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This SFDR Level 2 website disclosure should be regarded as being of preliminary character as the current updated version of the prospectus has been submitted to the CSSF for approval which is however currently still pending and thus may be subject to amendments following comments from the CSSF; That until such time as the prospectus is approved and the final dated prospectus is issued and visa stamped by the CSSF, no representation is made or should be deemed to have been made by the relevant parties and any investment in the Fund will be made exclusively on the basis of the final visa stamped version of the prospectus and not on the basis of this disclosure.

# Article 10 (SFDR)

## Website disclosure for an Article 8 fund

**MWM SICAV - Patrimonial SRI Fund**

**Product name: MWM SICAV - Patrimonial SRI Fund**

**Legal entity identifier: 549300FKOS10NGIMNF51**

Does this financial product have a sustainable investment objective?

<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective: __%</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul>	<input checked="" type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it had a proportion of 25% of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with a social objective</li> </ul>
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: __%</b>	<input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>



## A. Summary

Our ESG incorporation process is mixed and is based on the following approaches

1. Negative screening - our stakeholder's values, beliefs and visions are not aligned with:

- companies having revenues from adult entertainment distribution activities of more than 5%,
- companies directly involved in child labour<sup>3</sup> controversies for the last two years,
- companies producing anti-personal mines and cluster bombs, and
- companies directly involved in the tobacco industry that derive more than 5% of their revenues.

In our ESG incorporation process we automatically exclude any entity directly involved in those categories.

The negative screening approach is performed by the ESG or Investment Team with the use of several programs and websites.

2. Best-in Class – with this method we want to motivate companies to have an acceptable degree of implementation and/or commitment towards ESG aspects and Corporate Social Responsibility. As such, all companies having a Thomson Reuter's ESG (TR) score below C+ (40-/100) will be considered not sustainable. We consider companies below this score threshold not enough committed.

3. ESG Integration - when analysing ESG data we believe materiality aspects to be of crucial importance to define a company's true ESG value. For this reason, we developed Midas Materiality Scorecard. The latter is an internal tool that, taking in consideration our stakeholders' vision and values, gives a materiality score to the selected corporation. We accept all companies having a Midas Materiality score of at least 4. Exceptions can be made if additional information, other than the one provided by TR, is believed to increase the score. We include Principal Adverse Impact analysis in this process.

4. Active Engagement - The ESG Team in cooperation with the Investment team will define an engagement roadmap. The ESG Team will engage directly with the company to express our concern and motivate them to work towards improving its materiality aspects.  
Our ESG data are supplied by Thomson Reuters, Sustainalytics and ISS.



### B. No sustainable investment objective

This financial product promotes environmental or social characteristics, but does not have as its objective a sustainable investment.

#### How does this financial product take into account principal adverse impacts on sustainability factors?

Upon investment and over the life of the product, we assess and monitor indicators that are deemed to indicate the presence of a principal adverse impact as referred to in Annex I of the SFDR Delegated Regulation. Through our on-going monitoring and performance target relative to the general market index, we address PAI for each company we are invested in. More information is available via Midas Wealth Management’s Principal Adverse Impact Statement, published on Midas Wealth Management’s website. The Sub-fund will periodically report how it has considered the principal adverse impacts of its investments in the Company’s annual report.

#### Are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?

Yes



### C. Environmental or social characteristics of the financial product

#### What are the environmental or social characteristics promoted by this financial product?

The sub-fund promotes certain minimum environmental and social safeguards through applying exclusion criteria with regards to products and business practices that are not aligned to Midas Wealth Management (“Midas WM”) stakeholder’s values, beliefs and visions. Midas WM was convinced even before the COP21 Paris agreement that the financial sector has a crucial role to endorse in the transitioning phase to a sustainable economy and society. Furthermore, sustainability can only be achieved if every single citizen, government and corporation uses its expertise and best effort to reach for this goal. As a corporation, Midas WM aims to bring its own contribution according to its values – independence, transparency, confidentiality, performance, availability and responsibility.

