

PAI Policy

Contents

I.	Legal framework.....	2
II.	Sustainability-related disclosures in the financial services sector	2
III.	Purpose of this policy	2
IV.	Policy review	2
V.	Principal adverse impacts – Regulatory framework & context	3
a.	Principal adverse impacts – Context of the SFDR.....	3
b.	Principal adverse impacts – Link with sustainability factors and sustainability indicators.....	3
c.	Principal adverse impacts – Link with sustainability risk.....	3
d.	Principal adverse impacts – Requirements of the SFDR relevant for this policy	3
VI.	Principal adverse impacts – Integration in the investment decision-making process	4
a.	Principal adverse impacts – Organizational setup of the portfolio management function.....	4
b.	Principal adverse impacts – Scope of application and current inherent limitations	4
c.	Principal adverse impacts – Identification and prioritization of principal adverse impacts.....	5
d.	Principal adverse impacts – Description of the principal adverse sustainability impacts and of any related actions taken or planned.....	6
e.	Principal adverse impacts – Engagement.....	6
f.	Principal adverse impacts – Adherence to responsible business conduct codes and internationally recognised standards for due diligence and reporting	6

I. Legal framework

Structured Invest S.A. (hereafter “SI”) is a management company established under Luxembourg law and a 100% subsidiary of UniCredit Bank AG. 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”).

II. Sustainability-related disclosures in the financial services sector

On 27 November 2019, Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosure requirements in the financial services sector (hereinafter “SFDR”) was published and entered into force on 10 March 2021.

The main objective of the SFDR is to create transparency on

- how sustainability risks are considered in the management of investment funds; and
- if principal adverse impacts of investment decisions on sustainability factors (“comply or explain”) are considered in the management of investment funds.

These transparency requirements apply in principle to both SI and the managed investment funds.

III. Purpose of this policy

This policy describes the SI’s decision with respect to the requirements of article 4 (1) SFDR regarding the consideration of principal adverse impacts (hereinafter “PAIs”) of investment decisions on sustainability factors.

SI has chosen to consider principal adverse impacts of investment decisions on sustainability factors for the managed investment funds that are pursuing a sustainable investment strategy respectively are allocating part of their portfolio in sustainable investments as defined in article 2 (17) SFDR.

Further SI is part of a large financial group as referred to in article 3 (7) of Directive 2013/34/EU. The reporting on principal adverse impacts of SI will be included in the consolidated reporting of the UniCredit Group.

IV. Policy review

This policy will be reviewed and updated annually, and on an ad hoc basis in case of relevant changes to the organizational structure of SI, in case of amendments to the regulatory framework governing this policy or if otherwise deemed necessary.

SI expects to conclude its first review of this policy, before the Regulatory Technical Standards with regard to the content, methodologies and presentation of disclosures pursuant to article 2a (3), article 4 (6) and (7), article 8 (3), article 9 (5), article 10 (2) and article 11 (4) of the SFDR shall be applied.

V. Principal adverse impacts – Regulatory framework & context

a. Principal adverse impacts – Context of the SFDR

Principal adverse impacts are to be understood as those impacts of investment decisions that result in negative effects on sustainability factors (recital 20 of the SFDR). The SFDR is requiring both, SI as well as the managed investment funds, in article 4 (1) respectively 7 of the SFDR to decide if PAIs are to be considered.

There are no further clarifications or definitions to be found in the SFDR with respect to the concept of principal adverse impacts.¹

b. Principal adverse impacts – Link with sustainability factors and sustainability indicators

According to article 2 (24) SFDR sustainability factors mean environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters. For each sustainability factor different underlying sustainability indicators can in principle be identified (e.g. carbon footprint, wage equality, compliance with the requirements of the General Data Protection Regulation, Regulation (EU) 2016/679).

