

SFDR Disclosure

This disclosure is being published in accordance with Regulation (EU) 2019/2088 (SFDR) of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector, which came into effect on 10th March 2021. Calamatta Cuschieri Investment Services Ltd (CCIS) falls within scope as both a Financial Market Participant and a Financial Advisor.

SFDR aims to increase transparency regarding how sustainability risks are integrated into investment decisions and investment advice by Financial Market Participants and Investment Advisors. CCIS implements processes that consider ESG risk factors as part of a group of factors that make up an investment process. Along with the investment objective, investment time horizon, and the client's risk assessment, ESG Factors will be included in the overall investment recommendation process. However, these factors will not be considered as the primary deciding factor. This approach does not automatically exclude an investment on ESG grounds.

CCIS does not undertake an assessment of the Principal Adverse Impacts (PAIs) of its decisions on ESG Factors. Still, it will consider investments that are environmentally and socially responsible as much as possible. CCIS engages with clients to understand whether they have concerns about specific activities and/or industries to maintain exclusions on an ongoing basis. In such cases, CCIS will screen target entities and/or products consistent with the clients' sustainability preferences and aim to recommend and/or invest in such products on an ongoing basis, as applicable. As the regulatory landscape evolves, CCIS will consider further incorporating ESG-related risk factors into its investment process.

Alignment of Remuneration Policy with sustainability investments

In accordance 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. We believe there is no risk of misalignment with the integration of sustainability risks. As such, we believe our existing structures are sufficient to prevent excessive risk-taking in respect of sustainability risks, if any.