

FMG (Malta) Ltd – Website Disclosures

Responsible and Sustainable Investing

We do not assess Environmental, Social and Governance (“ESG”) Factors that may have investment ramifications, and which may have a material impact on the investment’s long-term financial performance. As a result, information on ESG Factors does not form part of our investment recommendation/decision making process. We will review this position on an annual basis.

Negative and positive screening

We will actively engage with our clients to understand whether they have concerns about specific activities and / or industries in order to maintain such exclusions on an on-going basis.

In such cases, we undertake, to the extent possible, to screen target entities and / or products that promote and provide solutions that are consistent with ESG Factors and shall aim at recommending and / or investing in such on an on-going basis, in so far as applicable.

Exclusions

We will not knowingly invest in companies involved in the following activities:

- arms manufacturing;
- manufacture of tobacco;
- hard spirits;
- gambling; and
- genetically modified organisms.

We will assess these types of investments on a case-by-case basis and any potential for indirect exposure is carefully considered and factored into investment selection.

Principle Adverse Impacts

We do not undertake an assessment of the Principal Adverse Impacts (“PAIs”) of our decisions on ESG Factors. PAIs are those impacts arising from a particular decision taken which we take that will eventually have a negative effect on ESG Factors.

Kindly contact compliance @fmgfunds.com for a full copy of our ESG Policy.

Alignment of Remuneration Policy with sustainability investments

In line with our Remuneration Policy, no variable remuneration is paid to our staff unless it is determined to be justified following a performance assessment based on quantitative (financial) as well as qualitative (non-financial) criteria.

Due to this very limited impact on the risk-profile of our clients, as well as the nature of our business, we deem that there is no risk of misalignment with the integration of the sustainability risks, if any, in our investment decision making process/investment advisory services with respect to our clients.

As such, we believe that our existing structures are sufficient to prevent excessive risk taking in respect of sustainability risks, if any.