



REMUNERATION POLICY

MARCH 2023



FORMUE | PLEJE

This document is a translation of the Danish remuneration policy.
In case of any reasonable doubt, the authentic Danish text shall prevail.

1 Introduction

This Remuneration Policy ("Remuneration Policy") defines and outlines the guidelines for the Formuepleje Group (the "Group") in relation to the remuneration of the employees of the Group. Furthermore, the policy will to a great extent regulate the specific rules concerning, the board of directors, the executive board and employees whose activities have a significant impact on the Group's risk profile or the risk profile of the managed alternative investment funds ("material risk-takers"), as well as employees engaged in control functions.

The Remuneration Policy is gender neutral. In this Remuneration Policy, the financial companies are described individually as a "Group Company" and collectively as the "Group Companies".

The Remuneration Policy has been prepared in accordance with applicable legislation (hereinafter referred to as "applicable legislation").

Under applicable legislation, the board must determine the business' remuneration policies, including pension policies and guidelines for the allocation of severance pay,, and is responsible for their implementation.

If a remuneration committee has been set up, this shall advise the board of directors in creating a Remuneration Policy and assist the board in ensuring compliance with the Remuneration Policy in practice and assess whether the Remuneration Policy has been updated, including, if necessary, propose updates to the Remuneration Policy.

The Remuneration Policy must be approved at the annual general meeting.

The Remuneration Policy has been prepared taking into account the Group Companies' size and organisation, as well as the scope and complexity of the Group Companies' activities, and helps to ensure:

- compliance with, and promotion of, sound and effective risk management which does not encourage excessive risk-taking,
- compliance with the Group's business strategy, values, and long-term goals, including a sustainable business model,
- compliance with the principles of protection of clients and investors in the performance of the Group Companies' activities and of containing measures to avoid conflicts of interest, and
- that the total variable remuneration which the Group undertakes to pay does not undermine the Group Companies' opportunity to strengthen their capital base.

In addition, the Remuneration Policy is designed to ensure:

- that the board identifies and appoints the Group Companies' material risk-takers,
- that information and reporting obligations are respected.

There is currently no link between the Group's remuneration and the Group's integration of sustainability risks.

2 General

The Group wishes to offer employees a remuneration package, including fixed remuneration and any variable remuneration, which matches the individual employee's competences and qualifications. The Group does not wish to pay the highest salaries in our business, but to be competitive and offer attractive pay conditions.

In order to attract, retain, develop and reward employees who contribute to value creation in the Group Companies, and thereby support a result-orientated culture in these, variable remuneration may be awarded, including to the executive board and other risk takers. The awards take the form of bonuses and incentive schemes.

Group Companies' bonus agreements and/or incentive schemes shall take into account the interests of customers, including helping to ensure that customers are treated fairly and honestly and that clients are not harmed by inappropriate bonus agreements and/or incentive schemes.

In addition, no remuneration schemes, sales targets or other arrangements shall be put in place that could incentivise employees of the Group Company to recommend a particular financial instrument, especially to a retail client, when that client should have been offered another financial instrument that would better meet their needs.

2.1 Criteria for awarding fixed salary components

Each staff member is awarded a fixed salary that matches their professional experience, educational background and organisational responsibilities. In order to offer appropriate fixed remuneration in line with the market, the Group may make use of salary statistics.

2.2 Criteria for awarding variable remuneration

The executive board shall ensure that criteria for the awarding of variable remuneration are set for each staff member.

The executive board of each Group Company shall ensure that the criteria for awarding variable remuneration reflect sustained and risk-adjusted performance, as well as performance beyond what can be expected given the employee's relevant professional experience and organisational responsibilities. Variable remuneration should be based on both the individual's performance (e.g. exceptional performance or fulfilment of predefined KPIs) as well as the performance of the relevant Group Company and/or the performance of the sub-fund.

For employees where the variable remuneration component is performance-related, it shall be determined on the basis of an assessment of:

- Employee performance – taking into account both financial and non-financial criteria
 - Non-financial criteria include compliance with internal rules and procedures as well as compliance with the Group Companies' guidelines and procedures, customer satisfaction, leadership, teamwork, creativity, and co-operation with other departments
- The performance of the relevant sub-fund (and/or the performance of the managed alternative investment funds); and
- The results of the Group Company

3 Specifically for management and selected groups of staff

3.1 On the board of directors in particular

The board of the Group Companies is only compensated with a fixed salary, if any, and not with any variable remuneration. Remuneration to the board is individual and reflects the competencies and contribution required in view of the Company's complexity and the scope of duties and responsibilities.

3.2 On the executive board in particular

The executive board of the individual Group Companies can be compensated through variable remuneration, which is generally indicated in a separate bonus agreement. The board must assess annually whether the variable remuneration for executive board members is in accordance with this Remuneration Policy.

