

Investment Guidelines

The Momentum Malta Retirement Trust (“the Scheme”) can hold many different types of investment, subject to applicable regulatory investment restrictions and the following Scheme Investment Guidelines adopted by the Trustee:

- The Members Portfolio (“Portfolio”) must be constructed in a manner, which takes into account the underlying Members attitude to risk, assessed by considering the total risk and diversification of the Members Portfolio as a whole.
- Collective Investment Scheme(s) (“CIS”) or fund(s) are acceptable, provided when using a look through approach, the CIS or fund(s) within the Portfolio as a whole, has a number of underlying investments or funds which are themselves diversified by sector and/or geographically in a way to avoid accumulations of risk in the Portfolio as a whole. Investment in a single fund may be considered where the above requirements are met.
- Individual corporate/government bond(s) or equities are acceptable provided that no more than 10% of the Members total Portfolio value will be invested in any such individual investment, with the permitted percentage being based on the Portfolio value at the time of receipt of the investment instruction.
- No private funds or private company shares, including shares in a company where the Member, or a related person is a controlling shareholder.
- No direct immovable property assets are permitted.
- Derivative products or instruments for speculative purposes are not permitted, aside from those used within a CIS or fund(s) (excluding hedge funds or highly leveraged funds), or within existing structured products, which provide a level of underlying guarantees.
- Direct crypto-currency investments or collective investment schemes or funds heavily invested in crypto currency or cannabidiol or similar are not permitted. Additionally direct holdings of commodities are not acceptable.
- Fixed deposit interest account(s) may be acceptable, provided that the option to break-out of the fixed term is evidenced when submitting the instruction and the Member is aware a break-out penalty may apply. For short term fixed interest deposits (up to 6 months) where an early break-out option is not available, a maximum of 40% of the Members Portfolio will be considered.

Additional requirements

- Investments must be classified as suitable for a retail individual.
- Non-Retail investment(s) will only be considered at the discretion of the Trustees, where requested by the Member and if the requirements for the assessment of professional member, as defined in the relevant Maltese Pension Rules have been met.
- For the purpose of ensuring the Members Portfolio is properly diversified, the Portfolio as whole should be constructed to avoid exposure to any single asset (excluding a CIS or funds) sector or region.
- All new investment purchase instructions must be for clean investments¹.
- Acceptance or rejection of an investment is at the discretion of the Trustees, having carried out a reasonable assessment and as outlined in the Investment Policy in the Scheme Particulars.

¹Investments which do not provide for the payment of adviser commissions.

Please note: any defined terms within this document have the same meaning as those defined terms set out in the [Scheme Particulars](#) and this document should be read in conjunction with the Scheme Investment Policy in the Scheme Particulars.

Important to Note

The Scheme is a Member Directed Scheme in respect of investments. This means that the Member has responsibility for directing how their Portfolio and individual investments are invested. Members must appoint either a licensed regulated Investment Adviser and/or Investment Manager to assist them when directing their investments².

The Member and their appointed Investment Adviser/Investment Manager must ensure that all investments instructed are in line with the Investment Guidelines and the Scheme Investment Policy as outlined in the Scheme Particulars.

Members should be aware that the value of investments can fall as well as rise and are not guaranteed. Past performance is no guide to future performance.

The Trustees strongly recommend regular ongoing investment review meetings are held by a Member with their appointed Adviser and/or Investment Manager each year to review their Portfolio. This enables a Member to monitor the performance of their Portfolio on an ongoing basis and to ensure the Portfolio remains aligned to the Member's retirement goals and risk profile. Organising regular review meetings are the responsibility of the Member and their appointed Investment Adviser or Investment Manager to arrange. The Trustee or Administrator does not accept any liability for any impact on a Member's Portfolio or performance of the Portfolio by failing to hold regular investment review meetings or failing to take any action required over this time.

We encourage Members to also monitor their Portfolio including the individual investment values and investment transactions and fees, on an ongoing basis by:

- Accessing the Members Investment Provider online investment portal
- Accessing the Momentum Member Portal or
- Requesting a valuation statement and transaction statement from their Investment Adviser/Investment Manager or from Momentum directly.

Further information in relation to monitoring a Member's Portfolio can be found in the Investment Policy section of the Scheme Particulars which can be accessed [here](#).

There are a range of ESG (Environmental, Social, and Governance) Investment options available to invest in through CIS, funds and/or other investment types should a Member wish to do so. Members can seek advice from their Investment Adviser or through their Investment Manager regarding ESG investment options.

These Investment Guidelines do not override any additional legal requirement imposed on the promoter of an investment or Investment Adviser/Investment Manager, regarding any contractual requirement or any client classification rules imposed under law or regulation in the jurisdiction of the investment product manufacturer/fund manager and/or under the Members current jurisdiction at the time of promotion and/or investment. It is the responsibility of the Member and the Investment Adviser/Investment Manager to ensure any such requirement(s) are fully met before directing any investment.

²A Member may only direct investments without the assistance of an Investment Adviser/Manager where the Member is a professional member as provided in the Malta Pension Rules. Please refer to the Scheme Particulars for further information.