The sub-fund promotes adherence to and conducting business activities in accordance with the International Labor Organization’s (ILO) labor standards, the United Nations Guiding Principles for Business and Human Rights (UNGPs), the United Nations Global Compact (UNGC) and the OECD Guidelines for Multinational Enterprises, by scrutinizing companies that violate these principles.

The sub-fund promotes having a weighted average ESG score that is better than that of the general market index. (MSCI ACWI Index).

**What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?**

Midas WM promotes sustainability along all countries and businesses, regardless of their size and sector, by directly engaging with them. In addition, the goal is to apply the Principles for Responsible Investment set forth by the United Nations (UN) and to address the UN Sustainable Development Goals. MWM is an UN PRI signatory since 24 April 2019.

Subject to data availability, the investment team monitors the selected PAI indicators for assets managed in the sub-fund on an ongoing basis using an internally developed monitoring system. Issuers identified as outliers on specific indicators, or which exhibit high adverse impact across several indicators, are identified based on data acquired from third party provider. These issuers are subject to further analysis by the investment team, which will then discuss if the materiality of these risk requires an exit. Furthermore, some PAI are an input into the investment team’s internal ESG scoring methodology described below, which is applied to the security selection process.

The negative screening excludes businesses that are not aligned with the investment’s team stakeholder’s values, beliefs and visions:

- companies having revenues from adult entertainment distribution activities of more than 5%,
- companies directly involved in child labour controversies for the last two years,
- companies producing anti-personal mines and cluster bombs, and
- companies directly involved in the tobacco industry that derive more than 5% of their revenues.

In its ESG incorporation process, Midas WM automatically exclude any entity directly involved in those categories. The negative screening approach is performed by the investment team with the use of several programs and sources.

The sub-fund uses the ESG ratings of industry-leading data providers, Thomson Reuters and others to assess the ESG performance of single securities. It invests in securities from issuers, which perform best in class with regards to the mentioned ESG criteria. The sub-fund’s best-in-class approach requires a minimum score for all its investments to be considered sustainable. As such, all companies having a Thomson Reuter’s ESG (TR) score below C+ (40-/100) will be considered not sustainable. We consider companies below this score threshold not enough committed.

**How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?**

The sustainable investments do no significant harm to any environmental or social sustainable investment objective by considering 14 principal adverse impacts indicators and aligning with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. In addition, we consider controversies in our investment process. Therefore, a Thomson Reuters Controversies score of 0 would be considered as a risk to cause significant harm.



**D. Investment strategy**

**What investment strategy does this financial product follow and how is the strategy implemented in the investment process on a continuous basis?**

The sub-fund’s investment strategy is driven by a fundamental portfolio approach with a macro-overlay. The portfolio manager works to complement bottom-up financial analysis alongside the consideration of ESG factors to reinforce the investment thesis of a particular holding in case of corporate credit investments or in the case of direct equity investments.

The Investable Universe is up to 60% of its assets in equities and equity type securities. The equity may include exposure to emerging market countries. At least 40% of the sub-fund’s assets are to be invested in debt and

money market instruments. These “fixed income” investments may be made in instruments issued by sovereign or corporate issued domiciled in developed or emerging markets as well as in instruments rated investment grade or non-rated or rated below investment grade.

The sub-fund invests in securities from issuers, which perform best-in class with regards to ESG criteria. The sub-fund’s best-in-class approach requires a minimum score for all its investments to be considered investable. The ESG incorporation process is mixed and is based on the following approaches: i) Negative Screening, ii) Best-in Class, and iii) ESG Integration. The sub-fund considers Principal Adverse Impacts in the investment process.

**What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?**

Norms and value-based exclusion criteria are applied to all investments of the sub-fund, first with reference to the UN’s Global Compact. These ensure investments do not breach established fundamental responsibilities across the areas of human rights, labour, environment and anti-corruption. Exclusion criteria also extend to unconventional and controversial weapons (e.g. chemical, biological). For all exclusion categories, the applicable criteria may evolve over time. Specific exclusion criteria and thresholds for non-compliant investments relevant at a certain point in time are as mentioned below.

