

Remuneration policy

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I. Remuneration policy

ENTER TO EFFECT LAST VERSION	22/04/2021
Approved By Remuneration Committee	02/03/2021
Approved By FARAD I.M. Board of Directors	22/04/2021
Line Managers or departments involved	FARAD I.M. Board of Directors FARAD I.M. Conducting Officers Human Resources FARAD I.M. Compliance
Legal requirements	<p>In preparing this procedure, FARAD Investment Management S.A. (hereinafter "FARAD I.M.") has endeavoured to align its procedures with the relevant legal requirements and current best practice and it complies with the relevant remuneration principles in a way and to an extent that is appropriate to its size, internal organisation, and the nature, scope and complexity of its activities. FARAD I.M. has duly factored the continuous growth of assets under management, the number and types of managed funds and number of employees and other parties (delegates etc.) for the preparation of this procedure.</p> <p>In particular, this procedure is designed to satisfy the requirements of:</p> <ul style="list-style-type: none"> - CSSF Circular 10/437; - CEBS Guidelines on Remuneration Policies and Practices, dated December 10, 2010; - CSSF Circular 11/505; - EU Commission Recommendation 2009/384/EC of 30 April 2009 on the remuneration policies in the financial sector; - EBA Guidelines on sound remuneration policies (EBA/GL/2015/22); - UCITS V Directive: Directive 2014/91/EU (amending 2009/65/EU - Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 amending Directive 2002/92/EC and Directive 2011/61/EU (MIFID Directive)CSSF Circular 14/585; - Regulation (EU) 2019/2088 of the European Parliament Council of 27 November and of the C2019 (SFDR)

<p>Aim and application</p>	<p>Promoting sound and effective risk management and not inducing excessive risk-taking, in line with the Company's strategy, objectives, tolerated risk values and long term interests (in particular a sustainable growth prospects and protection of clients and investors). Remuneration policy is aligned with the company's ESG objectives, e.g. long-term resilience of the business strategy under ESG considerations and risk appetite to avoid conflicts of interest when business decisions are taken.</p> <p>As a consequence the variable remuneration can in no way limit the Company's financial basis and solidity.</p> <p>Remuneration policies and practices are applicable to all staff.</p>
<p>Accessibility</p>	<p>In accordance with the legal requirements, the procedure is available:</p> <p>To employees: paper and digital copy of the whole procedure is accessible to all employees at the registered office of FARAD I.M..</p> <p>To everybody: abstract on the website of FARAD I.M. and available at the registered office of the FARAD I.M..</p>
<p>Updating / Review</p>	<p>At least annually, and in the following cases:</p> <ul style="list-style-type: none"> - Change of applicable legislation; - Any new legal requirement; - Any other change that would have an impact on the procedure.
<p>Communication to the CSSF</p>	<p>Upon request of the CSSF</p>

a. Definitions

Fixed Remuneration

Salary, lunch vouchers, health insurance, pension fund (according to the applicable terms and conditions), Auto Leasing. Restrictions are set in Annex I.

Bonuses

Payments not included in the fixed remuneration.

Management Body

The governing body of FARAD I.M., meaning the Board of Directors of FARAD I.M..

Senior Management

The Conducting Officers of FARAD I.M. (the “Senior Management” or the “Senior Managers”).

Control Functions

Staff (other than Senior Management) responsible for risk management, compliance and internal audit. Currently in FARAD I.M. organisation it corresponds to Senior Management.

Remuneration Committee

The Remuneration Committee is appointed by the Management Body, and is composed by the two FARAD I.M. Conducting Officers, the Chief Executive Officer and the HR Officer.

When discussing the remuneration of FARAD I.M. Conducting Officers, the Remuneration Committee is exceptionally composed by the HR Officer and the Chief Executive Officer.

The Committee gathers annually or ad hoc, but could decide to organise a meeting in extraordinary situations. The Remuneration Committee assists FARAD I.M. Management Body and reports directly to it.

Risk Takers

Employees having a material impact on the institution's risk profile if they meet one or more of the following criteria¹:

Standard qualitative criteria: related to the role and decision-making power of staff members (e.g. staff is a member of a *Management Body*, is a *Senior Manager*, has the authority to commit significantly to credit risk exposures, etc.).

