

## Information on the Remuneration Policy (March 2021)

### **Introduction Remuneration Policy**

FundShare Fund Management ("FundShare") has a Remuneration Policy (the "Policy") based on the *Beloningsbeleid op basis van Wet beloningsbeleid financiële ondernemingen* (the Dutch Remuneration Policy (Financial Enterprises) Act). This policy applies to all FundShare employees and is in line with current social developments. In addition, the ESMA Guidelines on sound remuneration policies under the UCITS Directive and AIFMD apply to employees who can influence FundShare's risk profile. The latter regulation sets additional requirements and concerns identified staff.

The Policy is aimed at ensuring that employee rewards lead to optimal performance without creating undesirable risks or behavior with regard to the specific services to our clients (e.g. preventing participants from being treated with negligence) and the solidity of FundShare. FundShare strives for a simple and transparent remuneration policy.

The Policy is consistent with and promotes a sound and effective risk management culture, also to protect the value of the managed investment portfolios. It does not encourage risk-taking which is inconsistent with the risk profiles of the funds that FundShare manages or to engage in unwanted behavior concerning the specific services provided to our business relationships or otherwise incentivize employees to take undesirable risks.

FFM's remuneration structure following the Policy does not encourage excessive risk-taking with respect to sustainability risks. Remuneration awards – following an annual performance assessment - are position and function-specific and reflect the employee's contribution and performance.

### **Rewards**

FundShare pays all employees a fixed monthly fee that is independent of individual performance and profit targets. In addition, FundShare has the option to pay out variable rewards. The ratio between fixed and variable remuneration are distributed in a balanced way.

### **Fixed rewards**

The fixed component of the remuneration reflects the relevant work experience and organizational responsibility of the relevant employee. In principle, the fixed remuneration consists of 12 monthly salaries, the statutory holiday allowance and pension benefits.

No fixed expense allowances are given other than for commuting expenses and business use of mobile private telephones.

### **Variable Rewards**

In principle, a maximum of 20% of the annual salary applies to variable remuneration. In special cases this may be higher with due observance of the legal provisions. Variable remuneration is not guaranteed.

FundShare board members do receive variable remuneration, which is discussed and approved in a shareholder meeting.

Variable rewards are only awarded if the employee is positively assessed based on predetermined criteria and objectives of the employee and only if the financial situation of FundShare justifies it, taking into account its assessment of an external auditor. The variable remuneration of all the employees is calculated keeping into account the financial achievements of the company in the previous year, projected on the regulatory capital requirement for the next year. The variable remuneration may be paid partially in financial instruments and may be subject to retention and/or deferral over a period which deemed appropriate in light of the risks of the managed funds.

Variable remuneration paid out can be reclaimed for a maximum of the full amount if FundShare is of the opinion that the variable remuneration awarded afterwards turned out to be unjustified on the basis of incorrect or missing information at the time.

Variable remuneration to be paid that has already been promised can be reduced by a maximum of the full amount if the payment is not justified based on new information or reasonableness and fairness.

**Identified staff**

The following staff members qualify as identified staff: the board members, the head of the investment management functions and the head of internal control activities. All these functions are, in general, eligible to receive variable remuneration. When determining criteria and targets for the allocation of the variable remuneration of these identified staff members, the specific role and function of the mentioned functions within the organization is taken into account.

Employees engaged in control functions are compensated in accordance with the achievements of the objectives linked to their function and in such a way that their objectivity and independence is not compromised.

**Remuneration policy decision-making**

The remuneration policy is drawn up by the Board of Directors. Because FundShare is a relatively small company with fewer than 20 employees, no remuneration committee is set up. FundShare also does not have a Supervisory Board. That is why the remuneration policy is coordinated with the Compliance Officer.

**Amendments policy**

At least annually, it is assessed whether the remuneration policy complies with the requirements of the board of management, applicable laws and regulations and the interests of FundShare's clients. It is assessed whether the remuneration can encourage undesirable behavior and whether the remuneration policy provides for appropriate measures.