



Sustainability Related Disclosures

Version Control

Version	Date	Author	Changes/Modifications	Approved by	Date Approved
1.0	Dec-22	Kyle Debono	First Draft	BOD	Dec-22
1.1	Oct-23	Kyle Debono	In line with Regulations and MFSA Guidelines. Updated to include reference to Sustainability Assessment Policy.	BOD	Oct-23

Medina Asset Management Limited ("Medina" or the "Company") falls under the scope of the Sustainability Finance Disclosure Regulation ("SFDR") - (EU) 2019/2088¹. In accordance with the SFDR Regulation, Medina is required to publish on its website information about its policy on the integration of sustainability risks in its investment decision-making process/investment or insurance advice.

Sustainability Assessment Policy

In line with the requirements imposed by the Regulation mentioned above, the Company has formulated its Sustainability Assessment Policy outlining Medina's approach when integrating Environmental, Social and Governmental ("ESG") considerations into its investment processes. Given the importance of the requirements related to suitability and sustainability requirements, the Company has involved not only its operational staff, its senior management and its Compliance Officer in the process, but also its Board of Directors (the "Board"). Together, the various parties just mentioned have agreed on a Sustainability Assessment Policy which has been approved by all members of the Board. The Sustainability Assessment Policy gives details of:

- the requirements that the Company is subject to in relation to sustainability assessments;
- the current policy of the Company on how to abide by these requirements;
- How clients' sustainability preferences are to be assessed (as part of the overall suitability assessment);
- How the sustainability characteristics of the universe of financial instruments which the Company may offer to its clients shall be assessed (as part of the overall product governance assessment).

¹<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32019R2088>

Responsible and Sustainable Investing

Medina, 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”) and Exchange Traded Funds (“ETFs”) 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 and ETFs.

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.