion.

The Management Company will use the following formula to determine the number of units into which a unitholder may convert his/her existing units:

$$A = \left(\frac{B \times C}{D} \right) \times E$$

where:

- A = Number of units to be issued in the new sub-fund or the new unit class
- B = Number of units in the original sub-fund or the original unit class
- C = Redemption price per unit of the original sub-fund or the original unit class
- D = Net asset value per unit of the new sub-fund or the new unit class
- E = Exchange rate between the currencies of the two sub-funds or two unit classes on the date of conversion

Should the calculation of the number of new units result in fractions of units, the figure is rounded down to the nearest whole number, unless the Board of Directors has approved the issue of fractions of units. The investor will receive payment for the fractions at the redemption price.

The Management Company will provide the unitholder with the details of the conversion.

3.6 Suspension of net asset value calculation and the issue, conversion and redemption of units

The Management Company is entitled to temporarily suspend the calculation of the net asset value, as well as the issue, conversion and redemption of units for one or more sub-funds in the following cases:

- a) If stock exchanges or markets that serve as the basis for the valuation of a substantial proportion of a sub-fund's assets, or foreign exchange markets for the currency in which the net asset value or a significant proportion of a sub-fund's assets are denominated are closed (apart from the usual public holidays), or if business is suspended or restricted on such markets, or if they are temporarily exposed to major fluctuations.
- b) If relevant disposals of a sub-fund's assets are not possible owing to political, economic, military or other emergencies which are beyond the control of the Management Company, or if such action would be detrimental to the interests of the unitholders.
- c) In the event of disruptions in the communications network, or if the net asset value of a sub-fund cannot be calculated with sufficient accuracy.
- d) If restrictions on foreign exchange transactions or other asset transfers make sub-fund transactions impossible, or if the purchase and sale of assets of a sub-fund cannot be effected at normal exchange rates.

- e) If special circumstances concerning the careful, proper management of the Fund or sub-fund(s) in question make such suspension necessary and it is in the interests of the unitholders.

4 Appropriation of net income and capital gains

4.1 Distribution units

Under Article 12 of the Management Regulations, the Management Company will decide, after closing the annual accounts, whether and to what extent distributions are to be made on distribution units. Where distribution units are concerned, the Fund intends to distribute the greater part of earnings and to make such distributions within four months after the close of the financial year.

The Management Company is authorised to approve the distribution of interim dividends and the suspension of distributions.

Payment will be made according to the procedure described under section 3.4 "Redemption of units" .

Claims for distributions and allocations that are not made within five years after their due date will become statute-barred and the assets will revert to the corresponding sub-fund or unit classes.

4.2 Accumulation units

No distributions are planned for these unit classes. After the deduction of general costs, net income will be used to increase the net asset value of the units (accumulation).

5 Taxes and charges

The Fund assets are subject to a "taxe d'abonnement" in Luxembourg of 0.01% p.a. of the net assets, which is payable quarterly. The Fund's earnings are not taxed in Luxembourg. No withholding tax is currently levied on distributions by the Fund. Under current legislation, unitholders do not have to pay income tax, wealth tax or any other tax in Luxembourg, unless they are or have been resident in Luxembourg or operate a business there to which the units belong.

Potential unitholders should find out about the laws and regulations that apply to the subscription, purchase, ownership and sale of units at their place of residence and, if necessary, seek expert advice.

The unit classes for which the Management Company charges an all-in fee for running the Fund, asset management and distribution of the Fund units are listed in section 1.4.5. In return, the Management Company will bear all costs regularly incurred in connection with running the

Fund, asset management as well as with distribution of the Fund, if compensation is made for such costs, such as:

- costs of managing the Fund;
- fees and costs charged by the Depositary and the paying agents;
- costs of distribution;
- all costs imposed by law or by regulations, in particular the costs of publications of all types (such as price publications and notices to investors), as well as the fees payable to the supervisory authorities;
- printing the management regulations and sales prospectuses, as well as the annual and semi-annual reports;
- fees associated with any listing of the Fund and with its distribution both domestically and abroad;
- administrative costs, especially those for bookkeeping and calculating the net asset value;
- costs of paying out annual income to the investors;
- auditor fees;
- advertising costs.

The all-in fee is made up of two components: the flat management fee (to cover asset management and distribution costs) and the flat administration fee (to cover the costs of running the Fund and administrative costs).

The maximum all-in fee, maximum flat management fee and maximum flat administration fee for each sub-fund and unit class are set out in the table in section 1.4.5.

The sum of the flat management fee and the flat administration fee booked may not exceed the rate of the maximum all-in fee for the sub-fund or unit class in question. The aggregate figure for the all-in fee (or flat management fee and flat administration fee) actually paid out of the Fund to the Management Company is published in the Fund's annual and semi-annual reports.

The all-in fee (or flat management fee and flat administration fee) is charged to the Fund assets on a pro rata basis each time the net asset value is calculated, and is paid out at the end of each month.

The all-in fee does not cover taxes levied on the Fund assets, the usual transaction fees charged on purchases and sales or the costs of extraordinary action taken in the interests of the unitholders.

The all-in fee (or flat management fee and flat administration fee) to be paid to the Management Company

shall first come out of investment income, then out of fixed assets. The assets of each individual sub-fund shall be liable for all claims against that sub-fund. These costs shall be charged separately to each sub-fund. Costs borne by the Fund which cannot be allocated to a single sub-fund shall be charged to the individual sub-funds in proportion to their net assets. The assets of one sub-fund shall not be liable for claims against the assets of another sub-fund.

6 Information for unitholders

6.1 Remuneration policy

The Management Company has produced a remuneration policy in accordance with the applicable legal and regulatory requirements, particularly the UCI Act and the relevant ESMA guidelines on sound remuneration policies (ESMA/2016/411); this policy applies to all employees, in particular those identified under the UCI Act and including the salaried directors and executives of the Management Company. The remuneration policy has been prepared with the aim of protecting the interests of the investors as well as the interests of the Management Company and the Group on a long-term, sustainable basis. It is also in line with the business strategy, the goals and values of the Management Company and the funds it manages, and comprises measures aimed at avoiding conflicts of interest.

The remuneration policy is designed to promote effective, sound risk management and to prevent excessive risk-taking.

Employee remuneration consists of a fixed and a variable component; these are in due proportion to one another, such that percentage of the fixed component of total remuneration is high enough to facilitate total flexibility in relation to the variable component and also to be able to waive payment of a variable component entirely. The variable component is largely based on the consolidated net income, the performance of the Management Company and the function and performance of the employee.

The performance targets for individual employees are assessed and reviewed annually. The annual assessment provides a basis for setting the level of variable remuneration and any increase in the fixed element. Financial as well as non-financial criteria are taken into account when assessing an employee's individual performance. The variable component may be waived entirely following a failure to meet performance targets or a poor business result.

The version of the remuneration policy currently in force, which includes a precise description of this policy, details of how remuneration is calculated, other compensation and

the identity of the persons responsible for awarding the remuneration, is available at www.swisscanto.com/lu/de/gs/rechtliche-hinweise/verguetungspolitik.html and in hard copy, free of charge, at the registered office of the Management Company.

6.2 Accounting reports

The annual audited accounting reports will be made available to unitholders no later than four months after the end of the financial year (31 March) at the registered office of the Management Company and the offices of the sales and paying agents. Unaudited semi-annual reports will be made available in the same way no later than two months after the end of the reporting period (30 September). Separate accounts will be drawn up for the individual sub-funds. The total of the sub-funds – after conversion into the currency of the Fund (CHF) – constitutes the Fund assets.

In the event that liabilities from transactions involving derivative financial instruments and/or loans exist at the end of the financial year, they are to be explicitly stated in the accounting report, i.e. the strike price of current options and any liabilities associated with financial forwards and futures. Total liabilities from currency forwards, excluding options, must be stated for each type of transaction.

6.3 Data protection

Investors are advised that for organisational reasons and due to the outsourcing of various tasks, it is possible that personal data and information on the unitholders may be processed in countries which may not be subject to the same data protection standards as in the Grand Duchy of Luxembourg.

6.4 Other Information

Other information on the Fund or the Management Company, as well as on the net asset value and the issue and redemption prices of the units is available at the registered office of the Management Company on all bank business days.

The issue and redemption prices i.e. the net asset value of all unit classes, together with the note “excluding commission” , as well as any notifications relating to a suspension of net asset value calculations will also be published on every bank business day on the website: www.swisscanto.com as well as www.fundinfo.com.

The Management Company may amend these provisions in whole or in part at any time in the interests of the unitholders and with the consent of the Depositary. Unless

otherwise specified, amendments to the Management Regulations shall enter into force upon signature.

Unitholders listed in the register of unitholders will be promptly informed of changes to this Sales Prospectus and the Management Regulations by written notice.

