

# **PATRIMONIUM SICAV PLC**

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**SFDR Disclosure**

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## Version Control

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

## SFDR Disclosures - Patrimonium

### Responsible and Sustainable Investing

Patrimonium SICAV Plc (“Patrimonium” or the “Scheme”) does not currently apply any Environmental, Social and Governance (“ESG”) criteria in relation to the Scheme and/or any of its sub-funds, 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 Patrimonium’s investment recommendation and decision-making process. Furthermore, none of the sub-funds of the Scheme promote environmental or social characteristics or have sustainable investment as an investment objective. As a result, the Scheme and its sub-funds are currently considered to be non-ESG funds.

### Negative and positive Screening

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

### Exclusions

Patrimonium 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

Patrimonium 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, and the unit holders of its sub-funds, in relation to sustainability factors indicated in article 4 of the Regulation (EU) 2019/2088<sup>1</sup>. This is mainly due to the fact that consideration of PAIs does not fit in with any investment objective of any of the sub-funds within the Scheme. 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 investment objective of the sub-funds within the Scheme.

### Remuneration Policy

Patrimonium’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:

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

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

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 Scheme. Additionally, Patrimonium 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 Scheme, its sub-funds, or any of its stakeholders. Furthermore, as a licenced entity, the Scheme 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.