

Statement on principal adverse impacts of investment decisions on sustainability factors

July 2025

Table 1

Financial market participant CapitalatWork Foyer Group S.A., LEI 549300G1S24HHV2HX706

Summary

CapitalatWork Foyer Group S.A., LEI 54930068H4P06RJ61A49 considers principal adverse impacts of its investment decisions on sustainability factors. The present document is the third consolidated statement on principal adverse impacts on sustainability factors of CapitalatWork Foyer Group S.A. and its subsidiary CapitalatWork S.A. (both together called hereafter 'CapitalatWork'). This reference period is from 1 January to 31 December 2024. The data were sourced through the tool Clarity.AI. This is the fulfillment of the regulatory reporting obligations under Article 4 of the Sustainable Finance Disclosure Regulation and Chapter II of the Regulatory Technical Standards.

This statement outlines CapitalatWork's approach to assessing the Principal Adverse Impacts (PAI) of its investment choices on sustainability factors and provides a summary of our due diligence policies related to the associated procedures. To fulfill the regulatory reporting obligations under Article 4 of the SFDR and Chapter II of the RTS, CapitalatWork used the data provided through Clarity AI

Analysis was conducted on CapitalatWork's portfolio to establish the scope of the PAI reporting. Consequently, the calculations were specifically performed for all direct investments eligible to PAI reporting, made by CapitalatWork.

This analysis is mainly driven by the results of the direct investments, such as equities and bonds since they represent 85% of the total portfolio.

Due diligence

CapitalatWork uses a range of tools to manage its ESG (and other) products, such as PAI Consideration, Socially Responsible Investing Governance and Socially Responsible Investing Methodology. These guides are based on best-in-class players and exclusion policies.

CapitalatWork also considers a Norm Based Exclusion strategy, with the consideration of the UN Global Compact and the PRI (Principles for Responsible Investment) along with an activity and controversy exclusion policy.

Scope

Analysis was conducted on CapitalatWork's portfolio to establish the scope of the PAI reporting. Consequently, the calculations were specifically performed for all direct investments eligible to PAI reporting, made by CapitalatWork's. This analysis is mainly driven by the results of direct investments, such as equities and bonds since they represent 85% of the total portfolio. The part of the portfolio relating to the funds for the present calculation has been performed with a look-through approach based on the data available in Clarity AI's database, no European ESG Template (EET) was used in the calculation process.

The quarterly snapshots for financial year 2024 give the following portfolio composition:

Funds	Investee Companies	Other	Sovereign	Grand Total
1%	85%	0%	14%	100%

The present PAI analysis marks the third PAI production exercise conducted, CapitalatWork has continued its collaboration with its provider and extended its capacity to be able to calculate and review the PAIs she is still facing challenges associated with data collection, data processing, data quality checks, and data analysis. These challenges serve as the groundwork for further analysis and exploration.

Considering the circumstances mentioned above, CapitalatWork aims to actively monitor the development of Principal Adverse Impacts (PAIs). Capitalatwork plans to conduct a comprehensive review and engage in a reflective process. This review will entail evaluating the overall PAI approach and considering potential adjustments, as well as establishing specific targets related to Environmental, Social, and Governance (ESG) factors. Our objective is to adapt and refine our approach as necessary, ensuring that we stay aligned with evolving sustainability goals and industry best practices.

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 CapitalatWork has 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

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.

Exclusions

In 2024, a new exclusion was added to our investment strategy which states that the company will not invest in any company that derive more than 15% of its revenue from the production of controversial weapons.

ESG funds

CapitalatWork deploys a diverse range of methods, for its ESG products, such as PAI Consideration, Socially Responsible Investing Governance, Socially Responsible Investing Methodology, which involves companies' selection based on best-in-class players and exclusion policies. CapitalatWork also consider a Norm Based Exclusion strategy, with the consideration of the UN Global Compact and the PRI (Principle for Responsible Investment), but also an activity and controversy exclusion policy.

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 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 a new 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". CapitalatWork 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 indicators for social and employee matters, as set out in Table 3 of Annex I.