In addition, the following documents are available for inspection at the registered office of the Management Company during normal business hours. Copies are available free of charge from this office:

- Management Regulations;
- Articles of Association of the Management Company;
- Depositary Agreement between the Management Company and the Depositary.

The latest version of the Sales Prospectus, the Management Regulations, the Key Investor Information Document, the annual and semi-annual reports and notices to investors are available online at www.swisscanto.com.

Management Company:

Swisscanto Asset Management International S.A.

Depositary:

CACEIS Investor Services Bank S.A.

Specific provisions governing the sale of units in Germany, Austria and Liechtenstein

In the Federal Republic of Germany: Additional information for unitholders in the Federal Republic of Germany

Facilities according to Art. 92(1) a) of the Directive 2009/65/EC (as amended by the Directive (EU) 2019/1160) are available from:

RBC Investor Services Bank S.A.
14, Porte de France, L-4360 Esch-sur-Alzette, Luxemburg

Email: cswisscanto@rbc.com

RBC Investor Services Bank S.A. is responsible for processing subscription, repurchase and redemption orders and making payments to shareholders.

The following facilities according to Art. 92(1) b) to e) of the Directive 2009/65/EC (as amended by the Directive (EU) 2019/1160) are available from www.eifs.lu/swisscanto:

1. Information on how orders (subscription, repurchase and redemption) can be made and how repurchase and redemption proceeds are paid;
2. information and access to procedures and arrangements related to investors' rights and complaints handling;
3. information in relation to the tasks performed by the facilities in a durable medium;
4. the latest sales prospectus, the articles of association, the annual and semi-annual reports, as well as the key information documents.

Reference point for Fund's documents

In addition, the sales prospectus, the key investor information document, the management regulations, the semi-annual reports and the audited annual reports, as well as the issue and redemption prices and any notices for unitholders are published daily at www.swisscanto.com and at www.fundinfo.com.

Particular risks associated with obligations to provide evidence for tax purposes in Germany

It is the intention of the Management Company to provide details of the tax base for Germany in accordance with the Investment Tax Act (InvStG). The Management Company must provide evidence that this tax base is accurate at the request of the German tax authorities. The principles for calculating this data may be

interpreted in different ways and no assurance can therefore be given that the German tax authorities will acknowledge every material aspect of the calculation method used by the Management Company. Should past mistakes come to light, corrections will not be made with relation to the past but instead taken into account when preparing the data for the current financial year. The correction may be to the advantage or disadvantage of unitholders receiving a distribution or having an accumulation amount credited to them during that financial year.

In Austria

The following information is directed at potential investors in the Republic of Austria. It complements and clarifies the statements made in this sales prospectus with regard to the sale of fund units in Austria.

Facilities according to Art. 92(1) a) of the Directive 2009/65/EC (as amended by the Directive (EU) 2019/1160 are available from:

RBC Investor Services Bank S.A.
14, Porte de France, L-4360 Esch-sur-Alzette, Luxemburg

Email: cswisscanto@rbc.com

RBC Investor Services Bank S.A. is responsible for processing subscription, repurchase and redemption orders and making payments to shareholders.

The following facilities according to Art. 92(1) b) to e) of the Directive 2009/65/EC (as amended by the Directive (EU) 2019/1160 are available from www.eifs.lu/swisscanto:

1. Information on how orders (subscription, repurchase and redemption) can be made and how repurchase and redemption proceeds are paid;
2. information and access to procedures and arrangements related to investors' rights and complaints handling;
3. information in relation to the tasks performed by the facilities in a durable medium;
4. the latest sales prospectus, the articles of association, the annual and semi-annual reports, as well as the key information documents.

Publications

Issue and redemption prices are also published on the website of the daily newspaper "Der Standard" (www.derstandard.at) and any other announcements at www.swisscanto.com and www.fundinfo.com.

In the Principality of Liechtenstein

The following information is directed at potential investors in the Principality of Liechtenstein. It complements and clarifies the statements made in this sales prospectus with regard to the sale of fund units in Principality of Liechtenstein.

Facilities according to Art. 92(1) a) of the Directive 2009/65/EC (as amended by the Directive (EU) 2019/1160 are available from:

RBC Investor Services Bank S.A.
14, Porte de France, L-4360 Esch-sur-Alzette, Luxemburg

Email: cswisscanto@rbc.com

RBC Investor Services Bank S.A. is responsible for processing subscription, repurchase and redemption orders and making payments to shareholders.

The following facilities according to Art. 92(1) b) to e) of the Directive 2009/65/EC (as amended by the Directive (EU) 2019/1160 are available from www.eifs.lu/swisscanto:

1. Information on how orders (subscription, repurchase and redemption) can be made and how repurchase and redemption proceeds are paid;
2. information and access to procedures and arrangements related to investors' rights and complaints handling;
3. information in relation to the tasks performed by the facilities in a durable medium;
4. the latest sales prospectus, the articles of association, the annual and semi-annual reports, as well as the key information documents.

Publications

The net asset values are published at least twice a month on the website of Swiss Fund Data AG at www.swissfunddata.ch.

Place of performance and jurisdiction

The place of performance and jurisdiction is Vaduz.

Pre-contractual disclosure

for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

Product name:

Swisscanto (LU) Money Market Fund Responsible AUD

Legal entity identifier: (LEI-Code):

54930001XQA7MBCRCC47

Version:

July 2023

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

Yes

No

It will make a minimum of **sustainable investments with an environmental objective**: _____%

in economic activities that qualify as environmentally sustainable under the EU Taxonomy.

in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy.

It will make a minimum of **sustainable investments with a social objective**: _____%

It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of _____% of sustainable investments

with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy.

with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy.

with a social objective.

It promotes E/S characteristics, but **will not make any sustainable investments**.



What environmental and/or social characteristics are promoted by this financial product?

The sub-fund pursues an investment strategy that considers environmental and social characteristics. These characteristics include exclusion criteria, the integration of ESG considerations with the investment process, and the reduction of CO₂e intensity.

Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.

● ***What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?***

The Portfolio Manager uses a range of data points to measure the attainment of the environmental and social characteristics promoted. It uses data from independent, third-party providers and proprietary qualitative and quantitative research in this process.

Sustainability indicators integrated with the investment process are then used to assess the attainment of the characteristics promoted:

1. Exclusion criteria

The Portfolio Manager uses exclusion criteria to identify an increased risk of harm to environmental and social characteristics. These exclusion criteria are also used to establish an investment universe focused more specifically on investments that are aligned with these values.

The following businesses/criteria result in the exclusion of companies:

- The production of weapons and munitions, including the following banned weapons:
 - Cluster bombs and munitions
 - Anti-personnel and landmines
 - Biological and chemical weapons
 - Nuclear weapons systems
 - Nuclear weapons material
 - Enriched uranium
 - Blinding laser weapons
 - Incendiary weapons
- Manufacturer of war technology (> 5% turnover)
- Behaviour-based exclusions including those included in the list of the SVVK-ASIR (Swiss association for the promotion of responsible capital investment)
- Breaches of the UN Global Compact*
- Child labour
- Production of pornography
- Coal mining (> 5% of turnover)**
- Coal reserves (excl. metals production)**

Exclusions for government issuers:

- Countries included on the Non-Cooperative Countries and Territories (NCCT) list of the Financial Action Task Force (FATF)
- CPI score < 20 according to the Corruption Perceptions Index (CPI) of Transparency International

The Portfolio Manager reserves the right to exclude additional countries for reasons of business policy.

- * In the event of breaches by companies of the UN Global Compact principles (UN standard on human rights, labour rights, the environment and anti-corruption) that are uncovered by a screening based on the data of an external data provider, where appropriate, the Portfolio Manager will enter into dialogue with the company to urge them to change their behaviour. Any investments will be sold if there is no change in behaviour within an appropriate period of time. This is also the case if dialogue is considered inappropriate based on the severity of the breach.
- ** Green bonds and sustainable bonds do not require exclusion. For green and sustainable bonds, issuers must use the proceeds raised through the issue of the green or sustainable bond for specific purposes. If this is the case, green bonds are used to raise capital for specific activities to mitigate or prevent adverse impacts on the environment. Sustainable bonds are also used to raise capital for specific activities to mitigate or prevent adverse impacts on the environment and on society. Investments in green bonds or sustainable bonds thus make a contribution to a positive impact in relation to the relevant exclusion criteria.

2. ESG integration

The Portfolio Manager integrates environmental (E), social (S) and governance (G) factors for companies and governments into the investment process (ESG integration) in order to identify opportunities and risks prior to any investment decision. The assessment of the sustainability of a company or government regarding ESG criteria is carried out using proprietary ESG scores. These scores are calculated and measured using proprietary methods using data from independent, third-party providers and proprietary qualitative and quantitative research.

3. Reduction of CO₂e intensity

Additionally, the Portfolio Manager's investment activity is focused on a continuous reduction in the CO₂e intensity of investments in accordance with the Paris Climate Agreement.

