SIA "Viainvest"

DISCLOSURE OF INFORMATION RELATED TO SUSTAINABILITY

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V.1.0.	16.10.2023.	Initial version. Title: "No consideration of adverse impacts of investment decisions on sustainability factors".
V.2.0.	13.11.2023.	Title: "No consideration of adverse impacts of investment decisions on sustainability factors". In accordance with SFDR, the disclosed information has been supplemented and clarified, incl. regarding the transparency of remuneration policies in relation to the integration of sustainability risks.
V.3.0.	16.09.2024./ 18.09.2024.	Title: “Disclosure of information related to sustainability.” The document "No consideration of adverse impacts of investment decisions on sustainability factors" was supplemented with explanatory information on the concept of sustainability and sustainable financing; a general explanation of how investment firms should communicate sustainability-related information to investors; revealed the approach and practice implemented by VIAINVEST in relation to sustainability, both regarding the integration of sustainability factors and risks related to them in VIAINVEST's processes and risk management system, and also regarding the integration of sustainability risks in VIAINVEST's investment decision-making processes; changed structure and added information about VIAINVEST's integration of sustainability risks in its investment decision-making process, disclosed in accordance with SFDR requirements.

1. Terms

1.1. **VIAINVEST, Company, we** - SIA "Viainvest" (registration No. 40203015744, legal address - Roberta Hirša iela 1, Riga, LV-1045, Latvia); an investment firm licensed and supervised by the Bank of Latvia (www.bank.lv; legal address - K. Valdemāra iela 2A, Riga, LV-1050, Latvia). License number 06.06.08.735/538 and 27-55/2023/2.

1.2. **SFDR** - Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 201 on sustainability - related disclosures in the financial services sector.

1.3. **Regulation 2020/852** - Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088.

1.4. **Regulation 2022/1288** - Commission Delegated Regulation (EU) 2022/1288 of 6 April 2022 supplementing Regulation (EU) 2019/2088 of the European Parliament and of the Council with regard to regulatory technical standards specifying the details of the content and presentation of the information in relation to the principle of do no significant harm, specifying the content, methodologies and presentation of information in relation to sustainability indicators and adverse sustainability impacts, and the content and presentation of the information in relation to the promotion of environmental or social characteristics and sustainable investment objectives in precontractual documents, on websites and in periodic reports.

1.5. **Regulation 2023/363** - Commission Delegated Regulation (EU) 2023/363 of 31 October 2022 amending and correcting the regulatory technical standards laid down in Delegated Regulation (EU) 2022/1288 as regards the content and presentation of information in relation to disclosures in pre-contractual documents and periodic reports for financial products investing in environmentally sustainable economic activities.

1.6. **MiFID II** - Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments and amending Directive 2002/92/EC and Directive 2011/61/EU.

1.7. **MiFID II Delegated Regulation** - Commission Delegated Regulation (EU) 2017/565 of 25 April 2016 supplementing Directive 2014/65/EU of the European Parliament and of the Council as regards organisational requirements and operating conditions for investment firms and defined terms for the purposes of that Directive.

2. Purpose of the Document

2.1. This document's main purpose is to disclose information related to sustainability in accordance with SFDR requirements.

2.2. To achieve this goal more effectively, the Company with the help of this document:

2.2.1. at the beginning, introduces investors and potential investors to the concept of sustainability and sustainable financing from the perspective of the investment firm, explaining both these concepts, as well as such concepts as sustainability factors, sustainable investment, sustainability risks, greenwashing, etc.;

2.2.2. explains how an investment firm should communicate sustainability-related information to investors;

2.2.3. reveals the approach and practice implemented by VIAINVEST in relation to sustainability, both regarding the integration of sustainability factors and risks related to them in VIAINVEST's processes and risk management system, and regarding the integration of sustainability risks in VIAINVEST's investment decision-making processes;

2.2.4. finally, discloses sustainability-related information about the integration of VIAINVEST's sustainability risks in its investment decision-making process in accordance with SFDR requirements in a concentrated manner.

3. Sustainability and Sustainable Finance: Overview

3.1. Introduction

3.1.1. **Sustainability** and **sustainable financing** are currently becoming a central concept in many sectors, including the financial sector, as both society as a whole and companies at the individual level pay increased attention to such long-term development based on responsible management, considering the environmental, social and governance factors. Sustainable finance is becoming an essential tool to direct capital to projects and initiatives that contribute to positive environmental, social and governance impacts.