The SFDR neither defines a mandatory list of sustainability indicators to be considered nor for which sustainability indicators principal adverse impacts are applicable.

c. Principal adverse impacts – Link with sustainability risk

The SFDR is establishing a link between the requirement to consider sustainability risks² in the investment decision-making process (article 3 SFDR) and the consideration of principal adverse impacts of investment decisions on sustainability factors (article 4 SFDR). Both concepts share the same core foundation, i.e. they commence with the identification and consideration of relevant sustainability indicators.

In general, the identification and consideration of relevant sustainability indicators are inter alia dependent on the investment strategy as well as the geographical and sectoral focus of the managed investment funds. The monitoring of relevant sustainability indicators allows to establish a better and more informed understanding regarding the identification of (potential) sustainability risks. Further the assessment of certain sustainability indicators may be prioritized within the investment decision-making process to eliminate or at least mitigate sustainability risks.

d. Principal adverse impacts – Requirements of the SFDR relevant for this policy

The SFDR imposes as of 10 March 2021 transparency requirements only on SI concerning the consideration of PAIs. The transparency requirements require that SI explain how PAIs are considered at Company level. As SI complies with article 4 (1) of the SFDR no further disclosure for the managed investment funds with respect to article 7 (2) SFDR is required.

¹ Further clarifications will be provided by the Regulatory Technical Standards with regard to the content, methodologies and presentation of disclosures pursuant to article 2a (3), article 4 (6) and (7), article 8 (3), article 9 (5), article 10 (2) and article 11 (4) of the SFDR. These Regulatory Technical Standards are expected to be applied as from 1 January 2022.

² Article 2 (22) of the SFDR defines sustainability risk as an environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of the investment.

	Summary of requirements	Level	Implementation
Art. 4 (1) (a)	Publication on the website where the Company considers principal adverse impacts of investment decisions on sustainability factors and a statement on due diligence policies with respect to those impacts, taking due account of the Company's size, the nature and scale of the Company's activities and the types of financial products the Company make available.	Company	Description in this policy
Art. 4 (2) SFDR	<p>In the publication made in accordance with article 4 (1) (a) SFDR the Company shall include at least the following:</p> <ul style="list-style-type: none"> a) information about the policies on the identification and prioritisation of principal adverse sustainability impacts and indicators; b) a description of the principal adverse sustainability impacts and of any actions in relation thereto taken or, where relevant, planned; c) brief summary of the engagement policy in accordance with Article 3g of the Shareholder Rights Directive II (Directive 2007/36/EC), where applicable; d) a reference to the adherence to responsible business conduct codes and internationally recognised standards for due diligence and reporting and, where relevant, the degree of the alignment with the objectives of the Paris Agreement. 	Company	Description in this policy

VI. Principal adverse impacts – Integration in the investment decision-making process

a. Principal adverse impacts – Organizational setup of the portfolio management function

SI is responsible for exercising the portfolio management function for the managed investment funds. The portfolio management function of the investment funds can in principle be structured as follows:

- the portfolio management function is performed by SI (with/without the involvement of an investment advisor);
- the portfolio management function is delegated to a qualified third party.

b. Principal adverse impacts – Scope of application and current inherent limitations

SI considers principal adverse effects of investment decisions on sustainability factors.

The ability to consider principal adverse impacts depends substantially on the availability of relevant data and information for the invested assets. The availability, quality and saturation of relevant data and information for the systematic assessment of sustainability indicators and consideration of principal adverse impacts is for the time being not deemed adequate for all asset classes in which the managed investment funds invest.

Therefore, SI will initially focus its consideration of principal adverse impacts of investment decision on sustainability factors on managed investment funds that pursue as pre-contractually disclosed sustainable investment strategies and either qualify

- as article 9 funds under the SFDR (pursuing a sustainable investment strategy); or
- as article 8 funds under the SFDR and are allocating part of their portfolio in sustainable investments as defined in article 2 (17) SFDR.

