



No consideration of adverse impacts
of investment decisions on
sustainability factors

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1. Introduction

SAMAG Europe S.à r.l. is a limited liability company (société à responsabilité limitée), with its registered office at 19, esplanade de la Moselle L-6637 Wasserbillig, Grand Duchy of Luxembourg and registered with the Trade and Companies Register of the Grand Duchy of Luxembourg (Registre de commerce et des sociétés) under registration number B191932 and acts as AIFM (“Alternative Investment Manager”) of several Funds.

Under Article 4 of the 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, Financial market participants shall publish and maintain on their website if they do or if they do not consider adverse impacts.

Article 4 (b) further states the if adverse impacts of investment decisions on sustainability factors are not considered, it must be clearly stated why those adverse impacts are not considered and if the Financial market participants intends to consider them.

Thus, said according to Article 4(3) of (EU) 2019/2088 on sustainability-related disclosures in the financial services sector, Adverse impacts of investment decisions on sustainability factors are not considered because it is not mandatory for companies to consider these with less than 500 employees.

2. What are Principal Adverse Impacts (“PAI”)

Principal Adverse Impacts (PAI) refer to the significant negative effects that investment decisions and activities may have on environmental, social, and governance (ESG) factors. These impacts can be material and long-lasting, and they may include harm to natural resources, ecosystems, human rights, social well-being, or corporate governance practices. Identifying and managing PAI is a critical component of sustainable investment strategies, aiming to mitigate risks and enhance the positive contributions of investments toward sustainability objectives.

3. Statement on adverse impacts

SAMAG does not consider adverse impact of investment decisions on sustainability factors.

4. Why adverse impacts of investment decisions are not considered

For the moment, SAMAG does not consider the adverse impacts of investment decisions on sustainability factors in the manner prescribed by Article 4 of the SFDR as there is no sufficient data available in satisfactory quality to allow SAMAG to adequately assess the potential adverse impact of its investment decision on sustainability factors.

As stated above, the publication of a PAI statement is mandatory for financial market participants that exceed an average of 500 employees during the financial year (Art. 4 III SFDR). SAMAG has less than 500 employees.

5. Review on the Statement on PAI

SAMAG continuously monitors the quality of PAI-data in order to reevaluate the decision on whether or not to consider PAIs at AIFM level, each year.