

Periodic disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Product name: MFP Raphael’s Flexible equity fund (previously Raphael’s Ethical Choice fund)

Legal entity identifier: 54930071GHLDBXWVJ676

Isin codes: MT7000021085, MT7000021093, MT7000021101, MT7000021119

Environmental and/or social characteristics

Did this financial product have a sustainable investment objective?

<input checked="" type="radio"/> <input type="radio"/> <input type="checkbox"/> Yes	<input type="radio"/> <input type="radio"/> <input checked="" type="checkbox"/> No
<input type="checkbox"/> It made sustainable investments with an environmental objective: ___% <ul style="list-style-type: none"> <input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy 	<input checked="" type="checkbox"/> It promoted Environmental/Social (E/S) characteristics and while it did not have as its objective a sustainable investment, it had a proportion of 19.6% of sustainable investments <ul style="list-style-type: none"> <input checked="" type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> with a social objective
<input type="checkbox"/> It made sustainable investments with a social objective: ___%	<input type="checkbox"/> It promoted E/S characteristics, but did not make any sustainable investments



Sustainability indicators measure how the environmental or social characteristics promoted by the financial product are attained.

To what extent were the environmental and/or social characteristics promoted by this financial product met?

- The Fund promotes adherence to the 10 Principles of the UN Global Compact, the 17 UN Sustainable Development Goals (SDG’s) and the UN Principles for Responsible Investing which are the frameworks which guides the management of the fund. All companies in the portfolio were screened based on the MSCI ESG Research LLC data on

compliance with the UN Global Compact Principles and there appeared zero companies that failed although 4 companies were on the watch list and 7 companies were not scored on a total of 34 companies.

- The characteristics promoted by this financial product consist of investing in corporates with excellent Environmental, Social and Governance ratings while excluding companies involved in controversial products or activities with respect to animal welfare, fossil fuels, producing tobacco or unconventional military weapons as well as any company from the gambling sector. With respect to fossil fuels, companies active in coal, tar sands, oil shale, unconventional fossil fuels, deep sea drilling and arctic drilling are excluded.

- Looking at the MSCI ESG rating, we had 24% of the investee companies in the portfolio with a AAA rating and 70% of the portfolio had a rating of A and above.
- The majority of the investee companies have activities that are estimated to be eligible for the EU Taxonomy. On average for the entire portfolio the estimated eligibility of revenues for the EU Taxonomy is about 66%.
- According to the analysis performed by Clarus Risk, the portfolio was strongly aligned on several SDG's. The table below summarizes the SDG's with the highest alignment scores. The percentages are calculated as the ratio of the eligible assets of the portfolio (which was about 84% of total portfolio).

	% of aligned or strongly aligned	% of neutrally aligned	% of misaligned or strongly misaligned
5: Gender Equality	70%	30%	0%
6: Clean Water & Sanitation	29%	71%	0%
7: Affordable and Clean Energy	40%	60%	0%
8: Decent Work and Economic Growth	48%	52%	0%
9: Industry , Innovation and Infrastructure	24%	71%	5%
10: Reduced Inequalities	56%	43%	1%
11: Sustainable Cities and Communities	8%	89%	3%
12: Responsible Consumption & Production	52%	48%	0%
13: Climate action	48%	52%	0%

- The exclusion criteria were respected.

● **How did the sustainability indicators perform?**

- The sustainability indicators used to measure the attainment of these characteristics are :
 - a. GHG emissions scope 1, 2 and 3 as well as their evolution over time and the presence of emission reduction targets : 85% of the investee companies had GHG emissions reduction targets with KPI's, for 9% there was no evidence of GHG emission reduction targets while we had no data for 6%.