In the table below we have listed the PAIs and the related actions by CapitalatWork:

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	233 520.52 tons CO2e	123 737.56 tons of CO2e	N/A	<p>Coverage 97.83% Estimated 42.09% Reported 57.91%</p> <p>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 quality of data is more stable. Nevertheless, there are still way to improve the data collection</p> <p>It is worth to note that more than 75% of GHG emissions scope 1 are emitted by direct investments into four companies. Linked to Petroleum Industry and transportation</p> <p>The increase is linked to three main factors, increase of assets under management, more reliable and complete data from investee companies, increase in investment in fossil fuel sector.</p> <p>CapitalatWork Foyer Group SA will dive deeper into the analysis on a quarterly basis and will look to refine its analysis in the future, to have a clearer picture before taking any actions</p>

		Scope 2 GHG emissions	46 972.14 tons CO2e	34 025.785 tons of CO2e	N/A	<p>Coverage 97.83% Estimated 42.05% Reported 57.95%</p> <p>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 quality of data is more stable. Nevertheless, there are still way to improve the data collection</p>	<p>It is worth to note that 50% of GHG emissions scope 2 are emitted by direct investments into five companies. Linked to Petroleum Industry, mining and transportation</p> <p>The increase is linked to three main factors, increase of assets under management, more reliable and complete data from investee companies, increase in investment in fossil fuel sector.</p> <p>CapitalatWork Foyer Group SA will dive deeper into the analysis on a quarterly basis and will look to refine its analysis in the future, to have a clearer picture before taking any actions</p>
		Scope 3 GHG emissions	2 620 274 tons CO2e	1 806 763 tons of CO2e	N/A	<p>Coverage 97.64% Estimated 59.75% Reported 40.25%</p>	<p>It is worth to note that 50% of GHG emissions scope 3 are emitted by direct investments into five companies. Linked to Petroleum Industry, mining and transportation</p>

						<p>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 quality of data is more stable. Nevertheless, there are still way to improve the data collection</p>	<p>The increase is linked to three main factors, increase of assets under management, more reliable and complete data from investee companies, increase in investment in fossil fuel sector.</p> <p>CapitalatWork Foyer Group SA will dive deeper into the analysis on a quarterly basis and will look to refine its analysis in the future, to have a clearer picture before taking any actions</p>
		Total GHG emissions	2 916 476.5 tons CO2e	2 003 762.2 tons of CO2e	N/A	<p>Coverage 97.64% Estimated 61.82% Reported 38.18%</p> <p>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 quality of data is more stable. Nevertheless,</p>	<p>It is worth to note that more than 50% of GHG emissions scope 1 are emitted by direct investments into four companies. Linked to Petroleum Industry and transportation</p> <p>The increase is linked to three main factors, increase of assets under management, more reliable and complete data from investee companies,</p>

						there are still way to improve the data collection	<p>increase in investment in fossil fuel sector.</p> <p>CapitalatWork Foyer Group SA will dive deeper into the analysis on a quarterly basis and will look to refine its analysis in the future, to have a clearer picture before taking any actions</p>
	2. Carbon footprint	Carbon footprint	421.48 tons CO2e / EUR M invested	339.45 tons of CO2e / EUR M invested	N/A	<p>Coverage 97.64% Estimated 61.82% Reported 38.18%</p> <p>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 quality of data is more stable. Nevertheless, there are still way to improve the data collection</p>	<p>The increase is linked to three main factors, increase of assets under management, more reliable and complete data from investee companies, increase in investment in fossil fuel sector.</p> <p>CapitalatWork Foyer Group SA will dive deeper into the analysis on a quarterly basis and will look to refine its analysis in the future, to have a clearer picture before taking any actions</p>

	3. GHG intensity of investee companies	GHG intensity of investee companies	684.77 tons CO2e / EUR M revenue	585.75 tons CO2e / EUR M revenue	N/A	<p>Coverage 97.64% Estimated 61.85% Reported 38.15%</p> <p>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 quality of data is more stable. Nevertheless, there are still way to improve the data collection</p>	<p>The increase is linked to three main factors, increase of assets under management, more reliable and complete data from investee companies, increase in investment in fossil fuel sector</p> <p>CapitalatWork Foyer Group SA will dive deeper into the analysis on a quarterly basis and will look to refine its analysis in the future, to have a clearer picture before taking any actions</p>
	4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	8.13 %	5.08 %	N/A	<p>Coverage 97.98% Estimated 0% Reported 100%</p> <p>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.</p>	<p>The increase is linked to a 55% increase of our investment in Fossil fuel sector</p> <p>CapitalatWork Foyer Group SA will dive deeper into the analysis on a quarterly basis and will look to refine its analysis in the future, to have a clearer picture before taking any actions</p>

