



# Sustainable Finance Disclosure Regulation – Principal Adverse Sustainability Impacts Statement

Macquarie Asset Management

**June 2024**

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# Important information

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The following disclosures are made by each of the following entities pursuant to Article 4 of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (“SFDR”):

- Macquarie Investment Management Europe S.A. (“**MIME SA**”) (LEI: 222100BG2FQQTASJ7290)
- Macquarie Investment Management Austria Kapitalanlage AG (“**MIMAK**”) (LEI: 529900ABVEUZ22YQG259)
- Macquarie Asset Management Europe S.à r.l. (“**MAMES**”) (LEI: 2221008OZQM47X2T599)
- GLL Real Estate Partners Kapitalverwaltungsgesellschaft mbH (“**GLL**”) (LEI: 549300MDAFVIH9W88247)

(together, the “**In-Scope Entities**”).

The In-Scope Entities are part of Macquarie Asset Management (“**MAM**”).

# Introduction

## About MAM

MAM is a global asset manager integrated across public and private markets. Managing approximately \$US611.7 billion in assets with a team of over 2,400 people operating in 25 markets, we provide a diverse range of investment solutions including real assets, real estate, credit, equities and multi-asset.

MAM is trusted by institutions, governments, foundations and individuals to invest their assets. We focus on generating positive outcomes for our clients, portfolio companies and communities. This starts with understanding their needs and providing solutions that seek to deliver superior results over the long term.

We combine a long-term perspective with deep sector expertise. The portfolios we manage are positioned to benefit from major structural drivers of growth, change, and opportunity across developed and emerging markets.

Refer to MAM’s website at [www.macquarie.com/mam](http://www.macquarie.com/mam) for further information.

MAM is part of Macquarie Group (**Macquarie**), a diversified financial group providing clients with asset management, finance, banking, advisory, and risk and capital solutions across debt, equity and commodities. Founded in 1969, Macquarie Group employs approximately 20,600+ in 34 markets and is listed on the Australian Securities Exchange. Refer to Macquarie’s website for further information at [www.macquarie.com](http://www.macquarie.com).

All figures as at 31 March 2024.

## In-Scope Entities

MIME SA and MIMAK are authorised and regulated entities in the European Economic Area and act as the manager of certain financial products across public markets. The public markets businesses of MAM comprise of the Equities & Multi-Asset division and the Fixed Income and Leveraged Credit capabilities of the Credit division.

MAMES and GLL in Europe, which are authorised and regulated entities in the European Economic Area and act as the manager of certain financial products across private markets. The private markets businesses refer to MAM’s Real Assets and Real Estate divisions, and the Private Credit capability of the Credit division.

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# No consideration of adverse impacts of investment decisions on sustainability factors

The In-scope Entities do not consider adverse impacts of their investment decisions on sustainability factors at entity level in the strict sense of the SFDR comply or explain mechanism under Article 4 of the SFDR.

The In-scope Entities previously considered principal adverse impacts of their investment decisions on sustainability factors at entity level voluntarily, as disclosed in MAM's [2023 Principal Adverse Sustainability Impacts Statement \(PASI Statement\)](#). Following a lack of client interest in the PASI Statement, the In-scope Entities reviewed their decision to consider principal adverse sustainability impacts (PASI). Each of the In-scope Entities has less than 500 employees and therefore is not subject to the mandatory requirements to consider principal adverse impacts of investment decisions on sustainability factors under Article 4(3) of the SFDR. In light of the resources required to comply with the relevant reporting requirements and when considered against the limited insights provided to investors about their specific investments through the PASI Statement, the In-scope Entities have decided to no longer consider adverse impacts of their investment decisions on sustainability factors at an entity level in the strict sense of the SFDR Article 4 comply or explain mechanism.

MAM has carefully evaluated the requirements of the SFDR PASI regime and is supportive of the policy aims to improve transparency to clients, investors and the market. The In-scope Entities will continue to consider principal adverse impacts at a product level for products in scope of SFDR where stipulated in the pre-contractual disclosure, which the In-scope Entities consider provide investors with information relevant to their own investments. In this regard, the approach for considering such impacts is detailed in the pre-contractual documentation of the relevant products, as required under Article 7(1) of the SFDR.

MAM will keep this position under review. We also wish to re-affirm MAM and Macquarie's overall commitment to environmental, social and governance (ESG) matters as further described [here](#). For further information on how the In-scope Entities consider ESG, please refer to the In-scope Entities' [Sustainability Risks and Remuneration Policy Disclosures](#) provided in accordance with Article 3 and Article 5 SFDR. Further information can also be found in [Our approach to sustainability](#).

## Contacts

For any queries, please contact:

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