

## STATEMENT AS PER ARTICLE 4(1)b of the DISCLOSURE REGULATION – NO CONSIDERATION OF SUSTAINABILITY ADVERSE IMPACTS

Pursuant to EU Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (the “SFDR”), Falcon Money Management Limited (“Falcon” or the “Company”) is required to disclose the manner how Sustainability Factors (as defined hereafter) are integrated into the investment decisions and the assessment of the likely impacts of Sustainability Risks.

Article 4(1)(b) of the SFDR states that Financial Market Participants, such as the Company, shall publish and maintain on the websites, the reasons why they do not consider adverse impacts of investment decisions on sustainability factors, clear reasons for why they do not do so, including, where relevant, information as to whether and when they intend to consider such adverse impacts.

Falcon is a boutique AIF Manager authorised by the Malta Financial Services Authority. To date, Falcon manages two funds, and shortly one of them will be merging into the Falcon Money Management Funds RAIF-SICAV, registered in Luxembourg, leaving the Company with only one fund to manage. Due to its small size, business and investment strategy, the adverse impact of its investment decisions on the sustainability factors is of an extremely limited nature.

Falcon is sensible to the climate challenges and the sustainable development objectives of the Paris Agreement. The Company is also committed to the promotion of the employee well-being and the work-life balance. Initiatives have been taken and continue being developed to promote the personal and professional development of employees and the Company’s officials. The Company has also put in place robust governance structure to ensure high standards of its management and employees’ ethical behaviour.

The Company has a strong commitment to consider sustainability risks as part of this general business strategy. As part of these efforts the Company is integrating the sustainability risk factors in its remuneration policy to align employees’ interest and remuneration considerations with them. While the Company is strongly committed with the promotion of environmental, social and governance factors, it has decided not to consider the adverse impacts of its investment decisions on sustainability factors.

The above decision is the consequence of a cost-benefit analysis, and motivated by the following factors:

- (a) Size of the Company. The Company presently has less than 5 employees and the Falcon Money Management Group has in aggregate less than 15 employees.
- (b) Investment strategy. Falcon invests in commingled funds managed by external managers and currently does not invest directly in public or private securities such as shares (other than shares issued by commingled funds) or bonds. This restricts Falcon’s ability to promote ESG issues by directly influencing public companies through shareholder engagement (e.g., shareholder votes or management engagement). It must be noted the typical ESG considerations have limited relevance to some of the investment strategies employed by Falcon’s managers. Examples of these include funds investing in non-corporate securities (e.g., various futures, equity, and credit indices, G3 government bonds) as well as short-term trading-oriented strategies (where the holding period is too short to allow for a meaningful

engagement with management). Consequently, our investment strategy primarily focuses on other factors, such as risk-adjusted returns, market opportunities, and specific investment objectives.

While the Company does not currently consider sustainability adverse impacts, the Company is committed to transparency and provide other relevant sustainability disclosures. These may include information on our engagement efforts, adherence to industry standards and guidelines, and any positive contributions we make to sustainable practices within our investment portfolios. Additional information can be found in the Company's ESG policy.

The Company continuously reviews and assesses its investment processes and regularly evaluates the feasibility of integrating sustainability adverse impacts into the Falcon decision-making. We remain committed to staying abreast of developments in the market and regulatory landscape, and we will reassess our approach should the circumstances change. Any future changes or updates to our consideration of sustainability adverse impacts will be promptly communicated via the Company's website and to our clients.