3.2. Explanation of some essential concepts

3.2.1. To better understand what sustainability and sustainable financing mean, we offer to get acquainted with some important concepts, definitions and explanations related to these issues.

3.2.2. **Sustainability** is an approach to development that ensures environmental protection, social welfare, and balanced economic growth, while meeting the needs of existing generations without harming future generations. Sustainability focuses on long-term solutions that contribute to the preservation of ecosystems, efficient use of resources and social justice.

3.2.3. The practical implementation of the concept of sustainability is specified with the help of **sustainability factors** (or ESG factors), which can have both favorable and unfavorable effects on society, the specific company and its financial indicators, as well as on investors and the value of the investment. SFDR regulation defines sustainability factors as environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

3.2.4. Sustainability factors are divided into three main categories - environmental factors, social factors, and governance factors:

- 3.2.4.1. **Environmental factors:** for example, carbon emissions, climate change, energy efficiency, use of renewable energy, resource management, waste management, pollution reduction, biodiversity conservation, etc.;
- 3.2.4.2. **Social factors:** for example, working conditions and employee rights, employee well-being, safety requirements at the workplace, respect for human rights and promotion of equality, relations with local communities, involvement in public processes and promotion of the public good, etc.;
- 3.2.4.3. **Governance factors:** for example, responsible and ethical company management, transparency and openness in financial and operational matters, fairness in decision making, prevention of corruption and conflicts of interest, long – term strategic planning and risk management, involvement of stakeholders (employees, clients, society) in decision-making, etc.

3.2.5. However, to translate the sustainable development approach into real and tangible results, an appropriate financial approach is needed. **Sustainable finance** is a financing approach that integrates sustainability factors into financial decision-making. Such financing facilitates the flow of capital to projects that contribute to sustainability, such as renewable energy projects, social programs, or companies with high sustainability standards.

3.2.6. The concept of sustainable financing is closely related to the concept of **sustainable investment**. According to SFDR, a sustainable investment is:

- 3.2.6.1. an investment in an economic activity that contributes to an environmental objective, as measured, for example, by key resource efficiency indicators on the use of energy, renewable energy, raw materials, water and land, on the production of waste, and greenhouse gas emissions, or on its impact on biodiversity and the circular economy;
- 3.2.6.2. or an investment in an economic activity that contributes to a social objective, in particular an investment that contributes to tackling inequality or that fosters social cohesion, social integration and labour relations;
- 3.2.6.3. or an investment in human capital or economically or socially disadvantaged communities, provided that such investments do not significantly harm any of those objectives and that the investee companies follow good governance practices, in particular with respect to sound management structures, employee relations, remuneration of staff and tax compliance.

3.2.7. Sustainable financing and sustainable investments give investors the opportunity to combine financial returns with a positive impact on the environment and society. To achieve the integration of sustainability principles in the investment process, it is essential to understand the risks associated with sustainability factors, paying attention not only to opportunities, but also to potential problems that can affect investment results.

3.2.8. **Sustainability risks** are those challenges and potential problems that can arise if sustainability factors are not properly considered. These risks can negatively affect not only the company's reputation and financial results, but also society and the environment in general, as well as specific investments and their value. SFDR defines sustainability risks as environmental, social or governance events or conditions that, if they occur, could cause an actual or a potential material negative impact on the value of the investment.

3.2.9. **An assessment of sustainability factors and the resulting risks** for investment firms in general is essential to understand how sustainability factors can affect the value and stability of investment portfolios. Such an approach can not only reduce potential losses, but also generally help to create a portfolio that meets today's requirements for responsible and sustainable investing. Materiality analysis involves identifying sustainability factors and evaluating their impact on investments in both the short and long term. Below is a summary of the more important sustainability factors and the resulting material risks that investment firms should potentially consider.

3.2.10. **The main environmental factors and the main risks arising from them**

3.2.10.1. **The main factors:** climate change, carbon emissions and resource depletion directly affect companies and industries that depend on natural resources. Similarly, the transition to a low-carbon economy can change the value of assets.

3.2.10.2. **The main risks:** inadequate adaptation to environmental regulation or fluctuations in resource prices may cause the value of the portfolio to decline. In the long term, investments in companies with high emissions become increasingly risky.

3.2.11. **The main social factors and the main risks arising from them**

3.2.11.1. **The main factors:** working conditions, respect for human rights, clients' satisfaction and local community relations are critical factors that can affect the reputation and stability of companies.

