Statement of no consideration of principal adverse impacts decisions on sustainability factors

Miria Asset Management Limited

Version	Updated on	Comments
1	22nd December 2022	
1 bis	29th July 2024	Rebranded
2	29th June 2026	Revised statement

Statement

This Statement sets out disclosures by Miria Group in respect of the principal adverse impacts of its investment decisions on sustainability factors.

The EU Sustainable Finance Disclosure Regulation ("SFDR") provides a framework for achieving greater transparency on how financial market participants and advisers consider the principal adverse impacts ("PAIs") of their investment decisions on sustainability factors. Under Article 4 of SFDR, Miria Group is required either to publish information on how it considers the PAIs of its investment decisions on sustainability factors or, alternatively, to explain the reasons why it does not currently consider such adverse impacts.

Miria Group does not currently consider the PAIs of its investment decisions on sustainability factors and, in compliance with Article 4(1)(b) of SFDR, this Statement sets out the reasons why it does not do so.

Data availability: Miria Group has examined the mandatory PAI indicators set out in Annex I of the SFDR Delegated Regulation (EU) 2022/1288, including greenhouse gas emissions, carbon footprint and biodiversity impacts, amongst others. Having assessed available third-party data providers and the quality and coverage of data available in respect of the asset classes and geographies in which Miria Group's funds invest, Miria Group has concluded that the data required to measure reliably and consistently the mandatory PAI indicators is not yet sufficiently available or of adequate quality across the relevant investment universe to permit objective and meaningful disclosure. Miria Group continues to monitor the evolution of data availability in this area.

Proportionality: Given the size of Miria Group, the nature and scale of its activities, and the profile of its investment funds under management, Miria Group considers that full compliance with the PAI regime would at present be disproportionate relative to the resources and infrastructure that would be required to implement it in a meaningful and accurate manner.

Existing ESG integration: Miria Group has in place ESG policies and procedures that are appropriate and proportionate to its investment strategies. Whilst these do not constitute formal PAI consideration within the meaning of Article 4(1)(a) of SFDR, they reflect Miria Group's commitment to responsible investment and inform its investment decision-making process.

Miria Group will review this Statement and its decision not to consider PAIs annually, This review will take into account, among other things, developments in PAI data availability, changes in the scale and scope of Miria Group's activities, and any amendments to the applicable regulatory framework, including any changes arising from the ongoing review of SFDR by the European Commission.