



WEALTH FUND SERVICES

REMUNERATION POLICY

Wealth Fund Services Ltd Management Company complies with the law in relation to its size, internal structure, nature, scope and the complexity of its activities.

Concerning the design, approval and oversight of the remuneration policy:

- a. The company's remuneration policy encourages the alignment of the risks taken by its staff with those of the UCITS it manages, the investors of such UCITS and the management company itself; in particular, the remuneration policy duly takes into consideration the need to align risks in terms of risk management and exposure to risk
- b. The Board of Directors is responsible for approving and maintaining the remuneration policy of the management company, and overseeing its implementation. The Board of Directors also approves any subsequent material exemptions or changes to the remuneration policy and carefully considers and monitors their effects. Procedures to determine remuneration are clear, well-documented and internally transparent. For example, proper documentation is provided on the decision-making process, the determination of the identified staff, the measures used to avoid conflicts of interest, the risk-adjustment mechanisms used etc.
- c. In the design and oversight of the management company's remuneration policies, the supervisory function takes into account the inputs provided by all competent corporate functions (i.e. risk management, compliance, human resources, strategic planning etc.). As a result, those functions are properly involved in the design of the remuneration policy of the management company.
- d. Ultimately, the supervisory function ensures that the management company's remuneration policy is consistent with and promotes sound and effective risk management. The remuneration policy:
 - I. Is in line with the business strategy, objectives, values and interests of the management company
 - II. Does not encourage excessive risk taking as compared to the investment policy of the UCITS the management company manages, and

- III. Enables the management company to align the interests of the UCITS and their investors with those of the identified staff that manages such UCITS, and achieves and maintains a sound financial situation
- e. The supervisory function ensures that the management company's overall corporate governance principles and structures, as well as their interactions with the remuneration system are considered within the design and implementation of the management company's remuneration policies and practices. The supervisory function ensures that the following elements are taken into account: the clear distinction between operating and control functions, the skills and independence requirements of members of the management body, the role performed by internal committees, including the remuneration committee, the safeguards for preventing conflicts of interests and the internal reporting system and the related parties' transactions rules
- f. The remuneration policy is determined by the Board of Directors of the management company in the context of its supervisory role, which approves and reviews at least once a year the general principles of the remuneration policy and is responsible to oversee its implementation
- g. The implementation of the remuneration policy is subject at least once a year to a central and independent internal audit as far as the compliance with remuneration policies and procedures which have been determined by the Board of Directors are concerned
- h. Those members of staff who work at the supervisory function are compensated in relation to the level of achievement of the goals linked with their duties, completely independently of the performance of the business areas they supervise

Concerning the remuneration of members of the management body and supervisory function:

- a. The remuneration of the members of the management body is consistent with their powers, tasks, expertise and responsibilities
- b. Considering the size of the management company, its internal organization and the nature, scope and complexity of its activities, the management body does not determine its own remuneration. The supervisory function determines and oversees the remuneration of the members of the management body. To the extent compatible with the national law, the supervisory function also specifically approves and oversees the remuneration of senior executives and staff members who receive the highest amounts of total remuneration within the management company.
- c. In order to properly address conflicts of interests, members of the supervisory function are compensated only with fixed remuneration. When incentive-based mechanisms are in place, they are strictly tailored to the assigned monitoring and control tasks, reflecting the individual's capabilities and the achieved results.

Control Functions

Roles of control functions

The company ensures that control functions have an active role in the design, ongoing oversight and review of the remuneration policies for other business areas.

The control functions assist in determining the overall remuneration strategy applicable to the management company, having regard to the promotion of effective risk management.

The risk management function assesses how the variable remuneration structure affects the risk profile of the management company. For this purpose, the risk management function attends the meeting of the remuneration committee.

The compliance function analyses how the remuneration structure affects the management company's compliance with legislation, regulations and internal policies.

The internal audit function periodically carries out an independent audit of the design, implementation and effects of the management company's remuneration policies.

Remuneration of control functions

The remuneration level of staff in the control functions allows the management company to employ qualified and experienced personnel in these functions.

The remuneration structure of control functions personnel does not compromise their independence or create conflicts of interest in their advisory role to the remuneration committee, supervisory function and/or management body.

The remuneration of the senior staff responsible for heading the control functions is overseen by the supervisory function.

Control functions are not placed in a position where, for example, approving a transaction, making decisions or giving advice on risk and financial control matters could be directly linked to an increase or decrease in their performance-based remuneration.

Remuneration of the rest of the personnel

The total remuneration received by the rest of the personnel is comprised of fixed types of remuneration and is provided with no discrimination. Therefore, it is not considered to give incentives for risk taking.

The present remuneration system is designed with the aim to not promote excessive risk taking.