

# Remuneration Policy

Updated on November 28, 2018

## Preamble

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The AIFM Directive and the UCITS Directive have focused on the remuneration policies of portfolio management companies applicable to categories of personnel whose professional activities have a substantial impact on the risk profile of the UCITS managed in order to ensure sound risk management and to allow control of the risk-taking behaviour of members of staff.

Moneta Asset Management has implemented - in accordance with UCITS 5 Directive - a remuneration policy and practices (the "Remuneration Policy") with a view to ensuring sound and efficient management of the risks which it has decided, on an extensive basis, to make applicable to all its permanent employees in order to prevent, manage and avoid conflict of interest situations and incompatible or inconsiderate risks with regard to the interests of investors in the UCITS under management.

The Remuneration Policy takes into account the organisational and operational requirements of Moneta Asset Management, as well as the nature, scope and complexity of its activities.

A paper version of this document is available free of charge upon request.

## Guiding principles

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Moneta Asset Management uses a number of guiding principles to ensure that the level of total variable remuneration allocated to all its employees leads to an alignment of interests between the portfolio management company and the investors in the UCITS under management.

These guiding principles are as follows:

- the remuneration policy is compatible with sound and efficient risk management and does not promote or encourage risk-taking that is incompatible, inconsiderate or excessive in relation to the risk profiles of the UCITS under management, their regulations or the instruments of incorporation of such UCITS;
- the remuneration policy is consistent with the economic strategy, objectives, values and interests of (i) the management company, (ii) the UCITS under management and (iii) the investors invested in these UCITS, and includes measures to detect, prevent, manage and avoid conflicts of interest;
- the remuneration policy and its guiding principles are adopted and reviewed annually by a remuneration committee. This committee, whose members are the co-CEOs and two independent members, is also responsible for the effective implementation of these guiding principles, which it oversees;

- the guaranteed variable remuneration only occurs on an exceptional basis when a new member of staff is hired, and only during the first year;
- the variable remuneration is only paid or acquired if it is compatible with the financial situation of the portfolio management company;
- staff are required to undertake not to use personal hedging strategies or compensation or liability insurance that may conflict with the impact of alignment on the risk embedded in their compensation arrangements;
- variable remuneration is not paid through instruments or methods that facilitate circumvention of the requirements established by the regulatory framework in force.

### **Implementation of the remuneration policy in line with the guiding principles**

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The application of the above guiding principles is reflected by:

- Identification of the scope of the personnel concerned: in order to ensure consistency of treatment, the Management of Moneta Asset Management has decided to subject its remuneration policy to the entire staff of the Management Company;
- The annual written evaluation of all Moneta Asset Management employees sets the qualitative objectives to be achieved, which are decisive for future remuneration and promotion;
- Identification of the types<sup>1</sup> of remuneration paid by the asset management company, distinguishing between fixed and variable remuneration;
- The definition of qualitative criteria for the allocation of variable remuneration: it should be specified that the variable remuneration of employees is not directly linked to the performance of the UCITS managed but solely to the quality of their work over the long term and their involvement in transversal tasks;
- The determination of the terms of payment of the variable remuneration (in year N or deferred);
- Definition of the identity of the persons responsible for the allocation of remuneration: Moneta Asset Management's Management Committee is responsible for the preparation of remuneration decisions. It carries out an annual review of the various elements of the remuneration policy.

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<sup>1</sup> Dividends received by shareholders or remuneration in the form of profit-sharing from the portfolio management company do not fall within the scope of the remuneration policy.