Standard quantitative criteria: related to the level of total gross remuneration in absolute or in relative terms. In this respect, staff should be identified if:

- their total remuneration exceeds, in absolute terms, EUR 500.000,00 per year; or
- they are included in the 0.3 % of staff with the highest remuneration in the institution; or
- their remuneration is equal or greater than the lowest total remuneration of *Senior Management* and other *Risk Takers*.

¹ Definition has been provided following the Regulatory Technical Standards as endorsed by the European Commission.

Within FARAD I.M. the *Risk Takers* are the staff responsible for heading the portfolio management, administration, marketing and sales persons capable of binding FARAD I.M. and taking decisions that materially affect the risk positions of FARAD I.M..

Material impact (or “Materiality Influence”)

Such as defined in the Preface section (page 5 of this Policy).

Deferral Period

The deferral period is the period during which variable remuneration is withheld following the end of the accrual period (period during which the performance of the staff member is assessed and measured for the purposes of determining its remuneration).

Retention Period

Period of time during which variable remuneration that has been already vested and paid out in the form of instruments cannot be sold.

Supervisory Function

The relevant persons or body or bodies responsible for the supervision of the Senior Management and for the assessment and periodical review of the adequacy and effectiveness of the risk management process and of the policies, arrangements and procedures put in place to comply with the regulatory obligations. Given the size of FARAD I.M., the supervisory function is fulfilled by the Management Body².

Instruments

Shares or equivalent ownership interests, subject to the legal structure of the institution concerned or share-linked instruments or equivalent non-cash instruments, in the case of a non-listed institution”

Malus

Arrangement that permits FARAD I.M. to prevent vesting of all or part of the amount of a deferred remuneration award in relation to risk outcomes or performances of FARAD I.M. as a whole, the business unit, the AIF or UCITS and, where possible, the staff member.

Malus is a form of ex-post risk adjustment.

Claw back

Contractual agreement in which the staff member agrees to return ownership of an amount of remuneration to FARAD I.M. under certain circumstances. This can be applied to both upfront and deferred variable remuneration. When related to risk outcomes, claw back is a form of ex-post risk adjustment.

² Possibility given following the definition of “Supervisory Function” in ESMA Guidelines on sound remuneration policies of 31 March 2016.

II. Preface

Remuneration consists of all forms of payments or benefits paid by FARAD I.M..

An employee's total remuneration package is determined on the basis of the role and position of the individual employee, professional experience, seniority, education, responsibility, job complexity, the results of FARAD I.M. and the individual's performance.

FARAD I.M. has for several years adopted a strategy and policy on Diversity and Inclusion.

The objectives of that Policy simply that the remuneration of individuals is set with no regard to gender, race, ethnic origin, political views, sexual orientation, age or other discriminatory factors.

FARAD I.M. constantly strives to promote equality within FARAD I.M. both with respect to employment, career development, promotions, and equal pay.

FARAD I.M. has implemented numerous initiatives to achieve its ambitions within diversity and equal pay and regularly performs internal reviews in order to ensure that FARAD I.M. lives up to the set strategy and targets.

FARAD I.M. identifies the identified staff, according to this Policy and any other guidance or criteria provided by competent authorities (the "Identified Staff"). FARAD I.M. shall be able to demonstrate to competent authorities how they have assessed and selected Identified Staff.

The following categories of staff, unless it is demonstrated that they have no material impact on the FARAD I.M.'s risk profile or on assets it manages should be included as the Identified Staff:

- Executive and non-executive members of the *Management Body* of FARAD I.M.;
- All members of the *Senior Management* of FARAD I.M., such as the Conducting Officers;
- Control Functions;
- *Risk Takers*;
- Other *Risk Takers* such as any employee receiving total remuneration in the bracket of *Senior Managers* and *Risk Takers* (if applicable), whose activities have a material impact on the investment fund's risk profile as managed by FARAD I.M..

