Principal Adverse Impact (PAIs) Statement

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This disclosure relates to the consideration of Principal Adverse Impacts (PAIs) on sustainability factors, for Eurobank Private Luxembourg S.A. with LEI: 529900HB1NOUF0UAGK18, when acting as Financial Market Participant (FMP) and Financial Adviser (FA).

1. Statement on Principal Adverse Impacts (PAIs) on Investment Services

The Sustainable Finance Disclosure Regulation 2019/2088 (SFDR) details the requirements related to sustainability disclosures in the financial services sector. SFDR has introduced new rules on the incorporation of sustainability risks and factors[1], as well as disclosures required to be made for Investment Services, as noted in the present PAIs statement issued by Eurobank Private Bank Luxembourg.

The reference period for this statement is 1st January 2024 to 31st December 2024 (the "Reference Period").

As per SFDR regulation, Financial Market Participants ("FMPs") and Financial Advisers ("FAs") are required to either comply with the specific disclosure requirements outlined within the SFDR, including whether they consider principal adverse impacts of investment decisions on sustainability factors or explain why they have opted out of such consideration. Currently the Bank takes into consideration the Principal Adverse Impacts (known as PAIs) on sustainability factors, when acting as FMP and when acting as FA.

The Bank recognises that Sustainability Risks (as defined under the "MiFID Information Pack – Part II Risk Disclosure"- available for downloading at Bank's website at https://www.eurobankpb.lu/Media/Publications/MIFID-II.), as these are described in the **Bank's "Sustainability Risk & Remuneration Statement"** (available for downloading at Bank's website at https://www.eurobankpb.lu/Media/Publications/SFDR-Disclosures can lead to outcomes that have both positive and negative impacts on the environment or society, as well as on the performance of financial products. Moreover, considering PAIs indicators in the investment process, and monitoring these indicators at entity and product levels, as applicable, may assist to manage the investments' adverse impacts (PAIs) and Sustainability Risks.

In principle Sustainability Factors (per SFDR regulation) include elements regarding environmental, social and governance matters, respect for human rights, anti-corruption and bribery-related issues. Currently, there are in total 18 mandatory PAIs indicators (9 indicators relate to environmental matters and 5 cover social factors, 2 concerning investments in sovereigns and supranational institutions and 2 concerning investments in real estate assets). As per SFDR, there could be also additional indicators (46 in total) deemed as voluntary regarding disclosure requirements that may be reflected. The full range of climate, environmental, social, employee and human rights impacts, for which mandatory indicators have been identified and are considered in our investment processes as FMP and/or FAs, are highlighted under the below tables. As the sustainable data availability increases, the Bank aims to publish further information on PAI indicators.

Pursuant to Article 4 of the SFDR and the relevant articles of the Commission Delegated Regulation (EU) 2022/1288 (“SFDR Delegated Regulation”), this statement explains how the Bank currently assesses sustainability factors in its capacity as FMP (see Section 1 below) and in its capacity as FA (see Section 2 below). Further details of our approach for screening, investment process and engagement are set out in specific policies, are made available on the website under “ESG investing” section at https://www.eurobankpb.lu/Media/Publications/SFDR-Disclosures.

Within the investor profiling and suitability processes, there are controls in place, to monitor and manage relevant PAIs to ensure that clients’ portfolios reflect their investment objectives and sustainability preferences.

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2. Statement on Principal Adverse Impacts (PAIs) when acting as FMP

Eurobank Private Bank Luxembourg considers principal adverse impacts of its investment decisions on sustainability factors when acting as FMP (for discretionary portfolio management service), for which the investment management tasks are outsourced to Eurobank Asset Management.

In offering discretionary portfolio management under Investment Services per MiFID regime, it is noted that the portfolio may include or exclude financial instruments that avoid exposure to certain companies or sectors which may seem harmful to the environment or society subject to the Bank's Sustainability Risk Policy in Investment Services.

