

Article 4 of SFDR – Transparency of adverse sustainability impacts at entity level

Aztec AIFM Services S.A. (“Aztec AIFM”) “No consideration of adverse sustainability impacts”

Pursuant to Article 4 of the EU Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector (the “**SFDR**”), financial market participants shall publish and maintain on their websites information about whether or not they consider principal adverse impacts (“**PAI**”) of investment decisions on sustainability factors.

The financial market participants shall comply or explain whether or not PAI of investment decisions on sustainability factors are considered in the management of Alternative Investment Funds (“**AIFs**”), at the product level, and how sustainability risks are considered in the management of AIFs.

Currently Aztec AIFM does not consider the PAI of its investment decisions on sustainability factors for the following reasons:

- As third-party AIFM, it may service various AIFs with different ESG profiles.
- Aztec AIFM could not reasonably gather and/or measure all the data on which it expects to be obliged by Article 4 of the SFDR to report or could not do so systematically, consistently, and at a reasonable cost to investors.

Aztec AIFM monitors market developments, including the level of availability of the data, as well as the regulatory developments. Aztec AIFM continues to review its obligations with respect to whether it considers PAIs of investment decisions on sustainability factors. On this basis, Aztec AIFM could reconsider its position.

The Bright Alternative

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