CO₂e intensity for companies is defined as CO₂e emissions in relation to turnover (tonnes of CO₂e per USD million of turnover), and for government bonds as CO₂e emissions in relation to economic value added (tonnes of CO₂e per USD million of gross domestic product). Greenhouse gases with a global warming effect are included in accordance with the international Greenhouse Gas Protocol (GHG Protocol) (measured in CO₂ equivalents – CO₂e). Data of independent third parties is used to calculate CO₂e intensity. The Portfolio Manager uses this data to calculate the relevant CO₂e intensity, taking account of data availability and quality, any methodology discrepancies and special cases.

Investments that no longer comply with the characteristics described in points 1-2 are removed from the portfolio by an appropriate deadline. If a sub-fund no longer complies with the characteristics described in point 3, the Portfolio Manager adjusts the portfolio by changing the weighting of the various securities or by replacing holdings with securities with lower CO₂e intensity, in accordance with the annual targets. The Portfolio Manager ensures that the corresponding guideline is complied with on average over the year.

The sub-fund does not use a reference benchmark to measure the described environmental and social characteristics.

- **What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?**

This financial product does not make sustainable investments.

- **How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?**

How have the indicators for adverse impacts on sustainability factors been taken into account?

Not relevant as this financial product does not make sustainable investments.

How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:

Not relevant as this financial product does not make sustainable investments.

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The “do no significant harm” principle applies only to those investments underlying the 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.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



Does this financial product consider principal adverse impacts on sustainability factors?

- Yes,
the sub-fund considers principal adverse impacts (PAIs) on sustainability indicators. The mandatory indicators in Annex I to Regulation (EU) 2019/2088 are used for this purpose. The PAIs are taken into account in the investment process via the use of exclusion criteria, the reduction of CO₂e intensity and ESG integration, and directly in the calculation of PAI scores.
The Portfolio Manager uses the data of third-party providers. Where this is not possible, the Portfolio Manager will make reasonable efforts to obtain the data directly or to estimate this data in the best way possible.
The information regarding PAIs required under Article 11(2) of Regulation (EU) 2019/2088 is published in the Annual Report.

- No



What investment strategy does this financial product follow?

The fund classifies itself as a standard variable net asset value money market fund (VNAF money market fund) invests 100% of its assets in money market instruments in accordance with the Money Market Fund Regulation, of which at least 80% is made in AUD. The weighted average duration may not be longer than six months, and the weighted average residual maturity may not be longer than 12 months.

- ***What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?***

The Portfolio Manager considers the environmental and social characteristics promoted by the sub-fund in the daily management of the portfolio. Implementation of the approach-specific limits are considered by the Portfolio Manager when taking investment decisions on portfolio construction, and continuous compliance is ensured as part of ongoing portfolio monitoring.

1. Exclusion criteria

The consideration of sustainability aspects includes the definition of exclusion criteria for business activities that the Portfolio Manager judges to be high-risk (see above). The exclusion criteria are verified at least once a year for any changes or new information and adjusted accordingly.

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

2. ESG integration

As part of the investment process, the Portfolio Manager follows an approach which integrates environmental, social and governance (ESG) aspects. This means that environmental and/or social characteristics are automatically considered in addition to traditional financial analysis when selecting investments, in order to guarantee a positive contribution to ESG criteria and where applicable investment returns. There are therefore limited investments in ESG laggards. ESG laggards are companies within a specific sector or industry branch with particularly poor ESG scores versus their peers on the basis of proprietary ESG scores.

The weight of all positions in ESG Laggards of the Sub-Fund shall not exceed 20% of the weight of the portfolio.

3. Reduction of CO₂e intensity

The Portfolio Manager's investment activity targets a continuous reduction in the CO₂e intensity of investments as follows:

The Portfolio Manager defines a guideline for the average CO₂e intensity of the sub-fund's assets on an annual basis. The Portfolio Manager defines the respective guideline each year on the basis of the target value for the global reduction of CO₂e emissions (at least 4% annually), which is based on the Paris Climate Agreement of 12 December 2015. The guideline for the average CO₂e intensity of the sub-fund's assets is calculated by discounting the CO₂e intensity of the assets included in the reference benchmark as at the end of 2019 annually by the target value (4%) and global economic growth. The Portfolio Manager uses a rolling arithmetic average of nominal economic growth over the last three years to calculate economic growth.

- ***What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?***

The fund follows an active investment strategy and does not use a reference universe. It is not possible to quantify the minimum rate to reduce the scope of eligible investments.

- ***What is the policy to assess good governance practices of the investee companies?***

Good governance is considered when analysing investments by verifying compliance with the following global standards: the UN Global Compact (UNGC), UN Guiding Principles on Business and Human Rights (UNGP), and the International Labour Organisation (ILO) Conventions.

In the event of breaches by companies that are uncovered by a screening based on the data of an external data provider, where appropriate, the Portfolio Manager will enter into dialogue with the company to urge them to change their behaviour. Any investments will be sold if there is no change in behaviour within an appropriate period of time. This is also the case if dialogue is considered inappropriate based on the severity of the breach.

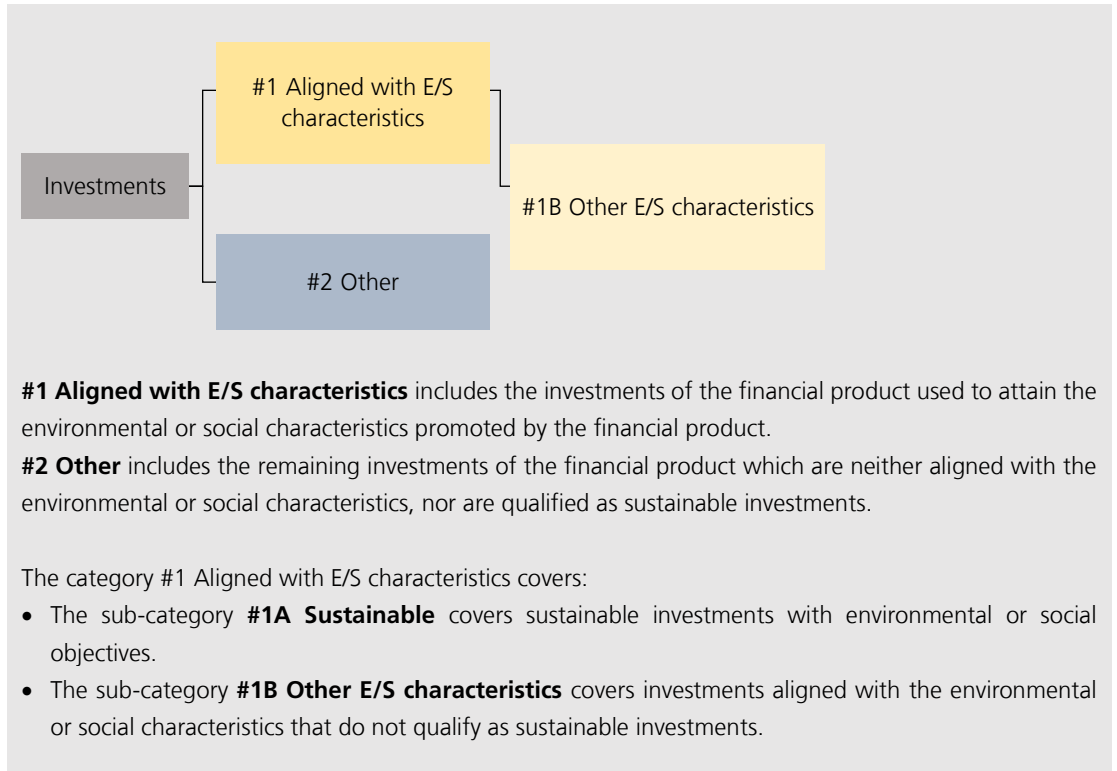
Good governance
practices include
sound management
structures, employee
relations,
remuneration of staff
and tax compliance.



What is the asset allocation planned for this financial product?

Asset allocation describes the share of investments in specific assets.

The Portfolio Manager ensures that at least 67% of the net assets of the sub-fund pursue the promoted environmental and social characteristics in accordance with the table below (#1 Aligned with E/S characteristics). The Portfolio Manager restricts investments in other assets (#2 Other) that do not pursue environmental and/or social characteristics to 33% of the sub-fund's net assets



● **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

Derivatives are only used to a limited extent for hedging purposes and do not pursue environmental or social characteristics.



To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

0% des Portfolios. Der Fonds verfolgt keine nachhaltigen Investitionen im Einklang mit der EU-Taxonomie.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU taxonomy¹?

