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# Remuneration System of

**Structured Invest S.A.,  
Luxembourg (“ManCo”)**

The remuneration system shall take into account the prevailing European law as the Directives 2014/91/EU and 2011/61/EU of the European Parliament and of the Council and the relevant implementing laws and apply to all employees including the identified staff. The remuneration system is in line with the business strategy, objectives, values and interests of the ManCo and the UCITS that it manages and of the investors in such UCITS, and includes measures to avoid conflict of interests. Furthermore the remuneration system is consistent with sound and effective risk management including sustainability risks as defined in Regulation (EU) 2019/2088 on sustainability disclosures and does not encourage risk taking which is inconsistent with the risk profiles, rules or instruments of incorporation of the UCITS that the management company manages. Therefore, relevant staff exposed to the specific risks have been identified and a number of risk factors are defined. The risk factors can be of qualitative or quantitative nature and include relevant environmental, social and governance aspects.

Remuneration for employees within the collective agreement is based on the applicable collective agreements and the works agreements as well as the individual employment or apprenticeship agreement. For employees out of the collective agreement provisions of the individual contracts are applied. The fixed salary is agreed in the employment contract. Employees out of the collective agreement are not entitled to special allowances or overtime compensation. The total annual salary (fixed salary plus incentive opportunity) is reviewed and if necessary adjusted yearly, usually in the 1st quarter with effect from January. Apprentices are subject to special regulations.

The remuneration system includes fixed and variable salary components as well as discretionary pension benefits. Bonuses will be paid in cash only. The ratio between fix and variable remuneration is limited. The variable remuneration must not exceed 100 % of the fix remuneration. For deferred compensations the following rule must be applied: If remuneration is risk-oriented, the latter must not be restricted or eliminated by hedging or other countermeasures. Guaranteed bonuses may be granted on an exceptional basis only. This might occur only in the context of hiring new staff and is limited to the first year of engagement.

In case of any changes of the legal framework the remuneration system will be adjusted accordingly to fulfill all relevant applicable requirements.

The compensation system for employees within the collective agreement is based on "13 + 0.9", for employees out of the collective agreement on "12+2". For purposes of variable compensation the system rests on four pillars (see chart) that are equally applicable to all employees within and out of the collective agreement, regardless of the division in which they work. Exceptions apply only to the Management of the ManCo.

Target Bonus	The bonus base value of variable compensation is fixed for each employee (0.9 – 2 monthly salaries)
Success Factor	The extent of the total pool must take account of value added in the course of the year, not only locally, but also group-wide (0 -1.5)
Individual Performance	The individual performance must be taken into account within the scope of the performance review process (appraisal; 0-200%)
Individual Bonus Amount	Amount disbursed within the bonus bandwidths, taking account of a management decision

The employees' performance and contribution to the ManCo's success will be rewarded with a bonus. This applies both to employees within and out of the collective agreement.

The basis for the variable compensation is the bonus base value. As described above, it will generally amount to 0.9 or 2 gross monthly salaries. For market reasons, higher base values may be agreed individually.

The bonus base value is determined as a rule by the gross salary drawn by the employee in the last month of the year for which the bonus is paid (for employees who leave in the course of the year, the last gross salary received serves as the basis). In case of employees whose employment begins or ends during the year (e.g. hiring, leaving, retirement, early retirement, transfer within the group, start / end of parental leave or suspension of employment for other reasons) the bonus base value will be calculated on the basis of the resulting cumulative working time factor (i.e. on a pro rata basis). This applies accordingly in case of a change to working hours in the course of a calendar year (e.g. a switch from full-time to part-time work). In case of early termination of a contract individual assessment of the bonus will be done by the Management in order to reflect performance achieved over time and to avoid rewarding failure.

The bonus will be determined each year. In all cases, the bonus shall be determined in accordance with the bonus base value and the employee's individual attainment of objectives and the available bonus budget based on the ManCo's performance.

Annual bonus budgets are thus made available to the ManCo. To calculate the annual budget, the Board of Directors of the ManCo determines a success factor on the basis of the business success, taking sustainability factors into account. The success factor is in a range from 0.5 to 1.5 if the ManCo does not make a financial loss. The success factor can be zero in case the ManCo makes a financial loss. The Board of Directors thus decides, based on how well the ManCo has achieved their targets, on how the overall bonus budget will be allocated to the ManCo.

Within the ManCo, the budget is distributed downward to the employees by the Management of the ManCo, taking into account the performance of

- the individual,
- the relevant business unit and
- the ManCo

based on the quantitative and qualitative targets.

Employees and their supervisors generally specify targets at the beginning of each business year at a performance review meeting (appraisal). Essential negative issues recognized in the appraisal can be taken into account in the following years. Accordingly, a multi-year framework is applied.

With a success factor of 1.0, the share of total compensation accounted for by the variable compensation with reference to the bonus base value maximal amounts to approximately 7% for the employees within the collective agreement and approximately 14% for the employees out of the collective agreement and, with reference to the maximum, to approximately 19% for the employees within the collective agreement and approximately 40% for the employees out of the collective agreement. With regard to the regulatory requirements for variable compensation, it therefore cannot be claimed that compensation depends to a significant extent on variable compensation; the compensation system is, as a whole, properly structured in accordance with the definition.

For the payout structure the current applicable regulations will apply (Deferral schemes). For identified staff any bonuses equal to or higher than a predetermined amount will be deferred by paying 40% of the variable compensation over a period of three years following the year of the initial bonus payment (60% year 1, 13.33% year 2, 13.33% year 3, 13.34% year 4). In case of a deferred compensation the variable remuneration including the deferred portion is paid or vests only if it is a sustainable according to the financial situation of the ManCo as a whole and justified according to the performance of the business unit and the individual concerned.

In the event of a significant individual violation of values or compliance rules the ManCo has the right to request from the employee the back-payment of the variable payment of the concerned period.

Quantitative and qualitative targets have to be used in a balanced way as criteria for the objective agreements for each individual employee.

Individual goals of employees in control functions reflect the performance of their own position. To avoid conflicting interests, they are independent of the success of the controlled units. Therefore financial goals have to be avoided where ever possible in order to guarantee the independence from the controlled units.

With the limitation of the variable compensation based on the bonus base value concept and an absolute limit the remuneration system avoids conflicts of interest as risk taking by employees is not incentivised. Special rules apply to employees in control functions as they are independent of the success of the controlled units.

The remuneration system is subject to the approval and the at least annual review by the Board of Directors. Additionally, the Board of Directors ensures the implementation of the remuneration policy.

The respective Compliance Officer reviews the application of the remuneration system on an at least annual basis.

Due to the size of the ManCo's business there is no remuneration committee in place. The Board of Directors covers the tasks of the remuneration committee.

Upon request, the remuneration policy provided free of charge in paper form by Structured Invest S.A.