3.2.11.2. **The main risks:** when investee companies ignore social responsibility issues, it can lead to reputational risks, loss of clients' trust and even legal consequences that can negatively impact investment returns.

3.2.12. **The main governance factors and the main risks arising from them**

3.2.12.1. **The main factors:** effective company management, ethical standards and transparency are the basis for sustainable operation and investment attractiveness. These factors are particularly important because they directly affect the reliability of the company's business.

3.2.12.2. **The main risks:** poor governance, corruption scandals or violations of shareholder rights can potentially lead to a decline in investment value. Companies with poor governance may face greater financial instability and litigation risk.

3.3. **Greenwashing**

3.3.1. Sustainability has become a priority for companies and investors. However, this trend also increases the risk that some companies can use sustainability related communication in an inappropriate way, known as **greenwashing**.

3.3.2. Greenwashing occurs when a company exaggerates or misrepresents its sustainability initiatives to give the impression that it is more environmentally friendly or socially responsible than it actually is. Such practices not only mislead investors, but also threaten confidence in the implementation of sustainability principles in general.

3.3.3. To avoid greenwashing, more and more attention is paid to the **disclosure of information related to sustainability**. Transparent information about a company's sustainability performance is essential for investors to make informed decisions and distinguish real sustainability initiatives from marketing strategies.

4. Disclosure of Sustainability-Related Information: General Description

4.1. **Introduction**

4.1.1. For investors to make informed decisions and evaluate companies' compliance with sustainable practices, the disclosure of information related to sustainability becomes especially important.

4.2. **How should an investment firm communicate sustainability-related information to investors?**

4.2.1. The European Commission explains on the specially created website (https://finance.ec.europa.eu/sustainable-finance/disclosures_en) that the European Union has introduced a transparency framework for this purpose, namely:

4.2.1.1. SFDR;

4.2.1.2. Regulation 2020/852;

4.2.1.3. Regulation 2022/1288;

4.2.1.4. Regulation 2023/363.

4.2.2. SFDR specifies how an investment firm should disclose sustainability-related information:

4.2.2.1. to help those investors who seek to invest their funds in companies and projects that support sustainability goals to make an informed choice;

4.2.2.2. so that investors can properly assess how sustainability risks are integrated into the investment decision-making process.

4.2.3. The investment firm should disclose the information:

4.2.3.1. about the company as a whole;

4.2.3.2. about financial products.

4.2.4. The information should be disclosed:

4.2.4.1. on the website;

4.2.4.2. in the pre-contractual documents of the products;

4.2.4.3. in periodic reports (if binding).

4.2.5. ***Important: SFDR does not oblige investment firms to consider green criteria in a mandatory way when making investments. Rather, it sets out the rules under which investment firms must substantiate the sustainability claims they make about their financial products.***

5. Disclosure of Information Related to Sustainability: Approach and Practice Implemented by VIAINVEST

5.1. Introduction

5.1.1. We are convinced that sustainable practices are essential not only for VIAINVEST's long-term growth, but they have a positive impact on society, social well-being, natural resources and the environment in general.

5.2. Integration of sustainability factors and related risks in VIAINVEST processes and risk management system

5.2.1. VIAINVEST gradually ensures the integration of sustainability factors and the risks associated with them into the Company's processes and risk management system, considering their impact on the Company's various processes and their inherent risks.

5.2.2. VIAINVEST is part of VIA SMS group (hereinafter - the Group; the Group consists of AS "VIA SMS group" and its subsidiaries). AS "VIA SMS group" as the parent/ main company of the Group, in order to promote sustainable business at the Group level, developed and approved the following internal regulatory documents, which set out the basic principles, which are binding on both VIAINVEST (as a company and the maintainer of the investment platform), as well as the companies belonging to the Group, which operate in various jurisdictions in the field of consumer lending (and the loans issued by these companies are the basis of the asset-backed securities offered on the VIAINVEST investment platform):

5.2.2.1. Corporate social responsibility (CSR) and sustainable development policy;

5.2.2.2. Code of Ethics;

5.2.2.3. Anti-corruption policy.

5.2.3. We are committed to further developing and strengthening our approach to sustainable development issues. To improve the transparency and purposefulness of our operations, in the future we as a company will complement the qualitative corporate social responsibility and sustainable development goals with quantitative ones. This will allow us to identify, monitor and evaluate our progress as a company based on specific indicators and results more accurately.