						<p>The coverage has increased, and the quality of data is more stable. Nevertheless, there are still way to improve the data collection</p>	
	<p>5. Share of non-renewable energy consumption and production</p>	<p>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</p>	<p>Consumption: 54.46 %</p> <p>Production: 0.0114 %</p>	<p>Consumption : 52.93 %</p> <p>Production : 0.0069 %</p>	N/A	<p>Coverage 89.32% Estimated 3.01% Reported 96.99%</p> <p>Coverage 98.78% Estimated 0% Reported 100%</p> <p>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 quality of data is more stable. Nevertheless, there are still way to improve the data collection</p>	<p>The share of non-renewable energy consumption and production is slightly increasing, and the coverage is more or less stable. This is linked to the increased investment in fossil fuel sector.</p> <p>CapitalatWork Foyer Group SA will dive deeper into the analysis on a quarterly basis and will look to refine its analysis in the future, to have a clearer picture before taking any actions</p>

	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: 0.172 GWh / EUR M revenue Sector A: 0.000049 GWh / EUR M revenue Sector B: 0.064 GWh / EUR M revenue Sector C: 0.094 GWh / EUR M revenue Sector D: 0.00064 GWh / EUR M revenue Sector E: 0.000029 GWh / EUR M revenue Sector F: 0.0046 GWh / EUR M revenue Sector G: 0.0015 GWh / EUR M revenue	Total : 0.124 GWh / EUR M revenue Sector A : 0.000066 GWh / EUR M revenue Sector B : 0.036 GWh / EUR M revenue Sector C : 0.072 GWh / EUR M revenue Sector D : 0.00056 GWh / EUR M revenue Sector E : 0.000042 GWh / EUR M revenue Sector F : 0.0051 GWh / EUR M revenue Sector G : 0.0015 GWh / EUR M revenue	N/A	Coverage 95.67% Estimated 51.73% Reported 48.27% Coverage 100% Estimated 33.91% Reported 66.09% Coverage 99.98% Estimated 46.33% Reported 53.67% Coverage 92.81% Estimated 54.45% Reported 45.55% Coverage 99.55% Estimated 50.32% Reported 49.68% Coverage 100% Estimated 49.53% Reported 50.47% Coverage 99.85% Estimated 52.74% Reported 47.26%	For further transparency, we have added below the translation of the NACE Sector codification. Sector codification Code Economic Area A Agriculture, Forestry and Fishing B Mining and Quarrying C Manufacturing D Electricity, Gas, Steam and Air Conditioning Supply E Water Supply; Sewerage, Waste Management and Remediation Activities F Construction G Wholesale and Retail Trade; Repair of Motor Vehicles and Motorcycles
--	--	--	---	---	-----	--	--

			<p>Sector H: 0.0054 GWh / EUR M revenue</p> <p>Sector L: 0.00083 GWh / EUR M revenue</p>	<p>Sector H : 0.0053 GWh / EUR M revenue</p> <p>Sector L : 0.0013 GWh / EUR M revenue</p>		<p>Coverage 100% Estimated 51.2% Reported 48.8%</p> <p>Coverage 100% Estimated 37.82% Reported 62.18%</p> <p>Coverage 99.97% Estimated 50.39% Reported 49.61%</p> <p>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 quality of data is more stable. Nevertheless, there are still way to improve the data collection</p>	<p>H Transportation and Storage</p> <p>L Real Estate Activities</p>
--	--	--	--	---	--	--	---

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 negatively affect those areas	6.58 %	5.78 %	N/A	<p>Coverage 97.7%</p> <p>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.</p> <p>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 quality of data is more stable. Nevertheless, there are still way to improve the data collection</p>	<p>CapitalatWork Foyer Group SA will dive deeper into the analysis on a quarterly basis and will look to refine its analysis in the future, to have a clearer picture before taking any actions</p> <p>The increase is also linked to the increase in investment in the petroleum industry and transportation</p>
--------------	---	--	--------	--------	-----	---	---

