

Statement on principal adverse impacts of investment decisions on sustainability factors

Financial market participant

Luminor Investicijų valdymas UAB, LEI 213800Z8QMZBMQLE7R21

Summary

Luminor Investicijų valdymas UAB, LEI 213800Z8QMZBMQLE7R21 (further in this document – AMC) considers principal adverse impacts of its investment decisions on sustainability factors. The present statement is the consolidated statement on principal adverse impacts on sustainability factors of Luminor Investicijų valdymas UAB. This statement on principal adverse impacts on sustainability factors covers the reference period from 1 January 2024 to 31 December 2024. The terms used in this statement, unless explained in the text, are defined in Annex I of the Commission Delegated Regulation (EU) 2022/1288 of 6 April 2022 supplementing Regulation (EU) 2019/2088 (hereinafter – the SFDR RTS).

AMC considers principal adverse impact on entity level by measuring and monitoring the aggregated negative impact on sustainability factors in respect to assets under management (AuM) of AMC pension funds’ investments. AMC considers the mandatory principal adverse impact indicators and three additional principle adverse impact indicators (both mandatory and additional principle adverse impact indicators also referred as indicators) (“Investments in companies without carbon emission reduction initiatives”, “Lack of a human rights policy”, and “Number of convictions and amount of fines for violation of anti-corruption and anti-bribery laws”) defined by 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 (hereinafter – the SFDR) and the SFDR RTS.

It is important to note that the data availability or quality of data for some indicators remains low and a large proportion is based on estimates and will develop further. The explanation column below describes the share of reported and estimated data from all the covered data. It is probable that the principle adverse impact indicator metrics below may increase with improved coverage or reduced estimation in next reports, without the actual negative adverse impacts having increased. The indicator metrics for the previous reference periods from 1 January 2022 to 31 December 2022 presented in column “Impact 2022” and from 1 January 2023 to 31 December 2023 presented in column “Impact 2023” have been updated relative to the previously reported statement in the following table due to the third party data providers updating their data.

Description of principal adverse sustainability impacts

TABLE 1

Indicators applicable to investments in investee companies							
Adverse sustainability indicator	Metric	Impact 2024	Impact 2023	Impact 2022	Explanation	Actions taken, and actions planned and targets set for the next reference period	
CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS							
Greenhouse gas emissions	1. GHG emissions	Scope 1 GHG emissions	19,337.305 tonne CO2e	15,390.018 tonne CO2e	23,788.104 tonne CO2e	Coverage ¹ 95.83% Estimated 22.11% Reported 77.89%	AMC followed exclusions on direct investments established by Luminor Sustainability Policy, applied to pension funds’ portfolios. AMC selected investment funds managed by fund management companies that are signatories to United Nations’ Principles for Responsible Investments (UN PRI). AMC implemented Sustainable Investments Due Diligence Procedure.
		Scope 2 GHG emissions	6,421.2046 tonne CO2e	3,211.1245 tonne CO2e	5,082.867 tonne CO2e	Coverage 95.83% Estimated 22.16% Reported 77.84%	

1. Coverage refers to a fraction of companies, where there is data available to calculate a specific Principal Adverse Impacts (PAI).

