



MEDINA
ASSET MANAGEMENT

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55, Level 2, Dawret ix-Xatt, Xghajra XJR 1201, Malta

Tel: +356 27 033 650
Web: www.medinam.com
Email: info@medinam.com

SFDR Disclosures

Reviewed and updated in December 2022

Responsible and Sustainable Investing

Medina Asset Management Limited (“Medina” or the “Company”) carries out proprietary research which does not factor in Environmental, Social & Governance (“ESG”) criteria when choosing products for investment purposes on behalf of its clients. Medina conducts qualitative and quantitative research as part of its investment selection process. Should a selected fund have a high ESG risk score this would currently still be included in the products offered. Furthermore, Medina does not currently manage any discretionary investment portfolios or mandates that have sustainability risk as one of their investment objectives/ risk management criteria nor do any of its managed portfolios or mandates qualify as promoting environmental or social characteristics or a combination of them, nor do they have sustainable investment included as an investment objective.

Negative and positive Screening

Medina does not apply negative screening to exclude specific sectors or companies based on ESG criteria.

Exclusions

Medina primarily invests through well diversified, professionally managed and highly liquid UCITS Collective Investment Schemes (“CIS”) which have retail clients as their main target market. As such, Medina does not have direct control over the underlying investments that are held within such CIS.

No consideration of adverse impacts of investment decisions on sustainability factors

Medina, due to its relatively small size and the type of assets which it includes in its investment process does not consider the Principle Adverse Impacts (“PAIs”) in its investment decision making/management process in relation to sustainability factors indicated in article 4 of the Regulation (EU) 2019/2088¹. PAIs are understood as those impacts of investment decisions and advice that result in negative effects on sustainability factors.

This stance may change in the future depending on the type of assets managed under the discretionary portfolio management mandates and depending on the investment objective of the investment portfolios managed. Another important factor which will allow Medina to start considering sustainability factors is the amount of relevant historical data that is available to assess the effects of sustainability risk on the investment returns. In any case, Medina shall ensure that the relevant precontractual documentation made available to any potential client clearly indicates that Medina currently shall not consider sustainability risks as part of its investment management process. It shall include a clear and concise explanation of its reasons for this.

¹ [Regulation \(EU\) 2019/2088 on sustainability-related disclosures in the financial services sector](#)



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Remuneration Policy

Medina's approach to remuneration, as set out in its remuneration policy considers various ESG principles which are based on sustainability factors. The manner in which this is done is summarised below, while a more in-depth overview is found in the remuneration policy itself which is available on request.

Environmental: the Company encourages various environmentally friendly measures such as recycling and being as energy efficient as possible.

Social: the Company ensures to provide a safe environment for its staff members and to offer equal and fair salaries and working conditions in a non-discriminatory manner. It ensures to handle any client data with utmost privacy (as far as legally possible) and does not discriminate between clients. All employees on a fixed pay basis and no commissions or sales target are applied.

Governance: the Company has independent directors on the board to add accountability and independent checks. Additionally, the Company employs certain control functions that are not involved in the investment process. This adds accountability and reduces the risk of any collusion or any undesirable effect on the company or any of its stakeholders. Furthermore, as a licenced entity, Medina must always have in place a number of policies and procedures such as the conflict of interest policy, the remuneration policy itself, and the compliance monitoring programme which ensure that governance factors are adhered to as much as possible.