

## **DISCLAIMER: NO CONSIDERATION OF THE ADVERSE IMPACTS OF INVESTMENT DECISIONS ON SUSTAINABILITY FACTORS**

One of the purposes 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 ("Disclosure Regulation") is to reduce information asymmetries that entities publicly disclose or through their websites. An example of this is the information related to the analysis of adverse impacts by participants in financial markets and financial advisers.

Principal Adverse Impacts (PIAs) means the significant negative impact on the environment or society that could occur as a result of advice and investment decisions in a given economic activity.

Andbank Luxembourg, as a participant in the financial markets and aligned with the objectives of transparency and rigor in market information pursued by SFDR Regulation (EU) 2019/2088, has opted not to report at this time on the main negative impacts on sustainability factors.

The main reasons behind this decision not to consider the principal adverse impacts are the difficulty in actively managing and monitoring adverse impact indicators at the entity level at this time, which makes it impossible to properly identify and assess them, and there is no legal obligation for Andbank Luxembourg to do so. Currently, there is no due diligence policy in relation to such adverse impacts.

The consideration of such impacts is provided for by legislation in the case of market participants regarding investment in financial products within the scope of Regulation (EU) 2019/2088 (Art. 4.1a), and in the provision of investment advice on financial products within the scope of Regulation (EU) 2019/2088 (Art. 4.5a), and its technical standards set out in Delegated Regulation (EU) 2022/1288.

Andbank Luxembourg is working on having more information available to be able to adequately monitor the requirements of Regulation (EU) 2019/2088, advancing in our analysis and evaluation processes, in accordance with the evolution and development of the regulations and the increase in available market information.

The full content of Andbank Luxembourg Responsible Investment Policy is available to the client on the website