Water	8. Emissions to water	Tons of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	0.00068 tons / EUR M invested	0.00085 ton / EUR M invested	N/A	<p>Coverage 34.38% Estimated 77.37% Reported 22.63%</p> <p>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 quality of data is more stable. Nevertheless, there are still way to improve the data collection</p>	<p>Coverage is getting higher, but the coverage figure is still too low to perform a meaningful stand-alone analysis on this metric. When performing benchmark analysis, we note that we have a higher coverage than on the MSCI world and that the results compare favorably with the one for MSCI World (0.0027 ton / EURm invested vs. 0.00068 for our investments):</p> <p>CapitalatWork Foyer Group SA will dive deeper into the analysis on a quarterly basis and will look to refine its analysis in the future, to have a clearer picture before taking any actions</p>
Waste	9. Hazardous waste ratio	Tons of hazardous waste generated by investee companies per million EUR invested, expressed as a weighted average	30.52 tons / EUR M invested	13.13 tons / EUR M invested	N/A	<p>Coverage 94.12% Estimated 68.22% Reported 31.78%</p> <p>We have continued to work and improve the data working with Clarity AI Inc. to be able to monitor the evolution of</p>	<p>The increase is linked to the increase in investment in the petroleum and chemical industry and transportation. The increase in coverage also has limited impact.</p>

						<p>the different PAIs. The coverage has increased, and the quality of data is more stable. Nevertheless, there are still way to improve the data collection</p>	<p>On the positive side we have noticed a decrease of the Hazardous waste ration through the year.</p> <p>here also comparison with MSCI World shows less impact from our investments (30.5 vs. 48.2 tons/EURm for MSCI World).</p> <p>CapitalatWork Foyer Group SA will dive deeper into the analysis on a quarterly basis and will look to refine its analysis in the future, to have a clearer picture before taking any actions</p>
--	--	--	--	--	--	---	---

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	5.41 %	15.14 %	N/A	<p>Coverage 95.97%</p> <p>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.</p> <p>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.</p>	<p>The large decrease is mainly linked to more accurate data and a thorough review of those.</p> <p>CapitalatWork Foyer Group SA will dive deeper into the analysis on a quarterly basis and will look to refine its analysis in the future, to have a clearer picture before taking any actions</p>

						The coverage has increased, and the quality of data is more stable. Nevertheless, there are still way to improve the data collection	
	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	0.25 %	0.21 %	N/A	<p>Coverage 99.6% Estimated 0% Reported 100%</p> <p>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 quality of data is more stable.</p>	<p>Slight increase in coverage and in percentage all companies involved are through indirect investment in Funds</p> <p>CapitalatWork Foyer Group SA will dive deeper into the analysis on a quarterly basis and will look to refine its analysis in the future, to have a clearer picture before taking any actions</p>

						Nevertheless, there are still way to improve the data collection	
	12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	8.40 %	7.20 %	N/A	<p>Coverage 46.71% Estimated 0% Reported 100%</p> <p>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 quality of data is more stable. Nevertheless, there are still way to improve the data collection</p>	<p>Unadjusted gender pay gap increased from 7.2% to 8.4%, while coverage slightly decreased.</p> <p>CapitalatWork Foyer Group SA will be aiming to dive deeper into the analysis on a quarterly basis and will look to refine in the future, to have a clearer picture.</p>

	13. Board gender diversity	Average ratio of female to male board members in investee companies	29.06 %	28.24 %	N/A	<p>Coverage 99.8% Estimated 0% Reported 100%</p> <p>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 quality of data is more stable. Nevertheless, there are still way to improve the data collection</p>	<p>Small increase in the ratio of female / male in boards. There the comparison with MSCI world shows that our investments have a lower figure than the MSCI World (33%).</p> <p>CapitalatWork Foyer Group SA will be aiming to dive deeper into the analysis on a quarterly basis and will look to refine in the future, to have a clearer picture.</p>
	14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons	Share of investments in investee companies involved in the manufacture or selling of controversial weapons	0.00%	0.00%	N/A	<p>Coverage 99.34% Estimated 0% Reported 100%</p>	<p>In accordance with our new set of guidelines, we have a 0% investment in companies involved in controversial weapons.</p>

	and biological weapons)					<p>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 quality of data is more stable. Nevertheless there are still way to improve the data collection</p>	<p>We will keep on monitoring this PAI in our quarterly review.</p> <p>CapitalatWork Foyer Group SA will be aiming to dive deeper into the analysis on a quarterly basis and will look to refine in the future, to have a clearer picture.</p>
--	-------------------------	--	--	--	--	---	--

