

SFDR Compliance Statement

ABG Sundal Collier



1 Background

Under the EU Sustainable Finance Disclosure Regulation (“SFDR”) (Regulation (EU) 2019/2088), financial advisers must publish information on their website about their policies for integration of sustainability risks into their investment advice, and whether they consider principle adverse impacts (“PAIs”) on sustainability factors in their investment advice. Furthermore, financial advisers shall publish information about how their remuneration policies are consistent with the integration of sustainability risks.

A summary of ABG Sundal Collier’s (“ABGSC”) SFDR compliance is provided in this document. Please note that this information is provided solely for the purpose of compliance with the disclosure requirements and shall not form the basis for any contract or create any obligations or commitments for ABGSC.

2 Integration of sustainability risks in our advisory

The SFDR requires ABGSC to publish information about the policies for integration of sustainability risks in our investment advice.

ABGSC does not offer investment advice as a separate service, nor do we provide investment advice related to portfolio allocation or other portfolio advice. Furthermore, we do not offer advice related to any financial products as defined in the SFDR Article 2.12. However, our sales and trading desks may provide advice regarding financial instruments to professional clients requesting investment advice in connection with our brokerage services.

A sustainability risk is defined as an environmental, social or governance event or condition that, if it occurs, could cause an actual or potential material negative impact on the value of investments.

Sustainability risks are - as all risks associated with a company or financial instrument- integrated as part of the analysis of the financial instruments that the investment advice may be based on. When an investment advice is provided, we will take into account any Sustainability Preferences received from the client and consider any relevant sustainability risks that might have a relevant material negative impact on the financial return of an investment. Industries and companies where there is an elevated unacceptable sustainability risk relative to the clients Sustainability Preferences are excluded and clients will not be recommended to invest in such a financial instrument.

As part of ABGSC’s client onboarding process, we will map the client’s sustainability preferences in accordance with the requirements of the EU MiFID II Directive (“MiFID II”). If we provide investment advice to you, we will, to the best of our ability, take your sustainability preferences into account if you have any. Since we do not provide investment advice related to portfolio allocation or other portfolio advice, we do not ask you about the minimum proportion your sustainability preferences shall apply to.

3 No consideration of adverse impacts of investment advice on sustainability factors

The SFDR also requires ABGSC to publish information as to whether they consider principle adverse impacts (“PAIs”) on sustainability factors in their investment advice.

A Principal Adverse Impact (PAI) is any impact of investment decisions or advice that results in a negative effect on sustainability factors, such as environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

As of today, ABGSC does not consider any adverse impacts of investment decisions on sustainability factors in the investment advice. This is due to the size, nature and scale of our activities and the types of financial products we advise on. We do not offer investment advice as a separate service, nor do we provide investment advice related to portfolio allocation or other portfolio advice. Furthermore, we do not offer advice related to any financial products as defined in the SFDR Article 2.12. Hence it is not currently possible, to carry out a reliable due diligence on the principal adverse impacts of the investment advice to the extent defined in the SFDR, and comply with the reporting obligations according to the delegated the regulation to the SFDR.

ABGSC will, however, continuously monitor the development of industry and market practice in this area as well as further regulatory guidance and review our position.

Notwithstanding the above, we will consider principle adverse impacts on sustainability factors in the investment advice to you if you have provided us with sustainability preferences that include principal adverse impact on sustainability factors.

4 Integration of sustainability risks in our remuneration policy

ABGSC has adopted a corporate remuneration policy that is designed to promote sustainability and discourage excessive risk-taking, including but not limited to credit risks, financial risks, operational risks and sustainability risks, among all staff within the Group. The remuneration policy shall be in line with the business strategy, objectives, values and long-term interests of the Group, and incorporates measures to avoid conflicts of interest. The variable compensation shall reflect a sustainable and risk-adjusted performance and the criteria that govern the possibilities of receiving variable compensation shall not encourage actions that may involve excessive risk-taking in terms of financial risks or sustainability risks and are designed in connection with the risk-adjusted results and performance.