

COMPANY LEI : 549300CC3PRX4DD5SP72

Date of publication of initial declaration: March 2021

Date of last update: December 2023

### **No consideration of adverse impacts of investment advice on sustainability factors<sup>1</sup>**

The company "SAFE ADVISORS INVESTMENT SERVICES S.A." (hereinafter referred to as 'the Company') informs the investors that it has adopted and implements an ESG Policy [for the integration of sustainability factors and sustainability risks<sup>2</sup> in the process of the provision of investment advice in accordance with the provisions of Regulation (EU) 2019/2088] which is uploaded, as each time applicable, on the website of the Company under the section with the title "ESG".

The Company in accordance with art. 4 par. 5 (b) of the Regulation (EU) 2019/2088 and the article 13 of the Regulation (EU) 2022/1288, **declares that:**

Taking into account that the necessary available data in relation to all the issuers or/ and the financial instruments do not yet exist to a sufficient extent, **the Company does not consider for the moment any adverse impacts of investment decisions on sustainability factors in its investment advice.** However, as soon as the above data become available to a sufficient extent, the Company intends to modify the above ESG Policy and adopt a specific procedure in order to take into account in its investment advice the above adverse impacts of investment decisions on sustainability factors in relation to the indicators which are mentioned in table 1 of appendix I of the Regulation (EU) 2022/1288.

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<sup>1</sup> "sustainability factors" mean environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

<sup>2</sup> "sustainability risk" means an environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of the investment.