

Version: 1.0

Valid as of: 04/03/2021

Applicable to: Eurobank Asset Management M.F.M.C.

Policy

Name: Sustainability Risk Policy for Eurobank Asset Management M.F.M.C.

Responsible Unit: Eurobank Asset Management M.F.M.C./ Investment Management & Corporate Strategy Division

Purpose: To describe the integration of sustainability risks into the investment process as described in the respective Investment Policies for Fund and Portfolio Management. It has been drafted based on Regulation (EU) 2019/2088 of the European Parliament and of the Council on sustainability-related disclosures in the financial services sector.

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1. Introduction



1.1 Purpose

This Policy generally describes the integration of sustainability risk factors (as further explained below) into the investment process, applied by the Investment Management & Corporate Strategy Division of the Company.

The Company is aware of the impacts, which sustainability risks can impose on the Funds and Portfolios managed and therefore considers the integrated approach outlined in this policy as strengthening its fiduciary duties towards the unitholders of Funds and the clients that own the Portfolios.

The Policy is in line with the requirements set by Regulation (EU) 2019/2088 of the European Parliament and of the Council on sustainability-related disclosures in the financial services sector.

2. Description



2.1 Policy Review

This Policy will be reviewed and updated on an ad hoc basis in case of major changes in the organizational structure of the Company and in case of amendments of the regulatory framework governing this Policy or if otherwise deemed necessary.

2.2 Integration of sustainability risks into the investment process

2.2.1 Organizational set-up of the Company's Investment Management & Corporate Strategy Division

The Company's Investment Management & Corporate Strategy Division is responsible for the investment process and pre-trade assessments of Funds and Portfolios.

This Division consists of the following units:

- Mutual Funds Investments
- Fund of Funds Investments & Fund Selection
- Institutional Portfolio Investments

2.2.2 Integration of sustainability risks into the investment decision process

Sustainability risk means an environmental, social or governance (ESG) event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of the investment.

The Company's Investment Management & Corporate Strategy Division is committed to taking a sustainable approach to investing. However, the applicability of these standards and of this analysis may vary depending on the type of Funds and Portfolios, the asset class, the region and the instrument used.

In addition, certain Funds and Portfolios may be subject to other investment guidelines, as detailed in the relevant investment policy or agreement. Therefore, this Policy will be implemented on a case-by-case basis.

ESG factors relate, among other things, to (i) the 10 principles of the United Nations Global Compact and (ii) the sectoral policies of the Company's Investment Management & Corporate Strategy Division.

The United Nations Global Compact (www.unglobalcompact.org) is a globally recognized common framework that applies to all industrial sectors. This initiative is based on international conventions in the areas of human rights, labor standards, the environment and the fight against corruption.

The Company's Investment Management & Corporate Strategy Division pays close attention to investments in sensitive sectors. Companies from these sensitive sectors may be excluded from the Company's Investment Management & Corporate Strategy Division. The sectors concerned include, but are not limited to, palm oil, wood pulp, mining activities, oil sands extraction, coal-fired power generation, tobacco, controversial weapons, unconventional oil and gas and asbestos.

The ESG analysis includes the assessment of the below three non-financial criteria at the level of the companies in which the Funds and Portfolios invest:

- Environmental: includes energy efficiency, reduction of emission of greenhouse gases and waste treatment;

- Social: concerns in particular respect of human and workers' rights, human resources management (workers' health and safety, diversity); and
- Governance: relates in particular to the independence of the board of directors/management body, the remuneration of managers and the respect of minority shareholders rights.

Engagement and dialogue are an integral and crucial part of sustainable investing. In this context, the Company is committed at two levels:

- Company engagement: the aim is to encourage companies to achieve the highest possible standards in terms of environmental, social and governance responsibility and to support them in this process.
- Voting engagement: the use of voting rights at general meetings is one of the cornerstones of the strategy of continuous dialogue with the companies concerned implemented by the Company. It is also an integral part of its investment process.

2.3 Sustainability factors considered in the investment decision process

Sustainability risks are considered in the investment decision process.

The events or conditions that may be responsible for a negative impact on the return of the Fund/Portfolio are split into environmental, social and corporate governance aspects. While environmental aspects include climate mitigation, for example, social aspects include the consideration of internationally recognized labour law requirements or the abolition of a gender pay gap. Corporate governance aspects include, for example, the consideration of employee's rights and data protection. The Company also considers the environmental aspects of climate change, such as carbon emission, the sustainable use and protection of water and marine resources, etc.

The specific sustainability factors considered may vary as they depend on the specific investment strategy followed by each Fund/Portfolio.

The effect of sustainability factors on the investments of a Fund/Portfolio are considered throughout the whole investment lifecycle and may at times lead to divestment.

All information concerning this Sustainability Risk Policy and its implementation is publicly available on the Company's website (www.eurobankam.gr)

3. Appendices



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2.

4. References



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5. Terminology



Management Company	:	Eurobank Asset Management M.F.M.C.
Fund Management	:	Investment management services for Funds
Fund	:	UCITS (Undetakings for Collective Investment in Transferable Securities)
Portfolio Management	:	Managing portfolios in accordance with mandates given by clients on a discretionary client-by-client basis where such portfolios include one or more financial instruments
ESG	:	Enviromental, Social and Governace

6. Amendments Table



Version	Date	Change Description
1.0	04/03/2021	First Edition