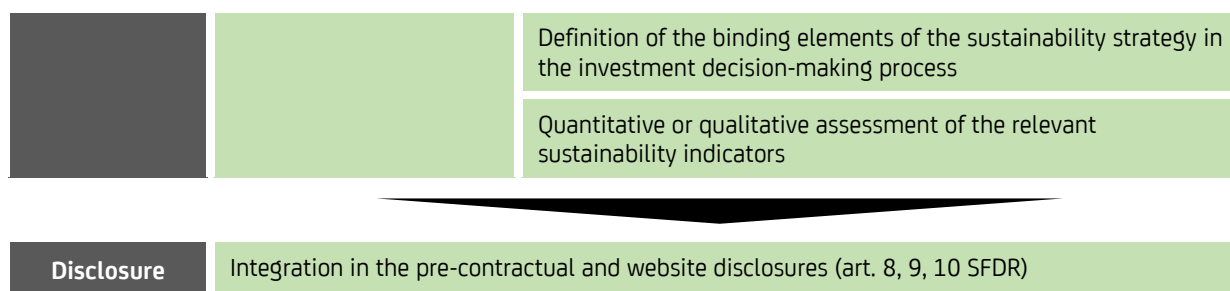
SI will regularly reassess the availability, quality and saturation of relevant data and information with the aim to expand the consideration of principal adverse impacts.

c. Principal adverse impacts – Identification and prioritization of principal adverse impacts

The identification and prioritization of principal adverse impacts of investment decisions on sustainability factors require the consideration of various elements by SI as portfolio manager:

	Elements (non-exhaustive)	Relevant considerations (non-exhaustive)
Identification & prioritisation of principal adverse impacts	Regulatory minimum requirements	SFDR
		EU Taxonomy Regulation (EU) 2020/852
	Investment strategy	Asset classes to be invested into
		Listed assets vs. unlisted assets
		Geographical considerations regarding the assets
		Industry sectors of the invested assets
	SFDR classification	Qualification of the investment fund under article 9 SFDR
		Qualification of the investment fund under article 8 of the SFDR and allocation of part of the portfolio in sustainable investments as defined in article 2 (17) SFDR
	Sustainability strategy (taking into consideration the investment strategy and SFDR classification)	Description of the sustainability strategy ³
		Identification of relevant sustainability indicators to be considered in the investment decision-making process
		Prioritisation of sustainability indicators that are essential to the delivery of the sustainability strategy
		Definition of relevant limits for the relevant sustainability indicators

³ i.e. focus of the strategy on defined environmental and/or social aspects provided that good governance practices are adhered to.



For the identification and prioritisation of relevant sustainability indicators, SI as portfolio manager is considering different external sources (e.g. data provider, materiality map provided by the Sustainability Accounting Standards Board) during pre-trade assessment. Based on this assessment, the relevant sustainability indicators that are identified as material for the delivery of the sustainability strategy are prioritised and in accordance with SFDR provisions reflected in the pre-contractual and website disclosures in accordance with article 8 and 9 SFDR respectively article 10 SFDR.

Relevant sustainability indicators⁴ that can be taken into consideration may include greenhouse gas emissions, energy consumption for non-renewable sources, violations of the UN Global Compact principles, board gender diversity of investee companies or consideration of convictions and fines for violation of anti-corruption and anti-bribery laws.

d. Principal adverse impacts – Description of the principal adverse sustainability impacts and of any related actions taken or planned

The requirement to consider principal adverse impacts of investment decisions on sustainability factors applies from 10 March 2021. The collection of data and information starts as from 10 March 2021 and the related actions planned will be based on the results and assessment of the first full reporting period.

e. Principal adverse impacts – Engagement

SI has published its engagement policy in accordance with the requirements of article 3g of Directive 2007/36/EC (Shareholder Rights Directive II) on its website. Please refer to [insert link].

f. Principal adverse impacts – Adherence to responsible business conduct codes and internationally recognised standards for due diligence and reporting

SI is authorized and supervised by the CSSF. Therefore, SI is subject to substantial regulatory provisions (EU, Luxembourg, CSSF) that in detail address the requirements of business conduct, due diligence and reporting.

Luxembourg, June 2021

Structured Invest S.A.

⁴ Legally required considerations such as exclusion of companies associated with cluster munitions are per default considered.