

No consideration of adverse impacts of investment decisions on sustainability factors

The European Regulation (EU) 2019/2088 on sustainability-related disclosure requirements in the financial services sector, the so-called Sustainable Finance Disclosure Regulation (SFDR), require financial market participants and financial advisors in the EU, to disclose on the integration of sustainability risks and the consideration of adverse sustainability impacts in our processes.

SFDR is an important milestone in the EU Commission's action plan on sustainable finance. This regulation aims to provide greater transparency on the degree of sustainability of financial products in order to channel investment flows towards truly sustainable investments while preventing greenwashing.

The cornerstone of the SFDR is the principle of double materiality: financial as well as sustainability, making it easier for end-investors to understand how ESG and sustainability factors are considered and integrated into their investments.

A responsible and sustainable investment framework and solid processes are essential on the journey towards sound investing. Our end-goal is to have our portfolio management services ESG-informed, adhering to a strong integration process and stewardship code.

Responsible investment practices are constantly developing and evolving. New risks may arise, public opinion may change and new market standards may be introduced. Our sustainable investment framework will, as such, be reviewed and, if necessary, adjusted on a recurring basis to incorporate these changes.

No consideration of the principal adverse impacts of investment decisions on sustainability factors

The Art. 4 I b of the SFDR requires financial market participants to disclose its approach with respect to the principal adverse impacts of its investments.

For the time being BMI does not consider adverse impacts of investment decisions on sustainability factors. Indeed, taking into consideration the variety of investment portfolios that BMI manages in cooperation with duly authorized investment managers and investment advisors located in various member states of the EU, the decision to consider PAIs is taken at the level of each portfolio as it requires the commitment of the relevant parties involved in the management of the investment vehicle.

In this context and as of today, BMI cannot commit to take a general approach to PAIs across all its funds while it recognizes this is a general objective to be reached through BMI active engagement as market practices converge to best practice. Detailed information may be found in each Fund's relevant documentation, which can be found on the website of the specific funds / sub-funds.

BMI policies

The Policy is regularly updated and at least on a yearly basis.

All other relevant information required by SFDR shall be made available to shareholders in due time by means of disclosures on the BMI's website.