3.3 On material risk-takers in particular

The Group Companies' material risk-takers must be appointed, including an ongoing and at least annual assessment of whether other employees in the Group Companies should be pointed out.

As a rule, material risk-takers in the Group Companies are:

- Employees whose activities have a significant impact on the individual Group Company's risk profile, and in Formuepleje A/S, the risk profile of the managed funds. Basically, this will cause that following can be material risk-takers (after a concrete assessment):
 - Investment director
 - Head of Legal
 - Head of IT
 - Head of Middle Office
 - Communication director
 - The management of control functions, including:
 - Management of Compliance
 - Management of the risk management function
 - Management of the accounting function
 - Management of Operations

The identification of material risk-takers is conducted regularly by the management of the individual Group Companies. Material risk-takers identified in the individual Group Companies are listed in Annex 1 to this Policy. Annex 1 must be updated, at the latest, before the allocation and payment of variable remuneration for additional assessment of whether other employees should also be listed in Annex 1.

The executive boards of the individual Group Companies are obligated to notify employees who are identified as material risk-takers of this, including about the special rules and restrictions applicable to such persons. In connection with notification about this, the executive board must distribute this Policy.

3.4 About employees in control functions in particular

Employees working with compliance and internal controls in the Group Companies' control functions, who are not also material risk-takers, are not covered by the remuneration rules for material risk-takers. Variable salaries for employees involved in the Group Companies' control functions, defined as employees working with compliance and internal controls, must be given based on an individual annual assessment of qualifications, functions, quality in performance and work performed.

The variable salary for employees in control functions cannot depend on the results of the sub-fund(s) the employee controls.

These employees are not subject to the other limitations on deferral, retention, etc. in this Remuneration Policy. However, they are subject to the rules on the relationship between fixed and variable remuneration in accordance with Section 5 of the Remuneration Policy.

3.5 Specifically for staff providing investment services

For staff who provide investment services, i.e. provide portfolio management, investment advice and/or brokerage services on behalf of a client or investor, there is a specific duty for the executive board to ensure that the awarding of variable remuneration takes into account the promotion of responsible business conduct and fair treatment of clients/investors, and to avoid conflicts of interest in the relationship with clients/investors. The implementation of this must be ensured where appropriate – taking into account staff who have a direct and/or indirect influence on the investment and ancillary services provided to a client/investor.

The executive board shall ensure that the awarding of variable remuneration to senior staff is structured in a way that does not create a conflict of interest that encourages the staff member to act against the interests of the client or investor.

The executive board shall also ensure that this is also regulated in each Group Company's policy for managing conflicts of interest.

4 Definition of variable remuneration

Variable remuneration is defined as any remuneration, both monetary and non-monetary, wherein the size/value of the remuneration is not known in advance, including

- Schemes which are directly dependent on performance/results, such as bonus schemes, performance-related contracts and other remuneration schemes which depend on the employee meeting pre-established objectives and criteria.
- Retention bonuses, including retention bonuses exclusively tied to the employee remaining for a certain term and retention bonuses which are also tied to performance requirements.
- Other ad hoc/discretionary amounts which are not necessarily directly result-related are also considered to be variable remuneration. This can be one-off payments based on e.g. a bonus pool in the Group Companies, but it can also be amounts allocated on the basis of e.g. a heavy workload, long hours, good results, the completion of projects, restructuring, etc. – i.e. ad hoc and estimated amounts.
- Employment bonuses which are not agreed in connection with the filling of a position and are not limited to the first year of employment.

Variable remuneration will thus be comprised of all pay elements which are not part of the fixed pay which is known in advance.

5 The relationship between fixed and variable remuneration

The Remuneration Policy must ensure an appropriate balance between fixed and variable remuneration, so that the relationship between fixed and variable remuneration is appropriate, proportional and balanced, and finally so that the total remuneration is in line with sound and effective risk management principles.

This means that the size of any variable remuneration, calculated at the time of award after the end of the relevant calendar year, cannot exceed a certain percentage of the fixed basic salary, incl. pension for that calendar year.

This percentage is determined as follows:

- For members of the executive board, the percentage is (up to) 50
- For material risk-takers, the percentage is (up to) 100

- For employees in control functions, the percentage is (up to) 50

However, in special cases the Group Companies' board of directors may decide that the variable compensation for material risk-takers can be up to 200 percent of the fixed basic salary, including pension, provided that the conditions specified in applicable legislation are met.

