

Statement on Principal Adverse Impacts (PAI)

Under the EU Sustainable Finance Disclosure Regulation (SFDR – Regulation (EU) 2019/2088), financial products and entities are classified according to the extent to which they integrate environmental, social and governance (ESG) considerations into their investment approach.

These criteria are intended to distinguish three categories of financial products:

- Article 9: The financial product has a sustainable investment objective.
- Article 8: The financial product promotes environmental or social characteristics and is managed by an entity that applies good governance practices.
- Article 6: The financial product does not promote environmental or social characteristics and does not have a sustainable investment objective.

In accordance with Article 4(1)(b) of the SFDR, Alpha Patrimoine S.A, which classifies itself as an Article 6 entity under the SFDR, does not currently consider the principal adverse impacts (PAIs) of its investment decisions on sustainability factors.

This decision reflects the nature of the investment strategies managed and the current lack of consistent, reliable and comprehensive ESG data required to assess and monitor such impacts across all asset classes. The Company therefore considers that it would not be possible, at this stage, to ensure accurate, meaningful and comparable reporting on adverse sustainability indicators.

Alpha Patrimoine S.A. continuously monitors regulatory developments, data availability and market standards regarding sustainability disclosures. The Company may reassess this position and consider the principal adverse impacts of its investment decisions once sufficient data and appropriate methodologies become available.