



Michael Grech

FINANCIAL INVESTMENT SERVICES

Sustainable Finance Disclosure Regulation

MICHAEL GRECH FINANCIAL INVESTMENT SERVICES LTD (the “Company”) falls within scope of Regulation (EU) 2019/2088 of the European Parliament of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (the Sustainable Finance Disclosure Regulation or SFDR), which will come into force on the 10th March, 2021 requiring financial market participants, including the Company, to make certain sustainability-related disclosures to end investors.

Sustainability Risk Policy

In line with the requirements imposed on in-scope financial market participants, the Company has formulated its Sustainability Risk Policy outlining the approach that the Company will take to integrating ESG considerations into its investment management processes by assessing not only all relevant financial risks but also relevant sustainability risks, with a view to mitigating risks and enhancing returns over the medium to long-term.

In compiling and maintaining the suite of investment products we advise on, we take into account, among other factors, information manufacturers of these products (e.g. asset managers) are required to disclose about how they integrate ESG risks into their investment decision making processes, including the likely impacts of ESG risks on the returns of financial products. This includes, where applicable, if they consider the impact of their investment decisions on sustainability factors (i.e. environmental, social and employee matters, respect for human rights, anti-bribery, and anti-corruption matters). As part of this process, we engage with product manufacturers to understand how they integrate these factors into their investment decision making through research, analysis, due diligence, and portfolio construction.

Should you require further details on how ESG risks are incorporated in the products on which we advise, please contact your designated account manager.

The Sustainability Risk Policy will be reviewed at least once a year to measure success and determine whether it continues to reflect the Company’s investment beliefs.

Remuneration Policy

The Company’s approach to remuneration, as set out in its remuneration policy, does not encourage excessive risk-taking with respect to sustainability risks.