The Bank outsourced the investment management tasks of the discretionary portfolios (DPMs) to the Group third party asset managers "Eurobank Asset Management", being members of Eurobank Group, which are external to Eurobank Private Bank Luxembourg. Therefore, certain sustainable investing activities at investment committee level, including the approach to identify and address principal adverse impacts and the screening of products in decision making process for managed portfolios is undertaken by such asset managers, on the Bank's behalf, based on the regulatory requirements and the related "Responsible Investment Policy" of "Eurobank Asset Management" (which is available at https://www.eurobankam.gr/en/esg). The Bank's Wealth Management Division works closely with "Eurobank Asset Management", and in alignment with the policies relating to PAIs.

The Bank continues to work with all its partners, to ensure that the "third-party asset managers", are truly aligned with the commitments to our clients. The Bank monitors how these organisations may respond to future sustainable investing challenges.

The table below highlights the selected indicators, for the Bank when acting as FMP, which have been monitored during the reference period – 1st January 2024 to 31st December 2024".

For any remaining mandatory PAIs that are not sufficiently covered in the results of the "Reference Period" 1st January 2024 to 31st December 2024, Eurobank Private Luxembourg and Eurobank Asset Management will make a reasonable effort to enhance their reporting as the availability and quality of data increases.

The following table presents the principal adverse impacts data for the reference period January 2024 to December 2024 for the assets of portfolio management service that Eurobank Private Bank Luxembourg S.A. has delegated to Eurobank Asset Management M.F.M.C.