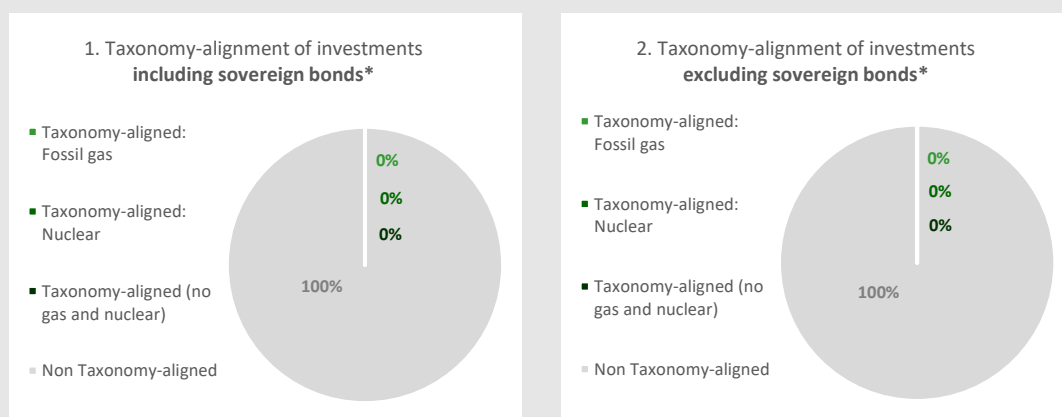
- Yes
 In fossil gas In nuclear energy
- No

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



*For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

What is the minimum share of investments in transitional and enabling activities?

0% of the portfolio.

¹Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

0% of the portfolio.



What is the minimum share of socially sustainable investments?

0% of the portfolio.



What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

This sub-fund may invest up to 33% of net sub-fund assets in assets that do not align with environmental and/or social characteristics (#2 Other). These assets may include any investments covered by the specific investment policy, including derivatives for hedging purposes and cash, and are used to pursue the investment strategy of the sub-fund. For these investments, minimum environmental and social safeguards are not generally applied.



Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

A specific index is not designated as a reference benchmark to determine whether the financial product is aligned with the environmental and/or social characteristics it promotes.



Where can I find more product specific information online?

More product-specific information can be found on the website:
<https://products.swisscanto.com/products/product/LU0141249184>.

 are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

Pre-contractual disclosure

for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

Product name:

Swisscanto (LU) Money Market Fund Responsible CHF

Legal entity identifier: (LEI-Code):

549300RM31NUOY25RP72

Version:

July 2023

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

Yes

No

It will make a minimum of **sustainable investments with an environmental objective**: _____%

in economic activities that qualify as environmentally sustainable under the EU Taxonomy.

in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy.

It will make a minimum of **sustainable investments with a social objective**: _____%

It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of _____% of sustainable investments

with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy.

with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy.

with a social objective.

It promotes E/S characteristics, but **will not make any sustainable investments**.



What environmental and/or social characteristics are promoted by this financial product?

The sub-fund pursues an investment strategy that considers environmental and social characteristics. These characteristics include exclusion criteria, the integration of ESG considerations with the investment process, and the reduction of CO₂e intensity.

Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.

● ***What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?***

The Portfolio Manager uses a range of data points to measure the attainment of the environmental and social characteristics promoted. It uses data from independent, third-party providers and proprietary qualitative and quantitative research in this process.

Sustainability indicators integrated with the investment process are then used to assess the attainment of the characteristics promoted:

1. Exclusion criteria

The Portfolio Manager uses exclusion criteria to identify an increased risk of harm to environmental and social characteristics. These exclusion criteria are also used to establish an investment universe focused more specifically on investments that are aligned with these values.

The following businesses/criteria result in the exclusion of companies:

- The production of weapons and munitions, including the following banned weapons:
 - Cluster bombs and munitions
 - Anti-personnel and landmines
 - Biological and chemical weapons
 - Nuclear weapons systems
 - Nuclear weapons material
 - Enriched uranium
 - Blinding laser weapons
 - Incendiary weapons
- Manufacturer of war technology (> 5% turnover)
- Behaviour-based exclusions including those included in the list of the SVVK-ASIR (Swiss association for the promotion of responsible capital investment)
- Breaches of the UN Global Compact*
- Child labour
- Production of pornography
- Coal mining (> 5% of turnover)**
- Coal reserves (excl. metals production)**

Exclusions for government issuers:

- Countries included on the Non-Cooperative Countries and Territories (NCCT) list of the Financial Action Task Force (FATF)
- CPI score < 20 according to the Corruption Perceptions Index (CPI) of Transparency International

The Portfolio Manager reserves the right to exclude additional countries for reasons of business policy.

- * In the event of breaches by companies of the UN Global Compact principles (UN standard on human rights, labour rights, the environment and anti-corruption) that are uncovered by a screening based on the data of an external data provider, where appropriate, the Portfolio Manager will enter into dialogue with the company to urge them to change their behaviour. Any investments will be sold if there is no change in behaviour within an appropriate period of time. This is also the case if dialogue is considered inappropriate based on the severity of the breach.
- ** Green bonds and sustainable bonds do not require exclusion. For green and sustainable bonds, issuers must use the proceeds raised through the issue of the green or sustainable bond for specific purposes. If this is the case, green bonds are used to raise capital for specific activities to mitigate or prevent adverse impacts on the environment. Sustainable bonds are also used to raise capital for specific activities to mitigate or prevent adverse impacts on the environment and on society. Investments in green bonds or sustainable bonds thus make a contribution to a positive impact in relation to the relevant exclusion criteria.

2. ESG integration

The Portfolio Manager integrates environmental (E), social (S) and governance (G) factors for companies and governments into the investment process (ESG integration) in order to identify opportunities and risks prior to any investment decision. The assessment of the sustainability of a company or government regarding ESG criteria is carried out using proprietary ESG scores. These scores are calculated and measured using proprietary methods using data from independent, third-party providers and proprietary qualitative and quantitative research.

3. Reduction of CO₂e intensity

Additionally, the Portfolio Manager's investment activity is focused on a continuous reduction in the CO₂e intensity of investments in accordance with the Paris Climate Agreement.

CO₂e intensity for companies is defined as CO₂e emissions in relation to turnover (tonnes of CO₂e per USD million of turnover), and for government bonds as CO₂e emissions in relation to economic value added (tonnes of CO₂e per USD million of gross domestic product). Greenhouse gases with a global warming effect are included in accordance with the international Greenhouse Gas Protocol (GHG Protocol) (measured in CO₂ equivalents – CO₂e). Data of independent third parties is used to calculate CO₂e intensity. The Portfolio Manager uses this data to calculate the relevant CO₂e intensity, taking account of data availability and quality, any methodology discrepancies and special cases.

Investments that no longer comply with the characteristics described in points 1-2 are removed from the portfolio by an appropriate deadline. If a sub-fund no longer complies with the characteristics described in point 3, the Portfolio Manager adjusts the portfolio by changing the weighting of the various securities or by replacing holdings with securities with lower CO₂e intensity, in accordance with the annual targets. The Portfolio Manager ensures that the corresponding guideline is complied with on average over the year.

The sub-fund does not use a reference benchmark to measure the described environmental and social characteristics.

- **What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?**

This financial product does not make sustainable investments.

- **How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?**

How have the indicators for adverse impacts on sustainability factors been taken into account?

Not relevant as this financial product does not make sustainable investments.

How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:

Not relevant as this financial product does not make sustainable investments.

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The “do no significant harm” principle applies only to those investments underlying the 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.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



Does this financial product consider principal adverse impacts on sustainability factors?

- Yes,
the sub-fund considers principal adverse impacts (PAIs) on sustainability indicators. The mandatory indicators in Annex I to Regulation (EU) 2019/2088 are used for this purpose. The PAIs are taken into account in the investment process via the use of exclusion criteria, the reduction of CO₂e intensity and ESG integration, and directly in the calculation of PAI scores.
The Portfolio Manager uses the data of third-party providers. Where this is not possible, the Portfolio Manager will make reasonable efforts to obtain the data directly or to estimate this data in the best way possible.
The information regarding PAIs required under Article 11(2) of Regulation (EU) 2019/2088 is published in the Annual Report.

- No



What investment strategy does this financial product follow?

The fund classifies itself as a standard variable net asset value money market fund (VNAF money market fund invests 100% of its assets in money market instruments in accordance with the Money Market Fund Regulation, of which at least 80% is made in CHF. The weighted average duration may not be longer than six months, and the weighted average residual maturity may not be longer than 12 months.

- ***What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?***

The Portfolio Manager considers the environmental and social characteristics promoted by the sub-fund in the daily management of the portfolio. Implementation of the approach-specific limits are considered by the Portfolio Manager when taking investment decisions on portfolio construction, and continuous compliance is ensured as part of ongoing portfolio monitoring.

1. Exclusion criteria

The consideration of sustainability aspects includes the definition of exclusion criteria for business activities that the Portfolio Manager judges to be high-risk (see above). The exclusion criteria are verified at least once a year for any changes or new information and adjusted accordingly.

