

# Sustainable Finance Disclosure (SFDR)

**Version 4**

**02-01-2025**

## **1. Introduction**

Numisma Capital Ltd (the “Company”) is a limited liability company with share capital, incorporated in accordance with the Laws of the Republic (registration number HE258965). The Company is regulated as an under the threshold alternative investment fund management company (“AIFM”) by the Cyprus Securities and Exchange Commission (“CySEC”) with license number CIF 122/10 and as a Cyprus Investment Firm offering the services of Portfolio Management and Investment Advice. As the Sustainable Finance Disclosure Regulation (EU) 2019/2088 of the European Parliament and of the Council on sustainability-related disclosures in the financial services sector (the “SFDR”) been entered into force, by this policy and other related policies/procedures and disclosures the Company intends to provide a definition of relevant factors and controls relating to sustainability risks. The SFDR requires financial market participants to disclose additional information on the integration of sustainability risks and potential adverse sustainability impacts on an entity level. Towards this the Company is required to publish:

- The Sustainability Risks Policy as per Article 3 of the SFDR,
- Any information on Adverse Sustainability Impacts as per Article 4 of the SFDR,
- And the Remuneration policy as per Article 5 of the SFDR.

## **2. Sustainability risks policy**

The Company acknowledges the potential impacts that sustainability risks can impose on the portfolios managed, advice provided, and Funds managed and considers the approach to integrate the risks arising from sustainability issues described in this policy. Before any investment decisions are taken on behalf of the clients, the Company will have to complete a process for the identification of the material risks associated with each proposed investment, including sustainability risks. More information on the Company's approach to integrate the sustainability risks into the investment decision making process (pre-trade assessment) can be found in the Sustainability Risk Policy which has been uploaded separately on the Company's website.

## **3. No consideration of adverse impacts of investment decisions on sustainability factors**

As per Article 12 of Commission Delegated Regulation (EU) 2022/1288, the Company, in its capacity as a 'Financial Market Participant' and 'Financial Adviser' as defined in Regulation, at the moment does not consider principal adverse impacts of investment decisions on sustainability factors as this limits the range of available investments under consideration and thus reduces diversification. The Company may reassess its consideration in the future with regards to the adverse impacts on environmental, social and governance matters. If at any time this change, an amended disclosure shall be made available on our website.

## **4. Integration of sustainability risks in the remuneration policies**

Numisma Capital Limited integrates sustainability risks into its Remuneration Policy, in its capacity as a 'Financial Market Participant' and 'Financial Adviser'.

The remuneration practices followed by Numisma Capital Limited do not encourage risk-taking with respects to sustainability risks.

## **5. Review and monitoring**

The Company will monitor and review the SFDR disclosures and the Policy on an annual basis and will proceed to changes where needed. Any update will be made in accordance with the regulations applicable and will be subject to the approval of the Company's Board of Directors.