

**SFDR Article 3 Disclosure
December 2022**

Consideration of sustainability risk in investment decision making - Article 3(1)

To meet the SFDR disclosure requirements, Andbank Asset Management Luxembourg (“AAML”) identifies and analyses sustainability risk as part of its risk management process.

Sustainability risk means an environmental, social, or governance event or condition that, if it occurs, could potentially or actually cause a material negative impact on the value of a Sub-fund’s investment. Sustainability risks may have an impact on long-term risk adjusted returns for investors.

AAML believes that the integration of this risk analysis could help to enhance long-term risk adjusted returns for investors, in accordance with the investment objectives and policies of the Sub-Funds. The Investment Manager therefore integrates sustainability risks in its investment process.