



EDMOND  
DE ROTHSCHILD

# REMUNERATION POLICY

EDMOND DE ROTHSCHILD ASSET  
MANAGEMENT (LUXEMBOURG)  
JANUARY 2022

C2: DOCUMENT FOR INTERNAL USE



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# 1. INTRODUCTION

The Board of Directors (the “Board”) has approved the Remuneration Policy (the “Policy”) of Edmond de Rothschild Asset Management (Luxembourg) SA (“EdRAML”) which comes into force on 1 January 2022 and which amends the previous Policy that was approved on 13/08/2021.

EdRAML is a subsidiary of Edmond de Rothschild (Europe) S.A. (“EdRE” or the “Bank”), itself a subsidiary of Edmond de Rothschild (Suisse) S.A. and a member of the Edmond de Rothschild Group (the “Group”). In this respect, this Policy takes into account the requirements of the remuneration policies of the Bank and the Group, without prejudice to obligations under sector-specific regulations to which EdRAML is subject, including in particular the following legislative texts which may be amended from time to time:

- Directive 2014/65/EU of 15 May 2014 (MiFID II);
- Directive 2013/36/EU as amended by Directive 2019/878/EU of 20/05/2019 (CRD V);
- Regulation 600/2014 of 15 May 2014 (MiFIR);
- Articles 388 to 391 of CSSF Circular 18/698;
- Article 5 of Regulation (EU) 2019/2088 of 27 November 2019 on sustainability-related disclosures in the financial services sector.
- All the opinions and RTSs issued by the European Banking Authority (EBA) and CSSF Circulars relating to remuneration, in particular Circulars 15/622 and 22/797.
- As a management company subject to Chapter 15 of the law of 17 December 2010:
  - CSSF Regulation 10-4 transposing Commission Directive 2010/43/EC of 1 July 2010 implementing Directive 2009/65/EC of the European Parliament and of the Council as regards organisational requirements, conflicts of interest, business conduct, risk management and content of the agreement between a depositary and a management company.
  - Articles 20 and 21 of the Law of 10 May 2016 transposing Directive 2014/91/EU (reflected, respectively, in Articles 111 bis and 111 ter of the law of 17 December 2010 transposing Directive 2009/65/EC).
  - *Guidelines on sound remuneration policies under the UCITS Directive and AIFMD* dated 31 March 2016 (ESMA/2016/411) (hereinafter the “ESMA Guidelines”) supplemented by ESMA Guidelines 2016/575 of 14 October 2016.
- As an AIF manager:
  - Article 12 and Annex II “Remuneration Policy” of the law of 12 July 2013 on alternative investment fund managers
  - *Guidelines on sound remuneration policies under the UCITS Directive and AIFMD* dated 31 March 2016 (ESMA/2016/411) supplemented by ESMA Guidelines 2016/579 of 14 October 2016.

This Policy applies to all EdRAML staff, including independent directors.

The Policy aims to maintain a policy that:

- is compatible with sound and effective risk management and that does not encourage excessive risk-taking that could adversely affect EdRAML's undertakings for collective investment (hereinafter "UCIs");
- is aligned with the strategy of EdRAML, the managed UCIs and the investors in these UCIs, in particular with their objectives, values and long-term interests, such as sustainable growth prospects;
- incorporates the principles governing the protection of current and potential clients and investors when services are provided;
- seeks to avoid, manage and reduce potential or confirmed conflicts of interest within EdRAML, including those between its various business activities, and between managed UCIs and their managers.

The Policy describes the basic principles of remuneration and the governance thereof, indicating the relationship between remuneration and performance. It also includes the criteria for assessing the employee against the individual and collective objectives set for him/her and the relative importance of the various components of remuneration.

