



Brussels, 6.4.2022  
C(2022) 1931 final

ANNEX 3

**ANNEX**

*to the*

**Commission Delegated Regulation (EU) 2022/1288**

**supplementing Regulation (EU) 2019/2088 of the European Parliament and of the Council with regard to regulatory technical standards specifying the details of the content and presentation of the information in relation to the principle of ‘do no significant harm’, specifying the content, methodologies and presentation of information in relation to sustainability indicators and adverse sustainability impacts, and the content and presentation of the information in relation to the promotion of environmental or social characteristics and sustainable investment objectives in pre-contractual documents, on websites and in periodic reports**

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ANNEX III

**Pre-contractual disclosure for financial products equivalent to those referred to in Article 9, paragraphs 1 to 4a, of Regulation (EU) 2019/2088 and Article 5, first paragraph, of Regulation (EU) 2020/852**

**Product name:** Helveteq Swiss Green Gold – AUCO2

**Legal entity identifier:** 506700SDAUZ876180S54

## Sustainable investment objective

Does this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input checked="" type="radio"/> <input checked="" type="checkbox"/> <b>Yes</b>	<input type="radio"/> <input type="radio"/> <input type="checkbox"/> <b>No</b>
<input checked="" type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective:</b> 95% <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul>	<input type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of ___% of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with a social objective</li> </ul>
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective:</b> ___%	<input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>

**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 include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



### What is the sustainable investment objective of this financial product?

The objective of this product is a reduction in carbon emissions and giving investors access to sustainable gold. The gold is responsibly sourced by a highly accredited refinery and the carbon footprint is assessed and compensated. The process of neutralizing the carbon emissions is certified by Carbon Trust Assurance. This continued effort ensures the attainment of the objective of reducing carbon emissions by channeling capital into carbon neutral assets. This contributes to net-zero undertakings in line with the global warming objectives of the Paris Agreement. No benchmark has been designated for this product.

**Sustainability indicators** measure how the sustainable objectives of this financial product are attained.

● **What sustainability indicators are used to measure the attainment of the sustainable investment objective of this financial product?**

The investment has the following sustainability indicators:

1. The % of investments in sustainable gold. The attainment of the sustainable investment objective of this financial product is mainly measured by the amount invested in sustainable gold, as described above. This is directly linked to point 3. of this paragraph.
2. The % of investments in securities that are on the exclusion list as result of the application of exclusion criteria stated in Sustainability Risk Policy and the ESG Product and Transparency Standard: [https://helveteq.com/helveteq\\_esg\\_product\\_and\\_transparency\\_standard/](https://helveteq.com/helveteq_esg_product_and_transparency_standard/)
3. The carbon footprint of the underlying(s). One of the criteria for the underlying is to achieve carbon neutrality.

● **How do sustainable investments not cause significant harm to any environmental or social sustainable investment objective?**

The product does not invest in companies, sovereigns or real estate and is, as such, not subject to the sustainability indicators defined in Tables 1, 2 and 3 of Annex I of the Commission Delegated Regulation (EU) 2022/1288. Nonetheless, it shall be addressed, that the refinery in scope of this product (MKS PAMP) addresses the issues at hand. MKS PAMP has set for its supply chains ambitious ESG goals, i.e. to reduce negative impacts, including environmental and aim for significant positive societal impact through its commercial and operational activities. As an industry leader regarding sustainable supply chains, MKS PAMP commits to source precious metals in a secure, transparent, traceable, ethically, socially and environmentally responsible way, not tainted by conflict or human right abuses. MKS PAMP factors in a comprehensive range of sustainability indicators, a detailed break-down of which can be found in the corresponding Responsible Precious Metals Policy ([https://www.mkspamp.com/sites/mksandpamp/files/inline-files/FINAL%200408\\_22\\_2022%20Group%20Policy\\_RGG9\\_0.pdf](https://www.mkspamp.com/sites/mksandpamp/files/inline-files/FINAL%200408_22_2022%20Group%20Policy_RGG9_0.pdf)). Furthermore, MKS PAMP has developed an approach to measure/reduce its Scope 1, 2 and 3 carbon footprint in relation to the Paris Accords and its SBTi approved commitments.

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

Not applicable.

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

The product does not make direct investments in companies. However, the refinery in scope of this product (MKS PAMP) complies with the UN Guiding Principles on Business and Human Rights as required by the LBMA Responsible Gold Guidance V.9 (<https://cdn.lbma.org.uk/downloads/Publications/2021/Responsible-Gold-Guidance-Version-9-Final.pdf>) and demonstrates that it goes beyond compliance with the OECD Due Diligence Guidance as reflected in the corporate Responsible Precious Metals Policy (vide supra).

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

- Yes
- No

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



**What investment strategy does this financial product follow?**

The product is a 1:1 tracker on MKS PAMP Carbon Neutral Gold<sup>®</sup> by means of a physical replication method.