When assessing the Materiality of Influence on FARAD I.M.'s risk profile or on an asset it manages, FARAD I.M. defines what constitutes materiality within the context of assets it manages. The materiality thresholds are those foreseen by legal and regulatory requirements.

FARAD I.M. follows certain criteria to check whether it is capturing the correct staff members including an assessment of staff members or a group, whose activities could potentially have a significant impact on FARAD I.M.'s results and/or balance sheet and/or on the performance of the portfolios/assets it manages.

FARAD I.M. performs an analysis of job functions and responsibilities in order to manage the risk profile.

III. Contents

Art. 1 Risk management

1. FARAD I.M. promotes sound and effective risk management. FARAD I.M. does not encourage risk-taking which is inconsistent with the risk profiles of the instruments it manages. FARAD I.M. encourages the achievement of sound and effective long-term risk management objectives from the point of view of ESG considerations.
2. In depth the strategy includes quantified risk tolerance levels with a multi-year horizon. FARAD I.M. has a proper balance between variable and Fixed Remuneration, based on the measurement of performance. FARAD I.M. aligns its remuneration policy with its interests and the interests of the assets managed and their investors.
3. In order to prevent excessive risk-taking, managers consider conservative valuation policies and do not ignore concentration risks and risk factors, such as liquidity risk and concentration risk that could place the assets, insurance policies and portfolios that FARAD I.M. manages under stress at some point in the future.

Art. 2 Supervision

1. In the context of the supervisory review process, the CSSF assesses the risks FARAD I.M. is or may be exposed to, including the risks associated with the remuneration Policy (and practices), examining to what extent internal processes as well as internal and prudential own funds ensure an adequate management and coverage of these risks.
2. The statutory auditor shall make a report to the Board of Directors of FARAD I.M. of any material deficiencies uncovered during the assessment of the implementation of the remuneration policy.

Art. 3 Remuneration Committee Rights and Duties

FARAD I.M. Remuneration Committee:

- a) is responsible for the preparation of decisions on remuneration to be taken by the Management Body in particular regarding the remuneration of identified staff.
- b) provide its support and advice to the Management Body on the design of FARAD I.M.'s remuneration policy;
- c) support the Management Body in overseeing the remuneration policies, practices and processes and the compliance with the remuneration policy;
- d) check whether the existing remuneration policy is still up to date and, if necessary, make proposals for changes;
- e) ensure the adequacy of the information provided to shareholders on remuneration policies and practices, in particular on a proposed higher maximum level of the ratio between fixed and variable remuneration;
- f) assess the mechanisms and systems adopted to ensure that the remuneration system properly takes into account all types of risks, liquidity and capital levels and that the overall remuneration policy is consistent with and promotes sound and effective risk management and is in line with the business strategy, objectives, corporate culture and values and the long-term interest of the institution;
- g) assess the achievement of performance targets and the need for ex post risk adjustment, including the application of malus and claw back arrangements;
- h) directly oversee the remuneration of the senior officers in the independent control functions, including the risk management and compliance functions;

Furthermore, FARAD I.M. Remuneration Committee has:

- the access to all data and information concerning the decision-making process of the Management Body on the remuneration policies and practices design and implementation, oversight and review;
- have adequate financial resources and access to all information and data from independent control functions, including risk management;

