

Sustainability Risk policy:

1. Introduction

This “Sustainability Risk Policy”, is the Group Policy on Sustainability. Invest4Growth Group comprises Invest4Growth Asset Management plc, MFP Sicav plc and I4G Partners bvba.

Invest4Growth Asset Management Ltd is a limited liability company with registration number C71649 and licensed by the Maltese regulator MFSA to provide investment services to professional clients. MFP SICAV plc, ‘Malta Fund Partners’, is a self-managed open-ended collective investment scheme organized as a multi-fund public limited liability company with variable share capital registered under the laws of Malta with registration number SV389 and Licensed by the Malta Financial Services Authority in terms of the Investment Services Act (Chapter 370, Laws of Malta). The company qualifies as a UCITS fund in terms of the Investment Services Act Regulations.

I4G Partners bvba was founded as an independent insurance broker in Belgium with registration number 0849.478.191 and licensed by the Belgian Regulator FSMA.

Within this policy, Invest4Growth means Invest4Growth Group and its different entities comprising Invest4Growth Asset Management Ltd, MFP Sicav plc and I4G Partners bvba.

This Policy contains general principles rather than a complete set of detailed rules that cover all situations. The more detailed rules are, or will be as deemed necessary, described in subordinate internal rules, such as guidelines and standard operating procedures as relevant for each respective Business Area. The policy applies to the Group and covers Invest4Growth’s business activities in all countries where Invest4Growth Group has its operations. All employees of Invest4Growth Group, and non permanent staff working on behalf of the Group, are subject to this policy.

Invest4Growth’s mission is to offer investment solutions that have a superior return risk balance and sustainability is an important element that impacts financial return and risks of our solutions. Investee companies with sustainable business practices tend to be more successful in the long-term.

For Invest4Growth, sustainability also means taking responsibility for the impact Invest4Growth has on the surroundings. It encompasses the ability to be a credible and reliable partner, which acts in the best interest of customers and ethically and responsibly towards society. Human rights, employee rights, environmental responsibility and anticorruption are included in the decision-making processes in order to contribute to sound financial markets. Sustainability is at the core of the business development, and the way of creating value.

Invest4Growth adheres to the 10 principles of the United Nations Global Compact which are derived from: the Universal Declaration of Human Rights, the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention Against Corruption.

Human Rights

- Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and
- Principle 2: make sure that they are not complicit in human rights abuses.

Labour

- Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- Principle 4: the elimination of all forms of forced and compulsory labour;
- Principle 5: the effective abolition of child labour; and
- Principle 6: the elimination of discrimination in respect of employment and occupation.

Environment

- Principle 7: Businesses should support a precautionary approach to environmental challenges;
- Principle 8: undertake initiatives to promote greater environmental responsibility; and
- Principle 9: encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

- Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

Furthermore, we are committed to the United Nations' 17 Sustainable Development Goals. The 2030 Agenda for Sustainable Development, adopted by all United Nations Member States in 2015, provides a shared blueprint for peace and prosperity for people and the planet, now and into the future. At its heart are the 17 Sustainable Development Goals (SDGs), which are an urgent call for action by all countries - developed and developing - in a global partnership. They recognize that ending poverty and other deprivations must go hand-in-hand with strategies that improve health and education, reduce inequality, and spur economic growth – all while tackling climate change and working to preserve our oceans and forests. The SDGs are to address all three dimensions of sustainable development (environmental, economic and social) and be coherent with and integrated into the United Nations global development agenda beyond 2015. The envisaged SDGs have a time horizon of 2015 to 2030.



2. Sustainability Risk Management

According to the EU Sustainable Finance Disclosure Regulation (SFDR) a ‘sustainability risk’ means 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.

Invest4Growth is managing Sustainability risks by putting effort to identify the risks, monitoring these risks and then mitigating the risks.

2.1. Environmental risks

While all environmental risks can be material, we estimate that climate-related risks are extremely material as it affects all ecosystems on earth and by that matter all investee companies as well. Following the adoption of the Paris Agreement, governments are endeavoring to transition to low-carbon and more circular economies on a global scale. Europe committed itself to become the first continent to reach climate neutrality by 2050. As an EU asset manager, Invest4Growth Asset Management Ltd plays an important role as enshrined in the EU Sustainable Finance Plan. Invest4Growth considers climate-related risks as financially material for all its investment strategies.

2.2. Social & governance risks

Invest4Growth also assesses social and governance risks of which the main parameters are displayed in the table below.

