BNY Mellon Fund Management (Luxembourg) S.A. (the “Management Company”)
Statement regarding the adverse impacts of investment decisions on sustainability factors
3rd July 2025

BNY Mellon Fund Management (Luxembourg) S.A. (the “Management Company”) has thoroughly assessed the requirements of the Principal Adverse Impact (“PAI”) regime as specified in Article 4 of the Sustainable Finance Disclosure Regulation (“SFDR”) taking into account the relevant Regulatory Technical Standards (“RTS”) and the latest Joint ESAs Annual Report on Principal Adverse Impact disclosures under the Sustainable Finance Disclosure Regulations.

The Management Company notes the policy objectives of the PAI regime, which strives to improve transparency for clients, investors and the wider financial market. The regime aims to offer clear insights into how financial market participants integrate the consideration of adverse impacts of their investment decisions on sustainability factors.

Several of the sub-funds managed by the Management Company consider principal adverse impacts on sustainability factors in accordance with Article 7 of the SFDR however the Management Company does not currently take into account the adverse impacts of investment decisions on sustainability factors in accordance with Article 4(1)(b) of the SFDR.

Whilst the Management Company recognises the utility and relevance of this information for investors at sub-fund level, it does not currently consider that this information has the same resonance for investors at the Management Company level.

The Management Company continues to keep this position under review and will review this statement at least annually.