5.3. The involvement and responsibility of VIAINVEST's organizational structure functions in the integration of sustainability factors and the associated risks

5.3.1. The following collegial bodies and functions participate in the integration of sustainability factors and the associated risks in the Company's processes:

5.3.1.1. **The Meeting of Participants:** determines VIAINVEST's development strategy, supervises risk management in the Company and the integration of sustainability risks into the overall risk management framework;

5.3.1.2. **The Board**: implements VIAINVEST's development strategy, ensures the identification and management of the Company's risks related to the operations, as well as the integration of sustainability risks into the overall risk management framework; integrates aspects related to sustainability in the Company's daily operating processes, for example, in the efficient use of resources, compliance with environmental requirements, employment processes, investment decision-making, etc.;

5.3.1.3. **Risk Director, Risk Control Function**: ensures the establishment of the Company's - wide risk management system, incl. development and implementation of appropriate risk management policies and procedures, gradually integrating sustainability risks into the Company's risk management system (including ensuring the development of relevant models and the selection, collection and processing of the necessary data in order to ensure the gradual integration of sustainability risks in investment decision-making processes as a part of the development of the portfolio management service, if such a decision will be made);

5.3.1.4. **Compliance and Legal Function:** ensures that the Company's operations comply with regulatory requirements in the field of sustainability, inter alia regarding the disclosure, revision and update of information on the website and in the pre-contractual documentation;

5.3.1.5. **Platform Management and Product Development Function:** within the framework of the development of the portfolio management service, ensures the gradual integration of sustainability risks into investment decision-making processes, identifying sustainability factors and the risks associated with them, as well as carrying out their assessment, so that in the future the Company could potentially offer sustainable investments if such a decision is made;

5.3.1.6. **Personnel Management Function:** ensures the raising of awareness of employees in sustainability issues and involvement in sustainability initiatives, as well as the implementation of a sustainable human resources policy;

5.3.1.7. **Marketing Function**: provides marketing communications that do not conflict with information disclosed in compliance with SFDR;

5.3.1.8. **Financial Reporting Function**: ensures gradual reflection of aspects related to sustainability in the Company's financial reports;

5.3.1.9. **Internal Audit Function:** in accordance with the audit plan, ensures the evaluation of sustainability risk management efficiency and results.

5.4. **Integrating sustainability risks into VIAINVEST's investment decision-making processes**

5.4.1. It is important to clarify that SFDR is binding on the Company as a financial market participant - an investment firm that offers financial products such as portfolio management. <u>***The obligation to disclose information on the integration of sustainability risks into investment decision-making processes applies directly to portfolio management, i.e. to how the Company makes decisions on where to invest clients' funds transferred to the Company as part of portfolio management, and not to those investment activities that the Company performs with its own funds and at its own expense***</u>.

5.4.2. The designation "Auto Invest" is used for the portfolio management service on the VIAINVEST investment platform. If "Auto Invest" is suitable and available for the investor (see below for the explanation of the assessment of suitability), the investor authorizes the Company to purchase financial instruments on behalf of the investor, in accordance with the investor's predetermined criteria for investing in financial instruments and the service strategy chosen by the investor (see the Company's "Portfolio Management Policy").

5.4.3. Currently, all financial instruments offered on the VIAINVEST platform are asset-backed securities secured by loans issued by the Group's companies located in Latvia, the Czech Republic, Sweden and Romania and operating under such brands as VIASMS and VIACONTO.

5.4.4. <u>***Currently, investments in all securities available on the Company's platform secured by issued loans (including those securities available for investment using the "Auto Invest" or portfolio management service,***</u> regardless <u>***of the investor's predetermined criteria for investing in financial instruments and the investor's chosen service strategy), are not considered "sustainable investments" within the definition included in Regulation 2019/2088 sustainability-related disclosures in the financial services sector***</u>.

5.4.5. In accordance with the MiFID II and MiFID II Delegated Regulation, while providing investment portfolio management, as part of the suitability assessment, VIAINVEST obtains the necessary information about the client's or potential client's knowledge and experience in the field of investment in relation to a specific type of product or service, the financial situation of the mentioned person, including financial ability to bear any related investment risks, and investment objectives, taking into account the client's risk tolerance and any **sustainability preferences**, so that VIAINVEST can provide to the client or potential client investment services and financial instruments that are suitable for him/ her and in particular correspond to his/ her risk tolerance and ability to suffer losses.

