

# Information according to the 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

## 1. Application and definitions

- 1.1 The obligation to disclose information on the integration of sustainability risks and sustainability drivers into the investment process shall apply to Finax, o.c.p., a.s. with its registered office at Bajkalská 19B, 821 01 Bratislava, Company registration number: 51 306 727, entered in the Business Register administered by the Municipal Court in Bratislava III in file no. 6713/B, section Sa (hereinafter referred to as “**Finax**”) regarding the provision of the portfolio management service and the provision of a PEPP (pan-European personal pension product).
- 1.2 **Sustainability factors** (hereinafter referred to as the “**ESG factors**”) mean environmental, social, and employee matters, respect for human rights, and anti-corruption and anti-bribery matters.
- 1.3 **Sustainability risk** means an environmental, social, or governance event or condition that, if it occurs, could cause an actual or potentially substantial negative impact on the value of the investment.

## 2. Investment decision-making

- 2.1 For portfolio management, Finax chooses among index ETFs. Index ETFs replicate indices, i.e., they invest in the same securities and in the same proportion as the composite index that is created by a third party. Since the role of index ETFs is to replicate an index, changes in these funds reflect changes in the underlying indices, and Finax does not actively select financial instruments that are in the ETFs.
- 2.2 ETFs are selected based on the criteria described in the article "[How do we choose our ETFs](#)", and the investment objective is to replicate the performance of indices. Decisions based on ESG factors and sustainability risks could affect the ability to achieve the investment objectives set by us in individual investment strategies. For these reasons, we do not consider sustainability risks to be relevant for passive index fund investments, and thus they are not incorporated into investment decisions. Moreover, due to the high diversification of index funds and their investments in thousands of companies, the impact of sustainability risks on returns is minimized.
- 2.3 Neither non-financial ESG factors nor EU criteria for environmentally sustainable economic activities are specially considered in the underlying investments of managed portfolios.

### **3. Consideration of adverse sustainability impacts of investment decision-making on ESG factors**

- 3.1 As the instrument is index ETFs and the investment objective is to replicate the performance of indices, the adverse effects of our investment decisions on ESG factors are not considered.
- 3.2 Finax monitors the market situation. Since ESG factors are increasingly being taken into account during the creation of the indices themselves and the valuations of companies, our practice may be reviewed in the future.

### **4. Remuneration policy**

- 4.1 Remuneration with regard to ESG factors is not applied.