	Scope 3 GHG emissions	251,708.25 tonne CO2e	125,440.58 tonne CO2e	149,732.53 tonne CO2e	Coverage 94.51% Estimated 43.06% Reported 56.94%	For more information, refer to the section "Description of policies to identify and prioritise principal adverse impacts on sustainability factors".
	Total GHG emissions	273,599.75 tonne CO2e	143,037.4 tonne CO2e	176,964.75 tonne CO2e	Coverage 94.48% Estimated 45.82% Reported 54.18%	
2. Carbon footprint	Carbon footprint	501.3692 tonne CO2e / EUR M invested	296.36743 tonne CO2e / EUR M invested	421.75998 tonne CO2e / EUR M invested	Coverage 94.48% Estimated 45.82% Reported 54.18%	AMC continued to offer its clients pension fund Luminor Tvari ateitis index with reduced negative environmental impact – significantly reduced investments in fossil fuel sector, as well as excluded or significantly reduced investments in companies involved in controversial activities.
3. GHG intensity of investee companies	GHG intensity of investee companies	832.79144 tonne CO2e / EUR M revenue	568.8793 tonne CO2e / EUR M revenue	851.38104 tonne CO2e / EUR M revenue	Coverage 94.61% Estimated 45.79% Reported 54.21%	
4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	7.548971 %	5.913307 %	10.5756 %	Coverage 93.29% Estimated 0% Reported 100%	In the next reference period AMC will be monitoring and analysing indicator data and its scope, and implications for pension funds' investment portfolios. AMC will prioritize "GHG intensity of investee companies" and "Lack of human rights policy" indicator in its investment process. All else being equal and if it does not contradict to the pension funds' mandate and underlying strategy, when deciding on the inclusion of the instrument into an investment portfolio, an instrument with a better assessment outcome of the climate-related metrics and "Lack of human rights policy" indicator screening will be preferred in general. There are no specific targets set for the subsequent reporting period for the indicators.
5. Share of non-renewable energy consumption and production	Share of non-renewable energy consumption and non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage	Consumption: 40.30482 % Production: 1.252837 %	Consumption: 29.292238 % Production: 1.1116626 %	Consumption: 44.84558 % Production: 2.3807933%	Coverage 89.29% Estimated 2.01% Reported 97.99% Coverage 76.92% Estimated 0% Reported 100%	
6. Energy consumption intensity per high impact climate sector	Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector	Total: 0.19356269 GWh / EUR M revenue Sector A: 0.0011610079 GWh / EUR M revenue Sector B: 0.042367924 GWh / EUR M revenue Sector C: 0.069486916 GWh / EUR M revenue	Total: 0.17800452 GWh / EUR M revenue Sector A: 0.0013347059 GWh / EUR M revenue Sector B: 0.040745154 GWh / EUR M revenue Sector C: 0.058109917 GWh / EUR M revenue	Total: 0.33523905 GWh / EUR M revenue Sector A: 0.0013852054 GWh / EUR M revenue Sector B: 0.065795496 GWh / EUR M revenue Sector C: 0.09097756 GWh / EUR M revenue	Coverage 97.78% Estimated 31.13% Reported 68.87% Coverage 98.03% Estimated 20% Reported 80% Coverage 99.66% Estimated 28.61% Reported 71.39% Coverage 99.17% Estimated 32.08% Reported 67.92%	

			Sector D: 0.0719872 GWh / EUR M revenue	Sector D: 0.070700705 GWh / EUR M revenue	Sector D: 0.16871843 GWh / EUR M revenue	Coverage 81.52% Estimated 36.35% Reported 63.65%
			Sector E: 0.00079624244 GWh / EUR M revenue	Sector E: 0.0007791984 GWh / EUR M revenue	Sector E: 0.0010793249 GWh / EUR M revenue	Coverage 100% Estimated 36.16% Reported 63.84%
			Sector F: 0.0011432556 GWh / EUR M revenue	Sector F: 0.000518357 GWh / EUR M revenue	Sector F: 0.0015645326 GWh / EUR M revenue	Coverage 99.41% Estimated 36.7% Reported 63.3%
			Sector G: 0.002678769 GWh / EUR M revenue	Sector G: 0.002692178 GWh / EUR M revenue	Sector G: 0.0037698876 GWh / EUR M revenue	Coverage 98% Estimated 29.14% Reported 70.86%
			Sector H: 0.007563769 GWh / EUR M revenue	Sector H: 0.010529827 GWh / EUR M revenue	Sector H: 0.01168029 GWh / EUR M revenue	Coverage 99.03% Estimated 22.44% Reported 77.56%
			Sector L: 0.0065365233 GWh / EUR M revenue	Sector L: 0.0041708164 GWh / EUR M revenue	Sector L: 0.0034044988 GWh / EUR M revenue	Coverage 95.62% Estimated 29.35% Reported 70.65%
Biodiversity	7. Activities negatively affecting biodiversity- sensitive areas	Share of invest- ments in investee companies with sites/operations located in or near to biodiversity- sensitive areas where activities of those investee companies nega- tively affect those areas	1.3774124 %	0.8765439 %	1.1882911 %	Coverage 92.98% Third party data provider leverages NLP models to identify breach- es for this indicator. All controversies considered a potential vio- lation by NLP models are later reviewed by analysts.
Water	8. Emissions to water	Tonne of emissions to water gener- ated by investee companies per million EUR invest- ed, expressed as a weighted average	0.0033640668 tonne / EUR M invested	0.0042655393 tonne / EUR M invested	0.006381572 tonne / EUR M invested	Coverage 33.65% Estimated 68.31% Reported 31.69%

