

## **No consideration of adverse impacts of investment decisions on sustainability factors**

### **I. Legal framework**

Structured Invest S.A. (hereafter “SI” or the “Management Company”) is a management company established under Luxembourg law and a 100% subsidiary of UniCredit Bank GmbH, Germany. SI is authorized under chapter 15 of the law of 17 December 2010 relating to undertakings for collective investment as amended (“Law of 2010”) and is furthermore authorized as alternative investment fund manager pursuant to chapter 2 of the law of 12 July 2013 relating to alternative investment fund managers as amended (“AIFM Law”).

Pursuant to Article 4 of the Regulation (EU) 2019/2088 (SFDR), SI is required to disclose whether or not it considers the principal adverse impacts (“PAIs”) at the entity level.

### **II. Structured Invest S.A. statement on PAIs (“Statement”)**

In compliance with article 4 (1) (b) of the SFDR and article 12 of the Delegated Regulation (EU) 2022/1288 supplementing Regulation EU 2019/2088 (RTS), SI positions itself in the “explain” option described at article 4(3) of the SFDR and discloses the following statement:

***SI does not consider any adverse impacts of its investment decisions on sustainability factors at entity level.***

### **III. Explanation.**

For the moment, SI does not consider the adverse impacts of investment decisions on sustainability factors in the manner prescribed by Article 4 of the SFDR as there is no sufficient data available in satisfactory quality to allow the Management Company to adequately assess the potential adverse impact of its investment decision on sustainability factors.

Furthermore Based on Art. 4 SFDR the publication of a PAI statement is mandatory for financial market participants that exceed an average of 500 employees during the financial year (Art. 4 III SFDR). SI has less than 500 employees.

It is highlighted, that SI acts as the management company of collective investment schemes whereas the investment management of the collective investment schemes is delegated in most cases to investment managers. The ESG ambition, the ESG approach / methodology, the tools and ESG data providers that are used and the consideration of adverse impacts of investment decisions on sustainability factors varies among the investment managers. Furthermore, ESG characteristics, ambition level and approaches (including the consideration or not of adverse impacts of investment decisions) are defined at the level of each product and can vary from one product to the other. Hence, some of the products managed by our delegated investment manager may consider principal adverse impacts of their investment decisions. In this case, the approach for considering such impacts is detailed in the pre-contractual documentation of the concerned products, as required under article 7(1) of the SFDR Regulation.

### **IV. Review of the Statement**

SI continuously monitors the quality of PAI-data in order to reevaluate the decision on whether or not to consider PAIs at management company level, each year.

Luxembourg, June 2023

Structured Invest S.A.