The basic principles of the Policy can be summarised as follows:

- to encourage the performance and development of employees;
- to offer competitive general remuneration prospects allowing EdRAML to attract, retain, motivate and reward employees who are necessary for the effective and efficient leadership and management of a management company;
- to encourage employees to share in EdRAML's general success while continuing to assume their individual roles and responsibilities;
- to focus attention on quantitative and qualitative factors vital to the sustainable development of EdRAML's activities in line with its short-, medium- and long-term interests and those of its existing and potential clients;
- to maintain and improve performance by linking remuneration directly to risks and the accomplishment of ambitious individual and collective performance targets which do not encourage inappropriate behaviour and ensure respect for the company's values;
- to subject the remuneration system to healthy corporate governance, as well as strict compliance with procedures, internal regulations, social legislation and financial sector legislation.

## 2. DEFINITIONS

For the purposes of the regulations, the “**management body**” is “the body with ultimate decision-making authority in a management company, investment company or depositary, comprising the supervisory and the managerial functions, or only the managerial function if the two functions are separated”. In the case of EdRAML, this is its board of directors (hereinafter “the Board”).

**“Relevant Persons”**: any employee who could have an impact on the service provided or corporate behaviour of the firm, including persons who are front-office staff, sales force staff or other staff indirectly involved in the provision of investment or ancillary services whose remuneration may constitute an inappropriate incentive to act against the interests of their clients.

This category includes:

- persons overseeing the sales forces (such as line managers) who may be incentivised to pressure sales staff;
- financial analysts whose literature may be used by sales staff to entice clients to make investment decisions;
- employees responsible for complaints handling, retaining clients or product design and development;
- the company’s tied agents.

**Identified Staff Members**: any employee involved in day-to-day management belonging to any of the categories listed below<sup>1</sup>:

- The members of the Executive Committee (hereinafter “the ExCom”);
- The heads of control functions (internal audit, risk management, compliance, internal control) as well as employees of those functions who are members of the decision-making committees and/or who have a role in pre-trade controls for portfolio management,
- The heads of the following functions:
  - Asset Management;
  - Administration;
  - Marketing;
  - Human Resources.

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<sup>1</sup> Article (2) of Directive 2014/91/EU: “Those categories of staff should include any employee and other member of staff at fund or sub-fund level who are decision takers, fund managers and persons who take real investment decisions, persons who have the power to exercise influence on such employees or members of staff, including investment advisors and analysts, senior management and any employees receiving total remuneration that takes them into the same remuneration bracket as senior management and decision takers. Those rules should also apply to investment companies that have not designated a management company authorised pursuant to Directive 2009/65/EC. Those remuneration policies and practices should apply, in a proportionate manner, to any third party which takes investment decisions that affect the risk profile of the UCITS because of functions which have been delegated in accordance with Article 13 of Directive 2009/65/EC.” ”

- Other risk takers, in particular fund managers. This category may also include sales managers.
- Any member of staff whose total remuneration is within the same range as that of Senior Management or risk takers, provided that he/she has an influence on the level of risk of the assets managed or of EdRAML.
- Based on the Appointments and Remuneration Committee's assessment and subject to the approval of the Board, potentially other staff members who are not covered by the above but who:
  - Could potentially have a material influence over the risk profile of EdRAML or a UCI;
  - Have high total remuneration, in absolute terms or relative to members of senior management and risk takers;
  - Could be required by law or regulations.
- The term UCI (Undertaking for Collective Investment) includes open-ended undertakings for collective investment in transferable securities (UCITSs) and Alternative Investment Funds (AIFs).

### 3. GOVERNANCE

#### a. Role of the Board

The Board's remit includes:

- approving and supervising the Policy for all EdRAML paid employees. It reviews the general principles of the Policy at least once a year and is responsible for their implementation;
- approving the recommendations made to it by the Appointments and Remuneration Committee.

It therefore has sole authority, subject to approval from the General Meeting of Shareholders where applicable, to decide on the remuneration pool containing the fixed and variable portions.

The Board delegates responsibility to the ExCom for implementing the Policy and associated procedures.

#### b. Role of the Appointments and Remuneration Committee

The Board takes into account the recommendations of the Appointments and Remuneration Committee, composed of Board directors, including at least three directors, at least two of whom are independent (see composition in Appendix 3). The Chair of the Appointments and Remuneration Committee must be one of these two independent directors.

