

FINECO ASSET MANAGEMENT DAC REMUNERATION POLICY SUMMARY

Our Compensation Policy

This document has been prepared in order to summarise the Fineco Asset Management's (the Firm's) current remuneration policy. The policy is designed to ensure compliance with the remuneration related provisions of the UCITS Directive 2014/91/EU ("UCITS V Directive"), UCITS Regulations (being the European Communities Undertakings for Collective Investment in Transferable Securities) Regulations, 2011 and S.I. No.420 of 2015 – Central Bank (Supervision and Enforcement) Act 2013 (section 48(1)) (Undertakings for Collective Investment in Transferable Securities) Regulations 2015) and ESMA Guidelines on Sound Remuneration Policies under the UCITS Directive (2016/ESMA/575) ("ESMA Guidelines") (together the "Applicable Regulations").

Objectives of the policy

The policy has the objective of providing appropriate methods of remuneration to employees based on the work undertaken and the outcomes thereof. The policy aims to establish processes for remuneration of identified staff that are:

- (i) consistent with and promote sound and effective risk management,
- (ii) do not encourage risk-taking which is inconsistent with the risk profiles, rules or instruments of incorporation of the funds it manages, and
- (iii) do not impair the Firm's duty to act in the best interests of the shareholders of the Funds.

The remuneration policy is designed not to incentivise risky behaviour, which may have detrimental impacts to the performance of the firm or for its clients. The policy aims to ensure that employees are compensated in a manner which is appropriate to the Firm's size, internal organisation and the nature, scope and complexity of its activities.

Compensation of Employees

The compensation of employees is governed by the rules set out within the compensation policy. The compensation of employees can include both fixed and variable remuneration element. Any variable remuneration paid to employees is discretionary in nature and is tied to the performance of the firm, and the benefits provided to underlying unit holders.

Review of policy

The firm's remuneration policy is reviewed by the board of management a minimum of once per annum to ensure it is compliance with relevant legislation and remains appropriate to the Firm's size, internal organisation and the nature, scope and complexity of its activities.

A full version of the remuneration policy will be provided free of charge upon request to compliance@finecoassetmanagement.com. Alternatively, a request can be made in writing to the compliance officer at 1 Custom House Plaza, IFSC, Dublin 1.