

Policy for the Integration of Sustainable Risks



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©GRUPO JOMAR® complies with what is established in the **ley 10/2010, de 28 de abril**, of Prevention of Money Laundering and Financing of Terrorism and its development regulations, approved by **Real Decreto 304/2014, de 5 de mayo**, its modification by **Real Decreto-ley 11/2018, de 31 de agosto**, and of **Real Decreto-ley 7/2021, de 27 de abril de 2021**, with the aim, among others, of incorporating the **Directiva (UE) 2015/849, de 20 de mayo**, that establishes additional obligations to those of the Spanish Law. It also complies with the **Directiva 2018/843** (Fifth Directive or AMLD 5), on the prevention of the use of the financial system for money laundering or terrorist financing, together with the **Reglamento 2015/847** about the information accompanying fund transfers, and the **Reglamento (UE) 2019/2088** of the European Parliament and of the Council of November 27, 2019.

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1. POLYCE OBJECTIVE

GRUPO JOMAR, S.L. (hereinafter, "GRUPO JOMAR®") is an entity dedicated to other Financial Activities, represented by Mr. José Martínez Romero before, The Executive Service of the Commission for the Prevention of Money Laundering and Monetary Offenses (**SEPBLAC**), is the Spanish Financial Intelligence Unit. The **SEPBLAC** is also the Supervisory Authority for the prevention of money laundering and the financing of terrorism. The corporate purpose of the GRUPO JOMAR® entity are mainly those established in, CNAE 6499. Other Financial Services, Except Insurance and Pension Funds N.C.O.P.

The Sustainable Development Goals (2015-2030) reached on September 25, 2015, also known by its acronym ODS, are an initiative promoted by the United Nations to give continuity to the development agenda after the Millennium Development Goals (ODM) this being a way of action for the Company to achieve ESG factors.

This Policy responds and establishes the scope of the obligations of its publication, in compliance with Regulation (EU) 2019/2088 of the European Parliament and of the Council of November 27, 2019, on the disclosure of information related to sustainability in the financial services sector.

2. APPLICALE AREGULATIONS

In particular, and without prejudice to any other rule or recommendation by the supervisor that does not have the rank of officer on the date of approval of this policy and that may be applicable, the Policy is governed by:

- Regulation (EU) 2019/2088 of the European Parliament and of the Council, of November 27, 2019, on the disclosure of information related to sustainability in the financial services sector.

3. SCOPE OF APPLICATION

This Policy is applicable, and must be known by all Collaborating Partners, Directors, Managers, Employees, and other people linked to GRUPO JOMAR®.

4. DEFINITIONS

4.1 Factors ESG

Environment, Social and Government (ESG), are understood as all information related to environmental and social issues, as well as those related to personnel, and with respect for human rights and the fight against corruption and bribery.

The Environmental Factor (E) covers the direct or indirect effect that the activity of the companies has on the environment.

The Social Factor (S) It includes the impact that a certain company has on its social environment, on the community.

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The **Governance Factor (G)** considers the impact of the shareholders themselves and the administration and is based on issues such as the structure of the boards of directors, the rights of the shareholders or transparency, among others.

4.2 Criteria ISR

Socially Responsible Investment (ISR) to investment that not only considers profitability, but also social or environmental impact.

4.3 Criteria RSC

Corporate Social Responsibility (RSC) to the active and voluntary contribution by companies to improve human rights, the social, economic, and environmental environment, respectively.

4.4 Sustainable Investments

Investments have this consideration in:

- An economic activity that contributes to an environmental objective, measured, for example, through key resource efficiency indicators related to the use of energy, renewable energy, consumption of raw materials, water and land, production of waste and emissions greenhouse gases and impact on biodiversity and the circular economy or;
- An economic activity that contributes to a social objective, and in particular, any investment that contributes to fighting inequality.
- Any investment that reinforces social cohesion, social integration and labor relations, or any investment in human capital or in economically or socially disadvantaged communities; provided that the investments do not significantly harm any of these objectives and the beneficiary companies follow good governance practices, in particular with regard to sound management structures, employee relations and relevant staff remuneration. tax obligations.

It consists, therefore, in adding to the financial analysis, an analysis of the risks and opportunities for the entity, which involve environmental, social, and corporate governance aspects for better decision-making.

An environmental objective is understood as the following:

- Adaptation to climate change.
- Climate change mitigation.
- Transition to a circular economy.
- Prevention and control of contamination.
- Sustainable use and protection of water and marine resources.
- Protection and recovery of biodiversity and ecosystems.

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5. INTEGRATION OF SUSTAINABILITY RISKS

GRUPO JOMAR® becomes aware of the importance of ESG factors in order to achieve the Sustainable Development Goals "ODS" (2015-2030), basing decision-making on financial factors and, additionally and progressively, on ESG factors.

Therefore, GRUPO JOMAR®, in its Investment Decision Making Procedure, may incorporate said ESG criteria in portfolio management and investment advice activities, based on external information sources, among others, Bloomberg, Interactive Brokers, being able to turn to other providers to complement the quality of the information. The data will serve as the basis in the qualitative analysis process of investment products, together with the financial elements that weights in the process of selecting a product and are taken into consideration to a greater or lesser extent.

The integration of the ESG criteria in the investment decision-making of the GRUPO JOMAR® entity will be carried out by combining the financial criteria to assess the suitability or not of the investment.

In the Investment Decision-Making Procedure, and depending on the sector to which they belong, GRUPO JOMAR® may monitor indicators related, but not limited, to aspects such as the following criteria:

- Corporate Social Responsibility (RSC).
- Socially Responsible Investment (ISR).
- Environment, Social and Government (ESG).

6. OUR EXCLUSION POLICY

Additionally, the GRUPO JOMAR® Entity applies an exclusion policy, not investing in companies linked to certain types of activities, such as, for example:

- **Prohibited weapons:** We do not invest in companies that produce, store, distribute, trade, or sell landmines or cluster bombs.
- **Thermal coal:**
 - We do not invest in companies producing thermal coal.
 - We do not invest in power plants that generate electricity from coal.
 - We do not invest in thermal power plants when using these fossil fuels.
- **Bituminous sands:** We do not invest in companies dedicated to the extraction of oil from tar sands, its derivatives, or transporting it through pipelines, or otherwise.
- **Bituminous slate:** We do not invest in mining companies or related to this sector to be able to produce oil, through different chemical processes.

7. CONTROL AND DOCUMENTARY REVIEW

This Policy will come into effect from the date of its approval by the Board of Directors of the entity GRUPO JOMAR®. It may be subject to annual review or before, if necessary, this Policy described here may be modified, depending on the Legislative Regulatory requirements, or with the purpose of adapting said policy to the instructions issued by a regulatory change, or by any significant circumstance based on our activity.

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