

Sustainability Risk Policy – Disclosure Statement

This disclosure statement considers the approach taken by Mirabella Financial Services LLP, Mirabella Malta Advisers Limited and Mirabella Malta Limited (hereafter collectively “ACA Mirabella”) in accordance with the requirements of Article 3 of Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector (“SFDR” or the “ESG Disclosure Regulation”) ACA Mirabella is required to formulate and disclose its policy on the integration of sustainability risks¹ into its investment and/or advisory decision-making processes.

ACA Mirabella’s Investment Philosophy

ACA Mirabella has been appointed to provide investment management services to a number of Alternative Investments Funds (“AIFs”). Collectively being hereunder referred to as the “Client/s”. ACA Mirabella has in place operational arrangements that has been reviewed and approved by the Malta Financial Services Authority in Malta and the Financial Conduct Authority in the UK.

Depending on the AIF in question, ACA Mirabella will enter into agreements with its Clients in respect of the provision of management activities with regards to the assets of certain AIFs.

- In the EU, the board of Mirabella Malta Limited has appointed an Investment Committee for each mandate which, in accordance with the terms of reference, shall be responsible for the provision of investment management services to the Clients. Subject to any investment strategies, policies, restrictions, or parameters arising from the terms of any prospectus, offering memorandum, private placement document, or management agreement, or as may be set by the Client.
- In the UK, appropriately competent individuals are seconded into Mirabella Financial Services LLP in order to carry out the investment management and advisory services pursuant to the relevant investment management agreement/s in place between Mirabella Financial Services LLP and the fund/investment vehicle/off-shore fund manager/general partner, as applicable.

ACA Mirabella also provides services under Article 6(4) of the Alternative Investment Fund Managers Directive (the “AIFMD”), these services are currently limited to the MiFID like activity of managing portfolios of investments.

In addition, ACA Mirabella intends to market the funds it manages, where appropriate, in the EU and the UK. This will either be undertaken without a passport, together being referred to as the “Article 36 Funds”, or will have the benefit of undertaking this activity under the AIFMD passporting regime with these funds being referred to as the “Article 32 Funds”.

In the EU, Mirabella Malta Advisers Limited has been granted a Class 3 Investment Services Licence for a MiFID II Investment Firm by the Malta Financial Services Authority to provide investment services, including the provision of Investment Advice in relation to one or more financial instruments, as set out in its scope of permissions. These permissions are extended to Mirabella’s Tied Agents and are agreed between the Tied

¹ an environmental, social or governance event or condition that, if it occurs, could cause a negative material impact on the value of the investment

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Agent and Mirabella under the relevant tied agent agreement. Mirabella's Tied Agents are also able make use of Mirabella's MiFID passports to provide investment advice services in EEA member states.

Limited Disclosure

ACA Mirabella is fully supportive of the goal of the European Commission's Action Plan on Sustainable Finance and recognises SFDR as a key pillar of the EU's ESG initiative, however, due to the nature of the investment strategies employed by ACA Mirabella and its Clients/Tied Agents and the instruments invested in to achieve its stated investment objectives agreed with ACA Mirabella's Clients/Tied Agents, it is not practicable to formally integrate sustainability risk in a manner which is achievable by other types of investment strategies.

No consideration of sustainability adverse impacts

ACA Mirabella does not consider the adverse impacts of its investment and/or advisory decisions on sustainability factors.

Whilst ACA Mirabella supports the objectives of SFDR with respect to transparency of due diligence policies and reporting against relevant quantitative metrics in respect of portfolio investments it has chosen not to consider these impacts at this time, predominantly due to the nature of its investment and/or advisory strategies and the limited capacity of the Firm to materially engage with, and report on, these issues in a relevant and meaningful way.

Whilst uncertain as to when specifically, ACA Mirabella may consider the adverse sustainability impacts it remains open to doing so in future and will monitor the situation with respect to its business model and investment and/or advisory strategies.

Remuneration Policy

ACA Mirabella has reviewed its Remuneration Policy in accordance with the requirements of Article 5 of SFDR to ensure consistency with its integration of sustainability risks as described above. The relevant details incorporated in that respect are featured below:

- Central to ACA Mirabella's Remuneration Policy is the promotion of sound and effective risk management and this has now been extended beyond financial risks to encompass sustainability risks. ACA Mirabella does not have any quantitative sustainability-focused performance targets at either a portfolio or asset level and therefore this is a qualitative assessment in respect of adherence to its internal procedures for integration of sustainability risk as outlined above.
- Further, another key aspect of ACA Mirabella's remuneration policy is with respect to avoiding creating an environment which rewards or encourages excessive risk-taking. Again, this principle has been extended beyond financial risk to incorporate sustainability risks and for those individuals who have a role in ensuring or overseeing that its sustainability risk policy is adhered to this is factored into decisions in respect of variable remuneration awards.