Waste	9. Hazardous waste and radioactive waste ratio	Tonne of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average	32.631176 tonne / EUR M invested	25.73431 tonne / EUR M invested	44.72334 tonne / EUR M invested	Coverage 93.98% Estimated 51.42% Reported 48.58%
-------	---	--	-------------------------------------	------------------------------------	------------------------------------	--

INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS

Adverse sustainability indicator		Metric	Impact 2024	Impact 2023	Impact 2022	Explanation	Actions taken, and actions planned and targets set for the next reference period
Social and employee matters	10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	4.8463287 %	4.2230034 %	1.1118335 %	Coverage 92.98% Third party data provider leverages NLP models to identify breaches for this indicator. All controversies considered a potential violation by NLP models are later reviewed by analysts.	AMC followed exclusions on direct investments established by Luminor Sustainability Policy, applied to pension funds’ portfolios. AMC selected investment funds managed by fund management companies that are UN PRI signatories. AMC implemented Sustainable Investments Due Diligence Procedure. For more information, refer to the section “Description of policies to identify and prioritise principal adverse impacts on sustainability factors”.
	11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance /complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	0.48413497 %	0.21132499 %	0.67627513 %	Coverage 95.08% Estimated 0% Reported 100%	
	12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	10.130169 %	5.781516 %	6.7651324 %	Coverage 57.75% Estimated 0% Reported 100%	
	13. Board gender diversity	Average ratio of female to male board members in investee companies, expressed as a percentage of all board members	21.90401 %	17.282055 %	20.489 %	Coverage 95.42% Estimated 0% Reported 100%	

	14. Exposure to controver- sial weapons (anti-per- sonnel mines, cluster munitions, chemical weapons and biological weapons)	Share of invest- ments in invest- ee companies involved in the manufacture or selling of contro- versial weapons	0.0018633783 %	0.0074784923 %	0.006846654 %	Coverage 95.07% Estimated 0% Reported 100%
--	--	--	-------------------	-------------------	------------------	---

Indicators applicable to investments in sovereigns and supranationals

	Adverse sustainability indicator	Metric	Impact 2024	Impact 2023	Impact 2022	Explanation	Actions taken, and actions planned and targets set for the next reference period
Environmental	15. GHG intensity	GHG intensity of investee countries	94.42047 tonne CO2e / EUR M GDP	101.32127 tonne CO2e / EUR M GDP	146.95 tonne CO2e / EUR M GDP	Coverage 97.95% Estimated 100% Reported 0%	Same as in section "CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS".
Social	16. Investee countries sub- ject to social violations	Number of in- vestee countries subject to social violations (absolute number and relative number divided by all investee countries), as referred to in in- ternational treaties and conventions, United Nations principles and, where applicable, national law	Relative: 3.01904 % Absolute: 2.25	Relative: 1.7510121 % Absolute: 1.5	Relative: 3.5943954 % Absolute: 3.5	Coverage 100% Estimated 0% Reported 100% Coverage 100% Estimated 0% Reported 100%	AMC adheres to investment restrictions based on the sanctions imposed by authorities of the countries where we operate, and sanctions imposed by the EU, UN and US.

