

Sustainability-related disclosures

This section of the website sets out disclosures by 1 asset management Luxembourg S.à r.l. (1am Lux) under 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 (EU SFDR), including as amended by Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment (EU Taxonomy).

1 asset management Luxembourg S.à r.l.

Sustainability risks

Article 3, EU SFDR

Pursuant to the EU SFDR, ‘sustainability risk’ means an environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of an investment. 1am Lux is committed to (i) ensuring sustainability risks are integrated into the investment decision process of funds under its management and (ii) monitoring sustainability risks with respect to managed funds. 1am Lux commits resources to effectively implement such efforts.

1am Lux maintains a Sustainability Risk Policy which sets out, amongst others, (1) its processes and procedures for ensuring the integration of sustainability risks into the investment decision process of funds under management and (2) its ongoing monitoring of sustainability risks for funds under management.

- **Integration of sustainability risks:** In situations where 1am Lux fully delegates portfolio management of a fund under management, it conducts diligence on such portfolio management delegates to understand their investment selection process. In the course of this diligence, 1am Lux assesses the proposed delegate’s investment decision making process to understand how the diligence performed on assets by such delegates considers different risks (including sustainability risks) in a manner that is relevant and appropriate to the given strategy. In situations where portfolio management is performed internally, 1am Lux’s appointed investment committees operate on the basis of a documented investment procedure which includes processes for identifying and managing different risks, including sustainability risks.
- **Oversight framework in relation to delegate portfolio managers:** 1am Lux conducts ongoing diligence over delegate portfolio managers and regularly receives information with respect to assets in the portfolios of funds under management. As part of this delegation oversight process, the portfolio managers provide 1am Lux with periodic information on assets in the applicable fund’s portfolio. Portfolio managers are asked to confirm whether there have been any operational incidents at the asset level, such as climate related natural disasters.
- **Ongoing monitoring.** As part of its ongoing monitoring of the risks associated with funds under management, 1am Lux assesses the level of sustainability risk associated with a given fund at inception and over time. This assessment is completed by 1am Lux’s permanent risk management function and documented in the risk profile of the fund, which is approved by the Board of Managers. The permanent risk management function subsequently monitors the level of various risks (including sustainability risks) over time and regularly reports the Board of Managers.

Product level sustainability risk

Unless a delegate portfolio manager or investment committee has specific binding commitments in respect of a particular fund, the identification of sustainability risks would not in itself prevent such portfolio managers from making an investment. Instead, sustainability risk forms part of the overall risk management processes, and is one of many risks which may, depending on the specific investment opportunity, be relevant to such portfolio manager's or investment committee's determination of risk.

Further detail can be found in 1am Lux's Sustainability Risk Policy.

Statement on principal adverse impacts of investment decisions on sustainability factors

Article 4 EU SFDR

No consideration of adverse impacts of investment decisions on sustainability factors

1am Lux does not consider adverse impacts of investment decisions on sustainability factors.

As of the date of this disclosure, 1am Lux does not currently act as AIFM to any funds that consider PAI in accordance with SFDR. Accordingly, 1am Lux does not take PAI into account at entity level in a way that is different from consideration of PAI at the product level in respect of funds under management.

1am Lux will continue to consider its position in relation to PAI at entity level as its capabilities grow over time.

Remuneration Policies

Article 5 EU SFDR

1am Lux maintains a Remuneration Policy in accordance with the requirements of AIFMD and the ESMA Guidelines. 1am Lux has assessed its own characteristics to ensure its remuneration practices appropriately align the incentives of its employees and managers with the risk profiles (including in relation to sustainability risks) and investment strategies (including sustainability-related strategies) of its funds under management.

Product-specific information

Article 10, EU SFDR

Product-specific disclosures pursuant to Article 10 EU SFDR can be found on the [investor portal](#).

SFDR Website Disclosures first published: June 2021 (Group disclosures of the legal entity under its prior ownership)

SFDR Website Disclosures last updated: March 2025

Changes since last update: Disclosures relating to the EU SFDR applicable to the AIFM's prior group were first published on its website in June 2021 and subsequently updated in accordance with applicable regulatory obligations and the EU SFDR and EU SFDR CDR. The AIFM underwent a change of ownership in December 2024 and publishes this disclosure in 2025 under its new group's website.

