

Table 1

Statement on principal adverse impacts of investment decisions on sustainability factors

WEALINS S.A. 529900DRTSUMACSSIX70

**Summary**

WEALINS S.A. considers principal adverse impacts (PAI) of its investment decisions on sustainability factors. The present statement is the consolidated principal adverse sustainability impacts statement to 31 December 2023.

In our role as insurance investment distributor and advisor, WEALINS S.A. collaborates very closely with its partners 'network of insurance intermediaries (brokers, banks, family office) who, in their turn are responsible for engaging in a relation with policyholders. They define the investment strategy and investment support(s) most suitable for each policy holder, considering their risk appetite, investment expectations and sustainability preferences.

The investments underlying WEALINS S.A. products provide access to up to four different types of funds, depending on the product and the target market. These may be external (UCITS, etc.) and/or internal collective funds, dedicated and/or specialised insurance funds set up and managed in accordance with Luxembourg regulatory provisions, and in particular with the provisions of circular letter LC 15/3 of the Commissariat aux Assurances (Luxembourg insurance supervisory authority). Through these external and/or internal funds, policyholders of WEALINS S.A. products can invest in a large number of strategies and investment profiles, most often managed by external and independent financial managers and sometimes, when the regulatory provisions of the policyholders' countries of residence allow it, directly by the policyholders.

Investment decisions are thus taken by these external financial managers mandated by WEALINS S.A. in the case of internal collective or dedicated funds, or by the policyholders themselves, or at least with the confirmation of the policyholders, who may, if they so wish, seek investment advice. In all these cases, it is the responsibility of the independent investment managers appointed by WEALINS S.A., the investment advisors appointed by the policyholders or, if applicable, the policyholders themselves to integrate sustainability risks into their investment decisions and to assess the principal adverse impacts of their investment decisions on sustainability factors and investment returns.

For these reasons, WEALINS S.A. in its role, at product level, is not able to give full "consideration" the adverse impacts of investment decisions on sustainability factors.

Nevertheless, in compliance with Foyer S.A. reporting requirements, WEALINS S.A. has started gathering relevant data in line with PAI reporting of the investments universe that is made available to its clients since 2023. Last year, unfortunately, the average coverage of the portfolio did not reach a satisfactory level (reaching on individual KPIs at best 27%). In 2024 WEALINS S.A. has changed service provider and is now more confident about the quality and nature of the data at its disposal. For this reason we feel today better prepared to publish reporting. We hope that as from next year we will be able to deliver a more complete picture of the sustainability statues of its different portfolios.

The analytical data gathered for the PAI reporting refers to the largest parts of our clients' investments (FID – Dedicated Internal Funds and FAS – Specialised Insurance Funds) which amounts to €14.6 Billion<sup>1</sup>. Because of its business model and as stated above, WEALINS does not have any direct link with the companies the clients 'portfolios are invested in; therefore we are not able to influence the decision-making process that can lead to more sustainable business choices at company level. For these data, WEALINS is therefore not able to provide any comment and explanation for actions taken to remediate any of the negative and/or controversial activities which characterize the activities of the companies in which the investments are made.

<sup>1</sup> Out of which €3.2bn was not not available for the look-through.

Nevertheless, and as part of WEALINS’ commitment to sustainability, we are working towards the definition of a sustainable investment framework that all our asset management partners will have to abide by, and which includes our minimum requirements for collaboration. This will entail that our clients will be able to select the Asset Managers and investment products which will have undergone WEALINS S.A.. first sustainability screening.

For its internal portfolio, (to be published separately) WEALINS SAs currently engaging with Foyer S.A. who is managing its own assets, in order to ensure there is a proper alignment between the management of the fund and WEALINS S.A.’commitments, particularly in terms of abiding by its sustainability policy and the upholding of the UN Global Compact principles. Going forward WEALINS S.A. aims to engage with Foyer S.A. in order to define together the main impacts and the respective actions that can be taken to improve or mitigate those impacts.

