

Transparency of adverse sustainability impacts at entity level

<<< Statement pursuant to art. 4(1)¹ 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 >>>

Regulation (EU) 2019/2088 is considered an important milestone of European Union law in terms of ESG factors, requiring the disclosure of specific information concerning market participant approaches to adverse sustainability impacts at entity level.

SAI Erste Asset Management S.A., a part of the Erste Asset Management Group, gives constant attention to environment, social, ethical, and governance matters, is committed to the objectives of the EU Regulation and makes consistent compliance efforts by reviewing the operations of securities issuers in the investment decision-making process.

The quantitative or qualitative assessment of sustainability risks and the determination of adverse sustainability impacts requires the evaluation of several relevant sources of information published by third parties. Taking into account the fact that, so far, there has been no standardised disclosure of sustainability factors, assessments that are not evidence-based may lead to inconsistent outcomes

The sustainability data currently available to the company are incomplete, inaccurate or estimate-based and not easily accessible. Given the lack of accurate and updated data, we are currently unable to consider the principal adverse impacts of investment decisions on sustainability factors.

In this context and in accordance with the provisions of art. 4(1) of the EU Regulation, SAI Erste Asset Management S.A. declares that it does not currently consider the adverse impacts of investment decisions on sustainability factors. Nevertheless, SAI Erste Asset Management S.A. will seek to regularly review the information and to closely monitor the investments made, with due care and diligence, in the best interest of investors.

SAI Erste Asset Management S.A.

¹ **Article 4(1)** Financial market participants shall publish and maintain on their websites:

(a) where they consider principal adverse impacts of investment decisions on sustainability factors, a statement on due diligence policies with respect to those impacts, taking due account of their size, the nature and scale of their activities and the types of financial products they make available; or
(b) where they do not consider adverse impacts of investment decisions on sustainability factors, clear reasons for why they do not do so, including, where relevant, information as to whether and when they intend to consider such adverse impacts.