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Indicators applicable to investments in investee companies						
Adverse sustainability indicator		Metric	Impact [year 2023]	Impact [year 2024]	Explanation/Coverage*	Actions taken, and actions planned and targets set for the next reference period
CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS						
Greenhouse gas emissions	1. GHG emissions	Scope 1 GHG emissions	1 911.61	2 142.77	GHG emissions are calculated at the portfolio level by aggregating emissions from investee companies in proportion to the portfolio's exposure to those companies. This approach ensures that both direct (Scope 1) and indirect (Scope 2 and 3) emissions are captured. Coverage 22.33%	Eurobank invests in sustainable development and consistently designs its actions in banking and investments to improve its impact on environmental sustainability, social responsibility and corporate governance. High importance is placed in the effective integration of sustainability principles and ESG aspects throughout the activities of the organization, its governance model and related commitments. Eurobank's Sustainability Strategy is defined in a holistic approach across two pillars of impact: the operational impact arising from its own activities and the financed impact resulting from Eurobank's lending and investing activities to specific sectors and clients. Committed to actively contributing to the achievement of the United Nations Sustainable Development Goals (SDGs) and the 2030 Agenda goals, Eurobank is a signatory of the UN Global Compact since 2008. In September 2019 Eurobank signed the UNEP FI Principles for Responsible Banking (PRB), affirming its commitment to play an active role in implementing the SDGs and the Paris Agreement on Climate Change. Eurobank aims to align its operations, portfolio and investments with the ultimate objective of reaching Net Zero by 2050. In this context, Eurobank became a signatory of the UN-convened Net Zero Banking Alliance, committing to a multifaceted approach to align its lending, and investment portfolios with net-zero emissions by 2050 or sooner, in line with the most ambitious targets set by the Paris Climate Agreement, with interim decarbonization and emissions reduction targets. Moreover, Eurobank discloses its management of climate-related matters following the reporting recommendations of the Task Force on Climate-related Financial Disclosures (TCFD) providing a holistic overview of its Governance, Strategy, Risk management and Metrics and Targets on climate-related matters. In addition, Eurobank calculates and discloses the financed emissions associated with loans, bonds and shares of its positions following the PCAF methodology. Furthermore, Eurobank's environmental and energy management performance, with respect to the improvement of its operational footprint, is monitored through specific indicators and associated targets disclosed also in the Environmental Report (EMAS). Within the EMAS Report framework, Eurobank also discloses the Green House Gas emissions record in line with the ISO 14064 standard, as verified by external independent party and in line with the provisions of the national Climate Law. The Sustainability Strategy, through a set of actions with measurable targets, reflects Eurobank's vision in the short, medium, and long term in relation to the environment, its social footprint, with focus on its people, and the ESG impact on the market and its portfolio. Eurobank endeavors to foster favorable economic, social, and environmental outcomes across all facets and sectors of its financing activities, with a commitment to sustainability and responsible stewardship. To achieve this objective, Eurobank's Financed Impact strategy is structured around the following four strategic pillars: •Clients' engagement and awareness to adapt their business so as to address climate change challenges. •Actions for supporting clients in their transition efforts towards a more sustainable economic environment. •Enablers and tools, such as frameworks and products, to underpin sustainable financing. •Assessment and management of climate-related material exposures and risks. The Operational Impact Strategy (OIS) defines Eurobank's operational sustainability priorities and objectives and is deployed through milestones and KPIs that support annual and long-term targets set across commitments/multiple project streams, spanning over the next decade. The Operational Impact Strategy is developed and deployed along three pillars and corresponding corporate targets. The 1st pillar refers to the "Environmental Impact" for minimising negative impact in Eurobank's operations to promote environmental stewardship and attain climate neutrality. With respect to environmental issues, Eurobank focuses on climate change mitigation and green transition supporting activities that promote clean energy, resource efficiency, circular economy and pollution prevention. The Operational and Financed pillars of the Sustainability Strategy are combined for addressing Eurobank's path towards Net Zero by 2050. Making progress along these pillars, of the Sustainability Strategy, Eurobank aims to maximize its contribution towards achieving the Paris Climate Agreement's targets and the UN Sustainable Development Goals (SDGs). Through a set of actions with measurable targets, the Sustainability Strategy reflects the Group's vision in the short, medium and long term in relation to the environment, its social footprint, with focus on its people, and the Sustainability impact on the market and its portfolio. To fulfil its commitments, Eurobank makes related disclosures. With regards to the UNEP FI Principles for Responsible Banking (PRB), Eurobank issues Progress Reports on an annual basis, as part of the Annual Report - Business and Sustainability, showing the steps Eurobank has already taken to implement the UNEP FI PRB, as well as the steps forward. Further to Eurobank's commitment to the UN Global Compact, it demonstrates its progress towards the Ten Principles and the Sustainable Development Goals through its annual Communication On Progress Report. In the context of Eurobank's commitment to Net Zero Banking Alliance, Eurobank will publish on an annual basis its progress against its emission reduction targets and the key actions taken. Within the wider sustainability ambition of the Eurobank Group, Eurobank Asset Management MFMC was the first asset management company in Greece to become a UN Principles for Responsible Investment signatory and has been submitting its annual reports since 2020 on a continuous basis. In accordance with Principle 2 of the six Principles for Responsible Investing (PRI), Eurobank Asset Management is committed to being active owner and incorporating ESG issues into its ownership policies and practices. Active ownership relates to how stewardship responsibilities are exercised through mechanisms such as engagement with current or potential investee companies and through exercising voting rights at shareholder meetings. Eurobank Asset Management, in accordance with its fiduciary duty, actively engages with investee companies through constructive dialogue on all aspects of the business, including ESG issues.
		Scope 2 GHG emissions	493.21	577.25		
		Scope 3 GHG emissions	18 406.18	23 851.67		
		Total Scope 1 + 2 (tCO2eq)	2 405.50	2 720.35		
		Total Scope 1 + 2 + 3 (tCO2eq)	20 799.16	26 539.60		
	2. Carbon footprint	Carbon footprint	622.65	409.96	Carbon footprint measured as tCO2eq per million euros invested. Carbon footprint is calculated by determining the total emissions of each company within the portfolio and attributing them based on the portfolio's investment size. This ensures that emissions are normalized across different portfolios for comparability. Coverage 22.33%	
	3. GHG intensity of investee companies	GHG intensity of investee companies	734.54	1 023.69	GHG intensity calculated as tCO2eq per million euros in revenue. GHG intensity is derived from the ratio of emissions to revenue for companies in the portfolio. This is calculated at a weighted average, focusing on industries that are most exposed to carbon risks. Coverage 32.8%	
	4. Exposure to companies active in the	Share of investments in companies active in the fossil fuel sector	4.30%	2.11%	Weighted average calculation. Coverage 34.35%	
	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 renewable energy sources, expressed as a percentage of total energy sources	39.53%	38.96%	Weighted average calculation. Coverage 11.66%	
	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	-	11.43	Weighted average calculation. Coverage 1.52%	
Biodiversity	7. Activities negatively affecting biodiversity-sensitive areas	Share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas	2.72%	1.25%	Involvement and Policy Calculations, i.e. the share of the investments in the portfolio that are involved with (or exposed to) certain industries or activities. Coverage 34.35%	
Water	8. Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	0.00	0.00	Coverage 0.06%	
Waste	9. Hazardous waste and radioactive waste ratio	Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average	1.45	2.25	Coverage 22,36%	