6 Payment of variable remuneration

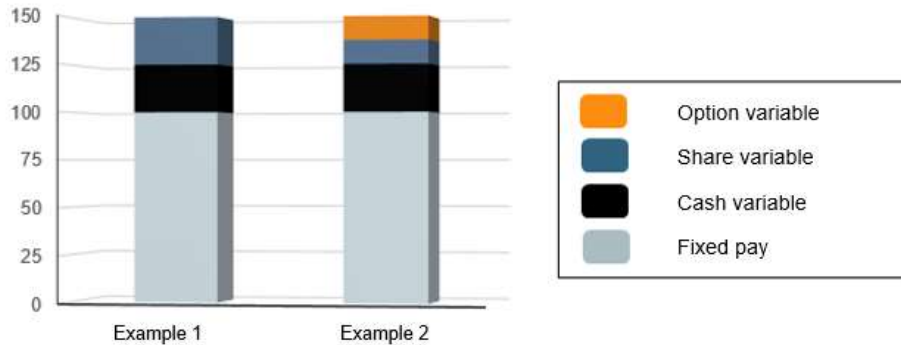
The payment of variable remuneration to executives and other risk-takers must comply with applicable legislation.

For the Group Companies, this means that agreements on the use of variable remuneration for executive board members and other risk-takers must include the following limitations:

i.	The instrument requirement must comply with applicable regulations, and at least 50 % of a variable salary component should consist of instruments, in accordance with "Lov om Finansiell Virksomhed" (FIL) (the Danish Financial Business Act) and "Lov om Forvaltere af Alternative Investeringsfonde m.v." (FAIF) (the Danish Act on Alternative Investment Fund Managers, etc.) and "Lov om Fondsmæglerselskaber og investeringsservice og -aktiviteter" (FMSL) (the Danish Stockbroking companies and Investment services and activities Act).
ii.	For a member of management, options regarding equity holdings or similar instruments cannot exceed 12.5 % of the remuneration or the fixed base salary, including pension, at the time of calculation.
iii.	Equity holdings and instruments etc. cannot be sold by the recipients until the end of a retention period of least six months. There can be no hedging of the risk associated with these equity holdings and instruments, etc.
iv.	At least 40 % of a variable remuneration component must be deferred for a period of at least five (5) years for executives, and for a period of at least four (4) years for other material risk-takers. For major variable remuneration components (exceeding DKK 750,000), at least 60 % of the variable remuneration shall be deferred in the same way. Payment cannot commence until one (1) year after the calculation of the variable salary.
v.	Payment of deferred variable remuneration is contingent on the awarding criteria continuing to be met by payment and the Group Companies' financial situation not having deteriorated significantly, relative to the time of calculation, and that the employee has not attended or been responsible for a behaviour which has resulted in a significant loss to Formuepleje or has not complied with appropriate requirements for honesty in accordance with FIL article 77 a / FAIF article 20 / FMSL article 109.
vi.	Non-paid as well as paid variable remuneration is subject to repayment ("claw-back") if it is paid based on information which subsequently proves to be manifestly incorrect or inaccurate and if the employee is in bad faith. The variable remuneration must thus be repaid in whole or in part, if the variable remuneration has been paid on basis of information on results which can be proven wrong and if the recipient is in bad faith.
vii.	The Group Companies may decline to pay variable remuneration if this does not comply with the capital requirement or the solvency requirement, or if the FSA believes that there is an obvious risk thereof.

viii.	Similarly, variable remuneration cannot be paid to members of the board of directors or executive board if the Group Companies have been given a deadline by the FSA to meet the solvency requirement.
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The composition of the variable remuneration = 50 % of the fixed salary can be illustrated as follows:



7 Triviality limit

If the board of directors and executive board finds it justifiable, a variable remuneration of a maximum of DKK 100,000 annually can be paid to executives and other risk-takers without the recipients becoming subject to the restrictions regarding deferral and instrument requirements. The other requirements (clawback) continue to apply.

A specific assessment must be made of this, and the board of directors and the executive board are jointly responsible for assessing that the exception is sound.

8 Pension benefits

The Group Companies must ensure that pension benefits which can be equated with variable remuneration comply with applicable legislation. The Group Companies do not grant pension benefits to the board, the executive board or to other employees whose activities have a material impact on the risk profile.

The Group Companies shall not award pension benefits to any employee of the Group.

9 Severance

The Group Companies exclusively enter into agreements on severance payments which:

- have been entered into in connection with the filling of the position,
- are not dependent on the results achieved in the performance of the position, and
- by severance have a maximum value corresponding to the last two years' total remuneration incl. pension.

FAIF article 20(1-7), FIL article 77a(1-6) and FMSL article 109(1-6) do not apply on agreements on severance payment, which are entered into upon severance, for that part of the severance payment, which does not exceed a value equalling a total remuneration incl. pension for one year.

Severance payments, which are not covered by the above-mentioned, must reflect the results achieved in the performance of the position over time and cannot reward unachieved results or violations.

