



Remuneration Policy

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Purpose

The remuneration policy of Investedge UCITS Sicav PLC (Investedge) applies to all employees. The policy reflects Investedge's objectives for good corporate governance as well as sustained and long-term value creation for shareholders. In addition, it ensures that

- Investedge is able to attract, develop and retain high-performing and motivated employees in a competitive, international market
 - employees are offered a competitive remuneration package
 - employees feel encouraged to create sustainable results and that a link exists between shareholder and employee interests
 - Investedge's focus areas are supported
- The policy focuses on ensuring sound and effective risk management through:
- a stringent governance structure for setting goals and communicating these goals to employees
 - including both financial and non-financial goals in performance and results assessments
 - making fixed salaries the main remuneration component

Corporate governance

Once a year, the Board of Directors monitors compliance with the remuneration policy and considers adjustments thereto.

At the annual performance and appraisal interview, the individual employees and managers evaluate and document performance and set new, documented goals. Decisions on adjustment of the employee's fixed salary or on performance-based pay are made on the basis of this meeting. Adjustment of material risk takers' fixed salary or on performance-based pay is based on the same process as above stated. The bonus pool is submitted for the review of the Board of Directors and approved once a year by the Board of Directors.

Remuneration components

The various remuneration components are combined to ensure an appropriate and balanced remuneration package that reflects the business unit, the employee's rank in Investedge and professional activity as well as market practice.

The remuneration components are

1. fixed remuneration (including fixed supplements)
2. performance-based remuneration (variable salary)
3. severance payment

The fixed remuneration is determined on the basis of the role of the individual employee, including responsibility and job complexity, performance and local market conditions.

The performance-based remuneration motivates and rewards the employees in case of outstanding performance of Investedge. The Board of Directors shall determine a maximum percentage of performance-based remuneration relative to the fixed remuneration. This percentage varies according to the type of position held. Performance based remuneration may be disbursed once a year as a cash bonus at the discretion of the Board of Directors.

Severance payments are payable in accordance with relevant employment laws and the employment contract.

Performance-based remuneration

Performance-based remuneration is awarded in a manner which promotes sound risk management and does not induce excessive risk-taking. It is not established in advance or specified in the employment contract and remains at the discretion of the Board of Directors. Disbursed as well as non-disbursed components are subject to claw back without compensation if granted on the basis of data which has subsequently proven to be manifestly misstated. Performance-based pay is awarded by ensuring:

- an appropriate balance between fixed and performance-based components
- that the fixed component represents a sufficiently high proportion of the total remuneration to make non-payment of the performance-based component possible
- that the performance-based component reflects the risk underlying the achieved result
- that awarded performance-based pay may be forfeited in full or in part if granted on the basis of unsustainable results (backtesting – as a minimum for employees who are identified as risk takers)
- that awarded performance-based pay may be clawed back if granted on a deliberately erroneous foundation

Performance-based remuneration pools must be based on an assessment of Investedge's budget performance and a number of KPIs reflecting the trend in Investedge's focus areas.

The KPIs cover the following:

- a) profit before tax compared with budget
- b) assessment of risk-adjusted return
- c) cost development
- d) change in customer satisfaction
- e) compliance with internal business procedures

The Board of Directors decides on the funds to be allocated to the performance-based remuneration pool. Investedge's control functions are involved to ensure that risk, capital and liquidity limits are not exceeded.

Performance-based pay is granted to reflect the individual employee's performance and departmental as well as Investedge results. A discretionary assessment is always made to ensure that other factors – also factors which are not directly measurable – are considered.

Risk takers and control functions

The remuneration of material risk takers and employees in control functions is subject to stricter conditions. Once a year, the Board of Directors identifies employees who may take material risks on behalf of Investedge.

Employees in control functions, including Internal Audit, Compliance and Risk Management are not eligible for performance-based pay. Employees in the credit and control functions receive remuneration in the form of fixed salaries only. Investedge ensures that employees in these functions receive competitive remuneration.

Remuneration of the Board of Directors

Members of the Board of Directors receive a fixed fee. Board members are not covered by incentive programmes and do not receive performance-based remuneration. The basic fee of a Board member is set at a level that is on par with the rest of the market and reflects the qualifications and contribution required in view of Investedge's complexity, the extent of the responsibilities and the number of board meetings. No pension contributions are payable on Board members' fees.

The fees of the individual Board members are specified in the annual report.

General

The Board of Directors may deviate from this policy in individual cases if justified by extraordinary circumstances.