The following Norms based exclusion criteria are applied

- 1 UN Global Compact Violation negative screening: companies directly involved in child labour controversies for the last two years.
- 2 Controversial Weapons negative screening: companies producing anti-personal mines and cluster bombs
- 3 Other: Adult entertainment; Tobacco

The following Value based exclusion criteria are applied

- 1 Tobacco (producer) 5%
- 2 Tobacco (other) 5%
- 3 Adult Entertainment (producer) 0%
- 4 Adult Entertainment (other) 5%

As some companies are in a position to control the exact purpose of each of the products or service provided through their activities, Midas WM is applying a 5% threshold on the annual turnover which is considered a “margin of error” for these companies.

The sub-fund plans to make a minimum of 25% sustainable investments. These investments are measured by the combination of Thomson Reuters ESG score and Thomson Reuters Controversies score.

**What is the policy to assess good governance practices of the investee companies?**

As part of our investment process, we assess the investee company’s governance practices prior and during the investment period. The process is detailed in MWM good governance policy published on the website. We use Thomson Reuters data to gather the following governance data points:

Has the company already been the subject of controversies related to the points below? And does the company has policies in place to address them?

- Bribery and Corruption
- Business Ethics
- Whistle-blower Protection
- Fair Competition
- CSR Sustainability Committee
- Stakeholder Engagement
- Board Functions
- Board Structure
- Board Independence

**Does this financial product consider principal adverse impacts on sustainability factors?**

Yes, upon investment and over the life of the product, we assess and monitor indicators that are deemed to indicate the presence of a principal adverse impact as referred to in Annex I of the SFDR Delegated Regulation. Through our on-going monitoring and performance target relative to the general market index, we address PAI for each company we are invested in. More information is available via Midas Wealth Management’s Principal Adverse Impact Statement, published on Midas Wealth Management’s website. The Sub-fund will periodically report how it has considered the principal adverse impacts of its investments in the Company’s annual report.

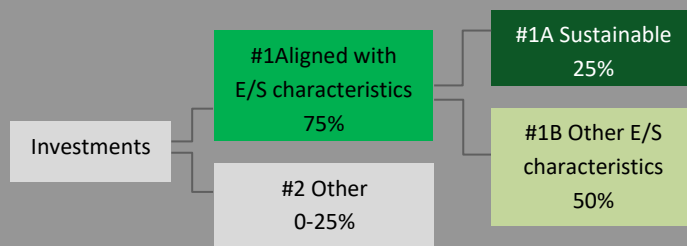
No



**E. Proportion of investments**

**What is the planned asset allocation for this financial product?**

*[Include only relevant boxes, remove irrelevant ones for the financial product]*



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

*[include the note below where the financial product commits to making sustainable investments]*

The category #1 Aligned with E/S characteristics covers:

- The sub-category #1A Sustainable covers sustainable investments with environmental or social objectives.
- The sub-category #1B Other E/S characteristics covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

**How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

The sub-fund does not make use of derivatives to attain the environmental or social characteristics promoted by the financial product. The sub-fund may make use of derivatives for hedging, liquidity and efficient portfolio management as well as investment purposes. Exchange traded and over the counter derivatives are permitted, including but not limited to futures, swaps, options and currency forwards. Whilst the sub-fund may use derivatives both for investment purposes as well as for hedging and efficient portfolio management, it does not utilize derivatives for such purposes outside the intended share of investments allocated to the ‘Other’ category.

**What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?**

While the sum of sustainable investments with an environmental objective always adds up to the sub-fund’s minimum proportion of 25 % sustainable investments, we do not commit to a minimum share of sustainable investments with an environmental objective because the sub-fund’s investment strategy does not have a specific environmental investment objective. Therefore, the minimum share of sustainable investments with an environmental objective is 0%.

**What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

Investments included in #2 Other include mostly money market products, futures contracts and listed options on equities & equity indices. Where relevant, minimum environmental safeguards apply to the underlying securities.



**F. Monitoring of environmental or social characteristics**

**What sustainability indicators are used to measure the attainment of the environmental or social characteristics promoted by this financial product?**

The sub-fund’s weighted average ESG score. We use the Thomson Reuters combined score (ESG + Controversies) of each company. The calculation uses the weight of each holding to calculate a global weighted average ESG score. The portion of cash is excluded.