Indicators applicable to investments in real estate assets

	Adverse sustainability indicator	Metric	Impact 2024	Impact 2023	Impact 2022	Explanation	Actions taken, and actions planned and targets set for the next reference period
Fossil fuels	17. Exposure to fossil fuels	Share of invest- ments in real es- tate assets involved in the extraction, storage, transport or manufacture of fossil fuels	0 %	0 %	0 %	Coverage 100% Estimated 0% Reported 100%	AMC implemented Sustainable Investments Due Diligence Procedure. For more information, refer to the section "Description of policies to identify and prioritise principal adverse impacts on sustainability factors".
Energy efficiency	18. Exposure to energy-in- efficient real estate assets	Share of invest- ments in ener- gy-inefficient real estate assets	50.6 %	56.5 %	56.7 %	Coverage 100% Estimated 0% Reported 100%	AMC monitors and requests data from local (Baltic) real estate asset managers thereby engaging with investees. There are no specific targets set for the subsequent reporting period for the indicators.

Description of policies to identify and prioritise principal adverse impacts on sustainability factors

Luminor Group has approved following policies and guidelines with the purpose to help identify and prioritize principal adverse sustainability impacts in the business activities of its different divisions and subsidiaries, including AMC:

Sustainability Policy – outlines the main sustainability principles and values we follow in our business activities, decision making (including investment decision making), remuneration, and relationships with our stakeholders to support achievement of our sustainability objectives. The latest version was approved by the Luminor Bank Supervisory Council on December 17th, 2024.

Sustainable Investment Guidelines – outline sustainable investment principles, including the Sustainability (ESG) risk integration in the investment decision making process in Luminor Bank and its asset management subsidiaries, including AMC. Approved by the Luminor Bank Head of Sustainability Department on November 25th, 2022.

AMC has approved Sustainable Investments Due Diligence Procedure (Procedure), which describes the process for Sustainability (ESG) due diligence assessment by AMC prior to making investment decisions and continuous monitoring thereof. Furthermore, the Procedure describes how Sustainability (ESG) risks and adverse sustainability impacts are integrated in the investment decision making processes. Latest version approved by the Head of Investment Management Unit on April 2nd, 2025.

In the investment process AMC aims to identify adverse sustainability impact from the investment decisions. AMC avoids direct investments in companies that do not meet our minimum safeguards. AMC aims to invest in investment funds managed by external asset managers who are UN PRI signatories and thus exhibit positive trend in integrating ESG factors in their businesses. This provides AMC opportunity to identify and prioritize investments with lower adverse sustainability impact.

Principal adverse impact indicator selection is based on the Sustainability Policy of Luminor Group. Subject to data availability, the selection of additional indicators follows the methodology of selecting the indicators which are deemed most relevant to consider based on the applicable policies, investee exposures and data quality. AMC selected three relevant additional indicators: an indicator relating to emissions – Investments in companies without carbon emission reduction initiatives, an indicator that relates to human rights – Lack of a human rights policy, an indicator that relates to anti-corruption and anti-bribery – Number of convictions and amount of fines for violation of anti-corruption and anti-bribery laws.

AMC prioritizes mandatory climate-related indicator “GHG intensity of investee companies”, and additional social indicator “Lack of human rights policy” in the investment decision making process. In addition, screening on these indicators is integrated in the financial instrument selection per Sustainable Investments Due Diligence Procedure. All else being equal and if it does not contradict to the Pension funds’ mandate and underlying strategy, when deciding on the inclusion of the instrument into a pension fund, an instrument with a higher assessment outcome of the climate-related indicator “GHG intensity of investee companies” and “Lack of human rights policy” indicator screening is preferred in general.

AMC uses external data vendor (Clarity AI) for collecting data on principal adverse impact indicators. The external data vendor has been selected on basis of a thorough due diligence process, however, it does not cover principle adverse impact indicators for all of the AMC portfolio holdings. As of end of 2024, Clarity AI has coverage of more than 33 thousand companies, 198 Nationals and 400 thousand funds. With substantial data coverage from external data provider the direct collection of data from issuers that we invest into is limited to alternative investment funds. AMC investments in private equity funds are not covered in principle adverse impacts current (2024) and previous (2023 and 2022) reference periods due to low proportion to total investments and materiality. Data on such investment funds is collected and monitored separately on a yearly basis in order to assess if it can be included in the report.

