Table 1

Statement on principal adverse impacts of investment decisions on sustainability factors

Financial market participant WEALINS S.A. 529900DRTSUMACSSIX70

Summary

Basis of preparation:
The present document is WEALINS' second published consolidated Principal Adverse Impact statement explaining the impact of investment decisions on sustainability factors. This reference period is from 1 January to 31 December 2024. The data was sourced through the tool, Clarity.ai. This is the fulfillment of our regulatory reporting obligations under Article 4 of the SFDR and Chapter II of the RTS.

Due diligence:
In our role as insurance investment distributor and advisor, WEALINS S.A. collaborates very closely with its partners' network of insurance intermediaries (brokers, banks, family offices) who, in their turn are responsible for engaging in a relation with policyholders. They define the investment strategy and investment support(s) most suitable for each policy holder, considering their risk appetite, investment expectations and sustainability preferences.

The investments underlying WEALINS S.A. products provide access to up to four different types of funds, depending on the product and the target market. These may be external (UCITS, etc.) and/or internal collective funds, dedicated and/or specialised insurance funds set up and managed in accordance with Luxembourg regulatory provisions, and in particular with the provisions of circular letter LC 15/3 of the Commissariat aux Assurances (Luxembourg insurance supervisory authority). Through these external and/or internal funds, policyholders of WEALINS S.A. products can invest in a large number of strategies and investment profiles, most often managed by external and independent financial managers and sometimes, when the regulatory provisions of the policyholders' countries of residence allow it, directly by the policyholders.

Investment decisions are thus taken by these external financial managers mandated by WEALINS S.A. in the case of internal collective or dedicated funds, or by the policyholders themselves, or at least with the confirmation of the policyholders, who may, if they so wish, seek investment advice. In all these cases, it is the responsibility of the independent investment managers appointed by WEALINS S.A., the investment advisors appointed by the policyholders or, if applicable, the policyholders themselves to integrate sustainability risks into their investment decisions and to assess the principal adverse impacts of their investment decisions on sustainability factors and investment returns.

For these reasons, WEALINS S.A. in its role, at product level, is not able to give full "consideration" of the adverse impacts of investment decisions on sustainability factors.

Nevertheless, in compliance with Foyer S.A. reporting requirements, WEALINS S.A. gathers relevant data in line with PAI reporting of the investments universe that is made available to its clients since 2023. This statement outlines WEALINS' approach to assessing the Principal Adverse Impacts (PAIs) of its investment choices on sustainability factors and provides a summary of our due diligence policies related to the associated procedures. This is the fulfillment of our regulatory reporting obligations under Article 4 of the SFDR and Chapter II of the RTS.
To fulfill the regulatory reporting obligations under Article 4 of the SFDR and Chapter II of the RTS, WEALINS used the data provided through Clarity AI Platform.
As part of WEALINS' commitment to sustainability, we are working towards the definition of a sustainable investment framework that all our asset management partners will have to abide by, and which includes our minimum requirements for collaboration. This will entail that our clients will be able to select the Asset Managers and investment products which will have undergone WEALINS S.A. first sustainability screening.

For its internal portfolio, (to be published separately) WEALINS SA is currently engaging with Foyer S.A. who is managing its own assets, in order to ensure there is a proper alignment between the management of the fund and WEALINS S.A.s' commitments, particularly in terms of abiding by its sustainability policy and the upholding of the UN Global Compact principles.

Scope:

The analytical data gathered for the PAI reporting refers to our clients' investments which amounts to €17.9 Billion at the end of Q4 2024 (€14.6 Billion at the end of Q4 2023 or +23%). Consequently, the calculations were specifically performed for all direct investments eligible to PAI reporting, made by WEALINS. This analysis is mainly driven by the results of direct investments, such as equities and bonds since they represent 36% of the total portfolio. The part of the portfolio relating to the funds is in the scope of the present calculation, yet no European ESG Template (EET) was used in the calculation process, rather the "look-through" feature of Clarity platform was used for funds (when available).

