



Remuneration Principles

J. Safra Sarasin Fund Management (Luxembourg) S.A. (the “Company”) has established a remuneration policy (the “Remuneration Policy”) covering any type of remuneration paid by the Company, any amount paid by the investment funds managed by the Company (the “Funds”), including performance fees as well as any transfer of units or shares of the fund made for the benefit of the employees.

The Company pays fixed remuneration and discretionary variable remuneration to its employees. Variable remuneration, in particular bonus payment, is paid without a legal claim for an employee on such remuneration. The variable remuneration is paid at the sole discretion of the Senior Management of the Company in line with the applicable standards of the Group. No carried interest is paid either by the Funds or by the Company to the employees, thus it has not been taken into consideration as variable remuneration.

The Company’s philosophy is based on a transparent and sustainable approach to operating a performance-related compensation system based on the activities carried out by employees. Performance, ability, responsibility, training, experience and conduct are also taken into account when setting the salary. Comparisons with internal and external benchmarks are also used as a basis for setting the salary.

Compensation packages are based on sustainable, quantitative and qualitative performance measurement criteria which are as objective as possible, including the inherent risks, graded according to responsibility and position held. In other words, the higher the proportion of variable pay is set in the compensation packages, the greater the influence on the operating business and risk trends. For the avoidance of doubt, the quantitative and qualitative performance measurement criteria are modulated taking into consideration the different tasks of employees and situations which are given during the relevant performance assessment period.

This principles aims at aligning remuneration structure with prudent and adequate risk-taking and the above mentioned legal and administrative requirements. The Company takes a prudent and adequate risk-taking approach in accordance with EBA Guidelines EBA/GL/2015-22).

Portfolio Manager

The Company has delegated the portfolio management activities to third parties (“Portfolio Manager”). These activities have a material impact on the risk profile of the Funds. To mitigate the risk-taking caused by a variable remuneration, the Company has entered in agreements with the Portfolio Manager and covers any payments made as compensation for the performance of portfolio management of the Funds and on behalf of the Company.

The Portfolio Managers and where applicable, the sub-investment managers compliance with these agreements and the proper execution of the duties thereunder in the best interest of the investors are monitored by the Company.

Proportionality Principle

The Remuneration Policy is constructed taking into account the principle of proportionality. Criteria such as the size of the Company, internal organization, nature, scope and complexity of the business and the character of the Funds form the basis for the proportionality assessment. In line with the proportionality assessment the Company has not set up a remuneration committee.

Investors may obtain, free of charge, a copy of the current Remuneration Policy at:

J. Safra Sarasin Fund Management (Luxembourg) S.A.
11-13 Boulevard de la Foire
L-1528 Luxembourg
Grand Duchy of Luxembourg
Fax: +352 26 21 25 49
E-mail: jssfml_info@jsafrasarasin.com