



Discretionary Portfolio Management Principal Adverse Impact Statement

Latest update: February 2023

This a statement on due diligence policies with respect to the principal adverse impacts of investment decisions on sustainability factors as per Article 4 of SFDR (EU Regulation 2019/2088)

The discretionary portfolio management team of Lemanik Asset Management S.A. is licensed by the Commission de Surveillance du Secteur Financier (hereinafter referred to as the “CSSF”) to provide investment services, namely the management of investment portfolios on a discretionary basis, pursuant to the provisions of Article 101 (3) (a) of the UCI Law and Article 5 (4) of the AIFM Law.

For the purposes of this statement, “principal adverse impacts” means the overall negative effects that an investment can have on any environmental, social and employee matters, respect for human rights, anti-corruption, and anti-bribery matters.

The discretionary portfolio management team, has taken the decision to not consider principal adverse impacts on sustainability factors in its investment decisions.

The team considers that its primary investment strategies and client relationships do not support adoption of the PAI regime within SFDR. Furthermore, the team has decided not to opt in due to the proportionality principle and the uncertainties arising from future regulatory requirements.

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