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INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS						
Social and employee matters	10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	0.41%	1.00%	Coverage 34.35%	The Operational Impact Strategy is also developed and deployed along the below pillars: 1) the "Societal Impact" for providing a diverse and inclusive environment for its people and clients, while fostering sustainable development and prosperity for the benefit of society, and 2) the "Governance & Business Impact" for focusing on building ESG awareness, internally and across its value chain, while intensifying its efforts for ethics and transparency. Eurobank is committed to respecting and protecting human rights. In line with international leading practice, Eurobank has established pertinent policies and procedures, such as the Code of Conduct and Ethics, that reflect this commitment. Eurobank has developed a wide suite of policies which target the respect for human rights, foster Diversity, Equity and Inclusion, aim at preventing and combating harassment, promote anti-bribery and anti-corruption practices and encourage reporting of illegal or unethical conduct. More specifically, focusing on the social aspect of ESG, Eurobank has taken actions that outline its corporate values, principles and commitments by issuing the Human Rights Statement, the Diversity, Equity and Inclusion Policy as well as the Policy against Harassment and Violence in Workplace. Eurobank acknowledges the UN Guiding Principles on Business & Human Rights and, in particular, the corporate responsibility to respect human rights (pillar 2). Eurobank shall avoid causing or contributing to adverse human rights impacts through its own activities and address such impacts if and when they occur. Furthermore, Eurobank shall seek to prevent or mitigate adverse human rights impacts that are directly linked to its operations, products or services by its business relationships, even if Eurobank has not contributed to those impacts. Eurobank is a signatory to the UN Global Compact since 2008, and is committed to respecting, actively supporting and promoting the 10 fundamental principles relating to human rights, labour rights, protection of the environment and anti-corruption. Moreover, Eurobank is a founding signatory of the United Nations Environment Programme Finance Initiative (UNEP FI) Principles for Responsible Banking, designed to bring purpose, vision and ambition to sustainable finance. In line with this commitment and the PRB implementation roadmap, Eurobank publicly discloses self-assessment reports. Eurobank is a signatory of the Banking Collective Bargaining agreements that define the framework of labour rights and working relations for the employees of the Banking Sector in Greece. Moreover, in its wider Diversity, Equity and Inclusion policies, Eurobank has successfully launched the Women in Banking initiative which activated Eurobank's endorsement of the 7 UN's Women's Empowerment Principles (WEPs), promoting gender equality and women's empowerment in the workplace, marketplace and community. In its investing activities through Eurobank Asset Management MFMC, the latter has developed a rigorous Responsible Investment Policy that takes into account how investee companies adhere to the UN Global Compact and excludes from the investment universe companies that severely breach the UN Global Compact principles on human rights, labor standards, environmental protection and anti-corruption. Likewise companies that are involved in the production of controversial weapons are excluded.
	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 Multi national Enterprises or grievance/complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	47.85%	56.82%	Coverage 34.21%	
	12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	21.28%	20.51%	Coverage 1.04%	
	13. Board gender diversity	Average ratio of female to male board members in investee companies, expressed as a percentage of all board members	34.65%	35.68%	Coverage 30.85%	
	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 contro versial weapons	0.00%	0.00%	Coverage 34.35%	

