MANENTIA WEALTH CONSULTING GROUP

Environmental, Social and Governance Policy

MASTER SHEET – VERSION CONTROL

Date	Details of Amendment	Amended by	Sign off date (Board of Directors)	Date of Next Review
03.06.2021	First Version – 1	Neal Rossignaud – Compliance Officer	Q2 2021	Q3 2022
04.08.2021	Slight Amendments - 2	Neal Rossignaud – Compliance Officer	Q3 2021	Q3 2022
30.05.2022	Yearly Update – 3 (Typos)	Neal Rossignaud – Compliance Officer	Q2 2022	Q2 2023
30.09.2022	Minor adjustment to Advisory and PM Process - 4	Neal Rossignaud – Compliance Officer	Q3 2022	Q3 2023
11.01.2023	Annual Update - 5	Neal Rossignaud – Compliance Officer Christophe LeNain – Legal officer	Q1 2023	Q1 2024
09.01.2024	Annual Update – Version 6	Neal Rossignaud – Compliance Officer	Q1 2024	Q1 2025
10.06.24	Included Signatures	Neal Rossignaud – Compliance Officer	Q2 2025	Q2 2025

1. Purpose and Rationale

1.1 The aim of this document is to set out the environmental, social and governance ("ESG") policy (the "**Policy**") of Manentia Wealth Consulting Group (the "Company" or "MWC") when providing investment services in terms of the Company's investment services licence. This policy has been adopted in accordance with the provisions of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (Sustainable Finance Disclosure Regulation or **"SFDR"**) including all amendments to this regulation.

1.2 The Board of Directors of the Company (the "**Board**") is satisfied that this document is consistent with the risk-profiles, long-term business strategy, objectives, values, and interests of the Company. The Board recognises that sustainability is key to generating value for all stakeholders.

1.3 The Board will periodically review this document to ensure that its remains up- to-date and consistent with the Company's regulatory obligations under applicable law and risk appetite. The Board shall be responsible for initiating and facilitating an annual review of this document and its implementation, which review shall be carried out in light of legal and business developments as well as the Company's experiences in its implementation.

1.4 All changes or material exceptions to this document are to be approved by the Board, whether in relation to the annual review or otherwise.

2. Regulatory Status of the Company

2.1 The Company is registered under the laws of the Malta and in possession of an Investment Firm Licence, Authorisation ID MWCG-IF-15623. The Company is presently authorised and licensed by the Malta Financial Services Authority to provide Insurance Broker services. The Company is also authorised and licensed to provide the following investment services:

- Investment Advice; and
- Portfolio Management

to Professional Clients and Retail Clients in relation to a number of financial instruments as set outin the Company's Licence.

3. Regulatory Obligations

3.1 The Company is required to have in place policies and procedures setting out the approach adopted by the Company on the integration of sustainability factors in the investment decision-making process and within its risk management framework. SFDR defines "sustainability factors" as "…*Environmental, Social and Governance matters, respect for human rights, anti- corruption and anti-bribery matters*…" (the "**ESG Factors**").

3.2 ESG Factors include, but are not limited to:

- Environmental: climate change; air/water pollution; biodiversity; deforestation; energy efficiency; carbon intensity; depletion of finite resources; and product evolution (energy-efficient products/renewable energy).
- Social: human rights; unethical supply chains; severe labour controversies; brand and reputational issues; and illegal working conditions.

- Governance: transparency & integrity; inadequate management of conflicts of interests; corporate governance failures; lack of appropriate board oversight; shareholder rights; bribery and corruption.

3.3 The Company is also required to publish on its website information about its policies on the integration of sustainability risks in its investment decision-making process or advice process. SFDR defines '*sustainability risk*' as an "*environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of the investment*" (the "**ESG Risk**").