5.4.6. As part of the suitability test, when clarifying the investment objectives of the client or potential client, VIAINVEST inter alia obtains information on whether the investor has any sustainability preferences. If there are no sustainability preferences, then in connection with the answers to other suitability test questions, the "Auto Invest" service may potentially be suitable and available for the investor.

5.4.7. If the potential client or client has any sustainability preferences, then the "Auto Invest" service is not suitable and available for the investor.

6. VIAINVEST: Disclosure of Information Under the SFDR

6.1. Introduction

6.1.1. So that the information disclosed to investors in accordance with SFDR is easy to understand, simple and concise, it is disclosed below in accordance with the following order: at the beginning, the relevant article of SFDR, about which the Company discloses information, is indicated, followed by the information to be disclosed by the Company, fulfilling the requirement of the relevant article of SFDR.

6.1.2. The Company ensures that its marketing communication does not contradict the information disclosed in compliance with SFDR.

6.1.3. The Company ensures that all information published in accordance with SFDR, particularly in accordance with Articles 3, 5 or 10 of SFDR, is constantly updated. If the Company makes changes to this information, it discloses an explanation of the changes made.

6.2. Requirement of Article 3 of SFDR: Transparency of Sustainability Risk Policies

6.2.1. Disclosing information about its policies regarding the integration of sustainability risks in its investment decision-making process, the Company discloses that it has not currently integrated sustainability risks in its investment decision-making process as part of portfolio management.

6.2.2. Currently, investments in all securities available on the Company's platform secured by issued loans (including those securities available for investment using the "Auto Invest" or portfolio management service, regardless of the investor's predetermined criteria for investing in financial instruments and the investor's chosen service strategy), are not considered "sustainable investments" within the definition included in Regulation 2019/2088 sustainability-related disclosures in the financial services sector.

6.2.3. VIAINVEST considers that the Company's current policies regarding the integration of sustainability risks in its investment decision-making process are suitable, proportionate and adapted to the financial product that the Company offers.

6.2.4. VIAINVEST follows the regulation, market practice, data availability and clients demand, and if necessary, submits to evaluation its policies regarding the integration of sustainability risks in the investment decision-making process, developing and improving them.

6.3. Requirement of Article 4 of SFDR: Transparency of Adverse Sustainability Impacts at Entity Level; Requirement of Article 12 of Regulation 2022/1288: Statement by financial market participants that they do not consider adverse impacts of their investments decisions on sustainability factors; Requirement of Article 7 of SFDR: Transparency of Adverse Sustainability Impacts at Financial Product Level

6.3.1. ***<u>No consideration of adverse impacts of investment decisions on sustainability factors.</u>***

6.3.2. Disclosing information on the transparency of adverse sustainability impacts on sustainability both at the entity level and also at the financial products level (both as pre-contractual disclosures and as disclosures on the website), the Company discloses that it applies Article 4(1)(b) of SFDR both at the entity level and also for each financial product, that is, when making investment decisions within the portfolio management, currently there is no consideration of adverse impacts of investment decisions on sustainability factors.

6.3.3. Taking into account its size, its type and scale of operations and the types of financial products it makes available, the Company, when making investment decisions, does not consider adverse impacts of investment decisions on sustainability factors in order not to expose itself to the risk of greenwashing. Until sufficiently reliable, consistent, complete, comparable and verifiable data related to sustainability aspects are available for those companies whose loans are the basis of asset-backed securities available on the VIAINVEST platform, as well as no methodology has been developed to assess the quality of the governance of the respective companies, measuring the compliance of the financial product with environmental or social characteristics or the achievement of sustainable investment goals, the Company will take a cautious/ conservative approach, choosing to consider that all its investments are not "sustainable investments". The Company chooses to wait until the rules and standards are more fully developed in the field of sustainability to avoid possible confusion or misunderstandings and not to expose itself to the risk of violating regulatory requirements.

6.3.4. Currently, investments in all securities available on the Company's platform secured by issued loans (including those securities available for investment using the "Auto Invest" or portfolio management service, regardless of the investor's predetermined criteria for investing in financial instruments and the investor's chosen service strategy), are not considered "sustainable investments" within the definition included in Regulation 2019/2088 sustainability-related disclosures in the financial services sector.

6.3.5. The Company assumes that in the future, in response to the demand of potential clients and clients for sustainable investments, it may begin to consider sustainability factors in its decision-making practices, inter alia evaluating the negative impact of investment decisions on sustainability factors.

