



# SFDR Disclosures

VERSION 1.0  
11 September 2024

**Regulation (EU) 2019/2088 of 27 th November 2019 on sustainability-related disclosures in the financial services sector, as amended (hereinafter the “SFDR”) governs the transparency requirements regarding the integration of sustainability risks into investment decisions, the examination of adverse impacts on sustainability and the disclosure of Environmental, Social and Governance (ESG) and sustainability-related information with respect to financial products. Commission Delegated Regulation (EU) 2022/1288 of 6th April 2022 supplements the SFDR on the content and presentation of relevant disclosures.**

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The Bank provides the investment services of Investment Advice and Portfolio Management, therefore it falls under the definitions of both a Financial Adviser and a Financial Market Participant, respectively, as per the SFDR, and as such, it has the relevant obligations set forth in this notification.

AstroBank, taking account of its size and the nature, complexity and scope of the activities it offers and the types of financial products that the Bank advises on, does not currently incorporate sustainability risks into its investment decisions, when providing Investment Advice or Portfolio Management services, nor does it consider any negative impacts on sustainability.

This is predominantly due to data challenges, such as the limitation of readily available data from third parties, hindering the Bank’s efforts in complying with the technical requirements when considering the integration of sustainability risks into investment decisions and investment advice.

Moreover, the Bank does not, as things stand, take into account the EU classification criteria under the Taxonomy Regulation (EU) 2020/852 on the establishment of a framework to facilitate sustainable investments, in terms of the investment services it offers.

AstroBank is considering the integration of sustainability risks within the Bank’s Remuneration Policy. In particular, the Bank is evaluating its variable remuneration practices in terms of consideration of sustainability risk, alongside all other elements of risk, so as to discourage excessive risk-taking.

If, in the future, it is decided that sustainability assessments will be integrated into the investment analysis and decision-making process, in accordance with the SFDR, this notification shall be updated accordingly.

★ **No consideration of adverse impacts of investment advice on sustainability factors**

As per Article 13 of Commission Delegated Regulation (EU) 2022/1288, the Bank, in its capacity as a Financial Adviser, taking account of its size and the nature, complexity and scope of the activities it offers and the types of financial products that the Bank advises on, does not currently consider principal adverse impacts of investment decisions on sustainability factors in its investment advice.

Moreover, ESG data challenges, such as the limitation of readily available data, hinder the Bank’s efforts in complying with the technical requirements when considering principal adverse impacts of investment decisions on sustainability factors in its investment advice.

The Bank may, in the future, reassess its consideration in regards to adverse impacts on greenhouse gas emissions, biodiversity, water, waste, social and employee matters, amongst other sustainability factors. Should this be the case, this notification shall be updated accordingly.

★ **No consideration of adverse impacts of investment decisions on sustainability factors**

As per Article 12 of Commission Delegated Regulation (EU) 2022/1288, the Bank, in its capacity as a Financial Market Participant, taking account of its size and the nature, complexity and scope of the activities it offers, does not currently consider principal adverse impacts of investment decisions on sustainability factors.

Moreover, ESG data challenges, such as the limitation of readily available data, hinder the Bank’s efforts in complying with the technical requirements when considering principal adverse impacts of investment decisions on sustainability factors.

The Bank may, in the future, reassess its consideration in regards to adverse impacts on greenhouse gas emissions, biodiversity, water, waste, social and employee matters, amongst other sustainability factors. Should this be the case, this notification shall be updated accordingly.