3.4 The Company is also required to include in its remuneration policies information on how these policies are consistent with the integration of ESG Risks and to include a description of the following matters in its pre-contractual disclosures:

a. the manner in which sustainability risks are integrated into their investment decisions; and

b. the results of the assessment of the likely impacts of sustainability risks on the returns of the financial products they make available.

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.

There is no risk or risk of interference in selection of a clients investments that may be linked to a possible conflict of interest or possible commission by an advisor by diverging from the fund selection that is in line with the clients sustainability preferences.

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

4. ESG Investment Guidelines

4.1 The Company does not promote funds that focus on sustainability.

The Company does however take into consideration as to whether clients are interested in Sustainability/ESG factors. If clients wished to express ESG preferences, then the Company will do its best to select funds based on an ESG factor determined by a screening process.

The selection process for funds that take into consideration ESG factors is described in Appendix 1.

4.2 For clients that are not interested in Sustainable and ESG factors the Company will not carry out an assessment or obtain information on ESG Factors in respect of the individual investments in which it invests in line with the clients' request.

5. Principal Adverse Impacts (PAI)

5.1 "Principal Adverse Impacts" are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters. Examples include Greenhouse Gas emissions and carbon footprint.

5.2 As permitted under Article 4 of Regulation (EU) 2019/2088 of the European

Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (the "SFDR"). MWC Group Limited in view of its size and nature of products that are distributed does not consider adverse impacts of investment decisions on sustainability factors.

6. Negative Screening

6.1 Certain clients may have concerns about specific activities or industries and may instruct the Company to exclude such activities or industries. In the circumstances, the Company will actively engage with its clients to better understand and define these criteria such that it is able to maintain such exclusions on an on-going basis.

7. ESG Labelled/Themed Investing

7.1 **The Company does not promote any products which are specifically labelled as ESG products.**

8. Review of this policy.

8.1 This document shall be reviewed by the Board annually. Any changes to this document shall be approved by the Board. The Compliance Officer shall monitor the implementation of this Policy through the Compliance Monitoring Program.

Appendix 1 - Screening process

Independent rating agencies

MWC will rely on the sustainability scores published by independent ratings agencies for collective investments and individual securities wherever possible. The preferred agencies are:

- Morningstar
- MSCI

Methodologies applied by Morningstar can be found here below:

Morningstar
Sustainability Rating

Collectives

Issuers/Managers of Collective Investments are expected to be compliant with SFDR regulations and their requirements. MWC will rely on the statements made by the manager of the collective by ensuring that the latter has taken all measures to comply with the rules in force. As assessment on sustainability is done by the manager of the collective, MWC expects them have requirements in place that asset managers need to meet with respect to various aspects of Responsible Investment, including identifying, measuring, managing, and disclosing adverse impacts of the investments they make. The degree and the way the adverse impacts are considered in the investment process depends on various factors, such as on the type of fund or strategy, asset class, and availability of reliable data. Where mitigating negative adverse impacts is a formal and binding element of the investment strategy, MWC expects asset managers to consider adverse impacts explicitly and structurally in their investment decision making. This includes embedding adverse impacts, where possible and feasible, in their exclusion, engagement and voting decisions.

Furthermore, MWC will rely on the sustainability and controversy ratings assigned by independent rating agencies to collective investments wherever available. Where neither the manager of a collective investment has published the classification, nor a sustainability rating has been assigned by an independent agency, the collective investment may be excluded from MWC's investable universe according to the ESG preferences of the clients and the type of investment products.

Individual securities

Wherever published, MWC will take into account sustainability and controversy ratings assigned by independent rating agencies to individual companies. However, research into this area shows that the quantity and quality of such ratings is currently much scarcer than for collective investments. Accordingly, MWC will endeavour to make its own qualitative assessment of the sustainability of an individual security based primarily on the sector in which the issuer is active and the efforts that it is making in becoming a more sustainable business. This assessment will be that of ESG momentum relative to its past efforts.

Positive/Negative Screens

Positive and negative screening of sectors and industries will be undertaken at client level when determining their wealth preferences.