Because of its business model and as stated above, WEALINS does not have any direct link with the companies the clients' portfolios are invested in; therefore, we are not able to influence the decision-making process that can lead to more sustainable business choices at company level. For these data, WEALINS is therefore not able to provide any comment or explanation for actions taken to remediate any of the negative and/or controversial activities which characterize the activities of the companies in which investments are made.

The end of year snapshot for the financial year 2024 gives the following portfolio composition:

Funds	Investee Companies	Others (& cash)	Sovereigns	Total
48%	36%	14%	2%	100%

Progress:

Review committee

A PAI review committee was established which meets on a trimestral basis to follow and understand changes on key PAIs. The priority PAIs selected are those in which Wealins have the most material impact and the greatest potential to reduce negative impact in the future. This approach allows us to understand the areas that have the most significant impact on our environmental, social, and governance (ESG) factors.

Priority PAI

- M1 - Total GHG emissions
    - M1,1 - Scope 1 GHG emissions
    - M1,2 - Scope 2 GHG emissions
    - M1,3 - Scope 3 GHG emissions
- M2 - Carbon footprint
- M3 - GHG intensity of investee companies
- M4 - Exposure to companies active in the fossil fuel sector
- M10 - Violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises
- M12 - Unadjusted gender pay gap
- M13 - Board gender diversity
- M14 - Exposure to controversial weapons
- M16,1 - Relative number of investee countries subject to social violations
- M16,2 - Absolute number of investee countries subject to social violations

Benchmarks

In order to better understand our impact relative to the market, within our trimestral review, we analyse our performance against benchmarks indices, MSCI World et MSCI Paris Aligned. This ensures we stay aligned with evolving sustainability matters and industry best practices. The broad findings thus far are that we perform slightly better than MSCI World and less than MSCI Paris Aligned.

Challenges:

We have been satisfied with the data provider we selected, clarity.ai and noticed that the coverage of data for many PAI's has consistently improved over time. However, we have questions over whether data quality checks are performed on the declared information that is used in the tool. Also, we are missing some meaningful analysis of this data and projections of how this might evolve over time. It would also be helpful to understand alternative options that would result in better performance against PAI's.

Ambition:

We are exploring the possibility of introducing an exclusion to our investment policy regarding investing in carbon. It is unlikely that this will be achieved in 2025, but we hope to lay the groundwork and build a case for this to happen in 2026.

Description of principal adverse sustainability impacts

The SFDR requires mandatory reporting of PAI indicators, which are divided into a "core set of universal mandatory indicators" and "additional opt-in indicators". WEALINS considers all mandatory PAIs from Table 1 of Annex I, and 2 additional PAIs: one additional indicator from environment-related indicators, as set out in Table 2 of Annex I, and one additional indicator for social and employee matters, as set out in Table 3 of Annex I.

Indicators applicable to investments in investee companies						
Adverse sustainability indicator		**Metric**	**Impact 2024**	**Impact 2023**	**Impact 2022**	**Explanation**	**Actions taken**
CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS						
Greenhouse gas emissions	1. GHG emissions	Scope 1 GHG emissions	549 958.8 tons CO2e	376 150.56 tons CO2e *(Coverage 93.43%)*	N/A	Coverage 96.1% Estimated 53.94% Reported 46.06%	We have continued to improve the data, working with Clarity AI Inc. to be able to monitor the evolution of the different PAIs. The coverage has increased and an increase in Scope 1 GHG emissions is observed between 2023 and 2024. The increase is mainly linked to the increase of assets under management and more reliable and complete data from investee companies. WEALINS will dive deeper into the analysis on a quarterly basis and will look to refine it in the future, to have a clearer picture
		Scope 2 GHG emissions	107 171.3 tons CO2e	84 179.34 tons CO2e *(Coverage 93.43%)*	N/A	Coverage 96.1% Estimated 53.97% Reported 46.03%	
		Scope 3 GHG emissions	5 470 767 tons CO2e	3 463 797 tons CO2e *(Coverage 92.23%)*	N/A	Coverage 94.03% Estimated 67.91% Reported 32.09%	
		Total GHG emissions	6 084 398 tons CO2e	3 857 473.8 tons CO2e *(Coverage 92.07%)*	N/A	Coverage 93.91% Estimated 69.73% Reported 30.27%	
	2. Carbon footprint	Carbon footprint	626.19 tons CO2e / EUR M invested	549.28 tons CO2e / EUR M invested *(Coverage 92.07%)*	N/A	Coverage 93.91% Estimated 69.73% Reported 30.27%	We have continued to improve the data, working with Clarity AI Inc. to be able to monitor the evolution of the different PAIs. The coverage has increased and so has the carbon footprint between 2023 and 2024.

