



Disclosures on the implementation of the requirements of Article 4 (1) of Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector regarding the transparency of adverse sustainability impacts at entity level

The Management Company

NBG Asset Management Luxembourg, S.A (also named “NBG AM Luxembourg” or “the ManCo”) is a public limited company (*Société Anonyme*) authorised by the Luxembourg supervisory authority Commission de Surveillance du Secteur Financier (hereinafter “CSSF”) pursuant to chapter 15 of the Luxembourg law of 17 December 2010 on undertakings for collective investment as amended from time to time (*loi concernant les organismes de placement collectif*) (the “2010 Law”) which implemented into the Luxembourg law (i) the Directive 2009/65/EC of the Parliament and of the Council of 13 July 2009 on the coordination of laws, regulations and administrative provisions relating to UCITS, as amended from time to time (the “Directive 2009/65/EC”) and (ii) the implementation measures of the Directive 2009/65/EC. The ManCo is a subsidiary of National Bank of Greece S.A. (NBG S.A.).

NBG AM Luxembourg is committed to conducting its business in accordance with applicable laws and regulations, and in a way which protects its reputation in the market. It is crucial that each employee shares in this commitment.

This Disclosure has been developed with respect to NBG AM Luxembourg activities as Management Company for investment funds.

Sustainability-related disclosures in the financial services sector

On 27 November 2019, Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosure requirements in the financial services sector (hereinafter “SFDR”) was published and entered into force on 10 March 2021.

The main objective of the SFDR is to create transparency on

- how sustainability risks are taken into account in the management of investment funds. and
- if principal adverse impacts of investment decisions on sustainability factors (“comply or explain”) are considered in the management of investment funds.

These transparency requirements apply in principle to both the NBG AM Luxembourg and the managed investment funds.

Purpose of the Disclosure

This Disclosure describes the NBG AM Luxembourg’s decision with respect to the requirements of article 4 (1) SFDR regarding the consideration of principal adverse impacts of investment decisions on sustainability factors.

Principal adverse impacts – Regulatory framework & context

Principal adverse impacts – Context of the SFDR

Principal adverse impacts (PAIs) are to be understood as those impacts of investment decisions that result in negative effects on sustainability factors (recital 20 of the SFDR). The SFDR is requiring both,



the NBG AM Luxembourg as well as the managed investment funds, in article 4 (1) respectively 7 of the SFDR to decide if PAIs are to be considered.

There are no further clarifications or definitions to be found in the SFDR with respect to the concept of principal adverse impacts¹.

Principal adverse impacts – Link with sustainability factors and sustainability indicators

According to article 2 (24) SFDR sustainability factors mean environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters. For each sustainability factor different underlying sustainability indicators can in principle be identified (e.g. carbon footprint, wage equality, compliance with the requirements of the General Data Protection Regulation, Regulation (EU) 2016/679).

The SFDR neither defines a mandatory list of sustainability indicators to be considered nor for which sustainability indicators principal adverse impacts are applicable.

Decision regarding PAI consideration at entity level

The NBG AM Luxembourg has chosen for the time being not to consider principal adverse impacts of investment decisions on sustainability factors, after having taken into consideration the managed investment funds (i.e. nature of the invested assets, classification with respect to the SFDR and non-sustainable investment strategies) as well as the inherent limitations with respect to information and data regarding principal adverse impacts of investment decisions on sustainability factors

Disclosure review and update

The NBG AM Luxembourg expects to conclude its first reassessment regarding the future consideration of principal adverse impacts of investment decisions on sustainability factors, before the Regulatory Technical Standards with regard to the content, methodologies and presentation of disclosures pursuant to article 2a (3), article 4 (6) and (7), article 8 (3), article 9 (5), article 10 (2) and article 11 (4) of the SFDR shall be applied.

¹ Further clarifications will be provided by the Regulatory Technical Standards with regard to the content, methodologies and presentation of disclosures pursuant to article 2a (3), article 4 (6) and (7), article 8 (3), article 9 (5), article 10 (2) and article 11 (4) of the SFDR. These Regulatory Technical Standards are expected to be applied as from 1 January 2022.