Services to be provided to the Clients

As mentioned in Article 2.1, MWC acts as portfolio manager and/or financial adviser, hereafter

"Adviser", hence an obligation to advise its clients in a prudent way, and always in the context of the client's investment beliefs, objectives, and restrictions i.e. in the spirit of the client's broader investment preferences.

During the onboarding process or during the annual review meeting if needed, the client is required to complete the Ethical Enquiry Questionnaire section in the 'Investment Appropriateness Assessment Questionnaire'. During the completion of this section the client will decide whether or not they wish to invest into funds that take into consideration certain ethical standards such as those mentioned in section 3.2 above, and whether they wish to invest in funds meet the ethical funds criteria.

The Client has the option to choose amongst three possibilities:

a) Strongly Like to Support
b) Support if Possible; or
c) Remark that he has no interest in ESG

The choices will be applied to a number of categories as mentioned in the Investment Appropriateness Assessment (IAA).

The choice will determine whether or not funds with an ESG rating need to be considered in the portfolio of the client.

The Adviser would then prepare a proposal in the form of a Financial Planning report that is presented to the client. The report would take into consideration the preferences (if any) selected by the client and apply them to the proposal. The Adviser prepares the selection by choosing fund from the Fund universe (which a fund list approved at IC Level) by selecting fund that have ESG rating which would have been provided by Morningstar, alternatively the Company would use an MSCI ESG rating if Morningstar is not available.

Ultimately in the Suitability Report the Adviser will provide the client with a list of funds in which he/she is proposing to invest, the Funds will have an ESG rating clearly disclosed, therefore showing the client where or not certain ESG factors and being taken into consideration. Moreover, the Suitability Report will mention an average ESG rating meaning that a selection on funds was made in line with the preferences selected by the client. This average takes into account all ESG ratings included in the allocation of the portfolio of the client.

Finally, the Suitability Report will also include a brief summary as to how those funds satisfy the ESG preferences selected by the client.

In the event that MWC cannot satisfy the ESG preferences of the client for different reasons and if the clients accepts to modify these ESG preferences regarding a specific investment then this must be mentioned in the Suitability Report.

Client-specific instructions

In the instance that a client has specifically requested that a certain security be held within the portfolio (be it an individual security or a collective investment), MWC will not be required to perform a sustainability assessment on that security. The Company may further disclose that the security was selected by the client and not by MWC and as a result clients portfolio may not be totally in line with the fund selection proposed by the adviser/portfolio manager and ESG preference selection of the client.

MWC Investment Universe

MWC maintains a list of investments (investment universe) held or approved to be held for and on behalf of clients. This universe will be reviewed regularly, to ascertain their continuing compliance with SFRD requirements and Client preferences.

Asset Review Process

Each asset will be reviewed either as a collective or as an individual security. Any securities held upon client-specific instruction will be flagged as such and segregated.

Regarding ESG aspects, every collective will be reviewed through the manager's publication of the fund's category classification and the result recorded in the investment universe. Any changes from a previous category will also be recorded. Any collective not having a manager's category classification will be researched via the preferred agencies. Any collective not having a preferred agency rating will be flagged for further review and potential expulsion from the investment universe.

Any collective proposed to be added to the investment universe will be similarly reviewed before being added to the universe.

For individual securities, MWC will endeavour to take into account sustainability and controversy ratings assigned by independent rating agencies to individual companies. Where that information is lacking, MWC will endeavour to make its own qualitative assessment of the sustainability of an individual company's activity. The outcome will be recorded in the investment universe. Where an issuer is identified as having a low sustainability or a high controversy profile, it will be flagged for referral to the MWC Investment Committee for determination of whether it should remain in the investment universe or be excluded.

Reporting

MWC clients receive a quarterly report of their investments managed by MWC. This report will incorporate the category classification of each of their holdings as identified by the Asset Review Process.