AURIGA ASSET MANAGEMENT LIMITED

SFDR Disclosure

Version Control

Version	Date	Author	Changes/modifications	Status
1.0	20.12.2022	Kyle Debono	First draft	Approved

SFDR Disclosures

Responsible and Sustainable Investing

Auriga Asset Management Limited ("Auriga" or the "Company") does not currently apply any Environmental, Social and Governance ("ESG") criteria in relation to the Company and/or any of its investment mandates, which may have a material impact on the investment's long-term financial performance. As a result, information on ESG factors does nor form part of Auriga's investment recommendation and decision-making process. Furthermore, none of the schemes managed by the Company promote environmental or social characteristics or have sustainable investment as an investment objective. As a result, the schemes and their sub-funds are currently considered to be non-ESG funds.

Negative and positive Screening

Auriga does not apply negative screening to exclude specific sectors or companies based on ESG criteria.

Exclusions

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

- Arms and/or weapons manufacturing and/or trading;
- Shell companies and banks;
- Online casinos not regulated in reputable jurisdictions;
- Precious gems/metals/stones manufacturing.

No consideration of adverse impacts of investment decisions on sustainability factors

Auriga does not consider the Principle Adverse Impacts ("PAIs") when taking investment decisions and the impact these might have on the return it offers to its Shareholders in relation to sustainability factors indicated in article 4 of the Regulation (EU) 2019/2088[1]. This is mainly due to the fact that consideration of PAIs does not fit in with any of the current investment mandates the Company has. PAIs are understood as those impacts of investment decisions and advice that result in negative effects on sustainability factors.

This stance may change in the future depending on the type of assets managed under the discretionary portfolio management mandates and depending on the investment objective of the corporate investment schemes (CISs) managed.

Remuneration Policy

Auriga's approach to remuneration, as set out in its remuneration policy, considers various ESG principles which are based on Sustainability Factors. The manner that this is done is briefly explained below, while a more in-depth overview may be found in the remuneration policy itself:

[1] Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector

• **Environmental** – Auriga has defined a set of environmental objectives that employees shall be assessed on when considering any bonus or pay rise.

• **Social** – Auriga 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 the utmost privacy (as far as legally possible) and it allows any potential client the ability to present their investment mandate proposal in a fair and non- discriminatory manner.

• **Governance** – having an independent director on the Board adds accountability and independent checks. Such person has a direct influence on the decisions taken at the highest level of the Company. Additionally, Auriga employs certain control functions that are not involved in the investment process. This adds accountability and reduces the risk of any collusion or any other undesirable effect on the Company or any of its stakeholders. Furthermore, as a licenced entity, the Company must always have in place several 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.