



SIA "Viainvest"
NO CONSIDERATION OF ADVERSE IMPACTS OF INVESTMENT DECISIONS ON SUSTAINABILITY FACTORS

EXTRACT FROM THE DOCUMENT "DISCLOSURE OF INFORMATION RELATED TO SUSTAINABILITY"

Nr. 2024-53-BD
Version 3.0
16.09.2024.
Riga, 2024

Approved by SIA "Viainvest"	September 16, 2024; Board decision No. 2024-53-BD
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Chronology of versions		
Version number	Date of approval/ publication	Summary of changes made
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.

**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**

1. **No consideration of adverse impacts of investment decisions on sustainability factors.**
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.
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.
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.
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. 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.

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