

## Remuneration Policy Statement

The purpose of this Remuneration Policy Statement is to provide to investors details on the Generali Investments Luxembourg S.A. ("GIL") Remuneration Policy which is in accordance with Directive 2009/65/EC which applies to all UCITS Funds under its management and Directive 2011/61/EU for Alternative Investment Funds (AIFs) under its management, together referred as "**the Funds**". In accordance with current best practice and the relevant Luxembourg regulatory framework such as Directive 2014/91/EU of 23 July 2014 (UCITS V), Commission Recommendation 2009/384/EC of 30 April 2009 on remuneration policies in the financial sector (Recital 5 UCITS V), ESMA guidelines on sound remuneration policies and practices in the asset management sector, Regulation (EU) 2019/2088 on sustainability-related disclosure in the financial services sector (SFDR), GIL, as Management Company subject to Chapter 15 of the law of 17 December 2010 and AIFM subject to the Law of July 12, 2013, applies remuneration which is consistent with effective risk management, on the basis of the following policy statement. A paper copy of the Remuneration Policy Statement is available free of charge upon request.

### 1. Purpose and scope of the Remuneration Policy

The Remuneration Policy of Generali Investments Luxembourg S.A. has been designed to align the personal objectives of staff with the risk-appetite, values and long term interests of GIL and the Funds under its management. It aims at mitigating incentives practices which may encourage employees to take unnecessary risk. The Policy applies to a certain category of staff called the identified staff, and whose activities have a material impact on the risk profiles of the GIL or the Funds under its management. The following GIL categories of staff are considered as identified staff, after taking into account the clear distinction between operating and control functions, the skills and independence requirements of members of the management body, the role performed by internal committees, including the remuneration committee, the safeguards for preventing conflicts of interests and the internal reporting system and the related parties' transactions rules.

Senior and executive management:

- Directors
- Conducting Officers
- Compliance Officer

Other Risk Takers: None

### 2. Measures implemented in order to promote sound and effective risk management, align the interests of the individuals and GIL and avoid excessive risk taking

The Remuneration Policy of GIL has been designed to:

- Be in line with the business strategy, objectives, values and interests of GIL;
- Not encourage excessive risk taking as compared to the investment policy of the Funds which are managed by GIL; and
- Enable GIL to align the interests of the Funds and their investors with those of the identified staff that manages such Funds, and to achieve and maintain a sound financial situation.

### 3. Description of the structure of remuneration

GIL recognizes and rewards its employees with an opportunity to share in GIL's overall success. It is designed to link the achievement of individual and company results with measurable, objective rewards. At the end of each fiscal year, employees are evaluated on their performance measured by an assessment of competencies and achievement against predetermined goals. Incentives awarded are based on a combination of the individual's performance and the company's financial results as well as the performance of the Funds concerned. The assessment of performance is set in a multi-year framework appropriate to the holding period recommended to the investors of the Funds in order to ensure that the assessment process is based on the longer-term performance of the Funds and its investment risks and that the actual payment of performance-based components of remuneration is spread over the same period. The remuneration includes a fixed and variable component:

- a) **Fixed remuneration:** Fixed remuneration is defined as base salary plus any benefits GIL provides to its employees which may include a company car, pension contributions, medical and life assurance premiums lunch vouchers. Base salary levels (including benefits) are set with reference to market benchmarking data, which are reviewed regularly. The fixed remuneration represents the most important part of the sums allocated by GIL to the given employees per financial year.
- b) **Variable remuneration:** GIL will, in principle, attribute to eligible employees, a variable compensation (short term incentive) if GIL has made (for the concerned calendar/financial year) a gross profit, whereby the gross profit is determined at a stage before the payment of taxes and elements of the variable remuneration.

The total variable remuneration will be distributed to eligible employees after receipt of the opinion rendered by the Remuneration Committee to the Board of Directors.

The measurement of performance used to calculate the variable remuneration includes a comprehensive adjustment mechanism to integrate all relevant types of risk, including, among others, the relevant environmental, social and governance (ESG) aspects, in order to avoid excessive risk taking with regard to direct or indirect sustainability risks.

The Remuneration Committee will base its opinion on the appropriateness of the variable remuneration (in general and specific individual cases) according to the parameters set in the Remuneration Policy and in compliance with the prevailing local regulation.

#### 4. The Responsibilities of the Remuneration Committee

Responsibility for the remuneration process at GIL rest with the Remuneration Committee of GIL. The Remuneration Committee meets at least on an annually basis or on request by at least one of the participants, and periodically reviews the general principles of the Remuneration Policy of GIL.

The Remuneration Committee:

1. Is responsible for the preparation of recommendations to the Board of Directors, regarding the remuneration of the identified staff as well as of the highest paid staff members in GIL;
2. Will provide its support and advice to the Board of Directors on the design of GIL's overall Remuneration Policy;
3. Will have access to advice, internal and external, that is independent of advice provided by or to Senior Management;
4. Will review the appointment of external remuneration consultants that the Board of Directors may decide to engage for advice or support;
5. Will support the Board of Directors in overseeing the remuneration system's design and operation on behalf of the Board of Directors;
6. Will devote specific attention to the assessment of the mechanisms adopted to ensure that:
  - The remuneration system properly takes into account all types of risks and liquidity and assets under management levels; and
  - The overall Remuneration Policy is consistent with the business strategy, objectives, values and interests GIL and the Funds it manages and the investors of such Funds.

The Remuneration Committee is composed of the following members:

- Sophie Mosnier (Chairperson/ Independent Director of GIL)
- Geoffroy Linard (Independent Director of GIL)
- Santo Borsellino (Director of GIL)