

Principal Adverse Sustainability Impact Disclosure**1 Overview**

In accordance with Regulation (EU) 2019/2088 (the “**Sustainable Finance Disclosure Regulation**”), this disclosure provides information on Goldman Sachs Bank Europe SE Private Wealth Management Division’s (“**PWM**’s”) policy for considering the adverse impacts of its investment decisions and investment advice on sustainability factors. If you have any questions about this document, please contact your Goldman Sachs team.

2 Identification and prioritisation of principal adverse sustainability impacts

Sustainability factors are defined in the Sustainable Finance Disclosure Regulation as environmental, social, governance and employee matters, as well as respect for human rights, anti-corruption and anti-bribery matters. PWM has adopted a high level, principles based approach to broadly identifying and monitoring principal adverse impacts of investment decisions and investment advice on sustainability factors.

PWM considers an adverse impact on sustainability factors to be principal where it has a material, negative impact on efforts to accelerate transition to a low carbon economy and/or to advance inclusive growth. PWM also considers an adverse impact to be principal where available data and client feedback indicate that it is of material concern to a significant majority of PWM’s clients.

PWM’s approach for understanding and monitoring principal adverse impacts in its investment advice and management services draws on ESG content it receives from Global Investment Research and other firmwide sources, as well as clients’ ESG preferences including in relation to principal adverse impacts. As noted below, due to the nature of its business offering, PWM does not directly undertake traditional shareholder engagement activities and instead leverages the capabilities of its affiliates, including the Goldman Sachs Asset Management’s (“**GSAM**”) Stewardship Team (which also manages certain PWM strategies on a delegated basis, as detailed in section 3 below). To give an example, in relation to centrally managed strategies managed by GSAM, principal adverse impacts identified by PWM teams are prioritised and communicated both to the GSAM Stewardship Team and the analysts within the GSAM fundamental equity and fixed income teams to inform their engagement efforts with issuers.

PWM continues to develop further data-driven processes and procedures internally to better enable PWM to consider principal adverse impacts in its investment decision-making and investment advice in a manner appropriate for each business line and consistent with the nature and level of delegation to GSAM, where this occurs.

3 Descriptions of principal adverse sustainability impacts and actions taken / planned

The principal adverse impacts that PWM most commonly encounters include climate related topics, board composition and diversity concerns, social risks, corporate strategy issues and insufficient disclosure.

Where PWM delegates the management of client portfolios to GSAM and, via GSAM, select third-party managers, then as part of PWM’s initial due diligence, and ongoing oversight and evaluation

of GSAM, PWM has regard to how these managers and GSAM assess and manage the principal adverse impacts of their investment activities on sustainability factors, their track record on stewardship and their adherence to responsible business codes and standards.

Additionally, PWM's Portfolio Management Group ("**PMG**") considers the portfolio construction implications, specifically sector and style biases that result from the integration of ESG considerations, including where such consequences could constitute a principal adverse impact for portfolios. PWM is continuing to invest in and develop analytical tools to provide a robust framework for this ongoing analysis within PMG.

Where PWM manufactures its own products including examples such as the Goldman Sachs Options Advisory Service, Structured Investment Strategies (Beta+) and desktop discretionary account, it may in the future consider and incorporate ESG factors, including principal adverse impacts, in the design of such products or derivations thereof. At present, given the index and options driven nature of these offerings, the identification and monitoring of principal adverse impact is considered less relevant.

To facilitate the initiatives detailed above, PWM is a primary participant in the Consumer and Wealth Management Division Sustainable Solutions Council ("**CWMD SSC**"). The CWMD SSC works to ensure PWM provides clients with a holistic, differentiated platform to develop and pursue their sustainability goals, and provides a framework for formally capturing and communicating PWM's requirements to the firm's Asset Management division. This enables PWM to influence platform development, including where such development is specifically beneficial in addressing principal adverse impacts in client portfolios.

4 Summaries of engagement policies

PWM's Engagement Policy (available [here](#)), in line with the Shareholder Rights Directive II, outlines PWM's engagement approach. While PWM does not directly undertake traditional shareholder engagement activities due to the nature of its business offering, PWM does fully support the principle of collaborative engagement. Additionally, PWM leverages the capabilities of its affiliates, including through the GSAM Stewardship Team for effective and meaningful engagement with investee companies and stakeholders.

5 Adherence to responsible business codes and standards

PWM does not formally adhere to the OECD Guidelines for Multinational Enterprises and as a wealth manager, PWM is not a signatory to the UN Principles of Responsible Investment. However, PWM does respect and support the principles of responsible business investing and looks to integrate certain of the Principles and Guidelines into its investment decisions and advice.

As noted above, where PWM delegates the management of some aspects of client portfolios to GSAM, and via GSAM to external third party managers, PWM has regard to GSAM's annual UN PRI Assessment Report, track record on adherence to responsible business codes and standards and GSAM's manager selection framework.

PWM also leverages the firm's participation in a number of sustainability-related ESG bodies and groups including, but not limited to, the UN principles of Responsible Investment, the UK Stewardship Code, the Carbon Disclosure Project (CDP), the United Nations Environment Programme Finance Initiative (UNEP FI), the Task Force on Climate Related Financial Disclosures

(TCFD) and the Center for Climate Aligned Finance. This helps deepen PWM's understanding of the sustainable finance landscape, inform conversations with clients and shape the ongoing enhancement of PWM's ESG offering.