The Appointments and Remuneration Committee is responsible for the preparation of recommendations:

- For determination and monitoring of the Policy, including aspects of gender-neutrality;
- In terms of remuneration, particularly for ExCom members, highly paid employees, heads of control functions and for remuneration that has an impact on the risks and management of risks by EdRAML or the UCIs that it manages or administers.

The Board approved the Policy after consulting the Appointments and Remuneration Committee.

The Appointment and Remuneration Committee meets in the manner set out in Appendix 3.

#### c. Role of the ExCom

The ExCom assists the Appointments and Remuneration Committee and the Board in defining and implementing the Policy and associated procedures.

In addition, the Chair of the ExCom reviews the total variable remuneration amounts (pools) and individual amounts, particularly in relation to Identified Staff Members, before submitting those amounts to the Appointments and Remuneration Committee and to the Board.

#### d. Role of the Control Functions

The Compliance Department carries out regulatory watch and verifies the Policy's compliance. It also analyses the way in which the Policy influences the establishment's compliance with regulations, rules, internal policies and risk culture.

The Risk function evaluates the risks observed and borne by EdRAML and the UCIs that it manages or administers, in view of the risks estimated on an ex ante basis during the previous financial years and reports on any material discrepancies to the Appointments and Remuneration Committee.

The Compliance and Risk functions report any risks and non-compliance issues to EdRAML's ExCom and to the heads of the Group's Human Resources, Compliance and Risk functions. The Human Resources, Compliance and Risk divisions issue recommendations regarding incidents' impact on evaluations and/or remuneration. In respect of sanctions for reported incidents, the manager of the employee in question, with the support of the Human Resources Department, is responsible for making a decision, justifying and documenting it. The recommendations are also sent to the Appointments and Remuneration Committee and the Board as part of procedures to approve, review and supervise implementation of the Policy.

The Risk division establishes adequate indicators to measure performance adjusted to risks allowing risk profile and culture aspects to be taken into account in the evaluation carried out by line managers, within the framework defined by Human Resources. These indicators incorporate the employee behavioural and disciplinary objectives that promote sound and effective risk management, a list of which is set out in Appendix 2 "Performance measurement indicators adjusted for risks".

The Risks and Compliance divisions provide elements/indicators, each in their respective areas of control and involvement, to help define the total mass of variable remuneration, performance criteria and remuneration awarded, whenever those functions consider that the activities carried out are likely to have a negative impact on staff behaviour and risks within that scope.

Those functions submit their comments and recommendations to the Appointments and Remuneration Committee.

The recommendations will be sent to the Board in the framework of procedures to approve, review and supervise its implementation.

Each year, the preparation, implementation and effects of the Policy on EdRAML's risk profile are subject to a central and independent examination by the Bank's Internal Audit function to ensure its compliance with remuneration policies and procedures. Internal Audit may seek the advice of other control functions if necessary.

Internal Audit presents the results of the evaluation to the Board. A report on this audit is sent to the Board and a copy of it is made available to the *Commission de Surveillance du Secteur Financier* (Luxembourg financial supervisory authority – CSSF) and the Independent Auditor, at their express request.

#### e. Role of the Human Resources department

The Human Resources department contributes to developing the Policy and regularly evaluating its effects, particularly with regard to the determination of Identified Staff Members, defining and updating fixed and variable remuneration structures and their components, defining attractive remuneration levels with the aim of attracting and retaining staff in accordance with EdRAML's risk profile, and monitoring the proper functioning of the assessment process.



The Human Resources department is also responsible at all stages in the process for the control, coherence and verification of the application of procedures, at all points of the process, in close collaboration with the control functions. Finally, it coordinates discussions with all stakeholders: the control functions, the ExCom, the Appointments and Remuneration Committee and the Board.

## 4. APPLICATION OF THE PROPORTIONALITY PRINCIPLE

In accordance with the applicable regulations, the Board has decided not to apply the proportionality principle at establishment level in view of:

- the size of EdRAML (approximately 150 employees) and the UCIs that it manages or administers (approximately EUR 32 billion);
- its internal organisation as a management company and alternative fund manager;
- the nature, scope and complexity of EdRAML's business activities.

