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# Sustainability-Related Disclosures Record Asset Management

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2025.1	Record Sustainability Offices		Update- Revised disclosures: Changes made to disclosure statement relating to article 4, 6, 7 and 12.
<b>2026.01</b>	<b>Record Sustainability Offices</b>		<b>Update- Revised disclosures: Changes made to disclosure statement relating to article 12.</b>

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## Introduction

Record Asset Management (“RAM”), a subsidiary of Record plc, is required to make several sustainability-related disclosures in accordance with the 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 (known as the EU Sustainable Finance Disclosure Regulation or “SFDR”).

This policy describes the manner in which sustainability risks are integrated into investment decision-making for the purpose of SFDR. The SFDR defines sustainability risks as environmental, social and governance events or conditions whose occurrence could have an actual or potential material negative impact on the value of an investment.

## Article 3 - Transparency of sustainability risk policies

RAM has integrated the consideration of sustainability risks into its discretionary investment decision-making process. RAM's policy on the integration of sustainability risks is detailed in Record plc's group-wide [Responsible Investment Policy](#). Sustainability risk forms part of RAM's overall risk management process and is considered alongside other risks deemed to be relevant and material to each specific investment opportunity.

## Article 4 - No consideration of adverse impacts of investment decisions on sustainability factors

RAM is required to provide a statement on the consideration of adverse sustainability impacts in accordance with Article 4 of the SFDR. RAM does not currently consider adverse impacts of investment decisions on sustainability factors as defined under SFDR. RAM has opted against doing so, primarily due to lack of available and reliable data. RAM will keep its position under review as reporting practices develop and may adopt the Article 4 framework in the future if it considers that to be practical and appropriate to do so.

## Article 5 - Transparency of remuneration policy in relation to the integration of sustainability risks

RAM has reviewed its remuneration policy in accordance with the Article 5 of the SFDR to ensure consistency with the integration of sustainability risks. A summary of the remuneration policy is set out below.

Central to the remuneration policy is the promotion of sound and effective risk management and avoiding an environment which rewards or encourages excessive risk-taking. The remuneration policy extends beyond financial risks to include sustainability risks. This policy applies to relevant individuals who are involved in overseeing and/or implementing RAM portfolio management and will be assessed in determination of variable remuneration by reference to their risk-adjusted performance. This is a qualitative assessment and does not relate to quantitative sustainability-focused key performance indicators.

## Article 6 - Transparency of the integration of Sustainability Risks

The financial products managed by RAM do not promote environmental or social characteristics and do not have sustainable investment as their objective. Consequently, they are classified as Article 6 products under the SFDR.

Sustainability risk forms part of RAM's overall risk management process and is considered alongside other risks deemed to be relevant and material to each specific investment opportunity.

## Article 7 – Transparency of Adverse Sustainability Impacts at Financial Product Level

RAM currently does not take into account the adverse impacts of investment decisions on sustainability factors as defined under the SFDR.

## Article 11 – Application of Article 11 and § 63(12) sentence 6 WpHG

RAM provides its investment services exclusively to professional clients within the meaning of the WpHG. Pursuant to § 63(12) sentence 6 WpHG, the obligation to provide periodic reports does not apply to professional clients unless such information is explicitly requested by the client. Accordingly, no periodic disclosures under Article 11 SFDR are provided to professional clients by default. The applicability of the exemption is determined based on the client's regulatory classification as documented in the client onboarding and classification records maintained by the Compliance function.

Should a professional client request periodic information within the meaning of Article 11 SFDR, the investment firm will provide such information in accordance with the applicable regulatory requirements.

## Article 12 – Keeping of Information up to Date

RAM maintains a process to ensure that the information published pursuant to SFDR remains accurate, complete and up to date at all times.

Responsibility for the review and maintenance of the SFDR disclosures lies with the management of RAM, supported by the compliance function, taking into account the organisational structure and proportionality applicable to a small investment firm pursuant to the German Investment Firm Act (WpIG).

The SFDR disclosures are reviewed on an ad hoc basis, in particular in connection with relevant regulatory developments or changes to the investment firm's services, activities or business model that could affect the content or accuracy of the disclosures.

Any material changes to the information disclosed under the SFDR will be published without undue delay. Such changes will be clearly identified in the change log at the beginning of this document.



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