- b. The energy efficiency: 66% of the investee companies have established an energy efficiency policy, but we had no data for 29%.
- c. Policy with respect to water and waste management: 65% of companies in the portfolio have established a water policy (26% were not scored) and 70% have established a waste reduction policy.
- d. Whether the investee companies are signatories of the UN Global Compact: 51% of the investee companies are known signatories.
- e. Whether the investee companies are GRI compliant in their sustainability reporting: 50% of the investee companies have indicated using the Global Reporting Initiative framework for guidance in its public reporting.
- f. The presence of policies with respect to environmental issues, human rights, child labour, anti-bribery and whistle-blower protection: 62% of investee companies had known policies in place to reduce the environmental impact of their activities, while over 82% of investee companies have policies with regards to human rights, child labour, anti-bribery and whistle-blower protection.
- g. Board Gender diversity: 67% of investee companies had at least 30% of the board positions held by women, while we had no data for 15% of investee companies.
- h. The rate of accidents/injuries in investee companies: there were 20 known fatal injuries over all investee companies during the previous year. 10 of which were at Veolia Environnement, 5 fatal injuries were at AB-Inbev, 3 at Air Liquide.

● ***...and compared to previous periods?***

Compared to the previous report, we see comparable or slightly improved figures overall. The improvements are quite high on the GHG emission reductions.

● ***What were the objectives of the sustainable investments that the financial product partially made and how did the sustainable investment contribute to such objectives?***

The sustainable investments of the Fund aim to further the transformation and decarbonization of the economy in order to mitigate the impact of climate change as well as to adapt to climate change. The sustainable investment objective is attained by mainly investing in companies that advance the following United Nations Sustainable Development Goals (SDGs): Affordable and clean energy goal (SDG 7), Decent work and economic growth (SDG 8), Industry, innovation and infrastructure (SDG 9), Sustainable cities and communities (SDG 11) and Climate action (SDG 13). 50% of the investee companies had a high rating of A or above at CDP (Carbon Disclosure Report), while 85% of the investee companies have GHG emission reduction targets with KPI's. we also invest in companies that contribute to the energy transition such as Deme (a world leader in land

reclamation, marine infrastructure, offshore energy and environmental remediation), Syensqo and Air Liquide.

How did the sustainable investments that the financial product partially made not cause significant harm to any environmental or social sustainable investment objective?

All investments qualifying as sustainable are screened against all relevant significant harm indicators under the EU Taxonomy, although there currently is still a lack of data on the EU Taxonomy.

The portfolio was also assessed by Clarus Risk on both the Do Not Significant Harm test and Substantial Contribution Criteria (revenue exposure) to the six environmental objectives of the SFDR. According to that assessment 0% of the portfolio failed the DNSH test on Climate Change Mitigation, Climate Change Adaptation, Sustainable Use and Protection of Water and Marine Resources and Protection and Restoration of Biodiversity & Ecosystems. Only on the environmental objectives of Transition to Circular Economy and Pollution Prevention & Control there was 2.99% of the portfolio that failed the DNSH test. On the “Substantial Contribution Criteria” we had 5,29% of the portfolio that generated a substantial contribution to Climate Change Mitigation and 0.05% to Climate Change Adaptation.

The Fund assesses the contribution of companies to the Sustainable Development Goals (SDG’s) and monitors the Principal Adverse Impact indicators referred to in Annex I of the SFDR Delegated Act. The Fund also considers whether the sustainable investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights through negative screening and the exclusion policy.

How were the indicators for adverse impacts on sustainability factors taken into account?

The fund considers principal adverse impacts on sustainability factors as referred to in Annex I of the SFDR Delegated Act.

Pre-investment, the following principal adverse impacts on sustainability factors are considered:

- Via the applied normative and activity-based exclusions, the following PAIs are considered:
 - Exposure to companies active in the fossil fuel sector (PAI 4, Table 1). The share of investments in companies active in the fossil fuel sector was 1.8% for 2024. However, at the end of the year, we had no exposure to companies which are directly active in the oil & gas sector. Only 3 investee companies have an indirect exposure to the

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

fossil fuel sector. These are Powell Industries, who specializes in systems for electrical power distribution, control and monitoring and which products serve various sectors including oil & gas companies. Furthermore there is Solvay that sells chemicals to the oil sector and DEME, who also generates revenue from the oil sector.

- Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons (PAI 14, Table 1). None of the investee companies had exposure to controversial weapons.
 - Violations of the UN Global Compact Principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises (PAI 10, Table 1). According to Clarus Risk (data based on MSCI) no violations were detected. According to Bloomberg data, 1 companies have been recorded to have a violation, but hence 97% of investee companies had no violations recorded.
- Via the ESG integration process, as part of the investment due diligence policies and procedures, the following PAIs are considered:
 - All indicators related to GHG emissions, as part of the required Climate Risk analysis (PAI 1-6, Table 1, PAI 4, Table 2)
 - Biodiversity, water and waste indicators (PAI 7-9, Table 1) when relevant for the sector
 - Board gender diversity (PAI 13, Table 1)

Post-investment, the following principal adverse impacts on sustainability factors are taken into account:

- All indicators related to Climate and environmental issues (PAI 1-9, Table 1)
- Indicators in related to social and employee matters (PAI 10-13, Table 1; PAI 1-2-4-6-9-10, Table 3)

For 2024, the data indicated a strong ESG focus of the fund. If we compare the PAI table of 2024 with 2023 we see a positive evolution.

— — — *Were sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:*

It is the purpose of the fund to only invest in investee companies which respect business and human rights and adhere to international norms and laws. All assets in the fund are screened versus some qualitative indicators such as the presence of policies on environmental issues, business ethics and human rights and which aim to respect international norms and regulation as laid out in the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

In that respect, strong governance principles are key which is why the fund supports an independent, diverse board of directors and prefers that key committees such as audit, nominating and compensation committees be comprised of independent directors.

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.’



How did this financial product consider principal adverse impacts on sustainability factors?

Yes, The fund considers principal adverse impacts on sustainability factors as referred to in Annex I of the SFDR Delegated Act, both pre-investment as well as post-investment (see explanation above). Upon investment and over the life of the product, we assess and monitor indicators that are deemed to indicate the presence of a principal adverse impact as per EU law, as far as we are able to collect data. We address adverse impacts by reducing or completely sell the exposure to investee companies which score below average on the principal adverse impact indicators, and which don’t manage to improve on these indicators. When the AUM’s of the fund will increase above EUR 50 million, we intend to delegate voting rights to proxy voting companies.



What were the top investments of this financial product?

The list includes the investments constituting the greatest proportion of investments of the financial product during the reference period which is: 2022

Largest investments	Sector	% Assets	Country
IBM	<i>IT</i>	5,1437%	United States
UCB	<i>Health Care</i>	5,0058%	Belgium
TSMC	<i>IT</i>	4,9510%	Taiwan
MICROSOFT	<i>IT</i>	4,8784%	United States
KLA	<i>I</i>	4,7391%	United States
SCHNEIDER	<i>Industrials</i>	4,3920%	France
ACCENTURE	<i>IT</i>	3,8217%	Ireland
CISCO	<i>IT</i>	3,7598%	United States
INTUIT	<i>IT</i>	3,7027%	United States
AIR LIQUIDE	<i>Materialqs</i>	3,7014%	France
ASML	<i>IT</i>	3,6826%	The Netherlands
NOVO NORDISK	<i>Health Care</i>	3,5242%	Denmark
EQT AB	<i>Financials</i>	3,2467%	Sweden
UNILEVER	<i>Consumer Staples</i>	3,1922%	United Kingdom
PYPAL	<i>Financials</i>	3,1275%	United States

What was the proportion of sustainability-related investments?



