

**Principle Adverse Impacts (PAIs) consideration – Entity Level**  
(in accordance with art. 4(1) of EU Regulation 2019/2088)

**Introduction**

The Sustainable Finance Disclosure Regulation (SFDR), Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019, requires the Company to make a “comply or explain” decision whether to consider the principal adverse impacts (“PAI”) of its investment decisions on sustainability factors, in accordance with a specific regime outlined in SFDR. PAIs are described as impacts that result, or might result, in negative effects on sustainability factors, such as social and employee matters, respect for human rights, anticorruption or anti-bribery matters.

**Opt-out on considering PAI at entity level**

The Company carefully assessed the requirements of the PAI regime under Article 4 of the SFDR and opted to not consider the adverse impacts of investment decisions on sustainability factors at entity level. If the Company considers PAI on a product level it will clearly disclose how it considers PAI in its product specific disclosures. While the Company supports the policy goals of the PAI regime to improve transparency to clients, the Company is cognizant of the fact that, given the scale of its activities and the types of products, it would be a challenge to comply with the specific regime of the SFDR. The Company also believes that certain of its investment strategies cannot presently support the adoption of the PAI regime, as it is difficult to ascertain the adverse sustainability impact of the underlying securities or products involved in these strategies. Lastly, as companies and market data providers are not yet ready to make all necessary data available, it is challenging for the Company to comply with the reporting requirements of the PAI statement. The Company reserves the right to reassess its position in the future.

**Our approach**

Despite the Company’s decision not to comply with the PAI regime and as part of its overall commitment to ESG matters, the Company has implemented positive ESG-related initiatives and policies. Our Responsible Investment Policy is available on our website at: [www.eurobankfmc.lu](http://www.eurobankfmc.lu)