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

2. ESG integration

As part of the investment process, the Portfolio Manager follows an approach which integrates environmental, social and governance (ESG) aspects. This means that environmental and/or social characteristics are automatically considered in addition to traditional financial analysis when selecting investments, in order to guarantee a positive contribution to ESG criteria and where applicable investment returns. There are therefore limited investments in ESG laggards. ESG laggards are companies within a specific sector or industry branch with particularly poor ESG scores versus their peers on the basis of proprietary ESG scores.

The weight of all positions in ESG Laggards of the Sub-Fund shall not exceed 20% of the weight of the portfolio.

3. Reduction of CO₂e intensity

The Portfolio Manager's investment activity targets a continuous reduction in the CO₂e intensity of investments as follows:

The Portfolio Manager defines a guideline for the average CO₂e intensity of the sub-fund's assets on an annual basis. The Portfolio Manager defines the respective guideline each year on the basis of the target value for the global reduction of CO₂e emissions (at least 4% annually), which is based on the Paris Climate Agreement of 12 December 2015. The guideline for the average CO₂e intensity of the sub-fund's assets is calculated by discounting the CO₂e intensity of the assets included in the reference benchmark as at the end of 2019 annually by the target value (4%) and global economic growth. The Portfolio Manager uses a rolling arithmetic average of nominal economic growth over the last three years to calculate economic growth.

- ***What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?***

The fund follows an active investment strategy and does not use a reference universe. It is not possible to quantify the minimum rate to reduce the scope of eligible investments.

- ***What is the policy to assess good governance practices of the investee companies?***

Good governance is considered when analysing investments by verifying compliance with the following global standards: the UN Global Compact (UNGC), UN Guiding Principles on Business and Human Rights (UNGP), and the International Labour Organisation (ILO) Conventions.

In the event of breaches by companies that are uncovered by a screening based on the data of an external data provider, where appropriate, the Portfolio Manager will enter into dialogue with the company to urge them to change their behaviour. Any investments will be sold if there is no change in behaviour within an appropriate period of time. This is also the case if dialogue is considered inappropriate based on the severity of the breach.

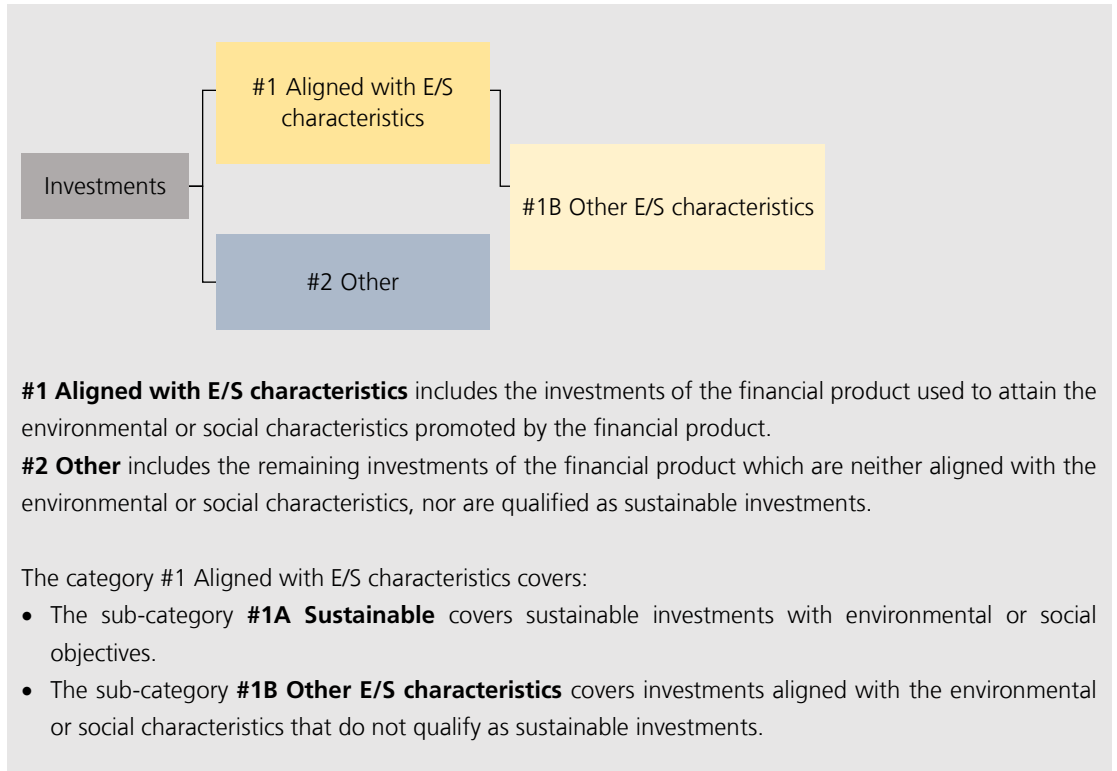
Good governance
practices include
sound management
structures, employee
relations,
remuneration of staff
and tax compliance.



What is the asset allocation planned for this financial product?

Asset allocation describes the share of investments in specific assets.

The Portfolio Manager ensures that at least 67% of the net assets of the sub-fund pursue the promoted environmental and social characteristics in accordance with the table below (#1 Aligned with E/S characteristics). The Portfolio Manager restricts investments in other assets (#2 Other) that do not pursue environmental and/or social characteristics to 33% of the sub-fund's net assets



● **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

Derivatives are only used to a limited extent for hedging purposes and do not pursue environmental or social characteristics.



To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

0% des Portfolios. Der Fonds verfolgt keine nachhaltigen Investitionen im Einklang mit der EU-Taxonomie.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU taxonomy¹?

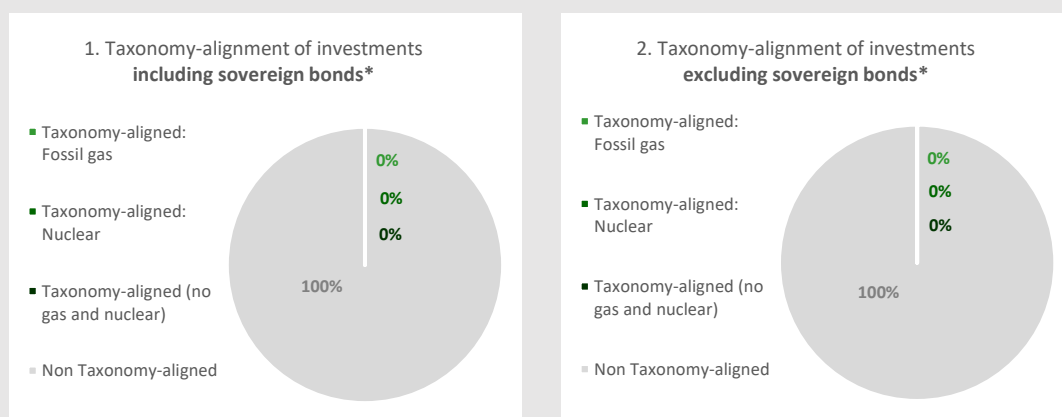
- Yes
 In fossil gas In nuclear energy
- No

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



*For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

What is the minimum share of investments in transitional and enabling activities?

0% of the portfolio.

¹Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

0% of the portfolio.



What is the minimum share of socially sustainable investments?

0% of the portfolio.



What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

This sub-fund may invest up to 33% of net sub-fund assets in assets that do not align with environmental and/or social characteristics (#2 Other). These assets may include any investments covered by the specific investment policy, including derivatives for hedging purposes and cash, and are used to pursue the investment strategy of the sub-fund. For these investments, minimum environmental and social safeguards are not generally applied.



Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

A specific index is not designated as a reference benchmark to determine whether the financial product is aligned with the environmental and/or social characteristics it promotes.



Where can I find more product specific information online?

More product-specific information can be found on the website:
<https://products.swisscanto.com/products/product/LU0141249424>.

 are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

Pre-contractual disclosure

for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

Product name:

Swisscanto (LU) Money Market Fund Responsible EUR

Legal entity identifier: (LEI-Code):

549300Z6J1IGN9YFQ768

Version:

July 2023

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

Yes

No

It will make a minimum of **sustainable investments with an environmental objective**: _____%

in economic activities that qualify as environmentally sustainable under the EU Taxonomy.

in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy.

It will make a minimum of **sustainable investments with a social objective**: _____%

It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of _____% of sustainable investments

with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy.

with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy.

with a social objective.

It promotes E/S characteristics, but **will not make any sustainable investments**.



What environmental and/or social characteristics are promoted by this financial product?

The sub-fund pursues an investment strategy that considers environmental and social characteristics. These characteristics include exclusion criteria, the integration of ESG considerations with the investment process, and the reduction of CO₂e intensity.

Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.

● ***What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?***

The Portfolio Manager uses a range of data points to measure the attainment of the environmental and social characteristics promoted. It uses data from independent, third-party providers and proprietary qualitative and quantitative research in this process.