Art. 4 Business strategy- conflicts of interest

1. FARAD I.M. ensures that its business strategy is in line with this Policy, objectives, values and interests of FARAD I.M. and the assets it manages or the investors of assets, and includes measures to avoid conflicts of interest.
2. FARAD I.M. ensures that its control functions have put in place a periodic monitoring in order to mitigate and manage conflicts of interest deriving from short-term-oriented excessive ESG-related risk-taking, including greenwashing or miss selling of products.
3. The Management Body is responsible for approving and maintaining this Policy, and overseeing its implementation. Members of the Board who are part of the executive management are excluded from this Board role.
4. The following elements are taken into account by the Management Body : the clear distinction between operating and *Control Functions*, the safeguards for preventing conflicts of interests and the internal reporting system and the related parties' transactions rules.
5. The approval of this Policy and decisions relating to the remuneration of the members of the *Management Body* has to be assigned to the meeting of the Shareholders of FARAD I.M..
 The Management Body remains responsible for the proposals submitted to the meeting of the shareholders of FARAD I.M., as well as for the actual implementation and oversight of any changes to the remuneration policies and practices.
 The implementation of this Policy shall be reviewed on an annual basis by the *Management Body* that assess whether the overall remuneration system is compliant with national and international regulations, principles and standards, it also ensures that all agreed plans/programs are being covered; it also ensures that the remuneration payouts are appropriate, and that the risk profile, long-term objectives and goals of FARAD I.M. are adequately reflected.
 The relevant internal *Control Functions* are closely involved in reviewing the remuneration system of FARAD I.M..
 Where periodic reviews reveal that the remuneration system does not operate as intended or prescribed the *Management Body* puts in place a timely remedial plan.
 The periodic review of the implementation of the remuneration policies and practices may be partially or totally externally commissioned. FARAD I.M. may decide to outsource the entire review, by performing the review at least annually or carrying out at least annually an internal assessment not amounting to a full independent review.

Art. 5 Disclosure

1. This Policy is available to all employees, as the Policy is part of the manual of procedures.
2. This Policy has been made on a best efforts basis and to the extent possible, explaining every omission made.

3. In addition, details and relevant information on this Policy shall be disclosed (in the form of an independent remuneration policy statement) in the website of FARAD I.M., in particular on:
 - a. The decision-making process used for determining the remuneration policy;
 - b. The link between pay and performance;
 - c. Criteria used for performance measurement and risk adjustment;
 - d. Performance criteria on which the entitlement to shares, options or variable components of the remuneration is based;
 - e. The main parameters and rationale for any annual bonus scheme and any other non-cash benefits.

Art. 6 Governance

1. The *Management Body* fixes the principles of, approve and apply the Policy. The *Management Body* remains responsible for implementation of the Policy. Members of the *Management Body* that are part of the executive management are excluded from this role.
2. Yearly controls of the Policy are carried by the Remuneration Committee, which shall report on the outcome of this review to the *Management Body*. A copy of said reports shall be put at the disposal of the CSSF upon request.
3. The implementation of the Policy is, approved on annual basis subject to central and independent internal review for compliance with policies and procedures for remuneration adopted by the governing body.

Art. 7 Remuneration of Control Functions

1. FARAD I.M.'s employees engaged in *Control Functions* are qualified and experienced personnel and they are compensated according to the achievement of the objectives linked to their functions, independent of the performance of the business areas they control.
2. If staff in *Control Functions* receives variable remuneration, this is not determined solely by the FARAD I.M. -wide performance criteria but is based on function-specific objectives.
3. The remuneration structure of *Control Functions* personnel does not compromise their independence or creates conflicts of interest in their advisory role to the *Management Body*. If remuneration of the *Control Functions* includes a component based on FARAD I.M.-wide performance criteria, the risk of conflicts of interest increases and, therefore, it will be properly addressed.
4. The remuneration of the senior officers in the risk management and compliance functions is directly overseen by the *Management Body*
5. *Control Functions* should not be placed in a position where they are directly linked to an increase or decrease in their performance-based remuneration.

Art. 8 Remuneration structures

a) Assessment of performance

1. FARAD I.M. has a remuneration policy that includes a performance-related remuneration. In this case the total amount of remuneration is based on a combination of the assessment of the performance

of the individual and FARAD I.M.'s overall results. When assessing individual performance, financial and non-financial criteria are taken into account.

The assessment of performance is set in a multi-year framework (three to five years) in order to ensure that it's based on long term performance.