Severance payments must not reward the lack of results or offences.

10 Employment bonuses

The Group Companies may enter into agreements for the payment of employment bonuses.

Employment bonuses which meet the following conditions are not defined as variable remuneration, and are therefore not covered by this Remuneration Policy:

- The agreement on the employment bonus is entered into in connection with the filling of the position
- The agreed employment bonus is limited to the first year of employment
- The Group Companies have a healthy and solid capital base at the time when the employment bonus is granted.

11 Remuneration packages related to compensation or buying out other contracts

Remuneration packages related to compensation or buying out other contracts in connection with past employment must be adjusted to the Group Companies' long-term interests, including the requirements regarding payment of variable remuneration, in accordance with the above section.

12 Employee share program

Formuepleje can offer its employees to take part of an employee share program combined with a gross salary reduction for a certain period. The program is offered in accordance with the taxation rules in "Ligningslovens (LL) § 7P" (the Danish Tax Assessment Act, article 7P), and it is voluntarily for the employee to take part, and the same conditions will apply for all. However, there may be exceptions to take part of the employee share program, such as hourly paid employees. In that case, it will be evident from the final employee share program. The allocation of the employee shares constitutes a fixed part of the employees' remuneration.

13 Incentive schemes

Formuepleje may offer its employees participation in incentive schemes, where these must only take into account the remuneration rules in the financial sector and this policy.

14 Duty of disclosure and reporting

The Group Companies shall ensure compliance with disclosure and reporting obligations in accordance with applicable law.

Group Companies are required to disclose remuneration information in accordance with applicable legislation.

Disclosure takes place on www.formuepleje.dk

As a fund manager for alternative investment funds, Formuepleje A/S must recognize disclosure requirement regarding remuneration regulated in FAIF article 61 and article 107 in the commission delegated regulation no 231/2013 of 19 December 2012.

In accordance with applicable legislation, the Group Companies are under no obligation to publish further information, as the Group Companies are not listed and do not have total assets exceeding DKK 500 million, just as, taking into account the Group Companies' size and the scale and the complexity of the activities, the board of directors has estimated that there is no need to make additional disclosures on remuneration, decision-making processes and remuneration structure.

14.1 Reporting to the Financial Supervisory Authority

In accordance with applicable legislation, the Group Companies must, by 1 May each year, report to the Danish FSA the number of people who, as part of their employment or duties as a board member of the Group Company, earned a total salary, including pension, exceeding an amount equivalent to 1 million euros in the previous financial year.

The report to the Financial Supervisory Authority must include the number of people per business area, whether the individual unnamed person has been appointed as a material risk-taker, the amount of each unnamed person's total remuneration including pension, split into fixed and variable remuneration, the overall amount of the variable salary which is deferred and an indication of the country in which the individual unnamed person performs their work.

15 Delegation

In accordance with "Lov om Forvaltere af Alternative Investeringsfonde m.v." (the Danish Act on Alternative Investment Fund Managers, etc.), Formuepleje A/S must, when delegating activities relating to portfolio management and risk management in accordance with Chapter 7 of "Lov om Forvaltere af Alternative Investeringsfonde m.v." (the Danish Act on Alternative Investment Fund Managers), ensure the following:

- that the business to which delegation is made is subject to remuneration rules similar to the "Lov om Forvaltere af Alternative Investeringsfonde §§ 20-22" (the Danish Act on Alternative Investment Fund Managers, etc., article 20-22), or
- that, in order to prevent circumvention of remuneration rules, appropriate contractual obligations are agreed with the business to which delegation is made regarding the remuneration of said business' members of management and other employees whose activities have a material impact on the fund manager's risk profile or the risk profile of the AIFs which the fund manager manages.

16 Documentation

Sufficient documentation describing the determination of variable remuneration of the board of directors, executive board and material risk-takers must be prepared at all times. Furthermore, a description which defines the evaluation of their performance must be available.

17 Monitoring, control and reporting

The board of directors of the Group Companies review the Remuneration Policy at least annually in order to adapt it to developments in the Group Companies.

The board of directors of the Group Companies is responsible for approving and monitoring that bonus agreements and incentive programmes are developed in accordance with the Remuneration Policy and legislation.

HR and Group Accounting constitute the first line of control, where HR reports at least once a year to the board of directors on compliance with the Remuneration Policy, including control of specific levels and

allocations as well as payment of the variable remuneration. The executive board must ensure that procedures are in place for the performance of the controls.

Furthermore, Compliance shall monitor the compliance with this policy and report, on an ongoing basis and when necessary, to the board of the Group Companies regarding compliance with the Remuneration Policy.

18 Effective date

This Policy enters into effect on April 11, 2023.