							The increase is mainly linked to the increase of assets under management and more reliable and complete data from investee companies. WEALINS will dive deeper into the analysis on a quarterly basis and will look to refine it in the future, to have a clearer picture.
	3. GHG intensity of investee companies	GHG intensity of investee companies	1 483.14 tons CO2e / EUR M revenue	914.37 tons CO2e / EUR M revenue *(Coverage 92.42%)*	N/A	Coverage 93.93% Estimated 69.77% Reported 30.23%	We have continued to improve the data, working with Clarity AI Inc. to be able to monitor the evolution of the different PAIs. The coverage has increased and there is an increase in the GHG intensity of investee companies between 2023 and 2024. The increase is mainly linked to the increase of assets under management and more reliable and complete data from investee companies. WEALINS will dive deeper into the analysis on a quarterly basis and will look to refine it in the future, to have a clearer picture.
	4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	10.38 %	9.36 % *(Coverage 88.98%)*	N/A	Coverage 89.7% Estimated 0% Reported 100%	We have continued to improve the data, working with Clarity AI Inc. to be able to monitor the evolution of the different PAIs. The coverage has increased and

						so has the % of companies in the sector. The increase is mainly linked to the increase of assets under management and more reliable and complete data from investee companies WEALINS will dive deeper into the analysis on a quarterly basis and will look to refine in the future, to have a clearer picture.
	5. Share of non-renewable energy consumption and production	Share of non-renewable energy consumption and non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage	Consumption: 56.66 % Production: 59.65 %	Consumption: 62.33 % *(Coverage 79.08%)* Production: 59.99 % *(Coverage 92.38%)*	N/A	Coverage 84.41% Estimated 3.47% Reported 96.53% Coverage 93.15% Estimated 0% Reported 100%	We have continued to improve the data, working with Clarity AI Inc. to be able to monitor the evolution of the different PAIs. The coverage has increased. It is also worth noting that shares of non-renewable energy activities have decreased.
	6. Energy consumption intensity per high impact climate sector	Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector	Total: 0.9394065 GWh / EUR M revenue Sector A: 1.1240531 GWh / EUR M revenue Sector B: 1.5301607 GWh / EUR M revenue	Total: 0.75393105 GWh / EUR M revenue *(Coverage 96.22%)* Sector A: 0.9757313 GWh / EUR M revenue *(Coverage 95.52%)* Sector B: 1.4331703 GWh / EUR M revenue *(Coverage 93.55%)*	N/A	Coverage 97.49% Estimated 64.76% Reported 35.24% Coverage 99.27% Estimated 56.76% Reported 43.24% Coverage 94.01% Estimated 60.85% Reported 39.15% Coverage 98.19% Estimated 66.75%	We have continued to improve the data, working with Clarity AI Inc. to be able to monitor the evolution of the different PAIs. The coverage has increased and there is an increase in total energy consumption between 2023 and 2024. The increase is mainly linked to the increase of assets under management and more reliable and complete