**How are the environmental or social characteristics and the sustainability indicators monitored throughout the lifecycle of the financial product and the related internal/external control mechanism?**

Upon investment and over the life of the product, we assess and monitor, on an annual basis, indicators that are deemed to indicate the presence of a principal adverse impact as per EU law. For sustainable investments, the PAI indicators have been taken into account by ensuring that the investments do no significant harm to any environmental or social objective. For this purpose, the 14 indicators are directly included in our ESG framework to determine whether a company has significant impacts on our sustainable objectives. A detailed description of the incorporation of principal adverse impacts is available via Midas Wealth Management’s Principal Adverse Impact Statement published on the Midas Wealth Management website.



**G. Methodologies**

**What is the methodology to measure the attainment of the environmental or social characteristics promoted by the financial product using the sustainability indicators?**

The sub-fund promotes having a weighted average ESG score that is better than that of the general market index. (MSCI ACWI Index).





## H. Data sources and processing

**What are the data sources used to attain each of the environmental or social characteristics including the measures taken to ensure data quality, how data is processed and the proportion of data that is estimated?**

For equity holdings, we use Thomson Reuters’ ratings. In the event of unavailable ESG data from Thomson Reuters, the ESG Team will analyse and evaluate companies individually. The investment team will work towards obtaining relevant information by engaging with the company and/or collecting publicly available information and subsequently fill our internal “ESG aspects checklist” to give an ESG score to the company. Results will be brought at the attention of the Investment Team. Meanwhile the ESG Team researches and analyses, the Investment Team can invest only if ‘negative screening’ conditions are met.

The sub-fund may invest in fixed income issued by corporations, governments, public institutions and supranational (GPI&S). The ESG analysis applied for the different issuers is as follows:

- Corporations: same ESG incorporation process as for equities or Sustainalytics.
- Governments, public institutions and supranational: ESG score provided by the ESG rating agency. (Sustainalytics, ISS);

Should the ESG rating agency not provide of a score for a GPI&S, the ESG Team can:

- Rely on another ESG rating agency having a similar methodology, or
- Analyse the governance and the sustainability of the entity



## I. Limitations to methodologies and data

**What are the limitations to the methodologies and data sources? (Including how such limitations do not affect the attainment of the environmental or social characteristics and the actions taken to address such limitations)**


Data availability. In the event of unavailable ESG data from Thomson Reuters, the ESG Team will analyse and evaluate companies individually. The investment team will work towards obtaining relevant information by engaging with the company and/or collecting publicly available information and subsequently fill our internal “ESG aspects checklist” to give an ESG score to the company




## J. Due diligence

**What is the due diligence carried out on the underlying assets and what are the internal and external controls in place?**

Once a company goes through the negative screening and complies with MWM’s best governance practice, an assessment of sector specific criteria is realised in addition to the PAI analysis. Data used for this materiality check come from Thomson Reuters, Sustainalytics, ISS or directly from the company Corporate Sustainability Report. The investment management team will then discuss the assessment and conclude on whether it complies with the Midas ESG policy or not. A product committee will review investments on an annual basis. Furthermore, an external audit takes place every year on the portfolio manager level.

 <b>K. Engagement policies</b>	
<b>Is engagement part of the environmental or social investment strategy?</b>	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<b>If so, what are the engagement policies? (Including any management procedures applicable to sustainability-related controversies in investee companies)</b>	
<p>The Engagement Roadmap is defined on a yearly basis by the Investment Team together with the ESG Team. The Roadmap is a list of companies to engage with and subsequent aspects to engage on. The list will give priority to companies and/or materiality aspects highlighted during internal sustainability analysis. Materiality aspects to discuss during engagement phase derive from the sustainability analysis and/or those aspects having a low score in our Midas Materiality Scorecard.</p>	

 <b>L. Reference benchmark</b>	
<b>Has a reference benchmark been designated for the purpose of attaining these characteristics promoted by the financial product?</b>	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	