The fund invests in direct holdings. In order to meet the environmental or social characteristics promoted, the fund generally invests about 70% of its assets in companies that fulfill the ESG criteria. Hence, 70% of the investments are aligned with the social or environmental characteristics. This includes at least 5% of the total investments that are qualified as Taxonomy-aligned sustainable investments. 30% of the investments do not incorporate any environmental or social characteristic.

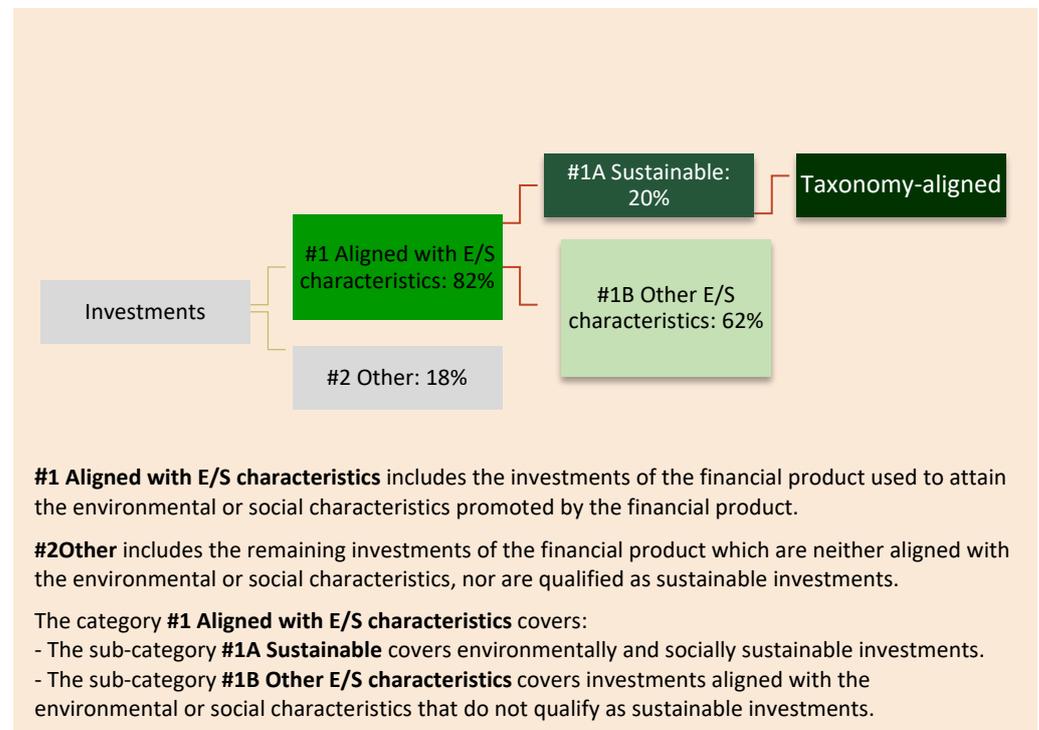
If we exclude the derivatives exposure that is used for hedging of the portfolio, about 85% of the portfolio was invested in investee companies, while the rest was held cash. 70% of the exposure to investee companies have an MSCI ESG rating in the category A, AA and AAA, while an additional 21% of the exposure was not rated by MSCI, but contain leading companies in sustainability. We had an exposure to 2 investee companies that are characterized as laggards with respect to ESG, namely Celsius Holdings and Interdigital. In the case of Interdigital, there is a clear lack of ESG data availability.

● **What was the asset allocation?**

86% of the portfolio was invested in investee companies (equities), while the rest of the portfolio comprises cash and derivatives for hedging purposes.

Asset allocation describes the share of investments in specific assets.

Of the investments, only 2.5% were invested in investee companies that are below the 50 percentile according to Bloomberg with respect to the Bloomberg ESG scoring peer group percentile ranking while 77% of assets



[include note only for the financial products referred to in Article 6, first paragraph, of Regulation (EU) 2020/852]

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

Enabling activities

directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are

activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:

- The sub-category **#1A Sustainable** covers environmentally and socially sustainable investments.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

were invested in companies above the 60 percentile meaning that the portfolio is clearly outperforming their peer group with respect to ESG.