Environment		Social		Governance	
Climate Change	Carbon emissions Product Carbon Footprint Financing Environmental impact Climate change vulnerability	Human Capital	Labor Management Health & Safety Human Capital development Supply Chain Labor Standards	Corporate Governance	Board Pay Ownership Accounting
Natural resources	Water stress Biodiversity & Land Use Raw Material Sourcing	Product Liability	Product Safety & Quality Chemical Safety Financial Product Safety Privacy & Data Security Responsible Investment Health & Demographic Risk	Corporate Behaviour	Business Ethics Anti-Competitive Practices Tax Transparency Corruption & Instability Financial System Instability
Pollution & Waste	Toxic Emissions & waste Packaging Material & Waste Emectronic Waste		Stakeholder Opposition		Controversial Sourcing
Environmental Opportunite	Opportunities in Clean Tech Opportunities in Green Building Opp. In Renewable Energy	Social Opportunities	Access to Communications Access to Finance Access to Health Care Opp's. in Nutrition & Health		

We point out that sustainability risk integration underscores the need for reliable and high quality ESG information. ESMA has acknowledged that there are operational challenges involved with getting reliable data on sustainability risk and factors. The ECB has highlighted this as an impediment to the consistent use of ESG data by market participants and stresses that unreliable ESG data and ratings limit users in their capacity to conduct granular financial risk analyses.

Invest4Growth believes that the large part of sustainability risks can best be managed by integrating ESG factors in its management and advice.

2.3. ESG integration

Invest4Growth is committed to sustainable business and development by combining financial performance with environmental and social responsibility as well as sound governance practices. The below principles shall be used as a guide on behaviour in the daily work and when making business decisions. Invest4Growth shall take these principles and other relevant environmental, social and

governance principles into consideration when evaluating business risks and opportunities in connection to financial advice, portfolio management and asset management.

As an asset manager or financial advisor, it is our role to select companies with the best strategic and economic assets to respond to the challenges of the future.

2.4. Financial Advice and portfolio management

- We are committed to enhancing our competence and knowledge regarding environmental, social and governance aspects relevant for advice in relation to our products and services.
- We are committed to improving our advice in a way that enables our customers to make informed decisions on environmental, social and governance aspects relevant in relation to our products and services and to be transparent of such aspects.
- We are committed to increasing the integration of existing and emerging environmental, social and governance aspects relevant when developing advice in relation to products and services.
- We are committed to increasing the integration of existing and emerging environmental, social and governance aspects relevant when managing client portfolios.

2.5. Asset Management

At Invest4Growth group, we are committed to responsible investment (RI), which refers to the integration of environmental, social and governance (ESG) factors into investment decisions with the objective of providing better risk adjusted returns, particularly over the long term.

Our Sustainability Risk Policy outline the philosophy and approach we take to ensure that ESG consideration is embedded throughout the investment process.

ESG factors involve different themes that can have a material impact on the value of companies and securities. These themes are displayed in the graph below and are related to Environmental, Social and Governance factors.

Environment		Social		Governance	
Climate Change	Carbon emissions Product Carbon Footprint Financing Environmental impact Climate change vulnerability	Human Capital	Labor Management Health & Safety Human Capital development Supply Chain Labor Standards	Corporate Governance	Board Pay Ownership Accounting
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	Opportunities in Green Building Opp. In Renewable Energy	Social Opportunities	Access to Communications Access to Finance Access to Health Care Opp's. in Nutrition & Health		

Examples of ESG factors include the use of natural resources, corporate behavior, product safety, employee health and safety practices, and shareholder rights issues. Invest4Growth Group believes these issues should be considered alongside traditional financial measures to provide a more comprehensive view of the value, risk and return potential of an investment. With this understanding, we are committed to the integration of ESG consideration into our investment management processes and ownership practices.

Even though assets are managed with different strategies and investment objectives, there is a companywide philosophy that companies that act in a sustainable way towards the environment,

society and all its stakeholders are likely to be more able to deal with a variety of issues in the future of their business or endeavors. Nevertheless, we take into account that in some strategies, we are not able to measure and monitor adequately the different ESG parameters and the adverse impact on sustainability. Furthermore, we currently have a limited offer of strategies.

2.5.1. Equities:

Invest4Growth offers an equity investment strategy to its clients both through MFP Raphael's Ethical Choice fund (UCITS) as well as through direct equities. Environmental, Social and Governance (ESG) factors are systematically integrated in the investment process. The sustainability indicators used to measure the attainment of these characteristics are :

- GHG emissions scope 1, 2 and 3 as well as their evolution over time and the presence of emission reduction targets
- The energy efficiency
- Policy with respect to water and waste management
- The contribution of the investee companies with respect to the 17 SDG's from the UN.
- Whether the investee companies are signatories of the UN Global Compact.
- Whether the investee companies are GRI compliant in their sustainability reporting.
- The presence of policies with respect to environmental issues, human rights, child labour, anti-bribery and whistle-blower protection.
- Board Gender diversity
- The rate of accidents/injuries in investee companies