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Adverse sustainability indicator		Metric		Impact [year 2024]	Explanation/Coverage*	Actions taken, and actions planned and targets set for the next reference period
Indicators applicable to investments in sovereigns and supranationals						
Environmental	15. GHG intensity	GHG intensity of investee countries	-	0.24	Coverage 14.41%	Eurobank provides financing for landmark initiatives in the area of renewable energy sources (RES), sustainable infrastructure and environmentally friendly solutions in Greece. Eurobank capitalizes on RRF funds initiating a new era for Greek entrepreneurship and for the reconstruction of the economy of the country, channeling funds to support the recipients' green transition. A flagship energy transition, mainly financed by Eurobank, is the electrical interconnection of Crete to Attica, the largest energy project in Greece in 2020 and one of the largest investments in Europe. The interconnection integrates isolated regions (islands) with the mainland electricity grid, securing reliable and stable power supply. It also allows for the development of renewable-energy power plants on the islands to gradually replace fossil fuel units and move forward to achieving Greece's energy transition and sustainability goals.
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	-	3.50	Coverage 14.37%	Countries that severely breach the UN Principles on Human Rights are not considered for investment.
Indicators applicable to investments in real estate assets						
Adverse sustainability indicator		**Metric**	**Impact [year 2023]**	**Impact [year 2024]**	**Explanation/Coverage***	**Actions taken, and actions planned and targets set for the next reference period**
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 manu facture of fossil fuels	-	0.00	There are no direct investments to real estate asssets.	N/A
Energy efficiency	18. Exposure to energy-inefficient real estate assets	Share of investments in energy-inefficient real estate assets	-	0.00	There are no direct investments to real estate asssets.	N/A
Other indicators for principal adverse impacts on sustainability factors						
Adverse sustainability indicator		**Metric**	**Impact [year 2023]**	**Impact [year 2024]**	**Explanation/Coverage***	**Actions taken, and actions planned and targets set for the next reference period**
Emissions	19. 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	-	33.61%	Coverage 34.29%	
Adverse sustainability indicator		**Metric**	**Impact [year 2023]**	**Impact [year 2024]**	**Explanation/Coverage***	**Actions taken, and actions planned and targets set for the next reference period**
Human Rights	20. Lack of a human rights policy	Share of investments in entities without a human rights policy	-	11.47%	Coverage 34.31%	

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Data Coverage definition :

For all PAIs, coverage statistics are calculated to enable users to see the proportion of the adjusted portfolio that is eligible and covered. In this context, "eligible" means those holdings that are the relevant type for the PAI in question (so, a corporate holding for a corporate PAI), and "covered" means those holdings for which the relevant underlying data has been obtained or estimated. A field indicating the number of holdings covered (that is, that have the relevant data for the PAI statistic) will also be calculated for all PAIs.

*As funds may have a mixture of different holding types alongside the PAI calculations, various coverage statistics will be supplied. For each PAI, the following is calculated: the percentage of "eligible" securities (that is, the percentage of the portfolio invested in securities the PAI is measuring), the percentage of the portfolio that is "covered" by data (where the required input is known for the holdings), and the percentage of the "eligible" part of the portfolio that is "covered." For example, a portfolio may have 60% in corporate holdings and 40% in sovereign holdings; of the corporate holdings, 50% may have data. For the PAIs, the percentage of the portfolio that is eligible would be 60% and the amount covered would be 30% (60% * 50%).*

Notes:

1. Eurobank Asset Management M.F.M.C. taking into account the size of the Firm, the scale of its activities and the types of products and investment strategies it manages, considers that complying with the regime of Principal Adverse Impacts of investment decisions on sustainability factors according to the Sustainable Finance Disclosure Regulation (SFDR, EU 2019/2088, PAI regime) would be disproportionate.
2. As per 31 December 2024 the percentage of assets under management that promoted Environmental / Social characteristics but did not make any sustainable investments accounted for the 2.8% of the total assets under management of Eurobank Asset Management M.F.M.C.
3. Many issuers and third-party market data providers are at present not able to provide the complete data set for the mandatory indicators, making it challenging to fully comply with the reporting requirements of the PAI regime. Further, the regulatory framework for sustainable finance is still evolving, which can create uncertainty and pose additional challenges.
4. Eurobank Asset Management M.F.M.C. will keep its decision not to comply with the PAI regime under regular review and will formally re-evaluate the decision at least annually.
5. Eurobank Asset Management M.F.M.C. has prepared, gathered and computed for the eligible assets under management the presented data via reliable third parties service providers.