Based on the EU Taxonomy **Eligible** Revenues, 20% of the investments in investee companies would qualify as sustainable investments. Please note that there is still a lack of data with respect to the EU Taxonomy.

● **In which economic sectors were the investments made?**

<i>Consumer Discretionary</i>	<i>6,19%</i>
<i>Consumer Staples</i>	<i>6,01%</i>
<i>Financials</i>	<i>6,34%</i>
<i>Health Care</i>	<i>9,03%</i>
<i>Industrials</i>	<i>6,77%</i>
<i>Information Technology</i>	<i>36,69%</i>
<i>Materials</i>	<i>8,85%</i>
<i>Real Estate</i>	<i>0,21%</i>
<i>Communication Services</i>	<i>1,78%</i>
<i>Utilities</i>	<i>0,29%</i>

We have no direct exposure to the Energy sector. Hence, there were no investments in the fund that derive revenues from the exploration & production of fossil fuels.

[include note for the financial products referred to in Article 6, first paragraph, of Regulation (EU) 2020/852

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies.
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.



To what extent were the sustainable investments with an environmental objective aligned with the EU Taxonomy?

As there continues to be some lack of data with regards to EU Taxonomy, we verify the percentage of the revenues of investee companies that are Taxonomy eligible, according to Bloomberg, as well as the percentage of revenue, capex and opex that are aligned with the EU Taxonomy according to the investee companies.

We had 38% of investee companies with EU Taxonomy eligible revenues. On average, the percentage of their revenues that were eligible was 50%. Based on the weight of the investee companies in the portfolio, 20% of the investments have EU Taxonomy eligible revenues.

With respect to the lack of data, we had only 50% of investee companies where we had data on the alignment with the EU Taxonomy.

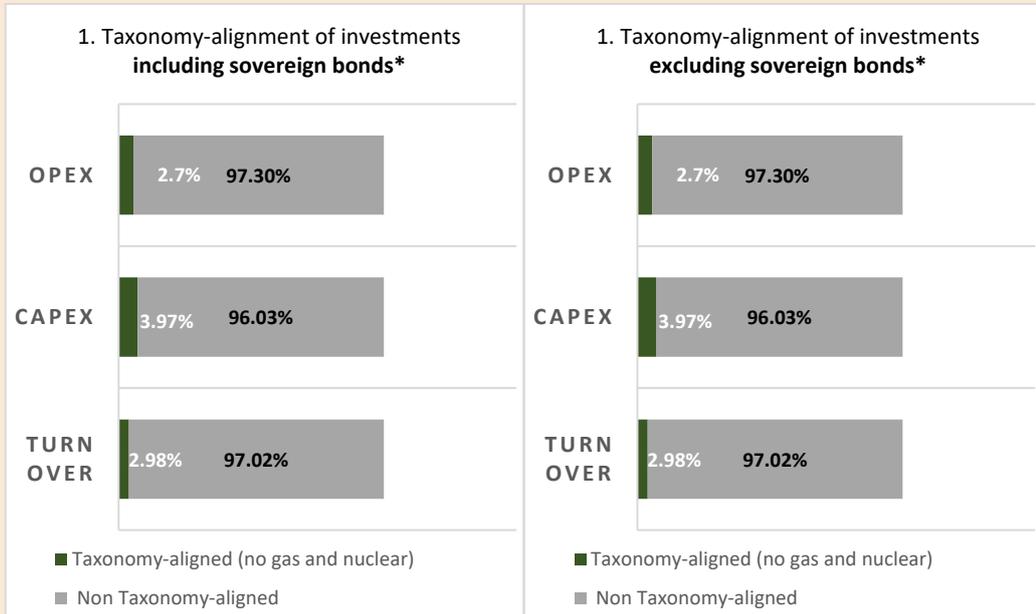
With respect to the Do No Significant Harm criteria, 35% of investee companies have indicated the they have undertaken a full assessment of the DNSH criteria with passing results, or that they report passing DNSH criteria using the Template for the KPI's of Non-Financial Undertakings from Annex II of the Commission Delegated Regulation (EU) 2021/2178.