			Sector C: 0.88075566 GWh / EUR M revenue	Sector C: 0.60483694 GWh / EUR M revenue _(Coverage 97.72%)_		Reported 33.25%	data from investee companies.
							WEALINS will dive deeper into the analysis on a quarterly basis and will look to refine in the future, to have a clearer picture
			Sector D: 2.484088 GWh / EUR M revenue	Sector D: 2.7366595 GWh / EUR M revenue _(Coverage 97.72%)_		Coverage 97.4% Estimated 57.89% Reported 42.11%	
							For further transparency, we have added below the translation of the NACE Sector codification.
			Sector E: 0.42263517 GWh / EUR M revenue	Sector E: 0.52280754 GWh / EUR M revenue _(Coverage 92.97%)_		Coverage 99.78% Estimated 65.99% Reported 34.01%	
						Coverage 96.86% Estimated 68.43% Reported 31.57%	**Code Economic Area**
			Sector F: 0.14777711 GWh / EUR M revenue	Sector F: 0.17214237 GWh / EUR M revenue _(Coverage 93.03%)_			**A** Agriculture, Forestry and Fishing
			Sector G: 0.28476968 GWh / EUR M revenue	Sector G: 0.06674881 GWh / EUR M revenue _(Coverage 96.46%)_		Coverage 97.6% Estimated 66.72% Reported 33.28%	**B** Mining and Quarrying **C** Manufacturing **D** Electricity, Gas, Steam and Air Conditioning Supply
			Sector H: 0.9828737 GWh / EUR M revenue	Sector H: 1.2349594 GWh / EUR M revenue _(Coverage 93.34%)_		Coverage 97.77% Estimated 54.68% Reported 45.32%	**E** Water Supply; Sewerage, Waste Management and Remediation Activities **F** Construction **G** Wholesale and Retail Trade; Repair of Motor Vehicles and Motorcycles
			Sector L: 0.49099445 GWh / EUR M revenue	Sector L: 0.5391905 GWh / EUR M revenue _(Coverage 93.64%)_		Coverage 94.57% Estimated 62.67% Reported 37.33%	**H** Transportation and Storage **L** Real Estate Activities
Biodiversity	7. Activities negatively affecting biodiversity-sensitive areas	Share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies	3.18 %	4.71 % _(Coverage 85.78%)_	N/A	Coverage 88.19% Clarity AI leverages NLP models to identify breaches for this PAI. All	We have continued to improve the data, working with Clarity AI Inc. to be able to monitor the evolution of the different PAIs. The coverage has increased.

						controversies considered a potential violation by NLP models are later reviewed by our analysts.	It is also worth noting that activities negatively affecting biodiversity-sensitive areas have decreased
		negatively affect those areas					
Water	8. Emissions to water	Tons of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	0.012911141 tons / EUR M invested	0.02250754 tons / EUR M invested (Coverage 31.1%)	N/A	Coverage 34.97% Estimated 82.34% Reported 17.66%	We have continued to improve the data, working with Clarity AI Inc. to be able to monitor the evolution of the different PAIs. The coverage has increased. It is also worth noting that emissions of water have decreased by 43%.
Waste	9. Hazardous waste ratio	Tons of hazardous waste generated by investee companies per million EUR invested, expressed as a weighted average	49.14 tons / EUR M invested	63.53 tons / EUR M invested (Coverage 92.28%)	N/A	Coverage 93.15% Estimated 76.52% Reported 23.48%	We have continued to improve the data, working with Clarity AI Inc. to be able to monitor the evolution of the different PAIs. The coverage has increased andemissions of hazardous waste have decreased by 23%.

INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION, AND ANTI-BRIBERY MATTERS							
Adverse sustainability indicator		**Metric**	**Impact 2024**	**Impact 2023**	**Impact 2022**	**Explanation**	**Actions taken**
Social and employee matters	10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	5.07 %	18.26 % *(Coverage 85.78%)*	N/A	Coverage 86.59% Clarity AI leverages NLP models to identify breaches for this PAI. All controversies considered a potential violation by NLP models are later reviewed by our analysts.	We have continued to improve the data, working with Clarity AI Inc. to be able to monitor the evolution of the different PAIs. The coverage has increased and share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises have decreased considerably and are now less than 10%.
	11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance/complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	0.51 %	0.47 % *(Coverage 93.5%)*	N/A	Coverage 94.25% Estimated 0% Reported 100%	We have continued to improve the data, working with Clarity AI Inc. to be able to monitor the evolution of the different PAIs. The coverage has increased.

	12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	12.59 %	11.57 % *(Coverage 49.98%)*	N/A	Coverage 55.68% Estimated 0% Reported 100%	We have continued to improve the data, working with Clarity AI Inc. to be able to monitor the evolution of the different PAIs. The coverage has increased and the average unadjusted pay gap has slightly increased. The increase is mainly linked to the increase of assets under management and more reliable and complete data from investee companies. WEALINS will be aiming at diving deeper into the analysis on a quarterly basis and will look for refining it in the future, in order to have a clearer picture
	13. Board gender diversity	Average ratio of female to male board members in investee companies	36.36 %	35.06 % *(Coverage 93.9%)*	N/A	Coverage 94.76% Estimated 0% Reported 100%	We have continued to work and improve the data, working with Clarity AI Inc. to be able to monitor the evolution of the different PAIs. The coverage has increased and the average unadjusted pay gap has slightly increased. The increase is mainly linked to the increase of assets under management and more reliable and complete data from investee companies. WEALINS will dive deeper into the analysis on a

						quarterly basis and will look to refine it in the future, to have a clearer picture.
	14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	Share of investments in investee companies involved in the manufacture or selling of controversial weapons	0.00023160178 %	0.01 % *(Coverage 91.41%)*	N/A	Coverage 91.53% Estimated 0% Reported 100%	We have continued to work and improve the data, working with Clarity AI Inc. to be able to monitor the evolution of the different PAIs.

Indicators applicable to investments in sovereigns and supranationals							
Adverse sustainability indicator		**Metric**	**Impact 2024**	**Impact 2023**	**Impact 2022**	**Explanation**	**Actions taken**
Environmental	15. GHG intensity	GHG intensity of investee countries	492.13 tons CO2e / EUR M GDP	419.99 tons CO2e / EUR M GDP *(Coverage 97.25%)*	N/A	Coverage 99.55% Estimated 100% Reported 0%	We have continued to improve the data, working with Clarity AI Inc. to be able to monitor the evolution of the different PAIs. The coverage has increased and an increase in the GHG intensity is observed between 2023 and 2024. The increase is mainly linked to the increase of assets under management and more reliable and complete data from investee companies. WEALINS will dive deeper into the analysis on a quarterly basis and will look to refine it in the future, to have a clearer picture.
Social	16. Investee countries subject to social violations	Number of investee countries subject to social violations (absolute number and relative number divided by all investee countries), as referred to in international treaties and conventions, United Nations principles and, where applicable, national law	Relative: 4.17 % Absolute: 5	Relative: 3.96 % *(Coverage 100%)* Absolute: 5 *(Coverage 100%)*	N/A	Coverage 99.97% Estimated 0% Reported 100% Coverage 99.97% Estimated 0% Reported 100%	The increase is mainly linked to the increase of assets under management and more reliable and complete data from investee companies. WEALINS will dive deeper into the analysis on a quarterly basis and will look to refine it in the future, to have a clearer picture.