The data coverage, estimation and the extent of its accuracy on select principal adverse impacts may vary greatly period to period, dependent of the quality of the corporate disclosures and evolving estimation models of the data vendor. As of this report, it is difficult to assess the magnitude of the margin of error, but it is expected to be substantial. As corporate disclosures are expected to improve and increase over time, it is expected that the margin of error will decrease. AMC continuously engages with the external data provider in cases where data is suspected to be incorrect or if there are significant data gaps.

Engagement policies

According to the Law on Markets in Financial Instruments No. X-1024 On amendment of 2, 3, 88, 89, 90, 93, 102 paragraphs, amendment of name of the fifth section and amendment to the annex as well as supplement by paragraphs 41(1), 41(2), 41(3), 41(4), 89(1) of the Law, adopted on 27 June 2019, we inform, that Luminor investicijų valdymas UAB, having the license issued under Law on Collective Investment Undertakings of the Republic of Lithuania and managing pension funds in accordance with Law on Accumulation of Pensions of the Republic of Lithuania and Law on Supplementary Voluntary Accumulation of Pensions of the Republic of Lithuania, does not directly invest in stocks of the companies, which are listed in the regulated markets. Accordingly, Luminor investicijų valdymas UAB does not prepare the Engagement policy.

References to international standards

AMC does not adhere to specific responsible business conduct codes and internationally recognised standards for principal adverse impacts' due diligence and reporting. As of the date of the report AMC does not commit to align with the objectives of the Paris Agreement. AMC has not implemented forward-looking climate scenarios in its investment process. However, AMC invests only in investment funds managed by external asset managers who are signatories to UN PRI.

For AMC Article 8 (as defined by the SFDR) pension fund Luminor tvari ateitis index (hereinafter – Pension Fund) relevant principle adverse impact indicators are selected to measure attainment of promoted social or environmental characteristics. Indicators are measured on the Pension Fund level by aggregating information calculated from investment funds' (where Pension Fund invests) principle adverse indicators, obtained from third party data vendors, and tracked index methodology. In instrument selection and monitoring for Pension Fund AMC employs ESG metrics provided by index administrators. Evaluation framework for such metrics (e.g. ESG Risk, ESG Controversies) is designed by index administrators to be consistent with international norms, e.g. represented by the UN Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the UN Global Compact.

Historical comparison

The historical comparison of principle adverse impact indicators is for the reference period from 1 January 2024 to 31 December 2024 as described in Table 1 column "Impact 2024" relative to indicators for the reference periods from 1 January 2023 to 31 December 2023 presented in column "Impact 2023" and from 1 January 2022 to 31 December 2022 presented in column "Impact 2022". The indicator values in the columns "Impact 2023" and "Impact 2022" have been updated from the previously published Statement on principal adverse impacts of investment decisions on sustainability factors. This is due to updated data from the third-party data vendor. In 2026 a historical comparison of the indicators in the period reported (1 January 2025 to 31 December 2025) will be made with the three previous periods (Statements for 2024, 2023 and 2022).

The composition of AMC's holdings has remained consistent throughout 2024, with approximately 82% of the 2024 portfolio aligning with that of 2023. The observed change in PAI (Principle Adverse Impact) indicators described below are primarily driven by an increased proportion of reported data in 2024, as opposed to the greater reliance on estimates in the previous reporting period and improved underlying data coverage of the indicators. Moreover, the share of sustainability-related investments increased in 2024, further demonstrating the continued commitment to sustainable investment practices.