● Did the financial product invest in fossil gas and/or nuclear energy related activities complying with the EU Taxonomy¹?

- Yes: *[specify below, and details in the graphs of the box]*
 - In fossil gas In nuclear energy
- No

¹ Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

The graphs below show in green the percentage of investments that were aligned with the EU Taxonomy. As there is no appropriate methodology to determine the taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.

[include note for the financial products referred to in Article 6, first paragraph, of Regulation (EU) 2020/852 that invest in environmental economic activities that are not environmentally sustainable economic activities]

 are sustainable investments with an environmental objective that do not take into account the criteria for environmentally sustainable economic activities under Regulation (EU) 2020/852.

- **What was the share of investments made in transitional and enabling activities?**

Please note that again data is lacking, hence the results are not representative.

The share of investments made in transitional activities was as follows:

Expressed as a share of Turnover : 0.00%

Expressed as a share of CapEx : 0.54%

Expressed as a share of OpEx : 0.04%

The share of investments made in enabling activities was as follows:

Expressed as a share of Turnover : 2.09%

Expressed as a share of CapEx : 1.61%

Expressed as a share of OpEx : 2.54%

- **How did the percentage of investments that were aligned with the EU Taxonomy compare with previous reference periods?**

The figures were substantially higher than in the initial report, but we believe this is meaningless due to the lack of data.



- **What was the share of sustainable investments with an environmental objective not aligned with the EU Taxonomy?**

We can't give a figure of the the share of sustainable investments with an environmental objective not aligned with the EU Taxonomy as the determination of what is a sustainable investment with an environmental objective happens on the level of activities, not at a company level. Hence, there are two approaches that we have followed. One is based on the EU Taxonomy, but as mentioned, there still lacks a lot of data. The results have been given earlier in this report. The other approach uses data from Clarus Risk, which is a specialised data provider. The approach of Clarus Risk calculates the alignment to the 17 SDG's on two levels, namely the SDG Product Alignment (This assessment estimates companies' revenue from products and services, addressing relevant SDGs or from products and services with potentially adverse impacts towards the goals) and the SDG Operational Alignment (This evaluates the extent to which companies' operations could result in a positive or negative impact in addressing each SDG by taking into consideration: internal policies, targets, and practices; trends in quantitative performance metrics, involvement in operations with significant adverse impacts, and events with a negative impact towards achieving SDGs).