2. Performance-related remuneration includes parameters linked to the risks and performance of the FARAD I.M.'s business unit in addition to the risks and performance of the individual activities. The amount of variable remuneration a staff member is eligible for is determined by his/her individual performance, the performance of his/her business line concerned and the FARAD I.M.'s performance. The relative importance of each level of the performance criteria is determined beforehand and adequately balanced to take into account the position or responsibilities held by the staff member.
3. To have the greatest impact on staff behavior, the variables used to measure risk and performance are linked as closely as possible to the level of the decisions made by the staff member that is subject to the risk adjustment. Performance criteria include achievable objectives and measures on which the staff member has some direct influence.
4. FARAD I.M. can assess the "Identified staff's performance with specific indicators such as the effective employment of available resources, achievement of agreed objectives, contribution to company goals and values. This should be done whilst avoiding the limitation of the variable remuneration performance criteria exclusively to the achievement of results, and not on the sustained stability of the entity as a whole, at the expense of the overall wellbeing of the entity. The performance of the individual staff members must, of course, be assessed based on the specific circumstances of their employ, such as industry, branch, geographic, etc.
5. FARAD I.M. uses both quantitative as well as qualitative criteria in order to assess individual performance.
6. The appropriate mix of quantitative and qualitative criteria, specified and clearly documented for each level and category of staff, depends on the tasks and responsibilities of the staff member.
7. Quantitative measures should cover a period which is long enough to properly capture the risk of the staff member's actions.
8. In addition to quantitative performance measures, variable remuneration awards should also be sensitive to the staff's performance with respect to qualitative (non-financial) measures.
9. Examples are the achievement of strategic targets, investor satisfaction, adherence to risk management policy, compliance with internal and external rules, leadership, management, team work, creativity, motivation and cooperation with other business units and with *Control Functions*. Such determined qualitative criteria could rely on compliance with risk control measures such as for instance the audit results.
10. Negative non-financial performance, in particular unethical or non-compliant behavior, overrides any good financial performance generated by a staff member and diminishes the staff member's variable remuneration.
11. Remuneration payable under deferral arrangements vests no faster than on a pro-rata basis; in the case of a variable remuneration component of a particularly high amount at least 60% of the amount is deferred.

b) Guaranteed variable remuneration

FARAD I.M. does not award, pay or provide guaranteed variable remuneration unless it:

- is exceptional;
- occurs only in the context of hiring new staff;
- is limited to the first year of service.

FARAD I.M. ensures that variable remuneration is not paid through vehicles or methods employed which aim at or effectively lead to non-compliance with remuneration requirements for identified staff or, where applicable, for all staff.

c) Ratios between fixed and variable components of total remuneration

The fixed component represents a sufficiently high proportion of the total remuneration to allow the operation of a fully flexible policy on variable remuneration components including that variable remuneration can go down to zero.

Fixed Remuneration is in line with the level of education, the degree of seniority, the level of expertise and skills required, the constraints and job experience, the relevant business sector and region.

Fixed Remuneration for Conducting Officers is calculated in line with the above in a sound way, taking also into account the business of FARAD I.M. as well as the competencies, risks and responsibilities taken by each of the Conducting Officers. The variable remuneration of the Conducting Officers is proposed by the *Remuneration Committee* exceptionally composed by the HR Officer and the Chief Executive Officer.

Fixed and variable remuneration for members of the Board of Directors is fixed by the Shareholders meeting. The non-executive members of the Board of Directors receive a fixed fee only. The executive members of the Board of Directors do not receive a remuneration for their role as members of the Board of Directors.

Fixed and variable remuneration for the Chief Executive Officer is also fixed by the Shareholders meeting.

Variable remuneration which consists of units of shares or other participations is subject to an appropriate retention policy designed to align incentives with the interests of FARAD I.M. and the financial assets that it manages and the investors in those financial assets.

In any case, the variable remuneration is limited to a maximum amount that has been set by the *Management Body* as requested by CSSF Circular 10/437.

d) Payments related to early termination

FARAD I.M.'s payments related to the early termination of a contract (for staff members who are leaving FARAD I.M. due to changes in the strategy of FARAD I.M. or in the financial assets it manages, or in merger and/or takeover situations) reflect performance achieved over time and do not reward failure.

Severance pay is determined and approved, in line with the FARAD I.M.'s general governance structures for employment.

FARAD I.M. shall explain to competent authorities the criteria used to determine the amount of severance pay upon request.

Art. 9 Measurement of performance

FARAD I.M.'s measurement of performance used to calculate variable remuneration components, or pools of variable remuneration components, includes a comprehensive adjustment mechanism to integrate all relevant types of current and future risks.

