



RULES AND INTERNAL DIRECTIVE ON HANDLING SUSTAINABILITY RISKS ("ESG-POLICY")

Version as of 18 November 2021

This directive is issued by the Board of Directors of the various IMT Group Companies and by the Partners of Kieber Nuener Struth – Attorneys at Law.

1. General

Dealing with sustainability risks is becoming increasingly important not only within the European Union but also in Liechtenstein. As early as 2018 the European Commission published the EU “Sustainable Finance Action Plan” aimed at achieving the objectives of the Paris Agreement and the United Nations 2030 Agenda (Sustainable Development Goals). In alignment with the European Green Deal, which sets out a timetable for a sustainable EU economy, the Commission also announced a strategy for a sustainable financial system.

Rz1

The financial sector plays a central part in the transition to a sustainable and in particular environmentally and climate friendly society. Since the subject of sustainability and the associated risks have to be considered as a whole, the ESG Policy is issued for the entire IMT Group.

Rz2

1.1 Categorization and goal of this ESG Policy

Diverse national and international supervisory authorities (e.g., ESAs, ECB, BaFin, FMA-AT, FMA-FL, etc.) have put out numerous publications communicating their expectations regarding management of sustainability risks, and they have provided applicable information material for all the institutes under their supervision. Against this background the goal of the present ESG Policy is principally to meet the requirements regarding compliance with the published regulations, and thus to ensure that the legal and regulatory organizational demands on the IMT Group (hereinafter referred to as “IMT” or “IMT Group Companies”) are implemented.

Rz3

1.2 The concept of sustainability

According to the European Union’s sustainability perception¹, sustainability should not be restricted to ecological factors but should take in the whole ESG (Environment, Social and Governance) spectrum.

Rz4



¹ Cf. COM, Why is Sustainable Finance important, www.ec.europa.eu/info/business-economy-euro/banking-and-finance/sustainable-finance/overview-sustainable-finance_en#what.

The United Nations has established 17 overarching Sustainable Development Goals (SDGs). ESG financial investments also pursue these goals.

Rz5

The Principality of Liechtenstein has taken on the task of meeting the United Nations' 17 Sustainable Development Goals, which are intended to be realized by 2030. The following goals have been identified as priority areas: High quality of education, gender equality, clean water and sanitary facilities, affordable and clean energy, industry, innovation and infrastructure, less inequality, responsible consumption and production and climate protection measures.

Rz6

SUSTAINABLE DEVELOPMENT GOALS



1 No poverty | 2 Zero hunger | 3 Good health and well-being | 4 Quality education | 5 Gender equality |
6 Clean water and sanitation | 7 Affordable and clean energy | 8 Decent work and economic growth |
9 Industry, innovation and infrastructure | 10 Reduced inequalities | 11 Sustainable cities and communities |
12 Responsible consumption and production | 13 Climate action | 14 Life below water | 15 Life on land |
16 Peace, justice and strong institutions | 17 Partnerships for the goals

1.3 Sustainability risks are ESG risks

In connection with our ESG Policy the term sustainability risks designates events or conditions in the environmental, social or governance areas, which might actually or potentially exert significant negative effects on the value of assets, on the situation regarding assets, finance and earnings or on the reputation of the IMT Group.²

Rz7

To enable us to manage and limit sustainability risks, structural adjustments have to be made in our Group. The required adjustments concern our business model, strategy and governance.

Rz8

² Cf. also Art. 2 Z 22 Regulation (EU) 2019/2088 of the European Parliament and the Directive of 27 November 2019 on sustainability-related disclosure requirements in the financial services sector.

2. IMT Group's sustainability commitment

Sustainability and a sense of responsibility have always been crucial mainstays of our corporate philosophy. On this basis we take care to ensure that ESG criteria are respected in all our Group's activities. They form a part of our core identity and working principles and are thus also a component of our medium and long-term corporate planning. As a successful business group, we are aware of our responsibility towards society and we regard ourselves as pioneers. We owe our success to the economic sphere and we would like to help it flourish. Our aspiration is that other financial services companies will follow our example.

E (Environment)

In line with our wish to safeguard the environment it is both a matter of importance for us and also our objective to keep our own use of resources, and thus our CO₂ footprint, as small as possible.

To achieve this efficiently and conscientiously we decided in mid-2021 to draw up an appropriate climate protection strategy. For this purpose, we commissioned ClimatePartner to calculate our Corporate Carbon Footprint (CCF) in accordance with the guidelines of the Greenhouse Gas Protocols Corporate Accounting and Reporting Standard. All significant emission sources were taken into account, including not only energy and heating but also business trips and office supplies.

Our CO₂ footprint clearly shows us where we can further reduce our CO₂ emissions. We will keep up to date on this by having our CO₂ balance sheet freshly drawn up every year.

In addition, to reduce our ecological footprint to the minimum possible and to offset the remaining footprint through environmentally friendly projects, we have set ourselves rules taking in the following measures:



We are using sustainably produced electricity.

