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Medina Asset Management does not currently manage any discretionary investment portfolios or mandates that have sustainability risk as one of their investment objectives/ risk management criteria. Hence, Medina Asset Management does not presently integrate sustainability risk nor sustainability adverse impact in its investment decision making/management process, 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.

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Where this is in the affirmative, Medina Asset Management shall ensure to disclose clearly:

- a. the manner in which sustainability risks are integrated into its investment decisions; and
- b. the results of the assessment of the likely impacts of sustainability risks on the returns of the financial product(s) it is managing.

Where Medina Asset Management shall deem sustainability risks not to be relevant, it shall include a clear and concise explanation of the reasons therefor.



Medina Asset Management'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 (available on request).

- **Environmental:** the company encourage 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 it allows any potential clients the ability to present their investment mandate proposal in a fair and non-discriminatory manner.
- **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 Asset Management 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.