3. Statement on Principal Adverse Impacts (PAIs) when Acting as FA

The Bank describes hereto how it assesses adverse impacts on sustainability factors as part of its investment advisory services. This statement on principal adverse impacts of investment advice on sustainability factors covers the Reference Period from 1st of January 2024 to 31st of December 2024.

The Bank provides investment advice to its Clients on a range of financial instruments (such as funds, bonds, stocks etc.) which may include financial instruments of Eurobank Group. Investment advice is provided at portfolio level.

The Bank considers PAI's in its investment advisory service to clients as follows:

- Understanding the Bank's client's sustainability preferences with regard to principal adverse impacts.
- Understanding which area of principal adverse impacts are important to the Bank's clients, environmental, social our governance related principals.
- The incorporation of a sustainability methodology per product category where principal adverse impacts are included.
- The incorporation of an end-to-end process in the Bank's investment advisory service where principal adverse impacts are considered both from the client's perspective but also from the bank's internal procedures, guidelines and product categories. When providing investment advice, the Bank ensures that personal recommendations are suitable for that Client and in line with their needs, investment objectives, risk tolerance, ability to bear financial losses and any sustainability preferences. As part of this suitability assessment, Clients are asked whether they have a preference for reducing principal adverse impacts from their investments (via considering PAIs) and how they are looking to achieve this (either on a qualitative or quantitative basis and in respect of which PAIs). Therefore, the Wealth Management Division would only consider PAIs in the provision of investment advice, if the Client has expressed sustainability preferences relating to PAIs.

The Bank considers specific parameters when selecting and recommending financial instruments, such as:

- Restrictions and parameters agreed with the Client for the relevant assignment; and/or
- The portfolio may include or exclude financial instruments that avoid exposure to certain companies or sectors that may seem harmful to the environment or society subject to the Bank's Sustainability Risk Policy in Investment Services.
- Any investment advice provided will be subject to the restrictions and/or guidelines documented in the relevant investment advice agreement in place with the Client.

Where a Client has indicated that they have sustainability preference(s) relating to the consideration of PAIs, the Bank:

- Would use information made available by FMPs for the underlying financial instruments (for those instruments that are within scope of SFDR), mainly using available and/or appropriate third-party information via external rating companies (i.e. Sustainalytics (e.g. ESG Risk rating, ESG Score*, carbon emissions etc.), Morningstar Direct[1], Bloomberg)

- Ensures that any related personal recommendations to be made are to include suitable financial instruments for which there is available information regarding Client's declared PAIs (as applicable).

Approach to ranking and/or selecting Financial Instruments based on the PAI indicators at strategy level
The Bank does not rank and select financial instruments based on the PAI indicators listed in SFDR, at strategy level. However, when selecting and recommending financial instruments, the Bank considers any restrictions and parameters agreed with the Client for the relevant assignment.

Where a Client has indicated a sustainability preference relating to PAIs, the Bank seeks to ensure that financial instruments are recommended that meet those preferences where possible.

The Bank has in place internal criteria/thresholds to reduce relevant adverse impacts (as applicable), for selecting and advising on Financial Instruments, based on PAIs per Clients' preferences.

The bank does this through an internal PAI methodology and with the help of third-party resources. The PAI indicators have been benchmarked based on current developments in the area of principal adverse impact.

For more information on PAI indicators, please consult the "Sustainability Risk & Remuneration Statement" available at
https://www.eurobankpb.lu/Media/Publications/SFDR-Disclosures.

[1] *Morningstar (being an external rating company) provides an ESG score for funds (i.e. Morningstar Globes with a score from 1 to 5) which take into consideration various ESG criteria for each underlying asset (e.g. the controversial conduct of companies).This score allow us to identify the best-in-class funds.

This disclosures are made in accordance with Articles 3 and 5 of Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector ('SFDR').

This information is provided for informational purposes only and does not constitute investment advice, an offer, or a solicitation to buy, or sell any financial instruments.

This information reflects the policies and practices in effect as of the date of publication and is subject to change. This page will be updated as required by applicable regulation or internal policy changes.

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