

# SFDR Disclosure

Redeye AB

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## **Background and Purpose**

Pursuant to Regulation (EU) 2019/2088 of the European Parliament and of the Council on sustainability-related disclosures in the financial services sector ("SFDR"), an investment firm authorized to provide investment advice (financial adviser), shall provide sustainability-related disclosures regarding its investment advice.

The purpose of the regulation is to increase transparency and reduce information asymmetry between financial actors on the one hand and investors on the other hand regarding sustainability-related aspects. The regulation is part of the overall ambition to accelerate the transition to a low-carbon, more sustainable, resource-efficient and circular economy in line with the Sustainable Development Goals (Agenda 2030) and the Paris Agreement, which are considered key for the EU to become economically competitive in the long term.

Redeye AB ("Redeye") is licensed by the Swedish Financial Supervisory Authority (Sw. Finansinspektionen) to provide investment advice services and is therefore, as investment advisor, obliged to provide this SFDR disclosure. Investment advice is, however, not a service currently offered by Redeye. When Redeye decides to commence providing investment advice services, the information provided herein may be subject to change.

## **Transparency of sustainability risk policies (Article 3 of SFDR)**

As Redeye does not provide investment advice services, Redeye does not apply any policies on the integration of sustainability risks in its investment advice.

## **Transparency of adverse sustainability impacts at entity level (Article 4 of SFDR): No consideration of adverse impacts of investment advice on sustainability factors**

In accordance with SFDR article 4(5), financial advisors shall provide information as to whether, taking due account of their size, the nature and scale of their activities and the types of financial products they advise on, they consider in their investment advice the principal adverse impacts on sustainability factors ("PAI"), or information as to why they do not consider adverse impacts of investment decisions on sustainability factors in their investment advice, and, where relevant, including information as to whether and when they intend to consider such adverse impacts.

Principal adverse impacts are defined as those consequences of investment advice that have negative effects on sustainability factors. Sustainability factors refer to

environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

Redeye does not consider adverse impacts of investment advice on sustainability factors, in Redeye's investment advice. This is due to Redeye not providing investment advice. Should Redeye begin to offer investment advice, Redeye will reassess this position.

While Redeye does not apply the specific PAI regime under SFDR, Redeye remains committed to addressing sustainability risks as part of our overall risk assessment framework. We continue to monitor regulatory developments and may reassess our approach to PAIs in the future.

**Transparency of remuneration policies in relation to the integration of sustainability risks (Article 5 of SFDR)**

Redeye does not take any special measures regarding the integration of sustainability risks in the determination of employees' remuneration (salary, pension, wellness, etc.). Employees of Redeye only receive fixed remuneration and no variable remuneration (bonus etc). Since no variable payments are paid there is no contradiction between the remuneration system and the integration of sustainability risks. Hence, Redeye's remuneration policy is consistent with the integration of sustainability risks.

**Transparency of the integration of sustainability risks in investment advice (Article 6 of SFDR)**

Financial advisors shall disclose the manner in which sustainability risks are integrated into their investment advice and the result of the assessment of the likely impacts of sustainability risks on the returns of the financial products they advise on. Where financial advisers deem sustainability risks not to be relevant, the descriptions shall include a clear and concise explanation of the reasons therefor.

Sustainability risk is defined according to SFDR as "an environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of the investment."

Since Redeye does not currently provide investment advice, Redeye does not deem Sustainability risk to be relevant. Should Redeye begin to offer investment advice, Redeye may reassess this position.