

Architas Multi - Manager Europe Limited (“AMMEL” or the “Company”)

2019 Remuneration Policy Summary Disclosure

AMMEL is authorised by the Central Bank of Ireland (“CBI”) to act as a Fund Management Company in relation to both UCITS and AIF funds, and under AIFMD is also authorised to provide MiFID equivalent services.

The total net assets of the Company and the assets under management of the Company as at most recent year end date (31 December 2019) were €35.8 million and €8.2 billion respectively.¹

Remuneration Policy Overview

In line with the relevant ESMA Guidelines, as an entity with employees performing services subject to different sectoral remuneration principles, AMMEL can remunerate employees by applying the sectoral remuneration principles which are deemed most effective for achieving the outcomes of discouraging inappropriate risk taking and aligning the interest of the relevant individuals with those of the investors in the funds or other portfolios they manage.

The AMMEL Remuneration Policy has been designed to ensure that the AMMEL approach to remuneration does not encourage short term risk taking and aligns the client outcomes to the employee outcomes. It has been designed to be consistent with and promote sound and effective risk management and does not encourage risk taking which is inconsistent with the risk profiles or rules of the products/ portfolios managed by AMMEL.

The Policy aligns with the AMMEL business strategy, objectives, values and interests of AMMEL and also with those of the funds/ portfolios that it manages and of the investors in such funds/ portfolios, and includes measures to avoid conflicts of interest.

Scope

The overarching principles of the Policy applies to all employees. Specific additional requirements apply to those staff categorised as “Identified Staff” (as defined below).

The Policy applies to all forms of payments or benefits paid by the Company to the Identified Staff in exchange for professional services. Such forms of payment or benefit may include:

¹ The total net assets and assets under management figures represent the most up to date information available as of April 2020.

- fixed remuneration (payments or benefits without reference to performance); and
- variable remuneration (additional payments dependent on performance or other contractual criteria).

Identified Staff

The ESMA Guidelines on remuneration require the Company to identify the categories of staff whose professional activities have a material impact on the risk profile of the Company or of the Funds they manage. The categories of “Identified Staff” include senior management, risk takers and control functions.

A list of the Company’s Identified Staff shall be maintained by the AMMEL Compliance Team. It should be noted that the inclusions of persons in this list relate specifically to their role within the Company and their remuneration (if any) received directly by the Company.

Delegation

Where AMMEL delegates investment management, in order to ensure that the delegation of the portfolio management functions does not act to circumvent the rules and requirements of the Remuneration Policy, AMMEL confirms that any delegates appointed are subject to remuneration policies that are equally as effective as those applicable to AMMEL.

Review

The Policy and the practical application of the Policy will be reviewed annually to ensure the Policy as designed is delivering on its stated objectives and outcomes.

The Remuneration Policy has been adopted by the board of directors of the Company (the “Board”) and will be reviewed on an annual basis. Changes to the Policy will be subject to the approval of the Board or by the Board’s approved delegate.

Disclosures

The Company's policy complies with the relevant remuneration-related requirements set out in:

- S.I. No. 352/2011 - European Communities (Undertakings for Collective Investment in Transferable Securities) Regulations 2011.
- S.I. No. 257/2013 - European Union (Alternative Investment Fund Managers) Regulations 2013.
- S.I. No. 375 of 2017 European Union (Markets in Financial Instruments) Regulations 2017
- Guidelines on sound remuneration policies under the UCITS Directive (ESMA/2016/575)

- Guidelines on sound remuneration policies under the AIFMD (ESMA/2013/232)
- Remuneration policies and practices (MiFID) (ESMA/2013/606)

Further details on the AMMEL Remuneration policy are available upon request.

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Prepared by AMMEL Compliance