



# Remuneration Policy

iM Global Partner Asset Management

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# Preamble

In accordance with the regulations resulting from Directive 2014/91/EC (known as "UCITS V"), guidelines of the European Securities and Markets Authority ESMA/2016/5799 and Annex II to Directive 2011/61/EU, iM Global Partner Asset Management has drawn up this remuneration policy. Its objectives are to promote the alignment of interests between investors, the management company and its employees, as well as the sound and effective management of the risks of the managed portfolios and the management company, taking into account the nature, scope and complexity of iM Global Partner Asset Management's business.

This Remuneration Policy also takes into account requirements deriving from the European Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial sector (SFDR).

## 1. Scope of identified staff

In accordance with the regulations in force, the Identified Staff includes employees whose professional activity may have a significant influence, by their decisions, on the risk profile of the management company and / or the products managed.

Identified Staff includes:

- the investment management team,
- the teams associated to Sales,
- the risk & compliance control teams.

## 2. Principles of staff remuneration

The remuneration of iM Global Partner's staff consists of the following:

- a fixed remuneration,
- variable compensation, which rewards individual and collective performance.

If applicable, a profit-sharing plan for the creation of value of the company may be set up in the form of free shares, options or other equivalent schemes.

Fixed remuneration is a sufficiently high proportion of total compensation that a fully flexible policy can be exercised in terms of variable compensation, including the possibility of not paying any variable compensation.

The reference period used for the assessment of the employees and the measurement of their individual and collective performance in order to determine the variable remuneration corresponds to the calendar year.

## 3. Governance

The Remuneration Policy is defined and adopted by the management of the Management Company.

The implementation of the Remuneration Policy is subject to the internal auditor's evaluation in accordance with the internal audit plan in place, who verifies that this implementation complies with the Policy.

In accordance with article Article 111b of the Luxembourg law dated 10 May 2016 and Article 12 of the 2013 Law, pursuant to the principle of proportionality, the management company has not set up a remuneration committee.

## 4. Allocation of variable compensation

The Remuneration Policy provides for the allocation of variable compensation to Identified Staff on a discretionary basis decided by management.

Compliance with internal regulations, procedures and organizational policies is considered for the allocation of variable compensation.

The variable compensation takes into account the qualitative and quantitative criteria specific to each of the persons and functions concerned and is the subject of an annual evaluation during the end-of-year interview. During the annual evaluation, the alignment of action with iM Global Partner's values (ENTREPRENEURIAL SPIRIT / LONGEVITY / RESPECT WITH CHALLENGE / INTEGRITY) is assessed.

In particular, the alignment with the LONGEVITY value takes also into account, in accordance with Article 5 of SFDR, qualitative achievements related to the environmental or social characteristics of the investments and the sustainability risk of the portfolios managed completed by quantitative criteria for the portfolios having specific sustainability risk objectives and constraints.

The Company ensures that the measurement of performance used to calculate the amount of variable remuneration to be allocated to the Staff members is determined by taking into account the full range of current and potential risks associated with activities undertaken. The total amount of remuneration shall be based on a combination of the assessment of the performance of the individual and of the business unit or fund concerned and of the overall results of the Company and the group.

In the furtherance of the abovementioned, the Company carries out on annual basis (by an external and independent company) a benchmarking of the level of salaries by function taking into account the cost of living which it takes into account for salary revaluations, particularly for lower salaries. The Company, eventually, privileges long-term remuneration in order to conserve/preserve its human resources.

The sales team can also benefit from a variable compensation indexed on the collection.

## 5. Method of payment of variable compensation

Beyond a threshold of two hundred thousand euros (200.000€), or equivalent in local currency, the variable compensation will be spread over a period of at least 3 years for at least 50% of its amount. Management reserves the right to reduce (or even cancel) the amount of compensation deferred in the event of fault or incompetence of the employee concerned or of the company's serious financial situation.

The company does not intend to pay any guaranteed variable remuneration although it may agree to do so in exceptional circumstances when an exceptional candidate is recruited, and they require a minimum bonus for the first year.

Staff are required to undertake not to use personal hedging strategies or remuneration- and liability related insurance- to undermine the risk alignment effects embedded in their remuneration arrangements.