

Information required by the SFDR - Investment Advisory Service provided by Bank Millennium S.A. (hereinafter referred to as the “Bank”)

For the purposes of these disclosures, as an investment advisory service provided by the Bank, we understand a service consisting in providing investment recommendations using an automated IT system.

In order to meet the SFDR requirements related to the transparency of the method of analysing risks for sustainability, in connection with the provision of investment advisory services, we provide our Clients with appropriate information on:

- Article 3 of the SFDR “Transparency of sustainability risk policies”
- Article 4 of the SFDR “Transparency on adverse sustainability impacts at entity level”

Declaration from Article 3 of the SFDR: “Transparency of sustainability risk policies”

Article 3 of the SFDR, requires Bank Millennium S.A., as a financial advisor, to publish on the website the information on its policies for the integration of sustainability risks as part of provision of the investment advisory services. By sustainability risks, we mean environmental, social or governance situations or conditions that, if they occur, could have actual or potential material negative impact on the value of the investment.

In the investment advisory service, we try to reduce sustainability risks by obtaining up-to-date information about financial instruments from the issuer of a given financial instrument. Sustainability risks are analysed before including financial instruments in the investment advisory service.

As a financial advisor within the meaning of Article 2(11) of the SFDR, we have decided to reduce sustainability risk by recommending only light green products, meeting the conditions of Article 8 of the SFDR. In this way, we can assess that the sustainability risk of financial instruments recommended as part of the investment advisory service is low.

Detailed information on the approach of Millennium TFI S.A. to taking into account issues related to sustainability as well as adverse sustainability impacts as well as all disclosures required by the SFDR can be found on the website www.millenniumtfi.pl in the “Documents” section and “Sustainability” “tab: [Millennium Towarzystwo Funduszy Inwestycyjnych S.A. \(millenniumtfi.pl\)](http://www.millenniumtfi.pl)

Declaration from Article 4 of the SFDR: “When providing investment advisory services, their adverse impacts on sustainability factors shall not be taken into account”

Due to the nature and scale of its operations, Bank Millennium S.A., applying the principle of proportionality, as part of its investment advisory, **does not take into account the effects of investment decisions on sustainability factors.**

At the same time, in terms of adverse effects of investment decisions on sustainability factors, we rely on the disclosure of the issuer of the financial instrument, i.e. Millennium Towarzystwo Funduszy Inwestycyjnych S.A. (hereinafter referred to as “Millennium TFI S.A.”). Due to the volume of funds under its management, their nature and scale of its operations, Millennium TFI S.A., at present does not take into account the effects of investment decisions on sustainability factors.

Detailed information on the sustainability risks taken into account when making investment decisions, as well as on the level of their materiality, has been specified by Millennium TFI S.A. in the

Prospectuses of the Funds as well as other documents made available by Millennium TFI, at:
[Millennium Towarzystwo Funduszy Inwestycyjnych S.A. \(millenniumtfi.pl\)](https://www.millenniumtfi.pl)

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