Funds	Investee companies	Other	Sovereigns	Total
49,02%	34,75%	13,23%	3%	100%

**Description of principal adverse sustainability impacts**

**Indicators applicable to investments in investee companies**

Adverse sustainability indicator		Metric	Impact 2023	Impact 2022	Explanation	Actions taken
<b>CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS</b>						
Greenhouse gas emissions	1. GHG emissions	Scope 1 GHG emissions	376150.56 tonne CO2e		Coverage 93.43%	
		Scope 2 GHG emissions	84179.336 tonne CO2e		Coverage 93.43%	
		Scope 3 GHG emissions	3463797 tonne CO2e	0	Coverage 92.23%	
		Total GHG emissions	3857473.8 tonne CO2e		Coverage 92.07%	
	2. Carbon footprint	Carbon footprint	549.28143 tonne CO2e / EUR M invested		Coverage 92.07%	
	3. GHG intensity of investee companies	GHG intensity of investee companies	914.36597 tonne CO2e / EUR M revenue		Coverage 92.42%	
	4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	9.36 %		Coverage 88.98%	
	5. Share of non-renewable energy consumption and production	Share of non-renewable energy consumption and non-renewable energy production of investee companies from non-renewable energy sources compared to	Consumption: 62.33 %		Coverage 79.08%	
			Production: 59.99 %		Coverage 92.38%	

		renewable energy sources, expressed as a percentage				
	6. Energy consumption intensity per high impact climate sector	Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector	Total: 0.75393105 GWh / EUR M revenue  Sector A: 0.9757313 GWh / EUR M revenue  Sector B: 1.4331703 GWh / EUR M revenue  Sector C: 0.60483694 GWh / EUR M revenue  Sector D: 2.7366595 GWh / EUR M revenue  Sector E: 0.52280754 GWh / EUR M revenue  Sector F: 0.17214237 GWh / EUR M revenue  Sector G: 0.06674881 GWh / EUR M revenue  Sector H: 1.2349594 GWh / EUR M revenue  Sector L: 0.5391905 GWh / EUR M revenue		Coverage 96.22%  Coverage 95.52%  Coverage 93.55%  Coverage 97.72%  Coverage 87.73%  Coverage 92.97%  Coverage 93.03%  Coverage 96.46%  Coverage 93.34%  Coverage 93.64%	
Biodiversity	7. Activities negatively affecting biodiversity-sensitive areas	Share of investments in investee companies with sites/operations located in or near to biodiversity- sensitive	4.71 %		Coverage 85.78%	

		areas where activities of those investee companies negatively affect those areas				
Water	8. Emissions to water	Tonne of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	0.02250754 tonne / EUR M invested		Coverage 31.1%	
Waste	9. Hazardous waste ratio	Tonne of hazardous waste generated by investee companies per million EUR invested, expressed as a weighted average	63.529648 tonne / EUR M invested		Coverage 92.28%	

**INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION, AND ANTI-BRIBERY MATTERS**

<b>Adverse sustainability indicator</b>		<b>Metric</b>	<b>Impact 2023</b>	<b>Impact 2022</b>	<b>Explanation</b>	<b>Actions taken</b>
Social and employee matters	10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	18.26 %		Coverage 85.78%	
	11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance/complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	0.47 %		Coverage 93.5%	

	12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	11.57 %		Coverage 49.98%	
	13. Board gender diversity	Average ratio of female to male board members in investee companies	35.06 %		Coverage 93.9%	
	14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	Share of investments in investee companies involved in the manufacture or selling of controversial weapons	0.01 %		Coverage 91.41%	

**Indicators applicable to investments in sovereigns and supranationals**

<b>Adverse sustainability indicator</b>		<b>Metric</b>	<b>Impact 2023</b>	<b>Impact 2022</b>	<b>Explanation</b>	<b>Actions taken</b>
Environmental	15. GHG intensity	GHG intensity of investee countries	419.99503 tonne CO2e / EUR M GDP		Coverage 97.25%	
Social	16. Investee countries subject to social violations	Number of investee countries subject to social violations (absolute number and relative number divided by all investee countries), as referred to in international treaties and conventions, United Nations principles and, where applicable, national law	Relative: 3.96 %  Absolute: 5		Coverage 100%  Coverage 100%	