Since 01.01.2021 we have been purchasing electricity derived exclusively from 100 % renewable energy sources. 82.3 % comes from hydroelectric sources in Liechtenstein and 17.7 % from photovoltaic systems likewise in Liechtenstein.



Our heating operates with wood pellets and is climate-neutral.

For a long time, we have been using FireStixx Premium Pellets + Pelprotec EN 14961-2/quality category A1. These are preferential EU goods.



We fly only when absolutely necessary, and whenever possible we book carbon-neutral flights.

Our environmental policy stipulates that when we book flights we always purchase CO₂ compensation. If this is not offered by the airline, we ensure the appropriate offset by buying CO₂ certificates ourselves.



We provide our employees with charging points for electric vehicles.



As far as the legal framework allows, we reduce our carbon footprint regarding emissions produced by employee commuting.

Our environmental policy states that our employees are permitted to do home office working on selected days, which means a considerable amount of driving with private cars is avoided. Additionally, we provide incentives for our employees to use low-CO₂ or carbon-neutral forms of transport.



We apply a digitalization strategy to reduce consumption of other resources.

Through our digitalization program we aim to reduce the use of paper and printing materials. One example is our banking correspondence which, in cooperation with our banking partners, we now send out to the greatest possible extent digitally.



Finally we acquire climate-neutral status through recognized climate-protection projects.

We have offset CO₂ emissions as determined by ClimatePartner for the 2020 financial year by supporting a program for protection of the Brazilian rain forest.

Further information about this can be found on our website: [Waldschutz, Pará, Brasilien](#)

S (Social)

In the sphere of our social responsibility we fulfill our commitment regionally through the following activities, among others:



Support for the Association for Protection and Safety (Verein für Schutz und Sicherheit, VVS)

The VVS does valuable work in the field of prevention. We supported this work in 2019 and 2020 by placing advertisements in Liechtenstein for a VVS children's road safety coloring-in book.



Support for the Christian Police Association Switzerland (CPA Switzerland)

"A Life without drugs" project. In this case too, we provide support by placing advertisements for the information brochure "Everything under Control? — For a Life without Drugs". This is part of a campaign against drug and alcohol abuse in young people. The brochure is published in all regions of Switzerland and Liechtenstein.



Charitable donations

For many years we have made donations at Christmas time to non-profit social institutions like the Liechtenstein Red Cross or institutions helping refugees and families in difficulties.



Support for the non-profit foundation "International Tax Centre (ITC)"

The entirely non-profit foundation is an independent, internationally networked think tank, which supports specialist analysis of national and international developments and standards in the fiscal area, with particular emphasis on Liechtenstein.

With regard to Liechtenstein the focus is on questions and problems arising in national and international tax law, on the successful positioning of the country as an internationally recognized and attractive location in fiscal terms, both for private and also for philanthropic asset structuring and wealth management, and focus is placed additionally on providing support and practical training for the younger generation of up-and-coming talents.



IMT Awards

We support the academic and research areas through our IMT Tax Excellence Award, IMT Award for Outstanding Academic Achievements, and our Finance Award.

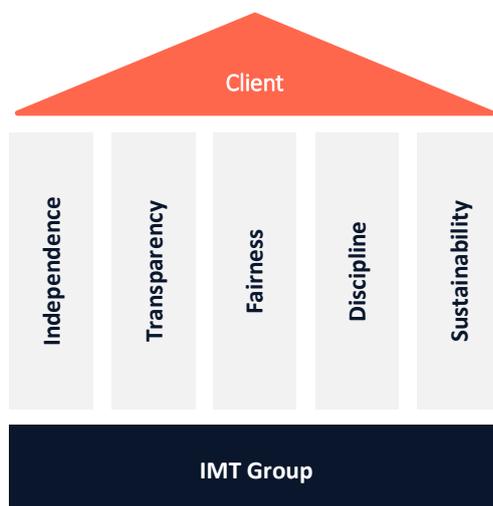
Further information can be found on our website: <https://imt.li/imt-award-de/>



Diverse Sponsoring, donations to sports clubs

G (Governance)

Our concept of quality in the field of corporate management has always been based on the following principles:



- Independence:** We are independent of other financial services companies and act exclusively in the interests of our clients.
- Transparency:** We guarantee complete transparency in our advisory activities, decision-making and costs. Conflicts of interest are principally avoided, but if nevertheless unavoidable, they are disclosed.
- Fairness:** We work on fair terms and are aware of our responsibility for our employees. We ensure that working conditions are safe and productive, and we set great store by ongoing training. Our remuneration policy is gender neutral and based on transparent, objective principles.
- Discipline:** In our activities we maintain disciplined adherence to the processes we have defined. As a future-oriented company we plan our activities with a long-term perspective.
- Sustainability:** We work out sustainable solutions for our clients, keeping their interests in the foreground. Our sense of responsibility runs through our dealings with all our stakeholders, and we are reducing our absolute CO₂ emissions to the lowest possible level.