Indicators applicable to investments in real estate assets							
Adverse sustainability indicator		**Metric**	**Impact 2024**	**Impact 2023**	**Impact 2022**	**Explanation**	**Actions taken**
Fossil fuels	17. Exposure to fossil fuels through real estate assets	Share of investments in real estate assets involved in the extraction, storage, transport or manufacture of fossil fuels	N/A	N/A	N/A	N/A	N/A
Energy efficiency	18. Exposure to energy-inefficient real estate assets	Share of investments in energy-inefficient real estate assets	N/A	N/A	N/A	N/A	N/A

Other indicators for principal adverse impact
[*Information on the principal adverse impacts on sustainability factors referred to in Article 6(1), point (a) in the format in Table 2*]
[*Information on the principal adverse impacts on sustainability factors referred to in Article 6(1), point (b), in the format in Table 3*]
[*Information on any other adverse impacts on sustainability factors used to identify and assess additional principal adverse impacts on a sustainability factor referred to in Article 6(1), point (c), in the format in Table 2 or Table 3*]

Description of policies to identify and prioritise principal adverse sustainability impacts

WEALINS' Investment guidelines and policies identify and manage accordingly sustainability risks, assess and manage key adverse impacts on sustainability factors in relation to its investment decisions in the context of discretionary management mandates to independent financial managers.

WEALINS is collecting and monitoring 18 mandatory and 2 optional PAIs on a best-effort basis. The objective of the next report is to improve data coverage in certain areas such as water but mostly to monitor and understand the impact of investment decisions on sustainability factors.

Margin of error with our methodologies

The calculation of PAI indicators is inherently reliant on data availability and quality. The data we receive from investee companies and third-party providers is reviewed and assessed for the purposes of data quality control to the extent possible. In this context, the calculations are done on a best-effort basis. Data coverage has steadily increased over the past years since we started analyzing principal adverse sustainability impacts.

Engagement policies

WEALINS monitors the companies in which we invest under different angles including strategy, financial and non-financial performance and risk, capital structure, corporate governance and environmental and social impact.

As of today, WEALINS does not engage with investee companies on sustainability-related matters.

References to international standards

Foyer Group, of which WEALINS is part of, is an associate member of LuxFLAG, an independent and international non-profit association created in 2006 by private and public founding partners to support sustainable finance. Foyer Group *has* also obtained the label, Responsibility Europe, which is a body that unifies European and international companies which have labels that are aligned with the ISO 26 000.

Historical comparison

Since fiscal year 2023 we have been using a tool and managing the creation of the reports internally and all comparisons will be made from this year as the basis for preparation are uniform and comparable. No historical performance will be performed from fiscal year 2022 as the quality and coverage of the data were such that we did not consider it reliable enough for publication.

Table 2
Additional climate and other environment-related indicators

CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS							
Adverse sustainability impact	Adverse sustainability impact (qualitative or quantitative)	Metric	Impact 2024	Impact 2023	Impact 2022	Explanation	Actions taken
Indicators applicable to investments in investee companies							
Emissions	4. Investments in companies without carbon emission reduction initiatives	Share of investments in investee companies without carbon emission reduction initiatives aimed at aligning with the Paris Agreement	55.86 %	59.29 % *(Coverage 99.99%)*	N/A	Coverage 100% Estimated 0% Reported 100%	WEALINS has chosen PAI O4 (investments in companies without carbon emission initiatives) as its climate / environmental optional disclosure. This figure has slightly decreased in 2024.

Table 3

Additional indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters

INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION, AND ANTI-BRIBERY MATTERS							
Adverse sustainability impact	Adverse sustainability impact (qualitative or quantitative)	Metric	Impact 2024	Impact 2023	Impact 2022	Explanation	Actions taken
Indicators applicable to investments in investee companies							
Social and employee matters	1. Investments in companies without workplace accident prevention policies	Share of investments in investee companies without a workplace accident prevention policy	3.64 %	4.76 % *(Coverage 92.74%)*	N/A	Coverage 93.75% Estimated 0% Reported 100%	WEALINS has chosen PAI O1 (investments in companies without workplace accident prevention policies) as its social optional disclosure. This figure has slightly decreased in 2024, despite an increase in coverage.