



FWU Invest S.A.

PAI Policy

Table of Content

1.	REVISION HISTORY	3
2.	SCOPE	3
3.	POLICY STATEMENT	3
4.	DEFINITIONS	3
5.	DATA SOURCE AND UTILIZATION	4
6.	IDENTIFICATION OF PRINCIPAL ADVERSE IMPACTS	4
7.	REPORTING AND TRANSPARENCY	5
8.	CONTINUOUS IMPROVEMENT	5

1. REVISION HISTORY

Date	Approver	Changes
08/05/2023	Michael Gram-Madsen	Initial version of policy
16/06/2023	FWU Invest S.A. BoD	Approval of policy
30/05/2024	Michael Gram-Madsen	Review of policy – no significant changes
13/06/2025	Michael Gram-Madsen	Review of policy – no significant changes

2. SCOPE

This policy applies to all investment decisions made by our management company on all sub-funds where PAI are taken into consideration.

3. RESPONSIBILITY

The Investment team at FWU Invest S.A. are primarily responsible for the implementation of the PAI policy. The responsibility is allocated to the Investment team due primarily to the use of investment algorithms to evaluate and analyse adverse impacts. Furthermore, the responsibility for the execution of Investment strategies also lies with the Investment team thus best placing them to ensure the terms of the policy are implemented.

4. POLICY STATEMENT

Our management company is committed to integrating sustainability considerations into our investment decision-making process. This policy outlines how we identify and prioritize principal adverse impacts on sustainability factors using data from MSCI, specifically focusing on the 14 mandatory principal adverse impacts.

5. DEFINITIONS

- Management Company: Refers to our organization responsible for managing investments and making investment decisions.

- Principal Adverse Impacts: Refers to negative effects on sustainability factors that may arise from investment activities, as outlined by the relevant regulatory requirements.
- Sustainability Factors: Refers to environmental, social, and governance (ESG) considerations that have the potential to impact the long-term value and performance of investments.
- MSCI: Refers to the prominent provider of ESG data and analytics utilized by our management company for PAI analysis.

6. DATA SOURCE AND UTILIZATION

Our management company relies on MSCI's ESG data and analytics as a primary source for assessing sustainability factors and principal adverse impacts.

MSCI provides comprehensive quantitative information on the 14 mandatory principal adverse impacts identified by the regulatory framework.

We utilize MSCI's dataset to have our investment algorithms evaluate and analyze the adverse impacts associated with each investment within our portfolio and optimize the resulting portfolio's exposure to the 14 PAIs.

7. IDENTIFICATION AND SELECTION OF PRINCIPAL ADVERSE IMPACTS

The management company reviews MSCI's data to identify the data points relevant for each of the 14 mandatory principal adverse impacts as specified by the regulatory framework.

The data is stored within the FWU Invest Master database and feeds into the Forward Lucy algorithm which optimizes the portfolio's exposure to each PAI. Within the algorithm each investment security in the universe has a PAI score calculated, which is an average of the ranking the company holds within each PAI.

The scoring ranges from 0 (best) to 100 (worst), and as such the Lucy algorithm's objective function is to minimize the total score while still keeping a reasonable diversification in the portfolio.

Some PAIs are exclusionary and are strictly optimized to zero in the algorithm.

Reference is made to the latest prospectus for specific details at the sub-fund level.

8. REPORTING AND TRANSPARENCY

The management company is committed to transparency and regularly communicates the identification and prioritization of principal adverse impacts to relevant stakeholders.

FWU Invest S.A. discloses information on principal adverse impacts in sustainability reports, investment prospectuses and other relevant documents, in accordance with regulatory requirements and industry best practices.

Stakeholders, including clients and investors, are able to access further information on principal adverse impacts on the company's website, www.fwuinvest.com.

9. CONTINUOUS IMPROVEMENT

The management company strives for continuous improvement in the identification and prioritization of principal adverse impacts.

We periodically review and update our policy and processes to align with regulatory changes, industry standards, and emerging best practices on at least an annual basis.

Feedback from stakeholders and ongoing monitoring of MSCI's data quality contribute to enhancing our ability to identify and prioritize principal adverse impacts effectively.

This policy is effective from the date of approval and will be reviewed annually or as required, ensuring its alignment with evolving regulatory and industry requirements.