Sustainability indicators integrated with the investment process are then used to assess the attainment of the characteristics promoted:

1. Exclusion criteria

The Portfolio Manager uses exclusion criteria to identify an increased risk of harm to environmental and social characteristics. These exclusion criteria are also used to establish an investment universe focused more specifically on investments that are aligned with these values.

The following businesses/criteria result in the exclusion of companies:

- The production of weapons and munitions, including the following banned weapons:
 - Cluster bombs and munitions
 - Anti-personnel and landmines
 - Biological and chemical weapons
 - Nuclear weapons systems
 - Nuclear weapons material
 - Enriched uranium
 - Blinding laser weapons
 - Incendiary weapons
- Manufacturer of war technology (> 5% turnover)
- Behaviour-based exclusions including those included in the list of the SVVK-ASIR (Swiss association for the promotion of responsible capital investment)
- Breaches of the UN Global Compact*
- Child labour
- Production of pornography
- Coal mining (> 5% of turnover)**
- Coal reserves (excl. metals production)**

Exclusions for government issuers:

- Countries included on the Non-Cooperative Countries and Territories (NCCT) list of the Financial Action Task Force (FATF)
- CPI score < 20 according to the Corruption Perceptions Index (CPI) of Transparency International

The Portfolio Manager reserves the right to exclude additional countries for reasons of business policy.

- * In the event of breaches by companies of the UN Global Compact principles (UN standard on human rights, labour rights, the environment and anti-corruption) that are uncovered by a screening based on the data of an external data provider, where appropriate, the Portfolio Manager will enter into dialogue with the company to urge them to change their behaviour. Any investments will be sold if there is no change in behaviour within an appropriate period of time. This is also the case if dialogue is considered inappropriate based on the severity of the breach.
- ** Green bonds and sustainable bonds do not require exclusion. For green and sustainable bonds, issuers must use the proceeds raised through the issue of the green or sustainable bond for specific purposes. If this is the case, green bonds are used to raise capital for specific activities to mitigate or prevent adverse impacts on the environment. Sustainable bonds are also used to raise capital for specific activities to mitigate or prevent adverse impacts on the environment and on society. Investments in green bonds or sustainable bonds thus make a contribution to a positive impact in relation to the relevant exclusion criteria.

2. ESG integration

The Portfolio Manager integrates environmental (E), social (S) and governance (G) factors for companies and governments into the investment process (ESG integration) in order to identify opportunities and risks prior to any investment decision. The assessment of the sustainability of a company or government regarding ESG criteria is carried out using proprietary ESG scores. These scores are calculated and measured using proprietary methods using data from independent, third-party providers and proprietary qualitative and quantitative research.

3. Reduction of CO₂e intensity

Additionally, the Portfolio Manager's investment activity is focused on a continuous reduction in the CO₂e intensity of investments in accordance with the Paris Climate Agreement.

CO₂e intensity for companies is defined as CO₂e emissions in relation to turnover (tonnes of CO₂e per USD million of turnover), and for government bonds as CO₂e emissions in relation to economic value added (tonnes of CO₂e per USD million of gross domestic product). Greenhouse gases with a global warming effect are included in accordance with the international Greenhouse Gas Protocol (GHG Protocol) (measured in CO₂ equivalents – CO₂e). Data of independent third parties is used to calculate CO₂e intensity. The Portfolio Manager uses this data to calculate the relevant CO₂e intensity, taking account of data availability and quality, any methodology discrepancies and special cases.

Investments that no longer comply with the characteristics described in points 1-2 are removed from the portfolio by an appropriate deadline. If a sub-fund no longer complies with the characteristics described in point 3, the Portfolio Manager adjusts the portfolio by changing the weighting of the various securities or by replacing holdings with securities with lower CO₂e intensity, in accordance with the annual targets. The Portfolio Manager ensures that the corresponding guideline is complied with on average over the year.

The sub-fund does not use a reference benchmark to measure the described environmental and social characteristics.

- **What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?**

This financial product does not make sustainable investments.

- **How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?**

How have the indicators for adverse impacts on sustainability factors been taken into account?

Not relevant as this financial product does not make sustainable investments.

How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:

Not relevant as this financial product does not make sustainable investments.

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The “do no significant harm” principle applies only to those investments underlying the 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.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



Does this financial product consider principal adverse impacts on sustainability factors?

- Yes,
the sub-fund considers principal adverse impacts (PAIs) on sustainability indicators. The mandatory indicators in Annex I to Regulation (EU) 2019/2088 are used for this purpose. The PAIs are taken into account in the investment process via the use of exclusion criteria, the reduction of CO₂e intensity and ESG integration, and directly in the calculation of PAI scores.
The Portfolio Manager uses the data of third-party providers. Where this is not possible, the Portfolio Manager will make reasonable efforts to obtain the data directly or to estimate this data in the best way possible.
The information regarding PAIs required under Article 11(2) of Regulation (EU) 2019/2088 is published in the Annual Report.

- No



What investment strategy does this financial product follow?

The fund classifies itself as a standard variable net asset value money market fund (VNAF money market fund invests 100% of its assets in money market instruments in accordance with the Money Market Fund Regulation, of which at least 80% is made in EUR. The weighted average duration may not be longer than six months, and the weighted average residual maturity may not be longer than 12 months.

- ***What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?***

The Portfolio Manager considers the environmental and social characteristics promoted by the sub-fund in the daily management of the portfolio. Implementation of the approach-specific limits are considered by the Portfolio Manager when taking investment decisions on portfolio construction, and continuous compliance is ensured as part of ongoing portfolio monitoring.

1. Exclusion criteria

The consideration of sustainability aspects includes the definition of exclusion criteria for business activities that the Portfolio Manager judges to be high-risk (see above). The exclusion criteria are verified at least once a year for any changes or new information and adjusted accordingly.

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

2. ESG integration

As part of the investment process, the Portfolio Manager follows an approach which integrates environmental, social and governance (ESG) aspects. This means that environmental and/or social characteristics are automatically considered in addition to traditional financial analysis when selecting investments, in order to guarantee a positive contribution to ESG criteria and where applicable investment returns. There are therefore limited investments in ESG laggards. ESG laggards are companies within a specific sector or industry branch with particularly poor ESG scores versus their peers on the basis of proprietary ESG scores.

The weight of all positions in ESG Laggards of the Sub-Fund shall not exceed 20% of the weight of the portfolio.

3. Reduction of CO₂e intensity

The Portfolio Manager's investment activity targets a continuous reduction in the CO₂e intensity of investments as follows:

The Portfolio Manager defines a guideline for the average CO₂e intensity of the sub-fund's assets on an annual basis. The Portfolio Manager defines the respective guideline each year on the basis of the target value for the global reduction of CO₂e emissions (at least 4% annually), which is based on the Paris Climate Agreement of 12 December 2015. The guideline for the average CO₂e intensity of the sub-fund's assets is calculated by discounting the CO₂e intensity of the assets included in the reference benchmark as at the end of 2019 annually by the target value (4%) and global economic growth. The Portfolio Manager uses a rolling arithmetic average of nominal economic growth over the last three years to calculate economic growth.

- ***What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?***

The fund follows an active investment strategy and does not use a reference universe. It is not possible to quantify the minimum rate to reduce the scope of eligible investments.

- ***What is the policy to assess good governance practices of the investee companies?***

Good governance is considered when analysing investments by verifying compliance with the following global standards: the UN Global Compact (UNGC), UN Guiding Principles on Business and Human Rights (UNGP), and the International Labour Organisation (ILO) Conventions.

In the event of breaches by companies that are uncovered by a screening based on the data of an external data provider, where appropriate, the Portfolio Manager will enter into dialogue with the company to urge them to change their behaviour. Any investments will be sold if there is no change in behaviour within an appropriate period of time. This is also the case if dialogue is considered inappropriate based on the severity of the breach.