AMC's holdings did not show improvement in most of 2024 mandatory climate and other environment-related indicators, with an increased negative impact relative to 2023 indicators and mixed negative impact relative to 2022 indicators. It is important to note that GHG emissions, carbon footprint, GHG intensity of investee companies, emissions to water and hazardous waste and radioactive waste ratio indicator metrics are significantly based on estimations than on reported numbers. Comparing the data coverage with the 2023 report there were major improvements for reported data coverage in indicators for GHG emissions, carbon footprint and GHG intensity. The observed increase in GHG emissions in 2024 can be mainly attributed to the substantial expansion of the investment portfolio in 2024 (the portfolio grew by approximately 35%), which led to higher absolute emissions despite ongoing sustainability efforts. From the indicators that only relied on reported numbers, exposure to companies active in the fossil fuel sector increased in 2024 compared to 2023, rising from 5.91% to 7.55%, but remained lower than the 10.58% recorded in 2022.

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters showed mixed results in 2024 relative to 2023 and 2022. The exposure to controversial weapons has decreased meaningfully relative to 2023 (from 0.0075% to 0.0019%). Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises (indicator 10) increased slightly since 2023 (from 4.22% to 4.85%). Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises (indicator 11) and unadjusted gender pay gap (indicator 12) also showed deterioration in 2024 compared to 2023. However, the board gender diversity has increased, showing higher average ratio of female to male board members.

Environmental indicator applicable to investments in sovereigns and supranationals showed improvement by 6.8% in GHG intensity of investee countries (100% of data estimated) and the social indicator has increased almost twice in number of investee countries subject to social violations (100% of data reported) comparing the data of 2024 and 2023.

Indicators applicable to investments in real estate assets showed the least change due to single investment fund being held by AMC pension funds. It remained not exposed to fossil fuels, and its share of energy-inefficient real estate assets decreased.

Additional climate and other environment-related indicator 4. Investments in companies without carbon emission reduction initiatives improved compared to 2022 from 52.4% to 39.61% but increased compared to 2023 by 5.33 percentage points. Additional indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters showed mixed results. The 9. Lack of a human rights policy indicator that is prioritized by the AMC has increased with the share of investments without a human rights policy from 3.27% to 5.74%. Additional indicator 17. Number of convictions and amount of fines for violation of anti-corruption and anti-bribery laws has remained the same since 2023.

-
2. Sustainability-related investments meet either the environmental or social characteristics promoting investment or Sustainable investment criteria.

TABLE 2

Additional climate and other environment-related indicators

CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS							
Adv. sustainability impact	Adverse impact on sustainability factors (qualitative or quantitative)	Metric	Impact 2024	Impact 2023	Impact 2022	Explanation	Actions taken, and actions planned and targets set for the next reference period
Indicators applicable to investments in investee companies							
Emissions	4. Investments in companies without carbon emission reduction initiatives	Share of investments in investee companies without carbon emission reduction initiatives aimed at aligning with the Paris Agreement	39.61 %	34.280643 %	52.404427 %	Coverage 100% Estimated 0% Reported 100%	Same as in section “CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS”.

TABLE 3

Additional indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters

INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS							
Adv. sustainability impact	Adverse impact on sustainability factors (qualitative or quantitative)	Metric	Impact 2024	Impact 2023	Impact 2022	Explanation	Actions taken, and actions planned and targets set for the next reference period
Indicators applicable to investments in investee companies							
Human Rights	9. Lack of a human rights policy	Share of investments in entities without a human rights policy	5.74 %	3.266376 %	6.383725 %	Coverage 95.58% Estimated 0% Reported 100%	Same as in section "INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS".
Anti-corruption and anti-bribery	17. Number of convictions and amount of fines for violation of anti-corruption and anti-bribery laws	Numbers of convictions and amount of fines for violations of anti-corruption and anti-bribery laws by investee companies	1: 0	1: 0	1: 0	1: Coverage 92.98% Third party data provider leverages NLP models to identify breaches for this indicator. All controversies considered a potential violation by NLP models are later reviewed by analysts.	
			2: 83.59121 million EUR	2: 83.59121 million EUR	2: 62.693405 million EUR	2: Coverage 92.98% Third party data provider leverages NLP models to identify breaches for this indicator. All controversies considered a potential violation by NLP models are later reviewed by analysts.	