



## **No consideration of adverse impacts of investments decisions on sustainability factors**

This document sets out disclosures by Alma Europe Ltd. (the “Company”), in respect of the principal adverse impacts of our investment decisions on sustainability factors.

The EU Sustainable Finance Disclosure Regulation (“**SFDR**”) requires the Company to make a “comply or explain” decision whether to consider the principal adverse impacts (“**PAIs**”) at entity level, in accordance with a specific regime as outlined in SFDR. The Company has decided not to comply with that SFDR regime. The Company is therefore required to publish and maintain on our website a statement to explain our reasons for not complying with the PAI regime in SFDR.

### **1. Non-compliance with the PAI regime in SFDR**

1.1. The Company has carefully evaluated the requirements of the PAI regime in Article 4 SFDR

1.2. The Company is supportive of the policy aims of the PAI regime, to improve transparency to clients, investors, and the market, as to how financial market participants integrate consideration of the adverse impacts of their investment decisions on sustainability factors. However, taking account of the Company's size, the company considers that it would be disproportionate to comply with the specific regime in the SFDR.

1.3. In addition, the Company is also concerned about the lack of reasonably priced / readily available data to comply with many of the technical reporting requirements of the PAI regime, as we believe that issuers and market data providers are not yet ready to make available all necessary data for the PAI regime.

1.4. The Company will keep its decision not to comply with the PAI regime under regular review.