6.3.6. Currently, AS "VIA SMS group", as the parent/ head company of the Group, voluntarily adjusts processes in those Group's companies which issue loans laying as the basis of the asset-backed securities offered on the VIAINVEST investment platform, to promote sustainable business at the Group's level.

6.4. **Requirement of Article 5 of SFDR: Transparency of Remuneration Policies in relation to the Integration of Sustainability Risks**

6.4.1. Disclosing information on the transparency of remuneration policies in relation to the integration of sustainability risks, the Company discloses that by gradually ensuring the integration of sustainability risk factors into VIAINVEST's processes and risk management system, it has integrated potential sustainability risks into its Remuneration Policy and practice in order to harmonize employee interests and remuneration considerations, as well as to promote the well-being of employees.

6.4.2. VIAINVEST Remuneration Policy and practice are gender-neutral, non-discriminatory and do not allow a difference in pay between men and women for equal work; they are based on the respect of human rights, the fight against corruption and bribery, as well as the proper and effective management of the risks of conflict of interest.

6.4.3. The current Company's Remuneration Policy does not provide for the variable part of remuneration as an element of the remuneration system, therefore the remuneration system and the Remuneration Policy and practice as a whole have been established in such a way as not to arise conflicts of interest or other incentives that the employee, inter alia when making investment decisions within the framework of portfolio management, one could be encouraged to prioritize his/ her own or the Company's interests in order to gain financial benefit, potentially harming the client, aspects related to environmental, social or governance issues, or sustainable development in general, and determines measures to prevent conflicts of interest, promotes the compliance with regulatory requirements, awareness of risks and prudent risk taking.

6.4.4. The fixed part of the remuneration is determined in an amount that is sufficient to ensure the financial stability of the employees and not to encourage actions that could conflict with the principles of sustainable development.

6.4.5. Currently, the Company's activities are focused on integrating sustainability factors and the risks associated with them in its processes (at the company level), while not yet defining concretely measurable sustainability goals/ quantitative indicators, but working on promoting employee awareness and building awareness of the importance of sustainable development (for example, generally promoting the circulation of electronic documents and paperless processes in the company, or generally reducing emissions by choosing remote work options and flexible working hours, etc.). This step-by-step approach ensures that employees are motivated to pay attention to sustainability issues and promote positive changes in the company's culture and operations.

6.4.6. Considering that the Company's remuneration system does not provide for a variable part of remuneration, including, for example, bonuses for an employee who makes investment decisions within the framework of portfolio management, or, for example, bonuses for the successful implementation and management of sustainability initiatives, the Company has not determined quantitative or qualitative indicators in relation to employees, to check the results achieved by a particular employee, inter alia in connection with the achievement of sustainability goals and the creation of long-term value, has not determined information on the deadlines for achieving the relevant sustainability indicators, and has not determined how it provides an objective approach to the assessment of the achievement of sustainability indicators.

6.5. **Requirement of Article 6 of SFDR: Transparency of the Integration of Sustainability Risks**

6.5.1. Disclosing information about the transparency of the integration of sustainability risks in the pre-contractual documents, the Company discloses that:

6.5.1.1. sustainability risks are not integrated into the Company's investment decisions;

6.5.1.2. the Company does not assess the likely impacts of sustainability risks on the returns of the financial products it makes available;

6.5.1.3. the Company does not assess the importance/ significance of sustainability risks.

6.5.2. Currently, investments in all securities available on the Company's platform secured by issued loans (including those securities available for investment using the "Auto Invest" or portfolio management service, regardless of the investor's predetermined criteria for investing in financial instruments and the investor's chosen service strategy), are not considered "sustainable investments" within the definition included in Regulation 2019/2088 sustainability-related disclosures in the financial services sector.

6.6. **Requirement of Article 10 of SFDR: Transparency of the Promotion of Environmental or Social Characteristics and of Sustainable Investments on Websites**

6.6.1. VIAINVEST does not offer financial products that promote environmental or social characteristics.

6.6.2. VIAINVEST does not offer financial products aimed at sustainable investments.

6.6.3. Currently, investments in all securities available on the Company's platform secured by issued loans (including those securities available for investment using the "Auto Invest" or portfolio management service, regardless of the investor's predetermined criteria for investing in financial instruments and the investor's chosen service strategy), are not considered "sustainable investments" within the definition included in Regulation 2019/2088 sustainability-related disclosures in the financial services sector.

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