



# 3i Investments (Luxembourg) SA

Website disclosures made pursuant to Regulation (EU) 2019/2088 ('SFDR') AND Commission Delegated Regulation (EU) 2022/1288 ('SFDR RTS')

## **INTEGRATION OF SUSTAINABILITY RISKS IN THE INVESTMENT DECISION-MAKING PROCESS (ARTICLE 3 DISCLOSURE)**

In relation to its activities as an alternative investment fund manager ("AIFM"), 3i Investments (Luxembourg) SA does not currently make investment decisions in relation to the alternative investment funds ("AIFs") which it currently manages as it has delegated portfolio management of those AIFs to 3i Investments plc.

In relation to its discretionary portfolio management activities under point (8) of Article 4(1) of Directive 2014/61/EU, 3i Investments (Luxembourg) SA does not currently make investment decisions in relation to the relevant underlying investments. The vehicles managed by 3i Investments (Luxembourg) SA as discretionary portfolio manager are themselves passive investors in investment vehicles which are managed by 3i Investments plc and it is 3i Investments plc which makes the investment decisions in relation to the underlying investments and portfolio.

3i Investments plc is subject to 3i's group-wide approach to sustainability and responsible investing which is summarised below. In the event that 3i Investments (Luxembourg) SA were to make investment decisions in the future, the below summary would be equally applicable to it.

3i group's Responsible Investment policy requires 3i Investments plc, among other things, to carry out an assessment of new investment opportunities to identify potential material environmental, social and governance risks and opportunities at an appropriate stage in the investment process. 3i's investment procedures relating to due diligence also contain more detailed requirements relating to ESG due diligence. 3i group has a distinct section of its website dedicated to 'Sustainability' at [3i.com/sustainability](https://3i.com/sustainability). Among other things, this refers to 3i's Sustainability Report, which aims to provide the information that is material and relevant for our stakeholders to form a view on how 3i group is performing on environmental, social and governance ('ESG') matters. The Sustainability Report is intended to be read in conjunction with 3i's annual report and accounts for each financial year and with the sustainability policies at [3i.com/sustainability](https://3i.com/sustainability).

3i group's Sustainability Report contains a section on 3i group as a responsible investor. This covers how we assess ESG risks as part of our decision-making and portfolio management processes. Central to this is 3i's Responsible Investment ('RI') policy, which is summarised on [3i.com/sustainability](https://3i.com/sustainability), and is embedded into our investment and portfolio monitoring processes and procedures. Our Sustainability Report explains the organisational, risk management and governance aspects of our RI policy and the use of our ESG assessment tool in considering ESG risk.

## **NO CONSIDERATION OF ADVERSE IMPACTS OF INVESTMENT DECISIONS ON SUSTAINABILITY FACTORS (ARTICLE 4 DISCLOSURE)**

3i Investments (Luxembourg) SA does not consider adverse impacts of investment decisions on sustainability factors as defined under and in accordance with SFDR.

As explained above, 3i Investments (Luxembourg) SA does not currently make investment

decisions in relation to its AIFM activities or its discretionary portfolio management activities and all relevant investment decisions are made by 3i Investments plc. 3i Investments plc is subject to 3i's group-wide approach to responsible investing and sustainability which is summarised above. In the event that 3i Investments (Luxembourg) SA were to make investment decisions in the future, the above summary would be equally applicable to it.

#### **REMUNERATION POLICIES IN RELATION TO SUSTAINABILITY RISKS (ARTICLE 5 DISCLOSURE)**

As explained above, 3i Investments (Luxembourg) SA does not currently make investment decisions in relation to its AIFM activities or its discretionary portfolio management activities and all relevant investment decisions are made by 3i Investments plc. When assessing the performance of its relevant staff, 3i Investments (Luxembourg) SA will take account of how effectively such staff have supervised and overseen the performance of 3i Investments plc. This will include the steps taken by relevant staff to ensure that 3i Investments plc is in compliance with 3i group's policies and procedures on the integration of sustainability risks in its investment decision-making processes, as summarised above.