

Sustainability Disclosures

Introduction

UpToMore B.V. (“UpToMore”) integrates sustainability considerations in accordance with Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector (“SFDR”). UpToMore manages UpToMore Fund FGR (the “Fund”), a financial product that promotes environmental and/or social characteristics within the meaning of Article 8 SFDR.

Integration of Sustainability Risks - SFDR Article 3

UpToMore integrates sustainability risks into its investment due-diligence process. The Fund primarily invests in third-party managed exchange-traded funds (ETFs) and other collective investment schemes that apply recognised ESG methodologies and exclusion criteria as part of their index construction and portfolio selection. UpToMore performs a qualitative assessment of the underlying products’ SFDR classification, ESG methodology, exclusion criteria and governance information, and considers identified sustainability risks in its investment decisions and ongoing monitoring. For additional information, please refer to the Sustainability Policy.

2. Principal Adverse Impacts - SFDR Article 4

UpToMore does not currently consider the principal adverse impacts (PAIs) of investment decisions on sustainability factors within the meaning of Article 4 SFDR. This position is linked to UpToMore’s size, business model and the nature of its strategy (a fund-of-funds structure investing in third-party ETFs). UpToMore may reassess this position in the future.

3. Remuneration and Sustainability - SFDR Article 5

UpToMore’s Remuneration Policy supports sound and effective risk management. Sustainability risks are taken into account in a proportionate manner, appropriate to UpToMore’s business model, scale and risk profile. Further information is available in the Remuneration Policy.

4. Product-level disclosures (Article 8) - SFDR Article 10

UpToMore Fund FGR promotes environmental and social characteristics by primarily investing in ETFs that apply ESG screening and exclusion criteria. The Fund does not commit to making sustainable investments within the meaning of Article 2(17) SFDR and does not use a designated reference benchmark for attaining environmental or social characteristics. The pre-contractual disclosures, prepared in accordance with Annex II SFDR, are included in the Prospectus.

Documents & references

- [Sustainability Policy \(Summary\) \(PDF\)](#)
- [Prospectus incl. SFDR Annex II \(PDF\)](#)
- [Remuneration Policy \(SFDR excerpt\)](#)

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