- **What was the share of socially sustainable investments**

We consider the following SDG's as socially based, namely

SDG 1: No Poverty : 4,4% of the portfolio was aligned ; 1,1% misaligned

SDG 3: Good Health and Well-being: 6.8% aligned ; 1,4% misaligned

SDG 4: Quality Education: 0% aligned ; 6,7% misaligned

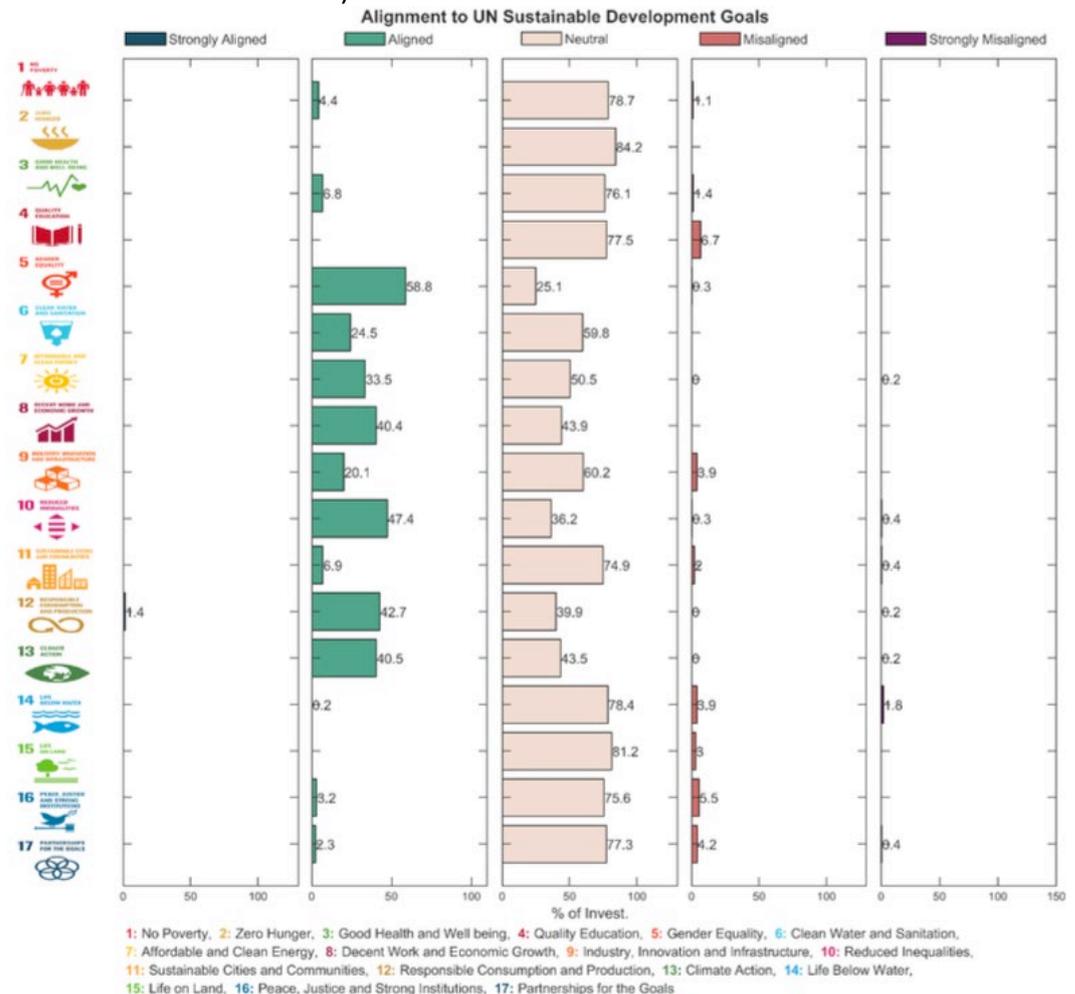
SDG 5: Gender equality: 58,8% aligned ; 0.3% misaligned

SDG 8: Decent Work and Economic Growth: 40.4% aligned ; 0% misaligned

SDG 10: Reduced Inequalities : 47,4% aligned ; 0,7% misaligned

SDG 16: Peace, Justice, and Strong Institutions : 3,2% aligned ; 5.5% misaligned

Please find below the alignment of the portfolio on the 17 SDG's. Overall, it is clear that on average, the alignment to social SDGs is much higher than the misalignment (aligned = 19,6% average versus misaligned 2,1% average). Please note that the percentages of alignment add up to about 84%, which is the percentage of the portfolio invested in investee companies, while the remaining 16% is cash and derivatives).



What investments were included under “other”, what was their purpose and were there any minimum environmental or social safeguards?

The investments included under “other” are the cash and derivatives for hedging purposes.



What actions have been taken to meet the environmental and/or social characteristics during the reference period?

We kept the same approach as we have had since the launch of the fund, namely selecting companies by screening them with the available tools we have in order to verify their ESG profile. Hence, we didn't had to amend the portfolio to meet environmental and/or social characteristics.