Indicators applicable to investments in sovereigns and supranational

Adverse sustainability indicator		Metric	Impact 2024	Impact 2023	Impact 2022	Explanation	Actions taken
Environmental	15. GHG intensity	GHG intensity of investee countries	80.64 tons CO2e / EUR M GDP	67.84 tons CO2e / EUR M GDP	N/A	Coverage 100% Estimated 100% Reported 0%	Reflecting the increase of emission of countries in which we are invested. CapitalatWork Foyer Group SA will be aiming to dive deeper into the analysis on a quarterly basis and will look to refine 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: 4.40 % Absolute: 3.5 -	Relative: 4.74 % Absolute: 4 -	N/A	Coverage 100% Estimated 0% Reported 100% Coverage 100% Estimated 0% Reported 100%	The number slightly decreased. Those are indirect investment in third party illiquid funds. The aim is to manage to divest from those as soon as possible CapitalatWork Foyer Group SA will be aiming to dive deeper into the analysis on a quarterly basis and will look to refine 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	In the investments that are in scope of these calculations, there were no real estate assets	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	In the investments that are in scope of these calculations, there were no real estate assets	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 impacts on sustainability factors

At entity level, for all products, CapitalatWork Foyer Group is collecting and monitoring 18 mandatory and 2 optional PAIs on a best-effort basis. This year 2024 was the third reporting year, with most of data collection challenges encountered the previous years, mainly resolved using our central data provider Clarity AI. The objective for the next reporting is clear: focus on the analysis of the data collected.

For the SFDR Article 8 products, CapitalatWork is both monitoring the principal adverse impacts and excluding those non-compliant companies from the investment decisions, aligning with the ESG strategy of the funds.

Margin of error with our methodologies

The calculation of PAI indicators is inherently reliant on the data availability and quality. The data we receive from 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.

As may be observed in the calculated PAI indicators above, the limited data availability for some PAIs, poses a severe limitation on the data coverage. CapitalatWork is committed to continue to improve this data availability by further engaging with relevant stakeholders to improve the data quality and availability.

Data Sources

The calculation of the PAI indicator was completed on the basis of a range of data, including values, scores and weights sourced from third-party data providers. As a summary, the following data sources may be highlighted for the different types of assets:

For direct investments in investee companies, the required ESG data was sourced from ESG Data Providers

For indirect investments in investments funds, the required ESG data was sourced from ESG Data Providers (Clairty AI) by doing a look-through on the underlyings holdings in those funds.

For investments in sovereigns and supranationals, the required ESG data was sourced from Clairty AI our main ESG Data provider

The external data providers are assessed on an ongoing basis for data quality, coverage and other attributes.

Engagement policies

CapitalatWork Foyer Group has in place an engagement policy in accordance with SRDII regulation, Shareholder Rights Directive II, Directive EU 2017/828 (amending Directive 2007/36/EC).

CapitalatWork monitors the companies in the shares of which we invest under different angles including strategy, financial and non-financial performance and risk, capital structure, corporate governance and environmental and social impact. We follow a materiality principle. The monitoring and engagement process with the investee company includes a voting policy, cooperation with other shareholders and the management of conflicts of interest.

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

References to international standards

CapitalatWork Foyer Group 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 year 2023 we have been using a dedicated data providers' tool (clarity AI) and managing the creation of the reports internally. All comparisons are made using 2023 as the basis for preparation are uniform and comparable. The constant evolution and improvement of the data quality will, in the future, allow CapitalatWork Foyer Group to get a better understanding of the impacts on PAIs. As no measurable objectives are in place to act on those no deductions can be made in terms of performance other than some happy coincidences.

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	44.34 %	47.07 %	N/A	Coverage 100% Estimated 0% Reported 100%	CapitalatWork Foyer Group SA will be aiming to dive deeper into the analysis on a quarterly basis and will look to refine in the future, to have a clearer picture.

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	3.29 %	1.14 %	N/A	Coverage 99.5% Estimated 0% Reported 100%	The main contributor to the increase score is Alphabet Inc (2.81%) the portfolio weight is taken has no other metric value is available. CapitalatWork Foyer Group SA will be aiming to dive deeper into the analysis on a quarterly basis and will look to refine in the future, to have a clearer picture.