Within the security selection process, Invest4Growth applies generally accepted strategies for the implementation of the ESG approach. The ESG performance of a company is evaluated independently from financial success based on a variety of indicators, which consider ecological and social objectives as well as corporate governance. For the assessment, transparency as well as the product and service range of a company will be taken into consideration. Invest4Growth's approach is to be a long-term investor in its chosen stocks. It will not adopt short-term trading strategies. The investment process comprises two different sets of selection criteria:

1) The first selection process will follow stringent investment criteria in selecting securities for the Sub-fund's investment portfolio. These criteria aim to ensure that the Sub-fund invests in high quality companies:

- That realize a high and sustainable return on operating capital employed;
- That realize high and sustainable free cash flows;
- Who dispose of competitive advantages which are difficult to replicate;
- Which do not require significant leverage to generate returns;
- With a strong growth profile;
- That are resilient to change, particularly technological innovation;
- Whose valuation is considered by the Sub-fund to be attractive.

In a second phase, the shortlisted equities will be screened on the ESG parameters and final selection will be made in line with the internal ESG policy.

Within this process, Invest4Growth starts with excluding companies involved in controversial products or activities with respect to animal welfare, fossil fuels, producing tobacco or military weapons as well as any company from the gambling sector. With respect to fossil fuels, companies active in coal, tar sands, oil shale, unconventional fossil fuels, deep sea drilling and arctic drilling are excluded.

Then, Invest4Growth considers ESG factors by focusing on the potential impact of ESG issues on company financials.

Environmental issues concern any aspect of a company's activity that affects the environment in a positive or negative manner. Examples include greenhouse gas emissions, renewable

energy, energy efficiency, resource depletion, chemical pollution, waste management, water management, impact on biodiversity, etc.

Social issues vary from community-related aspects, such as the improvement of health and education, to workplace-related issues, including the adherence to human rights, non-discrimination and stakeholder engagement. Examples include labour standards (along the supply chain, child labour, forced labour), relations with local communities, talent management, controversial business practices (weapons, conflict zones), health standards, freedom of association, etc.

Governance issues concern the quality of a company's management, culture, risk profile and other characteristics. It includes the board accountability and their dedication towards, and strategic management of, social and environmental performance. Furthermore, it emphasises principles, such as transparent reporting and the realisation of management tasks in a manner that is essentially free of abuse and corruption. Examples include corporate governance issues (executive remuneration, shareholder rights, board structure), bribery, corruption, stakeholder dialogue, lobbying activities, etc.

In order to reduce sustainability risks and enhances a positive impact Invest4Growth also focuses on investee companies which report on the 17 Sustainable Development Goals of the UN.

Upon investment and over the life of the holdings, we assess and monitor indicators that are deemed to indicate the presence of a principal adverse impact as per EU law, as far as we are able to collect data. We address adverse impacts by reducing or completely sell the exposure to investee companies which score below average on the principal adverse impact indicators, and which don't manage to improve on these indicators. When the AUM's of Invest4Growth will increase, we intend to delegate voting rights to proxy voting companies.

2.5.2. Alternative Strategies:

We offer an alternative investments strategy through MFP Best Strategies as well as through a derivatives strategy on broad equity indices.

Within the alternative investments strategy, Invest4Growth currently doesn't consider adverse impacts of investment decisions on sustainability factors. MFP Best Strategies will achieve its investment objective by investing in multiple alternative strategies, where a substantial proportion of the assets are invested in other UCITS Collective Investment Schemes. Due to a lack of data and look-through on the underlying assets, Invest4Growth is not in a position to monitor and measure adverse impacts of investment decisions on sustainability factors within the sub-fund. Therefore, MFP Best Strategies doesn't claim that this product promotes environmental or social characteristics nor does the Sub-Fund has a sustainable objective.

Thanks to the arrival of the SFDR, the Regulatory Technical Standards (RTS) and the EU Taxonomy, the available data communicated by funds should rapidly increase and enable us to include that data into our due diligence and risk management process.

As far as the derivatives strategy concerns, this is executed exclusively on broad equity indices. Therefore, this strategy doesn't take ESG factors into account.

2.5.3. Other asset classes and strategies:

Other asset classes and strategies are offered through Ucits funds from other Asset Managers, including ETF's.

Within our due diligence process and risk monitoring, we integrate the ESG Fund rating from MSCI.



We have set thresholds as we only select funds with at least a BBB rating, except for some niche asset classes such as High Yield bonds, where we set the threshold at BB. Over 65% of the funds in our fund section have a rating that is A or higher.

MSCI ESG rating	% of total
A	53,1%
AA	14,3%
BB	6,1%
BBB	18,4%
NR	8,2%

3. International standards and Initiatives:

We are a supporter of the following organizations and initiatives:

- UN Global Compact
- Principles for Responsible Investing (PRI)
- Global Reporting Initiative (GRI)
- Sustainable Accounting Standards Board (SASB) Alliance
- Carbon Disclosure Program (CDP)