

# SUSTAINABILITY POLICY

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## 1. Regulatory Background

This Sustainability Policy has been established in accordance with the following regulations:

- 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 ("SFDR").
  - Commission Delegated Regulation (EU) 2021/1253 of 21 April 2021 amending Delegated Regulation (EU) 2017/565 as regards the integration of sustainability factors, risks and preferences into certain organisational requirements and operating conditions for investment firms.
  - Commission Delegated Regulation (EU) 2021/1269 of 21 April 2021 amending Delegated Directive (EU) 2017/593 as regards the integration of sustainability factors into the product governance obligations.
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## 2. Scope

This Policy describes Alpha Patrimoine S.A.'s approach to integrating and monitoring sustainability risks arising in the context of its activities as:

- a discretionary portfolio manager, and
- an investment manager of investment funds,

in accordance with the requirements of the SFDR.

Pursuant to Article 2(22) of SFDR, a *sustainability risk* is defined as:

"An environmental, social, or governance event or condition that, if it occurs, could cause an actual or potential material negative impact on the value of the investment."

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## 3. SFDR Classification and General Approach

The Company has elected to be classified under **Article 6 of the SFDR**. This classification reflects the fact that the investment strategies currently implemented do not promote environmental or social characteristics and do not have a sustainable investment objective within the meaning of the SFDR.

This approach results from a thorough assessment of the strategies managed, the availability of extra-financial data and client expectations. At this stage, the ESG information available for the underlying issuers does not allow for a systematic, measurable and verifiable integration of sustainability factors into the investment decision-making processes.

In the interest of transparency and to avoid any risk of *greenwashing*, the Company prefers to communicate clearly that its discretionary mandates and investment funds are not marketed as ESG products.

The Company closely monitors developments in the European regulatory framework (including SFDR, the EU Taxonomy Regulation and ESRS standards) as well as improvements in the availability and reliability of ESG data. When market conditions and data sources permit, the Company intends to progressively integrate sustainability considerations into its investment processes and risk management framework.

Until then, sustainability risks are only taken into account to the extent that they represent financial risks likely to affect the value of the investments, in accordance with Article 6 of the SFDR.

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#### 4. Integration of Sustainability Risks in the Investment Process

For both discretionary mandates and investment funds managed by the Company:

- Alpha Patrimoine S.A. has decided not to systematically consider sustainability risks in its investment decisions.
- Investment decisions are primarily based on financial criteria and clients' investment objectives.
- The Company has assessed that tools currently available do not yet provide sufficiently reliable or comprehensive ESG data to support the robust integration and reporting required under SFDR.

Nevertheless, Alpha Patrimoine S.A. will continue to monitor regulatory and market developments in order to reassess the relevance and feasibility of sustainability risk integration on an ongoing basis.

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#### 5. Principal Adverse Impacts (PAI)

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

This decision is primarily due to:

- the current lack of consistent, reliable, and comprehensive ESG data across issuers and asset classes; and
- the absence of a harmonised methodology that would allow meaningful and comparable reporting on adverse sustainability indicators.

Alpha Patrimoine S.A. continuously monitors regulatory developments, data availability and market standards in relation to sustainability disclosures. The Company may reassess this position and consider the PAIs of its investment decisions once sufficient data and methodologies are available.

This statement will be reviewed at least annually and updated as needed.

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#### 6. Stewardship and Engagement

Alpha Patrimoine S.A. believes that effective stewardship and active ownership contribute to long-term value creation for investors and support the sound governance of investee companies.

The Company has adopted a Stewardship and Engagement Policy that sets out its principles and practices in relation to proxy voting and shareholder engagement, in line with applicable regulatory requirements.

This integrated approach provides a coherent framework for the exercise of voting rights, the monitoring of investee companies, and constructive engagement on relevant environmental, social, and governance (ESG) matters, thereby promoting responsible corporate behaviour.

The policy defines the procedures and internal controls governing the exercise of voting rights attached to securities held within managed portfolios or funds, as well as the Company's approach to engaging in dialogue with investee companies where appropriate.

Alpha Patrimoine S.A. may use proxy voting service providers to assist in the execution of voting rights, while maintaining internal oversight to ensure that all actions are taken in the best interests of clients and in compliance with applicable regulations, including the EU Shareholders' Rights Directive II (SRD II).

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## 7. Remuneration Policy

Alpha Patrimoine S.A. maintains a **Remuneration Policy** consistent with Luxembourg law and applicable CSSF requirements. The policy aims to promote sound and effective risk management, avoiding excessive risk-taking in the investment process.

Sustainability risks are considered within the overall risk management framework where relevant. Performance-based remuneration is structured to align with the Company's long-term objectives, investors' interests and prudent risk-taking principles.

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## 8. Suitability Assessment for Discretionary Portfolio Management

In accordance with Commission Delegated Regulation (EU) 2021/1253, Alpha Patrimoine S.A. includes sustainability preferences in the suitability assessment process for discretionary portfolio management clients.

The Company collects information from clients regarding their sustainability preferences to ensure that any investment recommendations or decisions made on their behalf align with those preferences, where applicable.

Alpha Patrimoine S.A. will review clients' sustainability preferences at the next regular update of client information, or earlier if there is a material change in the client's circumstances or investment objectives, to ensure continued alignment with managed portfolios.

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## 9. Review and Governance

This Sustainability Policy is approved by the Board of Directors of Alpha Patrimoine S.A. and is subject to at least annual review or earlier if required due to regulatory developments, changes in market practices, or material changes in the Company's investment approach.