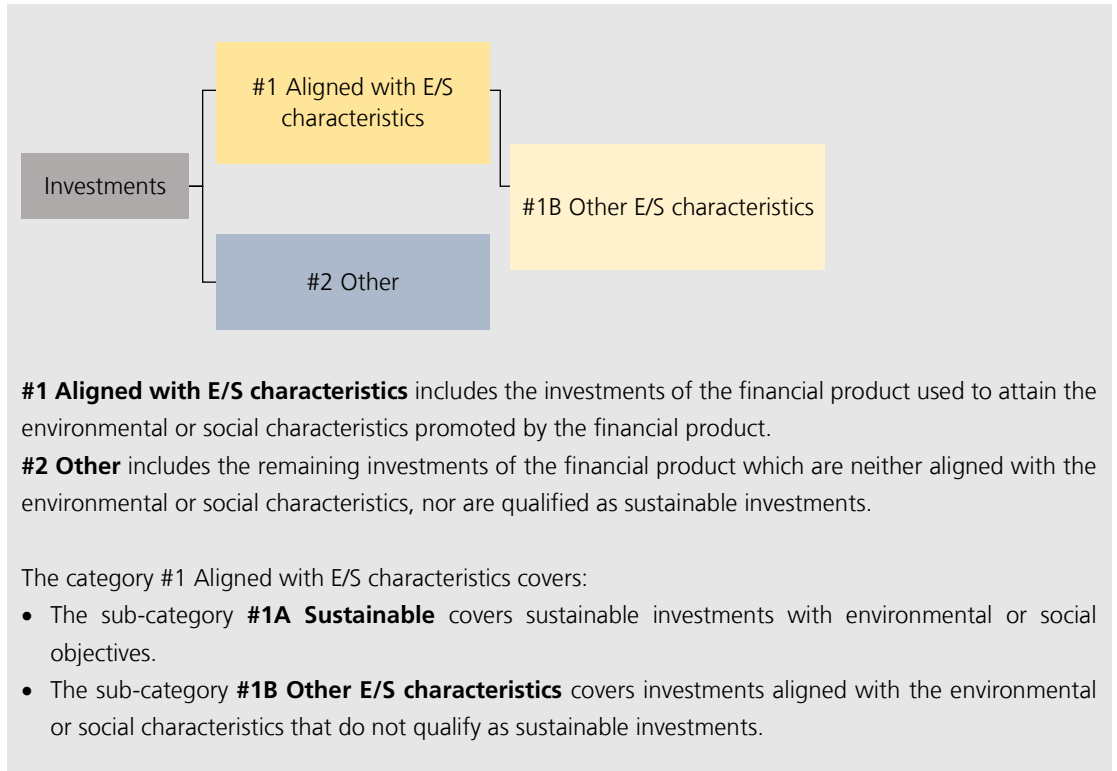
Good governance
practices include
sound management
structures, employee
relations,
remuneration of staff
and tax compliance.



What is the asset allocation planned for this financial product?

Asset allocation describes the share of investments in specific assets.

The Portfolio Manager ensures that at least 67% of the net assets of the sub-fund pursue the promoted environmental and social characteristics in accordance with the table below (#1 Aligned with E/S characteristics). The Portfolio Manager restricts investments in other assets (#2 Other) that do not pursue environmental and/or social characteristics to 33% of the sub-fund's net assets



● **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

Derivatives are only used to a limited extent for hedging purposes and do not pursue environmental or social characteristics.



To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

0% des Portfolios. Der Fonds verfolgt keine nachhaltigen Investitionen im Einklang mit der EU-Taxonomie.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU taxonomy¹?

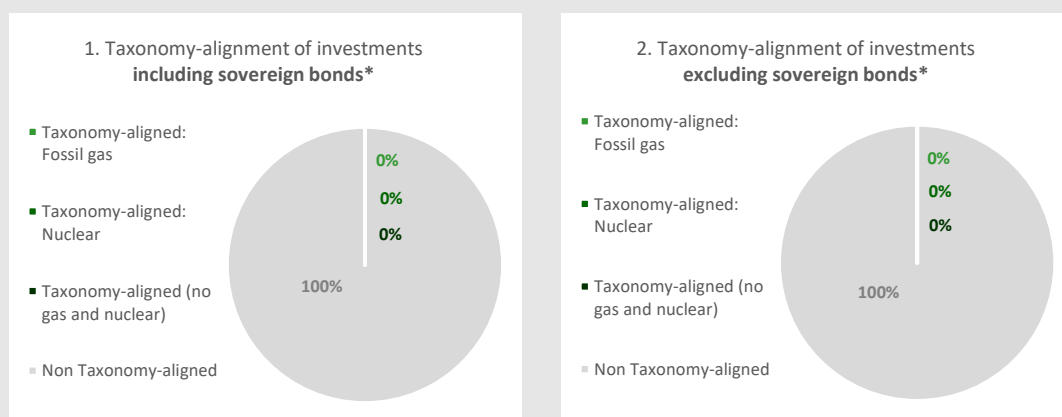
- Yes
 In fossil gas In nuclear energy
- No

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



*For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

What is the minimum share of investments in transitional and enabling activities?

0% of the portfolio.

¹Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective – see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

0% of the portfolio.



What is the minimum share of socially sustainable investments?

0% of the portfolio.



What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

This sub-fund may invest up to 33% of net sub-fund assets in assets that do not align with environmental and/or social characteristics (#2 Other). These assets may include any investments covered by the specific investment policy, including derivatives for hedging purposes and cash, and are used to pursue the investment strategy of the sub-fund. For these investments, minimum environmental and social safeguards are not generally applied.



Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

A specific index is not designated as a reference benchmark to determine whether the financial product is aligned with the environmental and/or social characteristics it promotes.



Where can I find more product specific information online?

More product-specific information can be found on the website:
<https://products.swisscanto.com/products/product/LU0141249770>.

 are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

Pre-contractual disclosure

for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

Product name:

Swisscanto (LU) Money Market Fund Responsible USD

Legal entity identifier: (LEI-Code):

5493004F95ISP2JTIM61

Version:

July 2023

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

Yes

No

It will make a minimum of **sustainable investments with an environmental objective**: _____%

in economic activities that qualify as environmentally sustainable under the EU Taxonomy.

in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy.

It will make a minimum of **sustainable investments with a social objective**: _____%

It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of _____% of sustainable investments

with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy.

with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy.

with a social objective.

It promotes E/S characteristics, but **will not make any sustainable investments**.



What environmental and/or social characteristics are promoted by this financial product?

The sub-fund pursues an investment strategy that considers environmental and social characteristics. These characteristics include exclusion criteria, the integration of ESG considerations with the investment process, and the reduction of CO₂e intensity.

Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.

● ***What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?***

The Portfolio Manager uses a range of data points to measure the attainment of the environmental and social characteristics promoted. It uses data from independent, third-party providers and proprietary qualitative and quantitative research in this process.

Sustainability indicators integrated with the investment process are then used to assess the attainment of the characteristics promoted:

1. Exclusion criteria

The Portfolio Manager uses exclusion criteria to identify an increased risk of harm to environmental and social characteristics. These exclusion criteria are also used to establish an investment universe focused more specifically on investments that are aligned with these values.

The following businesses/criteria result in the exclusion of companies:

- The production of weapons and munitions, including the following banned weapons:
 - Cluster bombs and munitions
 - Anti-personnel and landmines
 - Biological and chemical weapons
 - Nuclear weapons systems
 - Nuclear weapons material
 - Enriched uranium
 - Blinding laser weapons
 - Incendiary weapons
- Manufacturer of war technology (> 5% turnover)
- Behaviour-based exclusions including those included in the list of the SVVK-ASIR (Swiss association for the promotion of responsible capital investment)
- Breaches of the UN Global Compact*
- Child labour
- Production of pornography
- Coal mining (> 5% of turnover)**
- Coal reserves (excl. metals production)**

Exclusions for government issuers:

- Countries included on the Non-Cooperative Countries and Territories (NCCT) list of the Financial Action Task Force (FATF)
- CPI score < 20 according to the Corruption Perceptions Index (CPI) of Transparency International

The Portfolio Manager reserves the right to exclude additional countries for reasons of business policy.

- * In the event of breaches by companies of the UN Global Compact principles (UN standard on human rights, labour rights, the environment and anti-corruption) that are uncovered by a screening based on the data of an external data provider, where appropriate, the Portfolio Manager will enter into dialogue with the company to urge them to change their behaviour. Any investments will be sold if there is no change in behaviour within an appropriate period of time. This is also the case if dialogue is considered inappropriate based on the severity of the breach.
- ** Green bonds and sustainable bonds do not require exclusion. For green and sustainable bonds, issuers must use the proceeds raised through the issue of the green or sustainable bond for specific purposes. If this is the case, green bonds are used to raise capital for specific activities to mitigate or prevent adverse impacts on the environment. Sustainable bonds are also used to raise capital for specific activities to mitigate or prevent adverse impacts on the environment and on society. Investments in green bonds or sustainable bonds thus make a contribution to a positive impact in relation to the relevant exclusion criteria.

2. ESG integration

The Portfolio Manager integrates environmental (E), social (S) and governance (G) factors for companies and governments into the investment process (ESG integration) in order to identify opportunities and risks prior to any investment decision. The assessment of the sustainability of a company or government regarding ESG criteria is carried out using proprietary ESG scores. These scores are calculated and measured using proprietary methods using data from independent, third-party providers and proprietary qualitative and quantitative research.

3. Reduction of CO₂e intensity

Additionally, the Portfolio Manager's investment activity is focused on a continuous reduction in the CO₂e intensity of investments in accordance with the Paris Climate Agreement.

CO₂e intensity for companies is defined as CO₂e emissions in relation to turnover (tonnes of CO₂e per USD million of turnover), and for government bonds as CO₂e emissions in relation to economic value added (tonnes of CO₂e per USD million of gross domestic product). Greenhouse gases with a global warming effect are included in accordance with the international Greenhouse Gas Protocol (GHG Protocol) (measured in CO₂ equivalents – CO₂e). Data of independent third parties is used to calculate CO₂e intensity. The Portfolio Manager uses this data to calculate the relevant CO₂e intensity, taking account of data availability and quality, any methodology discrepancies and special cases.

