

Sustainable Risk Finance Disclosure Regulation (2019/2088) (the “SFDR”)

Primonial REIM Luxembourg (“PREIM Lux”) makes the following disclosures in accordance with Articles 3(1), 4(1)(b) and 5(1) of the SFDR.

Sustainability risk policies

Sustainability risks are “environmental, social or governance event or condition that, if it occurs, could cause an actual or potential material negative impact on the value of the investment”. If they materialise can have a material impact of the value and of the rental income of the assets held by the AIFs managed by PREIM Lux.

Sustainability risks (Environmental, Social and Governance) are taken into consideration in the same way as traditional financial risks, to assess the value, the risk, and the potential performance of an investment. Due diligence phase will encompass an in-depth review of the investment and a focused analysis on how potential risks, including sustainability, can be mitigated.

Sustainability risks then continue to be assessed throughout the holding period of investments and during the divestment phase.

No consideration of sustainability adverse impacts

PREIM Lux does not consider currently the principal adverse impacts of its investment decisions on sustainability factors in the manner prescribed by Article 4 of the SFDR. However, the AIFM is part of a group initiative which aims at integrating principal adverse impacts and setting objectives in terms of reduction of negative impacts. The objective is to be able to comply with the technical standards once they start to apply and to collate data in respect of the first reference period in 2022.

Remuneration policy

PREIM Lux’s remuneration policy includes sound and effective risk management with respect to sustainability risks whereas the structure of remuneration does not encourage excessive risk-taking with respect to sustainability risks and is linked to risk-adjusted performance.