

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 principal adverse impacts (PAI)

It is not mandatory for PREIM Lux to consider PAI, being a company with less than 500 employees, according to the regulatory threshold.

PREIM Lux has decided to not consider PAI at the entity level. The explanation is that PREIM Lux concentrates its human/technological resources at the level of specific funds’ to fully consider the PAI of their respective portfolio. The methodology and datasets must still be developed to take PAI into account at the entity level.

PREIM Lux aims, within the strategy of Primonial REIM Holding, at considering the PAI at the level entity, once the methodology and datasets are mature and published, which is planned for July 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.