

## Statement on principal adverse impacts of investment advice on sustainability factors

### 1. Introduction:

The European regulation (EU) 2019/2088 of 27 November 2019 on sustainability-related disclosures in the financial services sector (« **SFDR** ») imposes to financial advisors<sup>1</sup> to publish information on the consideration or not of the principal adverse impacts (« **PAI** ») of investment decisions on sustainability factors in their investment advices<sup>2</sup>.

Acting as a financial advisor within the meaning of SFDR, Spuerkeess (LEI: R7CQUF1DQM73HUTV1078) hereby declares that it takes into consideration, in its investment advice, the PAI of investment decisions on sustainability factors.

### 2. Use of the information published by financial market participants:

The consideration of PAI in Spuerkeess's investment advice is based on the collection and use of different information depending on the type of financial instrument:

- for investment funds; and
- for all other financial instruments.

#### 2.1. For investment funds:

Spuerkeess collects and uses information directly determined by management companies (acting as financial market participants) and made available through the "European ESG Template (EET)"<sup>3</sup> for exchanging data on ESG aspects. For each investment fund, the management company indicated the PAI considered or not within the framework for the applied investment policy.

#### 2.2. For all other financial instruments:

Spuerkeess has defined an ESG exclusion policy<sup>4</sup> that is part of its "Transition Enabler" strategy and is based on the principal of double materiality.

This policy allows for sector-based and/or controversy-based exclusions in the definition of the investment universe from which the investment solutions relating to Spuerkeess's investment advice service are built.

---

<sup>1</sup> Pursuant to article 2, 11) of SFDR.

<sup>2</sup> Article 4, paragraph 5 of SFDR.

<sup>3</sup> This is a template produced by FinDatEx, a market association whose mission is to facilitate the data exchange process between stakeholders in the financial market. This template enables the exchange, according to a standardized structure and nomenclature, of information related to the ESG aspects of financial instruments considered to be financial products within the meaning of SFDR.

<sup>4</sup> <https://www.spuerkeess.lu/en/about-us/sustainability/csr-policy-of-spuerkeess/statement-of-the-esg-exclusion-policy/>

The information collected and used by Spuerkeess for the application of this policy are determined and made available by MSCI, as an external ESG data provider.

In this context, Spuerkeess has established a mapping between each PAI and the exclusions defined in its ESG exclusion policy. This allows all PAI to be considered in Spuerkeess's investment advice.

### 3. Consideration of PAI in investment advice:

The consideration of PAI in Spuerkeess's investment advice is ensured through the management of several indicators grouped, pending of their nature, within the following issues:

ISSUES	#	INDICATORS
Reduction of greenhouse gas emissions (GHG)	1	GHG emissions
	2	Carbon footprint
	3	GHG intensity
	4	Exposure to fossil fuel sector
	5	Share of non-renewable energy consumption and production
	6	Energy consumption intensity per high impact climate sector
Protection of biodiversity	7	Activities negatively affecting biodiversity-sensitive areas
Sustainable water management	8	Emissions to water
Reduction of waste	9	Hazardous waste and radioactive waste ratio
Respect of social standards, labour law, good governance and gender equality	10	Violations of UN Global Compact principles and/or OECD Guidelines for Multinational Enterprises
	11	Lack of processes and compliance mechanisms to monitor compliance with UN global Compact principles and/or OECD Guidelines for Multinational Enterprises
	12	Unadjusted gender pay gap
	13	Board gender diversity
Exclusion of controversial weapons	14	Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)

To do this, when expressing their potential sustainability preferences, each client is invited to select the issues they wish to be considered in their investments. Spuerkeess then formulated investment advice based on selected financial instruments, taking the client's choices into account.

Thus, the consideration of PAI in Spuerkeess's investment advice results in respect for the sustainability preferences expressed by the client.