Investments that no longer comply with the characteristics described in points 1-2 are removed from the portfolio by an appropriate deadline. If a sub-fund no longer complies with the characteristics described in point 3, the Portfolio Manager adjusts the portfolio by changing the weighting of the various securities or by replacing holdings with securities with lower CO₂e intensity, in accordance with the annual targets. The Portfolio Manager ensures that the corresponding guideline is complied with on average over the year.

The sub-fund does not use a reference benchmark to measure the described environmental and social characteristics.

- **What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?**

This financial product does not make sustainable investments.

- **How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?**

How have the indicators for adverse impacts on sustainability factors been taken into account?

Not relevant as this financial product does not make sustainable investments.

How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:

Not relevant as this financial product does not make sustainable investments.

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The “do no significant harm” principle applies only to those investments underlying the 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.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



Does this financial product consider principal adverse impacts on sustainability factors?

- Yes,
the sub-fund considers principal adverse impacts (PAIs) on sustainability indicators. The mandatory indicators in Annex I to Regulation (EU) 2019/2088 are used for this purpose. The PAIs are taken into account in the investment process via the use of exclusion criteria, the reduction of CO₂e intensity and ESG integration, and directly in the calculation of PAI scores.
The Portfolio Manager uses the data of third-party providers. Where this is not possible, the Portfolio Manager will make reasonable efforts to obtain the data directly or to estimate this data in the best way possible.
The information regarding PAIs required under Article 11(2) of Regulation (EU) 2019/2088 is published in the Annual Report.

- No



What investment strategy does this financial product follow?

The fund classifies itself as a standard variable net asset value money market fund (VNAF money market fund invests 100% of its assets in money market instruments in accordance with the Money Market Fund Regulation, of which at least 80% is made in USD. The weighted average duration may not be longer than six months, and the weighted average residual maturity may not be longer than 12 months.

- ***What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?***

The Portfolio Manager considers the environmental and social characteristics promoted by the sub-fund in the daily management of the portfolio. Implementation of the approach-specific limits are considered by the Portfolio Manager when taking investment decisions on portfolio construction, and continuous compliance is ensured as part of ongoing portfolio monitoring.

1. Exclusion criteria

The consideration of sustainability aspects includes the definition of exclusion criteria for business activities that the Portfolio Manager judges to be high-risk (see above). The exclusion criteria are verified at least once a year for any changes or new information and adjusted accordingly.

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

2. ESG integration

As part of the investment process, the Portfolio Manager follows an approach which integrates environmental, social and governance (ESG) aspects. This means that environmental and/or social characteristics are automatically considered in addition to traditional financial analysis when selecting investments, in order to guarantee a positive contribution to ESG criteria and where applicable investment returns. There are therefore limited investments in ESG laggards. ESG laggards are companies within a specific sector or industry branch with particularly poor ESG scores versus their peers on the basis of proprietary ESG scores.

The weight of all positions in ESG Laggards of the Sub-Fund shall not exceed 20% of the weight of the portfolio.

3. Reduction of CO₂e intensity

The Portfolio Manager's investment activity targets a continuous reduction in the CO₂e intensity of investments as follows:

The Portfolio Manager defines a guideline for the average CO₂e intensity of the sub-fund's assets on an annual basis. The Portfolio Manager defines the respective guideline each year on the basis of the target value for the global reduction of CO₂e emissions (at least 4% annually), which is based on the Paris Climate Agreement of 12 December 2015. The guideline for the average CO₂e intensity of the sub-fund's assets is calculated by discounting the CO₂e intensity of the assets included in the reference benchmark as at the end of 2019 annually by the target value (4%) and global economic growth. The Portfolio Manager uses a rolling arithmetic average of nominal economic growth over the last three years to calculate economic growth.

- ***What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?***

The fund follows an active investment strategy and does not use a reference universe. It is not possible to quantify the minimum rate to reduce the scope of eligible investments.

- ***What is the policy to assess good governance practices of the investee companies?***

Good governance is considered when analysing investments by verifying compliance with the following global standards: the UN Global Compact (UNGC), UN Guiding Principles on Business and Human Rights (UNGP), and the International Labour Organisation (ILO) Conventions.

In the event of breaches by companies that are uncovered by a screening based on the data of an external data provider, where appropriate, the Portfolio Manager will enter into dialogue with the company to urge them to change their behaviour. Any investments will be sold if there is no change in behaviour within an appropriate period of time. This is also the case if dialogue is considered inappropriate based on the severity of the breach.

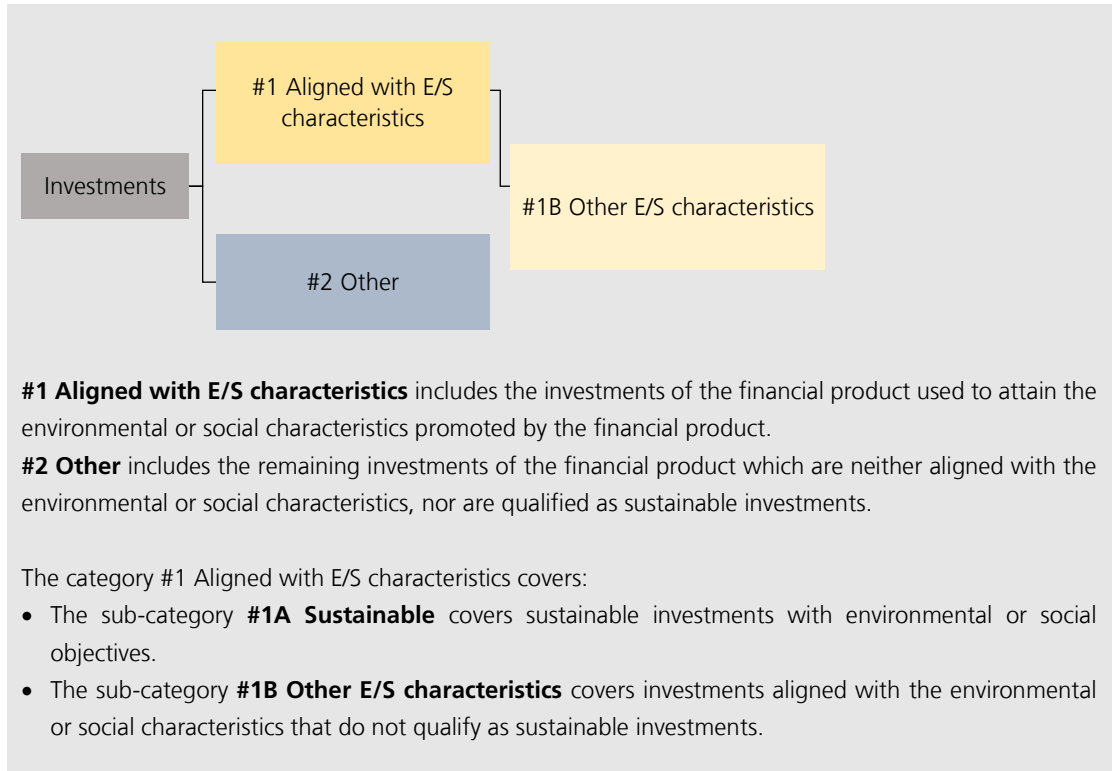
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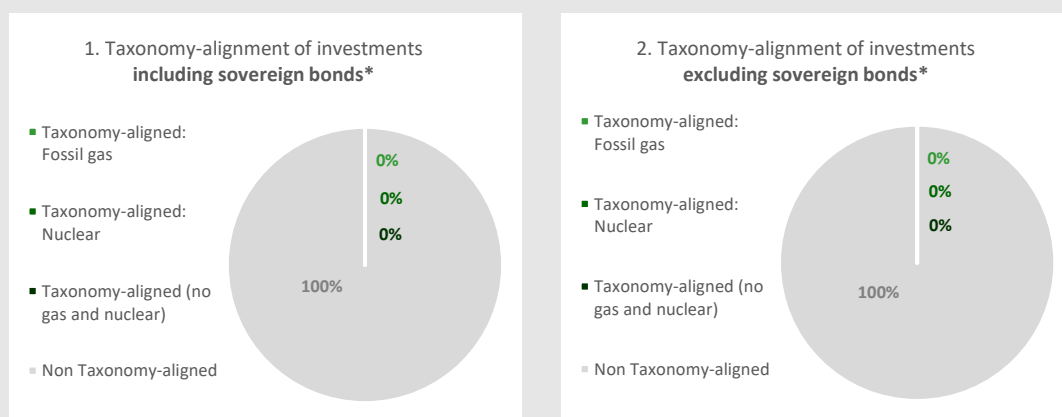
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