|  |  |
| --- | --- |
| **Client Name:** |       |
| **Authorized Representative/Attorney:****(for legal entities and/or Attorneys)** |       |
| **Identification no/ Registration no:** |       |
| **CIF No:** **(for Bank use)** |  |
| **Portfolio code (for Bank use)** |  |

|  |
| --- |
| **The completion of this questionnaire is mandatory, to provide the Bank with your Sustainability preferences.**  |
|  |
| **Pre-requisites:** Prior to being asked to complete the below questionnaire, * Clients are being briefed by their Relationship Manager on general Sustainability regulatory provisions; and
* they are provided with the Sustainability Explanatory Document with respect to Sustainability preferences and ESG aspects. This is available for downloading on Bank’s website at

<https://www.eurobankpb.lu/en/Media/Publications/MIFID-II>  |
| Contact us: |
| Before answering the questionnaire below and in case you need additional clarification on Sustainability matters, please contact your Relationship Manager/Officer per existing contact details that may have already been provided to you, or by phone at +352 420724-1 (working hours) |
|  |
| **SECTION A: OUTLINE OF CLIENT’S SUSTAINABILITY PREFERENCES** |
| **1.** | **Do you have any sustainability preferences in relation to your investments?** |
| **[ ]**  | **Yes**, I would like my investments to consider environmental, social, governance and any other sustainability related factors.* **Please continue the questionnaire by answering the following questions.**
 |
| **[ ]**  | **No**, I do not have any sustainability preferences at this point in time and chose to be neutral. If my circumstances change, I will notify my relationship manager so that my sustainability preferences are updated. |
|  | * **If you answer ‘no’ to this question, the present questionnaire ends here.**

In this case you will be considered by the Bank as “**sustainability-neutral**” and therefore, the Bank may recommend you products both with, and without sustainability-related features. |
| **SECTION B: CLIENT’S PRODUCT SUSTAINABILITY PREFERENCES** |
| **2.** | **Choose from the list of “sustainable investment product categories” below, the preferred minimum proportions in percentage of your whole portfolio that you would like to consider.****Note: The total of the minimum proportions of A and B should not exceed 100%** |
|  | **It is further clarified that your selection refers to the minimum % to be applied, this means that the Bank could proceed with investments within the range of the selected total minimum % (category A % + category B%) on your portfolio, as you selected and up to a total of 100%.**Eg. if 20% of category A investments & 40% of category B investments are selected, this means that the Bank is to invest from 60% to 100% in both category A & category B investments, where the lower threshold of 60 % is to be adhered to by the Bank, which refers to 20% of category A investments & 40% of category B investments (and if a higher percentage is invested it would include category A and/or category B investments up to 100%). |
|  |

|  |  |  |  |
| --- | --- | --- | --- |
| **E.g.** | **Category** | **Example for selection:** | **Implementation by Bank** |
|  | A | 20% | 20% or over 20% |
|  | B | 40% | 40% or over 40% |
|  |  | Total 60% | Total investments **from 60% and up to 100%** |

