

# Sustainable Finance Disclosure Regulation (SFDR)

## Summary of Principal Adverse Sustainability Impacts (PAI) Statement Report

### Summary

Citibank Europe plc (Luxembourg Branch) (LEI: N1FBEDJ5J41VKZLO2475) considers principal adverse impacts (“PAIs”) of its investment decisions on sustainability factors in relation to certain portfolios, as set out below. The present statement is the consolidated statement on PAIs on sustainability factors of Citi Investment Management (CIM) that provides portfolio management services. Where it provides these services through Citibank Europe plc (Luxembourg Branch) that entity will be a financial market participant under SFDR. This statement on principal adverse impacts on sustainability factors covers the reference period from 1 January 2024 to 31 December 2024, and includes a comparison against the previous reference periods.

CIM has not and does not integrate consideration of PAIs broadly at the entity level in its investment process, nor has CIM planned any actions aiming to mitigate PAIs or targets in relation to the PAIs disclosed in the statement. However, in relation to certain specific portfolios (ESG Focus Portfolios, and MACS ESG Portfolios), as described below, certain PAI were considered in the investment process on a limited basis, through the application of exclusionary criteria that map across to the relevant PAIs (wholly or partly), or through the application of screening processes capturing investments identified as exhibiting favourable Environmental, Social, and Governance (ESG) ratings which may be influenced by or linked to certain PAIs, or through investments in Article 8 funds with sustainable investments (“Article 8+ funds”) or Article 9 funds, which are required to take into account PAI indicators in their investment decision making process for sustainable investments.

The specific PAIs considered through the exclusionary criteria described above (details described further in this statement), were: i) PAI 4: Exposure to companies active in the fossil fuel sector, ii) PAI 10: Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises, and iii) PAI 14: Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons). However, the potential mitigation of their impacts is limited to the portfolios that consider them as part of their investment process, and therefore, have limited impact on the entirety of CIM’s holdings. CIM has not planned any PAI-related actions, or set PAI-related targets, and more generally acknowledging CIM’s limited investee engagement capabilities (i.e. given the relatively small stakes held in investee companies), CIM is not in a position to predict whether the PAIs will increase or decrease for the next reporting year.

As noted above, CIM’s consideration of PAIs on sustainability factors, in our investment processes is currently limited to certain portfolios only, and being a global investment management organization, and due to the nature of the Private Bank business, CIM aims to deliver investment solutions designed to meet clients objectives, within the regulatory framework where it operates. CIM currently uses PAI data included in this statement for regulatory disclosure purposes only.

The ability to source detailed and reliable ESG data on investee companies remains an ongoing challenge in the market. CIM’s methodology to identify PAIs relies on a third party data provider (MSCI) which is a well established specialist in sourcing such data, and which can source such data in a more efficient manner and granular level than CIM could at this point in time. CIM does not currently supplement third party data with proprietary analysis for the purpose of this statement and therefore relies on the methodologies for data collection, estimation and computation used by the data provider.

Where PAI data is unavailable for an investment, CIM understands MSCI uses a reweighting approach – i.e. instead of assuming that the adverse impact is zero or to exclude the relevant investment from the PAI figures disclosed below, for PAI indicators based on quantitative data, MSCI will seek to fill such data gaps

by assigning values to the investments with missing data based on the average of the PAI data for investments for which the data is available in certain indicators. This estimation methodology may not be accurate, representative or otherwise reflective of the actual PAI values of the investments for which the data has been estimated, and may implicitly assume that the average indicator value for the issuers of the securities that do report data is representative of the investments in the portfolio for which there is no information. For PAI indicators based on qualitative data, adverse impacts are identified by MSCI using data reported by, or about, the investee company. However, where such data is not available, this will be interpreted by the MSCI methodology as indicative (i.e. not conclusively nor necessarily accurately) of there being no adverse impact.

Data was available for approximately 76% of the in-scope portfolio across all PAIs, and for the remaining 24% no data was available. MSCI has re-weighted the exposures from the available data, only in relation to the PAIs below, to estimate exposures where data was not available.

Indicators applicable to investments in investee companies: 1. GHG Emissions, 2. Carbon Footprint, 3. GHG intensity of investee companies, 5. Share of non-renewable energy consumption and production, 6. Energy consumption intensity per high impact climate sector, 8. Emissions to water, 9. Hazardous waste and radioactive waste ratio, 12. Unadjusted gender pay gap, 13. Board gender diversity

Indicators applicable to investments in sovereigns and supranationals: 15. GHG Intensity

Additional indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters: 23. Average political stability score

For the purposes of this statement, all securities managed by CIM on a discretionary basis are included in the “current value of all investments” (this being the denominator figure that is used to calculate certain PAI metrics (e.g. GHG intensity figures) with the exception of the following: cash; cash-equivalent assets; derivatives and other assets held in portfolios that are not being used to directly or indirectly fund investments in investee companies or sovereigns but rather for non-investment purposes such as portfolio management. CIM also considers the exclusion of Cash to be a more conservative approach, given this makes the denominator figure smaller, and in turn the overall PAIs scores larger. CIM’s processes and governance framework are reviewed as required by current best practices, regulators and/or client expectations, and to ensure compliance with current laws and regulations. CIM may revisit the approach taken in this PAIs statement (on one or more points) in due course.

## Important information

At Citi Private Bank we take your data privacy seriously. To learn more please visit our website:

<https://www.privatebank.citibank.com/privacy>

**Citibank Europe plc, Luxembourg Branch**, registered with the Luxembourg Trade and Companies Register under number B 200204, is a branch of Citibank Europe plc. It is subject to the joint supervision of the European Central Bank and the Central Bank of Ireland. It is furthermore subject to limited regulation by the Commission de Surveillance du Secteur Financier (the CSSF) in its role as host Member State authority and registered with the CSSF under number B00000395. Its business office is at 31, Z.A. Bourmicht, 8070 Bertrange, Grand Duchy of Luxembourg.

**Citibank Europe plc** is regulated by the Central Bank of Ireland. It appears on the Central Bank register with reference number C26553 and supervised by the European Central Bank. Its registered office is at 1 North Wall Quay, Dublin 1, Ireland. Citibank Europe plc is registered in Ireland with company registration number 132781. It is regulated by the Central Bank of Ireland under reference number C26553.

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