**Indicators applicable to investments in real estate assets**

<b>Adverse sustainability indicator</b>		<b>Metric</b>	<b>Impact 2023</b>	<b>Impact 2022</b>	<b>Explanation</b>	<b>Actions taken</b>
Fossil fuels	17. Exposure to fossil fuels through real estate assets	Share of investments in real estate assets involved in the extraction, storage, transport or manufacture of fossil fuels	N/A			
Energy efficiency	18. Exposure to energy-inefficient real estate assets	Share of investments in energy-inefficient real estate assets	N/A			

**Other indicators for principal adverse impact**

*[Information on the principal adverse impacts on sustainability factors referred to in Article 6(1), point (a) in the format in Table 2]*

*[Information on the principal adverse impacts on sustainability factors referred to in Article 6(1), point (b), in the format in Table 3]*

*[Information on any other adverse impacts on sustainability factors used to identify and assess additional principal adverse impacts on a sustainability factor referred to in Article 6(1), point (c), in the format in Table 2 or Table 3]*

**Description of policies to identify and prioritise principal adverse sustainability impacts**

*[Information referred to in Article 7]*

**Engagement policies**

*[Information referred to in Article 8]*

**References to international standards**

*[Information referred to in Article 9]*

**Historical comparison**

*[Information referred to in Article 10]*

*Table 2*  
**Additional climate and other environment-related indicators**

CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS						
Adverse sustainability impact	Adverse sustainability impact (qualitative or quantitative)	Metric	Impact 2023	Impact 2022	Explanation	Actions taken
Indicators applicable to investments in investee companies						
Emissions	2. Emissions of air pollutants	Tonnes of air pollutants equivalent per million EUR invested, expressed as a weighted average	1.3242495 tonne / EUR M invested		Coverage 16%	
Emissions	4. Investments in companies without carbon emission reduction initiatives	Share of investments in investee companies without carbon emission reduction initiatives aimed at aligning with the Paris Agreement	59.29 %		Coverage 99.99%	
Water, waste and material emissions	6. Water usage and recycling	1. Average amount of water consumed and reclaimed by the investee companies (in cubic meters) per million EUR of revenue of investee companies  2. Weighted average percentage of water recycled and reused by investee companies	1: 1588.2043 m <sup>3</sup> / EUR M invested 2: 0.6 %		1: Coverage 30.31% 2: Coverage 4.12%	

Water, waste and material emissions	7. Investments in companies without water management policies	Share of investments in investee companies without water management policies	8.15 %		Coverage 94.99%	
Water, waste and material emissions	8. Exposure to areas of high water stress	Share of investments in investee companies with sites located in areas of high water stress without a water management policy	0.55 %		Coverage 88.88%	
Water, waste and material emissions	9. Investments in companies producing chemicals	Share of investments in investee companies the activities of which fall under Division 20.2 of Annex I to Regulation (EC) No 1893/2006	0.12 %		Coverage 98.03%	
Water, waste and material emissions	13. Non-recycled waste ratio	Tonnes of non-recycled waste generated by investee companies per million EUR invested, expressed as a weighted average	8.169691 tonne / EUR M invested		Coverage 58.29%	
Water, waste and material emissions	15. Deforestation	Share of investments in companies without a policy to address deforestation	75.47 %		Coverage 92.49%	

Table 3

Additional indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters

INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION, AND ANTI-BRIBERY MATTERS						
Adverse sustainability impact	Adverse sustainability impact (qualitative or quantitative)	Metric	Impact 2023	Impact 2022	Explanation	Actions taken
Indicators applicable to investments in investee companies						
Social and employee matters	1. Investments in companies without workplace accident prevention policies	Share of investments in investee companies without a workplace accident prevention policy	4.76 %		Coverage 92.74%	
Social and employee matters	2. Rate of accidents	Rate of accidents in investee companies expressed as a weighted average	8.715064 number of accidents per million hours worked		Coverage 64.71%	
Social and employee matters	3. Number of days lost to injuries, accidents, fatalities or illness	Number of workdays lost to injuries, accidents, fatalities or illness of investee companies expressed as a weighted average	13961.623 number of working days lost per year		Coverage 30.2%	
Social and employee matters	4. Lack of a supplier code of conduct	Share of investments in investee companies without any supplier code of conduct (against unsafe working conditions, precarious	3 %		Coverage 94.02%	

