

Sustainability Related Disclosure – No consideration of PAI

For the time being Luxcellence Management Company S.A. (hereafter “Luxcellence”) does not consider the adverse impacts of investment decisions on sustainability factors. In accordance with Article 4, I b) of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (“SFDR”), the main reason for not considering adverse impacts of investment decisions on sustainability factors at the company level is the lack of further information and data available to adequately assess the principal adverse impacts.

Besides as Luxcellence delegates the management of the portfolio to the portfolio managers (here after the “PMs”), the individual PMs are responsible for the consideration of the Principal Adverse Sustainability Impact (“PASI”) of their investment decision on the sustainability factors. The consideration of PASI depends on the specificities of the relevant fund and its PM.

The PMs could therefore decide not to consider the adverse effects of investment decisions on sustainability factors for their respective funds. Such impact deems not to be relevant and in addition, as mentioned above, there is a lack of data available on the market to determine and weigh such negative sustainability effects.

If the data quality is sufficient, Luxcellence acknowledges that the PMs may review their current position and plan any implementation in order to consider the principal adverse sustainability impacts on investments.

Further information may be found, as the case may be, in the prospectus of the relevant fund and/or on the website of the relevant PM.