SUSTAINABILITY STATEMENT

Sustainability Statement

WEALINS S.A. is a financial market participant under Regulation (EU) 2019/2088 (i.e. SFDR) and in our dual role as a sustainable insurance provider and responsible investor, we aim to carry out our mission of delivering a positive impact on our environment and society while generating revenues and adding value to our clients.

WEALINS is part of the Foyer Group, which holds the ESR (Responsible Business) and Responsibility Europe labels[2], recognizing its commitment to corporate social responsibility and sustainable development.

Our approach to Sustainability is engrained in the overall framework set out by Foyer Group, to which WEALINS S.A. belongs and which is summarised in the document Sustainability Statement published on the Group's website.

SFDR related disclosures

Policy on integration of sustainability risks in investment decision-making (Article 3 SFDR)

WEALINS S.A. acts as a distributor of unit-linked life insurance or capitalisation contracts and advisor. We offer the following products: external (UCITS, etc.) and or internal collective funds, dedicated and/or specialised insurance funds set up and managed in accordance with Luxembourg regulatory provisions, and in particular the provisions of circular letter LC 26/1 of the Commissariat aux Assurances (the Insurance Supervisory Authority in Luxembourg). We facilitate, promote, and support the development of ESG investment strategies through our life insurance or capitalisation contracts. In such role, we do not manage the underlying assets of the contracts, and therefore we refer to each respective partner (asset manager, or other) requirements in accordance with SFDR categorization.

Investment approach of WEALINS S.A. own funds

In line with our mother company, the Foyer Group, our approach to sustainability and investments is characterised by embedding sustainability risks considerations.

Foyer Group applies an UN Global Compact inspired screening, involving checks related to breaches of the following principles: Human rights, Labour, Environment and Anti-Corruption. Information regarding controversies of investee companies based on their level of intensity is also collected and the controversy intensity level is ranked from 1 (lowest intensity) to 5 (highest intensity). The controversy level specifies the negative intensity of company-related events on the environment or society, and risks to the company itself.

[1] Attributed by the INDR (Institut National pour le Développement durable et la Responsabilité sociale des entreprises). The INDR was founded in 2007 by members of the *Union des Entreprises Luxembourgeoises* (UEL), the umbrella organisation of Luxembourg employers, with the visionary aim to promote corporate social responsability (CSR). The INDR therefore serves as a gateway to all Luxembourgish companies that wish to contribute to sustainable development.

[2] The Responsibility Europe network aims to showcase companies and organisations that have achieved one of the best existing sustainable development and corporate social responsibility (SD/CSR) certifications and contribute to a sustainable future (https://www.responsibility-europe.org/en/).

wealins.com

WEALINS S.A. | 12, rue Léon Laval | L-3372 Leudelange - GD of Luxembourg | Postal address: L-2986 Luxembourg
T: (+352) 437 43 5200 | F: (+352) 42 88 84 | E: info@wealins.com | R.C.S. : Luxembourg B 53682 | Intra-community VAT: LU 166 094 20

Policy on integration of Sustainability risks in Insurance Advice (Article 3 SFDR)

In our role as insurance advisor, we have devised an entirely digital approach, through which we capture the sustainability preferences of our clients. This approach is done through our e-Wealins platform and the methodology we have created internally to map out the sustainability profile of our clients with the investment products that we source through third parties.

Excerpt on our approach

In line with our responsibilities as a financial adviser, in accordance with the Insurance Distribution Directive (IDD) regulation 2021/1257 of 21 April 2021, WEALINS S.A. needs to take into consideration the sustainability preferences of our clients.

In order to take good note of these preferences and determine their impacts on investments, we have developed a system that allow us to seemingly define our clients' preferences according to their risk appetite and match those with predefined sustainability 'profiles'.

To this end we have drafted sustainability questions that enable an open exchange between clients and WEALINS SA in order to ensure our clients can make an informed choice on sustainability and help them establishing sustainability preferences (take into account principal adverse impacts on environmental and social matters, investment promotes environmental or social characteristics (article 8 SFDR), sustainable investment (article 9 SFDR), investment in line with Taxonomy Regulation (EU) 2020/852).

Each preference carries a particular weight which determines a match to meet a sustainability profile(s) (from 2 to 6) established by WEALINS SA.

Once those preferences have been established, the clients are offered a set of specific products (external funds (UCITS, etc,) and or internal collective, dedicated and/or specialised insurance funds), that perfectly match the combination of their sustainability profile. We make our selection sourcing the information from the EET (European ESG Template) made available by our partners (asset managers, or other).

Statement on principal adverse impacts of investment decisions on sustainability factors (Article 4 SFDR)

WEALINS S.A. offers a range of unit-linked life insurance and capitalisation products whose financial risks are fully borne by the policyholders.

The investments underlying WEALINS S.A. products provide access to up to four different types of funds, depending on the product and the target market. These may be external (UCITS, etc.) and/or internal collective funds, dedicated and/or specialised insurance funds set up and managed in accordance with Luxembourg regulatory provisions, and in particular with the provisions of circular letter LC 26/1 of the Commissariat aux Assurances (Luxembourg insurance supervisory authority). Through these external and/or internal funds, policyholders of WEALINS S.A. products can invest in a large number of strategies and investment profiles, most often managed by external and independent financial managers and sometimes, when the regulatory provisions of the policyholders' countries of residence allow it, directly by the policyholders.

Investment decisions are thus taken by these external financial managers mandated by WEALINS S.A. in the case of internal collective or dedicated funds, or by the policyholders themselves, or at least with the confirmation of the policyholders, who may, if they so wish, seek investment advice. In all these cases, it is the responsibility of the independent investment managers appointed by WEALINS S.A., the investment advisors appointed by the policyholders or, if applicable, the policyholders themselves to integrate sustainability risks into their investment decisions and to assess the principal adverse impacts of their investment decisions on sustainability factors and investment returns.

WEALINS S.A., as a life insurance company mainly marketing unit-linked products1 is not directly involved in the choice of underlying(s) for internal funds. In particular, this responsibility 'is transferred to the financial manager, in accordance with the investment policy defined in consultation with the policyholder'. In accordance with our supervisors classification our role is therefore 'limited' in terms of being able to influence investment decisions for our clients investment choices, we can only limit ourselves to tracking them and assess how to be able to exert influence across the value chain.

We also provide access to the external fund list with the SFDR classification is available here : https://wealins.com/funds-list/

Information on how the remuneration policy of WEALINS S.A. is consistent with the integration of sustainability risks (Article 5 SFDR)

The remuneration policy of WEALINS S.A. is part of the overall remuneration policy of Foyer Group, to which WEALINS S.A. belongs, which is summarised in the document Sustainability Statement published on the Group's website.

WEALINS S.A. | 12, rue Léon Laval | L-3372 Leudelange - GD of Luxembourg | Postal address: L-2986 Luxembourg
T: (+352) 437 43 5200 | F: (+352) 42 88 84 | E: info@wealins.com | R.C.S. : Luxembourg B 53682 | Intra-community VAT: LU 166 094 20