		work, child labour and forced labour)				
Social and employee matters	5. Lack of grievance/complaints handling mechanism related to employee matters	Share of investments in investee companies without any grievance/complaints handling mechanism related to employee matters	0.78 %		Coverage 94.29%	
Social and employee matters	6. Insufficient whistleblower protection	Share of investments in entities without policies on the protection of whistleblowers	0.79 %		Coverage 93.07%	
Social and employee matters	7. Incidents of discrimination	Number of incidents of discrimination reported and number of incidents of discrimination leading to sanctions in investee companies	1: 0.35583544 number of incidents 2: 0.020230845 number of incidents leading to sanctions		1: Coverage 85.78% 2: Coverage 85.78%	
Social and employee matters	8. Excessive CEO pay ratio	Average ratio within investee companies of the annual total compensation for the highest-compensated individual to the median annual total compensation for all employees (excluding the highest - compensated individual)	250.96695		Coverage 25.69%	
Human Rights	9. Lack of a human rights policy	Share of investments in entities without a human rights policy	8.44 %		Coverage 95.37%	
Human Rights	10. Lack of due	Share of investments in entities without a due	14.7 %		Coverage 77.03%	

	diligence	diligence process to identify, prevent, mitigate and address adverse human rights impacts				
Human Rights	11. Lack of processes and measures for preventing trafficking in human beings	Share of investments in investee companies without policies against trafficking in human beings	7.87 %		Coverage 93.8%	
Human Rights	14. Number of identified cases of severe human rights issues and incidents	Number of cases of severe human rights issues and incidents connected to investee companies on a weighted average basis	0.009119429		Coverage 85.78%	
Anti-corruption and anti-bribery	15. Lack of anti-corruption and anti-bribery policies	Share of investments in entities without policies on anti-corruption and antibribery consistent with the United Nations Convention against Corruption	1.43 %		Coverage 95.36%	
Anti-corruption and anti-bribery	16. Cases of insufficient action taken to address breaches of standards of anti-corruption and antibribery	Share of investments in investee companies with identified insufficiencies in actions taken to address breaches in procedures and standards of anticorruption and anti-bribery	0 number of cases		Coverage 85.78%	
Anti-corruption and anti-bribery	17. Number of convictions and	Numbers of convictions and amount of fines for	1: 2 2: 4855.505 million EUR		1: Coverage 85.77% 2: Coverage 85.77%	

	amount of fines for violation of anti-corruption and anti-bribery laws	violations of anticorruption and anti-bribery laws by investee companies				
Social and employee matters	18. Average income inequality score	The distribution of income and economic inequality among the participants in a particular economy including a quantitative indicator explained in the explanation column	35.090626		Coverage 95.93%	
Social and employee matters	19. Average freedom of expression score	Measuring the extent to which political and civil society organisations can operate freely including a quantitative indicator explained in the explanation column	0.99444306		Coverage 99.89%	
Human Rights	20. Average human rights performance	Measure of the average human right performance of investee countries using a quantitative indicator explained in the explanation column	2.586509		Coverage 99.22%	
Governance	21. Average corruption score	Measure of the perceived level of public sector corruption using a quantitative indicator explained in the explanation column	1.1018142		Coverage 99.89%	
Governance	22. Non-cooperative tax jurisdictions	Investments in jurisdictions on the EU list of non-cooperative	2		Coverage 100%	



		jurisdictions for tax purposes				
Governance	23. Average political stability score	Measure of the likelihood that the current regime will be overthrown by the use of force using a quantitative indicator explained in the explanation column	0.2892039		Coverage 99.89%	
Governance	24. Average rule of law score	Measure of the level of corruption, lack of fundamental rights, and the deficiencies in civil and criminal justice using a quantitative indicator explained in the explanation column	1.114362		Coverage 99.89%	