 |
| **A.** | **Category A: Environmentally Sustainable Investments** – meeting the criteria as set forth in the EU Taxonomy regulation[[1]](#footnote-1).[Please select the following preferred minimum proportion (%)] |
| **[ ]**  | 0% | **[ ]**  | 20% | **[ ]**  | 40% | **[ ]**  | 60% | **[ ]**  | 80% |
| **B.** | **Category B: Sustainable Investments** – as set forth under the Sustainable Finance Disclosures Regulation (SFDR[[2]](#footnote-2)).*[*Please select the following preferred minimum proportion (%)] |
| **[ ]**  | 0% | **[ ]**  | 20% | **[ ]**  | 40% | **[ ]**  | 60% | **[ ]**  | 80% |
| **2.1.** | **Would** **you like your investments regarding your whole portfolio holdings to consider PAIs**[[3]](#footnote-3) **?** |
|  | If yes, this means that the Bank is to exclude certain investments from your whole portfolio, in order to apply your PAIs selection, according to the Bank’s methodology on PAIs (described in the ‘Sustainability Risk Policy in Investment Services’ and ‘Principal adverse Impacts (PAIs) Framework in Investment Services’ under Bank’s website at <https://www.eurobankpb.lu/Media/Publications/MIFID-II-ESG-Investment>  |
| **[ ]**  | **Yes**, I would like the Bank to integrate in my investments, financial instruments that consider PAIs, as follows.(please select one of the following options): |
|  | **[ ]**  | a) financial instruments that consider PAI with a focus on Environmental aspects, |
| **[ ]**  | b) financial instruments that consider PAI with a focus on Social & Governance aspects, |
| **[ ]**  | c) financial instruments that consider PAIs on Environmental and Social & Governance aspects, with the following prioritization order |
|  |  | **[ ]**  | Primary focus on Environmental aspects, secondary focus on Social & Governance aspects, |
|  | **[ ]**  | Primary focus on Social & Governance aspects, secondary focus on Environmental aspects, |
|  | **[ ]**  | No specific prioritization to declare |
| **[ ]**  | **No**, I do not have any PAI preferences at this given time, should that change, I will notify the bank. |
| **[ ]**  | **Yes**, I wish to choose **specific PAI indicators** that are aligned with the investment objectives that I have set, such as set out below.[For Corporate clients only, i.e. if you want to provide more details on PAIs go to Section C] |
| **C. SECTION C: CORPORATE CLIENTS - SUSTAINABILITY PREFERENCES** |
| **3.** | **Does your governance currently incorporate a Sustainable Finance Framework (SFF) or any other type of framework (e.g. Sustainable Investment Framework) related to the company’s efforts towards sustainability?**  |
| **[ ]**  | **Yes**, I would like my investments to consider environmental, social, governance and any other sustainability related factors.**🡪 Please describe below the type of investment activities that fall under your company’s sustainability framework** |
|       |
| **[ ]**  | **No** |
| **4.** | **Where PAIs are concerned, which of the following mandatory indicators are important to you when making investment decisions?** |
| Please rank your preferences for each indicator below (from 1 to 14) you would like the Bank to consider and prioritize when recommending and/or investing on your behalf |
|  | **PAI Indicators (Mandatory PAIs list)** |
|  | **Environmental** |
|  | **[ ]**  | 1. GHG emissions
 | Your ranking: | : |       |
|  | **[ ]**  | 1. GHG intensity of investee companies
 | Your ranking: | : |       |
|  | **[ ]**  | 1. Share of investment in companies active in the fossil fuel sector
 | Your ranking: | : |       |
|  | **[ ]**  | 1. Share on non-renewable energy consumption & production
 | Your ranking: | : |       |
|  | **[ ]**  | 1. Energy consumption intensity per high-impact climate sector
 | Your ranking: | : |       |
|  | **[ ]**  | 1. Activities negatively affecting biodiversity - sensitive areas
 | Your ranking: | : |       |
|  | **[ ]**  | 1. Emissions to water
 | Your ranking: | : |       |
|  | **[ ]**  | 1. Hazardous waste ratio
 | Your ranking: | : |       |
|  | **Social & Humanitarian** |
|  | **[ ]**  | 1. Violations of UN Global Compact Principles and OECD guidelines for multinational enterprises GHG intensity of investee companies
 | Your ranking: | : |       |
|  | **[ ]**  | 1. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact Principles and OECD Guidelines for Multinational Enterprises
 | Your ranking: | : |       |
|  | **[ ]**  | 1. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons, and biological weapons)
 | Your ranking: | : |       |
|  | **[ ]**  | 1. Unadjusted general pay gap
 | Your ranking: | : |       |
|  | **[ ]**  | 1. Board gender diversity
 | Your ranking: | : |       |
|  | **[ ]**  | 1. Exposure to controversial weapons
 | Your ranking: | : |       |
| **SECTION D: CLIENT’S DECLARATIONS/ACKNOWLEDGMENTS ON SUSTAINABILITY PREFERENCES** |
| I/We acknowledge and confirm the understanding and acceptance of all following undertakings/disclaimers: |
| 1. I/We acknowledge that I/we have received, read and understood the following documents put at my/our disposal (among other documents, and in the form of email notification by the Bank) before the completion of this Sustainability Preferences Questionnaire:
	* the information in the Bank’s “MiFID Information Pack”,
	* the “Bank’s Sustainability Risk Policy in Investment Services and Activities”, and
	* the Bank’s Sustainability Explanatory Document – available for downloading under the Bank’s website at <https://www.eurobankpb.lu/en/Media/Publications/MIFID-II>
 |
| 1. I/We confirm that I/we understood that the Bank applies my/our sustainability preferences (if any) on a portfolio-based approach, when considering in both Advisory (IA) and Discretionary Portfolio Management services (DPMs), based on my/our selections hereto.
 |
| 1. I/We acknowledge that if I/we have selected “no sustainability preferences” under the first question of this questionnaire, the product recommendation made by Eurobank Private Bank Luxembourg, might still include, or consist exclusively of products, with varying degrees of sustainability-linked characteristics to them.
 |
| 1. I/We understand that the above-mentioned Investment Profile is based on the information that I/we have disclosed and I am/we are aware that any errors or omissions may result in an incorrect sustainability risk profiling.
 |
| 1. I/We have read and understood the contents and purpose of this questionnaire and I/we confirm that the information I/we have given herein is true, complete and accurate.
 |
| **Do you agree with all the above statements / client declarations?** |
| **[ ]**  | Yes | **[ ]**  | No |
| **APPLICANT / CLIENT / AUTHORISED REPRESENTATIVE / ATTORNEY SIGNATURE(S):** |
| **Name** | **Signature** |
|       |  |
|       |  |
|       |  |
|       |  |
|       |  |
| Signature(s) Date: |       |

1. Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088 (OJ L 198, 22.6.2020, p. 13). [↑](#footnote-ref-1)
2. Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (OJ L 317, 9.12.2019, p. 1). [↑](#footnote-ref-2)
3. Products that consider Principal Adverse Impacts (“**PAI**”) meaning that companies invested in, do not significantly harm the environment and the aspects under consideration (E, S & G). [↑](#footnote-ref-3)