Art. 10 Avoidance of the remuneration policy and practices

1. FARAD I.M. does not pay variable remuneration through vehicles or methods that facilitate the avoidance of the requirements as defined in this Policy.
2. The FARAD I.M.'s *Management Body* has the responsibility for ensuring that the ultimate goal of having sound and prudent remuneration policies and structures is not improperly circumvented.

Art. 11 Decisions on Bonuses

1. The proposal of any bonus shall always be a discretionary option for the *Remuneration Committee*. The regular and constant payment of a bonus, notwithstanding the number of years during which such bonus was granted, cannot create a vested right in favor of the Employee, neither for years to come nor for the calculation of any indemnity due to the Employee.
2. The company reserves the right, depending on the employee's specifications, to use different payment method, in line with the Luxembourg law (es. Contribution in loan interest).
3. FARAD I.M. shall withhold Bonuses entirely or partly when performance criteria are not met by the individual concerned, the department concerned or FARAD I.M..
4. In addition FARAD I.M. shall withhold Bonuses entirely or partly in case, prior to the payment of the Bonuses, FARAD I.M.'s situation deteriorates significantly (in particular where it can no longer be presumed that it can or will continue to be able to carry out its business).
5. The *Management Body* shall be able to require staff members to repay all or part of the Bonuses that have been awarded for performance based on data which was subsequently proven to be not compliant with the objective settings and company rules or policies.
6. The decision on the payment of the Bonuses according to the principles defined in this Policy shall be subject to the positive evaluation of the *Remuneration Committee*.
7. The *Remuneration Committee* identifies different types of Bonuses which, in relation to their value and associated risk, can be indicated as "material" and shall be reserved to the management (the "**Material Bonus(es)**"). Where a Material Bonus is awarded, in order to take into account the outstanding risks associated with the performance to which the bonus relates, the Material Bonuses will consist of and shall be deferred in compliance with the indications below:
 - a. First year - 20% of the Material bonus of which 10% in cash and 10% in shares or other incentive plans of FARAD I.M. approved by shareholders, paid/transferred within 45 days from the balance-sheet approval;

- b. Second year - 20% of the Material Bonus of which 10% in cash and 10% in shares or other incentive plans of FARAD I.M. approved by shareholders, paid/transferred within 45 days from the balance-sheet approval;
 - c. Third year - 20% of the Material Bonus of which 10% in cash and 10% in shares or other incentive plans of FARAD I.M. approved by shareholders, paid/transferred within 45 days from the balance-sheet approval;
 - d. Fourth year - 20% of the Material Bonus of which 10% in cash and 10% in shares or other incentive plans of FARAD I.M. approved by shareholders, paid/transferred within 45 days from the balance-sheet approval;
 - e. Fifth year - 20% of the Material Bonus of which 10% in cash and 10% in shares or other incentive plans of FARAD I.M. approved by shareholders, paid/transferred within 45 days from the balance-sheet approval.
8. The *Management Body* shall require the repayment (*Clawback*) - for an unlimited period of time - of the cash part of any Material Bonuses that have been awarded for performance based on data which was subsequently proven to be not compliant with the objective settings and company rules or policies.
 9. The performance measurement will be performed by the *Remuneration Committee* - on the basis of the relevant head of department evaluations - for all employees within February 28th of each year and using for each employee the format adopted by the *Remuneration Committee*.

Art. 12 Variable component on the total remuneration and composition

All bonus payments are conditioned to FARAD I.M.'s result after-tax being positive after payment of Bonuses and will be compliant with the rules and limitation adopted by the *Remuneration Committee* (in particular in terms of maximum amount, deferral and Deferral Period and nature).

