

## SFDR DISCLOSURE

Amstel Capital (Malta) Ltd (the “Company”) falls within scope of Regulation (EU) 2019/2088 of the European Parliament of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (the Sustainable Finance Disclosure Regulation or SFDR), requiring the Company to make certain sustainability-related disclosures to end investors.

Amstel Capital Malta Ltd (the “Company”) confirms in relation to the Company and the Scheme it manages (Amstel Global Umbrella Fund SICAV Plc) that, when making investment decisions, it does not consider the adverse impacts of investment decisions on sustainability factors at the present time in terms of the SFDR. Sustainability factors are defined by the SFDR as environmental, social and governance criteria. The main reason for currently not considering adverse impacts is the absence of sufficient data and data of a sufficient quality to allow the Company to define material metrics for disclosure.

The Company intends to monitor the industry position closely and to update its approach in due course as the industry position evolves and further regulatory guidance is made available.

Amstel Global Umbrella Fund SICAV Plc (the "Scheme"), and any of its sub-funds, does not promote environmental or social characteristics or have sustainable investment as an investment objective. As a result, the Scheme and any of its sub-funds is currently considered to be a non-ESG Fund.

With regards to the integration of sustainability risk in the remuneration policies of Amstel Capital Malta Ltd, the Company has in place a remuneration policy, which is designed to:

- Facilitate common, uniform and consistent application of relevant regulatory provisions on remuneration;
- Ensure remuneration practices do not encourage excessive risk taking (including sustainability risks), which is inconsistent with the firm’s risk appetite or the risk profile of the Scheme it manages;
- Ensure that all officials of the Company are remunerated on a fixed fee basis only; and
- Develop, implement and maintain a culture of ensuring the client’s best interests are met.

This Policy is one of the core tools which the Company uses to implement and comply with best practice, create a sustainable and responsible remuneration strategy, and to eliminate and mitigate against behaviours which could lead to failure to act in the client’s best interest.

Amstel Capital Malta Ltd