At an organisational level, Goldman Sachs values and recognises the importance of sustainable finance. Goldman Sachs is deploying $750 billion across investing, financing and advisory activities by 2030 and bringing its commercial expertise to help clients accelerate climate transition and advance inclusive growth. More information on the group’s sustainable finance initiative can be found here https://www.goldmansachs.com/what-we-do/sustainable-finance.

Goldman Sachs Bank Europe SE (“GSBE”) is mindful of its broader risk management obligations and the supervisory expectations (in particular pursuant to the ECB Guide on climate-related and environmental risks and the BaFin Guidance Notice on Dealing with Sustainability Risks) and where deemed applicable, aims to appropriately integrate sustainability risks within its risk management policies and procedures.

1 Overview

In accordance with Regulation (EU) 2019/2088 (the “Sustainable Finance Disclosure Regulation”), this document sets out the Goldman Sachs FICC and Equities business units’ approach to integrating sustainability risks when providing investment advice.

2 Scope

This document applies to the Goldman Sachs FICC and Equities business units of GSBE and its branches to the extent that they provide investment advice as defined under Directive 2014/65/EU (MiFID II).

3 Integration of sustainability risks

The Goldman Sachs FICC and Equities business units do not typically provide investment advice on financial products as defined under the Sustainable Finance Disclosure Regulation and do not advise clients on sustainable investments or the sustainability risks/rewards of products. As such, there are no specific policies on the integration of sustainability risks in our investment advice.

However, should there be occasions where the Goldman Sachs FICC and Equities business units provide investment advice, where relevant, we may direct clients to the underlying documentation of the financial products which contain information on relevant sustainability risks. When advising clients, we will also have regard to general market risks, which may include consideration of material sustainability events that
cause or are reasonably expected to cause broad disruption to investment performance, asset flows and the financial markets generally.