



# ENVIRONMENTAL, SOCIAL AND GOVERNANCE SOLUTIONS

Fuchs Asset Management S.A.

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Fuchs Asset Management is an independent management company authorised and supervised by the Commission de Surveillance du Secteur Financier (CSSF) in accordance with both UCITS and AIFM laws. Fuchs Asset Management manages investment funds of external clients which can either falls under the definition of:

- standard products without any particular environmental, social and governance (ESG) characteristic or sustainable investment objective;
- financial products which promote environmental, social and/or governance characteristics, as per Article 8 of the 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 (SFDR); or
- financial products having a sustainable investment as objective, as per Article 9 of the SFDR.

For that reason, it is not possible for us to develop comprehensive or single ESG policies, nor to develop a statement or policy dedicated to the principal adverse impacts on sustainability that would fit all investment strategies, policies and restrictions or the risk profile of each investment fund we manage. **Nevertheless, Fuchs Asset Management promotes at all times sound and effective sustainability risk management** that is consistent with the risk profile, rules and constitutional documents of the investment funds we manage. To this end, sustainability risks are globally integrated into our investment decisions and risk management processes.

Fuchs Asset Management performs initial and ongoing ESG due diligences on all the financial market participants to whom portfolio management has been delegated.

We ensure to work in close collaboration with financial and investment advisers or initiators of investment funds we have under management in order to set up adequate controls, key risk indicators and reporting solutions in line with the pre-contractual (e.g. prospectus or offering memorandum) disclosures imposed by the SFDR.

For investment funds which promote environmental, social and/or governance characteristics, in the sense of Article 8 of SFDR, and those that have sustainable investment objectives, in the sense of Article 9 of SFDR, we notably verify that there are adequate ESG policies and procedures at the entity level and sustainability risk controls in place in the investment process on pre-trade, post trade and for reporting purposes.

The assessment of sustainability risks is complex, might be difficult to obtain and may be incomplete, estimated, out of date or otherwise materially inaccurate. Even when identified, there can be no guarantee that these data will be correctly assessed.

We are committed to maintain and improve research to incorporate ESG aspects into activities and influence positively all the financial market participants and advisers we work with to follow this path.

To this extent, the current approach is expected to evolve overtime. Based on the latest available information on adverse impacts, our intention is to publish and update information available on our website on a regular basis in order to comply at all time with all applicable laws and regulations.

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