Art. 13 Salary increase according to performance measurement and risk adjustment

1. Salary increase may be granted on the basis of the relevant head of department duly motivated proposal, upon final approval by the Remuneration Committee Salary increase shall take in consideration the assessment of the performance of the individual, and of the department concerned and of FARAD I.M. in a three year framework and in consideration of:
 - a. Financial performance;
 - b. Compliance with internal procedures and needs;
 - c. Compliance with the principles governing the relationship with clients.
2. In determining remuneration pools or individual awards, FARAD I.M. should consider the full range of current and potential risks associated with the activities undertaken. Moreover, ex-ante adjustments is applied to ensure that the variable remuneration is fully aligned with the risks undertaken. FARAD I.M. establishes whether the risk adjustment criteria they are using takes into consideration severe risks or stressed conditions.
3. FARAD I.M. determines to what level they are able to risk adjust their variable remuneration calculations quantitatively – whether to the business unit level or further down the line such as to a trading desk level, if any, or even to an individual level. FARAD I.M. determines the level of granularity that is suitable for each level.

4. In order to have a sound and effective remuneration scheme, FARAD I.M. uses a number of different quantitative measures based on an overarching risk adjustment framework for their risk adjustment process.
5. The quantitative ex-ante risk adjustments rely on existing measures within the FARAD I.M., generally used for other risk management purposes. As a result, the limitations and potential issues related to these measures should also be relevant for the remuneration process. The risk adjustments used benefit from the experience gained when dealing with these risks in other contexts and should be challenged like any other component of the risk management process. Qualitative measures for ex-ante risk adjustment.
6. Qualitative risk elements are considered by FARAD I.M.. Qualitative ex-ante adjustments could take place while setting unit remuneration pools or when determining or allocating individuals' remuneration. Qualitative ex-ante risk adjustments are common at pool and individual levels, contrary to quantitative adjustments which tend to be mostly observed only at the pool level. FARAD I.M. makes qualitative risk adjustments when allocating/determining individuals' remuneration through assessments that may explicitly include risk and control considerations such as compliance breaches, risk limit breaches and internal control break-downs.

IV. Annex I

Bonus Policy definition

Basis condition: gross profit (before taxes) exceeding 15% of the Company's invested capital³ and gross profit after payment of bonuses still positive.

Determination according to prorate on gross profit.

1st level (no material bonus)

Gross profit between 15% and 60% (total bonus 1st level)

Bonus in cash, paid after year-end Balance Sheet approval by the General Assembly, with a maximum of 3 times the monthly salary.

2nd level (material bonus)

Gross profit between 60% and 100% (total bonus 2nd level)

On top of the 1st level bonus, an additional bonus of maximum 3 times the monthly salary will be paid.

3rd level (material bonus)

Gross profit between 100% and 200% (total bonus 2nd level)

On top of the 1st and 2nd level bonus, an additional bonus of maximum 3 times the monthly salary will be paid.

4th level (material bonus)

Gross profit between 200 % and 300% (total bonus 2nd level)

On top of the 1st, 2nd and 3rd level bonus, an additional bonus of maximum 3 times the monthly salary will be paid.

The number of monthly salaries paid as bonuses is established by taking into account the position held and the seniority of each Employee.

The total number of monthly salaries will be paid as bonuses, according to the following table:

POSITION	0-1 Years	1-3 years	3-5 years	>5 years
Junior	x	1	1.5	2
Officer	x	1.5	2	2.5
Manager	1	3	3	3
Conducting Officer – Senior Management	3	3	3	3

Gross Salary Limit for Executive Directors and Senior Managers

The annual gross salary limit is fixed to the Executive Directors and Senior Managers at:

2021: limit of 150'000 Eur annual gross salary

2022: limit of 150'000 Eur annual gross salary

Car Policy

The company recognizes that we have an important role to play in the protection of the environment and sensible resource management.

³ Corporate capital plus share premium.

Consequently, sustainability runs through all aspects of our business, starting with energy-saving policies in our offices, and flowing to encourage to use the public transport and bicycles.

In case of a Car Leasing as remuneration advantage, for Directors and Senior Managers the monthly amount is fixed at maximum 1060,00 Eur HTVA.

The car CO2 emissions must stay below 110g/km, and choose between Hybrid, Electric or Diesel cars, in classic colors.

It is forbidden to have "Cabrio" and sports models or flashy colors.

In case of resignation, the employee is obliged to take in charge the Car Leasing and / or any transfer fees.