

Policy on the integration of risks related to sustainability in the decision-making processes regarding investments within SSIF BRK Financial Group SA.

This statement is prepared in accordance with the provisions of Article 4 (1) (b) of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27.11.2019 on information on sustainability in the financial services sector.

Regulation (EU) 2019/2088 lays down rules for financial market participants on transparency regarding the integration of sustainability risks and the consideration of adverse effects on sustainability in activities and on the provision of information on sustainability in financial products.

Sustainability factors include environmental, social and labor issues, respect for human rights, issues related to the fight against corruption and bribery.

SSIF BRK FINANCIAL GROUP S.A. is concerned with the environmental, social, ethical and governance issues, which are also reflected in the selection of customers and service providers.

SSIF BRK FINANCIAL GROUP S.A. is constantly concerned with the systematic incorporation of environmental, social and governance (“ESG”) factors into the investment process, managing both risks and opportunities. This helps to make better-informed investment decisions and to optimize the risk / return profile of the investment portfolio, as well as to reflect BRK values in the investment process, to better align the business with the company's objectives and expectations regarding sustainability.

Responsible investment, based on either exclusionary principles or the existence of certain restrictions, is evolving towards becoming an integral part of the social responsibility strategy. According to the legal obligations of SSIF BRK FINANCIAL GROUP S.A., it must act with professional fairness and diligence. Although SSIF BRK FINANCIAL GROUP S.A. makes the necessary diligence in analyzing the activity of issuers in the investment process, in order to protect the interest of investors and in the context in which information on sustainability factors may be difficult to obtain, incomplete, inaccurate or based only on estimates, there is a high probability of not being able to take into account the main negative effects of all investment decisions on sustainability factors. In the context mentioned above and taking into account the obligations imposed by Article 4 of Regulation (EU) 2019/2088, SSIF BRK FINANCIAL GROUP S.A. states that it will not yet take into account the negative effects of investment decisions on sustainability factors, proposing to reassess this situation on a regular basis and to notify investors of any future changes. SSIF BRK FINANCIAL GROUP S.A. will continue to closely monitor the investments made, acting responsibly and diligently

The above information is based on currently available information, including information provided by third parties. If third parties have not provided us with (adequate) information, we will continue our efforts to obtain that information. When more (appropriate) information becomes available, we will change our information to reflect this.

The main adverse effects

*How do we consider the negative effects on sustainability?*

In accordance with the EU Regulation on information on sustainability in the financial services sector SSIF BRK FINANCIAL GROUP S.A. needs to be transparent about how they take into account the negative impact on the sustainability of investment decisions.

SSIF BRK FINANCIAL GROUP S.A. supports the systematic incorporation of environmental, social and governance ('ESG') factors into the investment process, managing both risks and opportunities. In addition to the strategies described in terms of integrating sustainability risk, it involves integrating ESG material risks and opportunities into investment research and analysis, as well as demonstrating and consistently documenting the integration of ESG factors for each individual investment analysis. We recognize that taking full account of the adverse impact of ESG is a gradual process, in which we will continue to improve.

We apply the Remuneration Policy which is developed in compliance with the legislation. The framework is aligned with the business strategy of SSIF BRK FINANCIAL GROUP S.A., the objectives, values and risk appetite and supports the creation of long-term value for all stakeholders. Following the provisions of the Framework, performance management is based on a number of financial and non-financial performance objectives. These objectives focus on robust and effective risk management, as well as on balanced risk-taking.