The investment strategy is implemented via the collateralization mechanism as described in our Base Prospectus (<https://helveteq.com/wp-content/uploads/2022/04/BaseProspectusApril2022.pdf>), which is monitored by an independent administrator.

**What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?**

The ETP has the following binding elements:

1. No other underlying(s) apart from MKS PAMP Carbon Neutral Gold<sup>®</sup> are permitted, except for derogations stated below under “What is the asset allocation and the minimum share of sustainable investments?”.
2. No investments in securities that are on the exclusion list as result of the application of exclusion criteria stated in Sustainability Risk Policy and the ESG Product and Transparency Standard, are permitted ([https://helveteq.com/helveteq\\_esg\\_product\\_and\\_transparency\\_standard/](https://helveteq.com/helveteq_esg_product_and_transparency_standard/)).

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

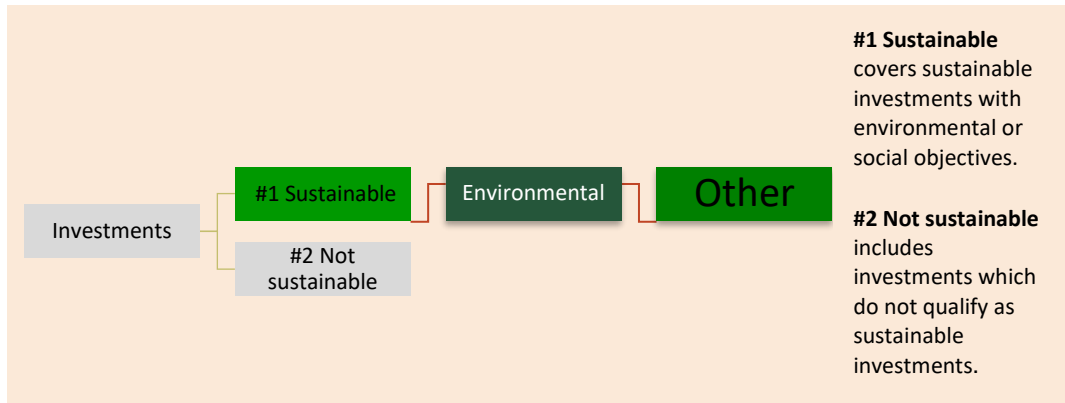
- **What is the policy to assess good governance practices of the investee companies?**

Not applicable.

**Asset allocation**  
describes the share of investments in specific assets.



**What is the asset allocation and the minimum share of sustainable investments?**



Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee

As already described above, the product is a 1:1 tracker on MKS PAMP Carbon Neutral Gold® by means of a physical replication method. In case this Gold is not available (temporarily or permanently) or becomes illiquid the Collateral may also consist of other, similar Gold which should have been responsibly produced and responsibly sourced.

The Gold is held in physical form and to the extent complementary necessary for purposes of liquidity and cash management non-physical book entry gold at a maximum of 5% of the assets underlying the the product and a cash account with an initial cash account amount of zero. The minimum share of sustainable investments is 95%.

- **How does the use of derivatives attain the sustainable investment objective?**

The product does not use derivatives.



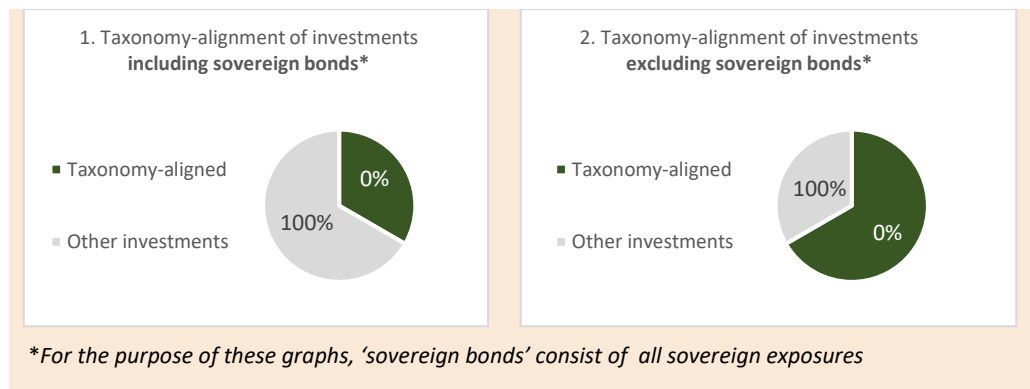
**To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?**

Zero percent.

*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.*

**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.



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

Zero percent.



**What investments are included under “#2 Not sustainable”, what is their purpose and are there any minimum environmental or social safeguards?**

The only assets included under “#2 Other” are cash and gold book-entries, to the extent complementary necessary for purposes of liquidity and cash management, at a maximum of 5% of the assets underlying the product.



**Where can I find more product specific information online?**

More product-specific information can be found on the website:

<https://helveteq.com/auco2>

<https://helveteq.com/sfdr-mifid2/>