The Board has, however, decided to apply the proportionality principle at the individual level.

Given that no criteria have been set by the competent authority, the decision has been made to apply the proportionality principle for identified staff members whose variable remuneration is less than EUR 100,000. This quantitative criterion allows EdRAML to avoid the requirements for the process of paying deferred remuneration and/or remuneration in the form of financial instruments for these persons.

For a limited number of employees whose variable remuneration is  $\geq$  EUR 100,000, that remuneration is paid as set out in paragraph 6.

## 5. CATEGORIES OF STAFF COVERED

Against this background, this Policy applies to all EdRAML employees and complies with the regulatory requirements set out on page 1 of this Policy. Specific provisions apply to “Relevant Persons” and to “Identified Staff Members”, particularly in respect of variable remuneration.

### a. Relevant Persons

The Compliance Department identifies Relevant Persons in accordance with applicable regulations, and particularly the ESMA guidelines. EdRAML has introduced and implements specific measures to determine whether the Relevant Persons may potentially not act in the interests of their clients, thereby enabling it to take remedial action where necessary.

Organisational measures implemented on the launch of any new service or product also properly reflect the requirements of the remuneration policy and remuneration practices and the risks that such products or services may pose in terms of business practices and conflicts of interest.

### b. Identified Staff Members

The Human Resources, Compliance and Risk functions identify the Identified Staff Members in accordance with the ESMA Guidelines. The identification process, as well as justification for decisions, are duly documented.

The list of Identified Staff Members is set out in Appendix 1.

The Human Resources, Compliance and Risk functions validate the list, or amend it if necessary, in consultation with businesses and functions. When a person is removed from the list, the reasons for that removal are documented. The list is presented to the ExCom then to the Appointments and Remuneration Committee. The Board is responsible for final validation of the list, at the recommendation of the Appointments and Remuneration Committee.

In addition, with reference to Art. 109 of Directive 2019/878 (CRD V) (“[...], Member States shall ensure that the requirements laid down in those articles apply to members of staff of subsidiaries that are not subject to this Directive on an individual basis where: (a) the subsidiary is either an asset management company, or an undertaking that provides the investment services and activities listed in points (2), (3), (4), (6) and (7) of Section A of Annex I to Directive 2014/65/EU; and (b) those members of staff have been mandated to perform professional activities that have a direct material impact on the risk profile or the business of the institutions within the group”), the members of EdRAML’s ExCom have also been identified as Material Risk Takers at the Bank level insofar as they have been considered to have a direct material impact on its risk profile and activities.

## 6. STRUCTURE AND COMPONENTS OF REMUNERATION

For the purposes of this policy, remuneration consists of one or more of the following:

- Any form of payment or benefit paid or granted by EdRAML;
- Any amount paid by the UCI itself, including all performance fees paid directly or indirectly to the categories of staff referred to herein;
- Any transfer of units in the UCI in exchange for professional services provided by the categories of EdRAML's staff referred to herein.

All payments made by the UCI to EdRAML for the benefit of the categories of staff covered by this policy or directly by the UCI to those categories of staff are considered to be remuneration.

The remuneration of employees covered by this Policy includes a fixed portion and a variable portion.

Fixed remuneration represents a high enough proportion of overall remuneration to offer flexibility in the payment of variable remuneration and the possibility for employees to receive no variable component. A rise in the fixed remuneration, and any decisions relating to the promotion of employees, must take into account their performance in terms of risks and compliance. The variable portion may not exceed 100% of the fixed portion. It may be increased to 200% based on a reasoned decision taken on a case-by-case basis by the Shareholders' General Meeting. This decision is made annually, in advance, and is motivated.

The fixed and variable components of the total remuneration are balanced appropriately and the total volume of variable remuneration does not limit EdRAML's capacity to increase its capital base.

The components of employees' variable remuneration that are > or equal to EUR 100,000 are broken down as follows:

|            |             | Immediate       | Deferred           |
|------------|-------------|-----------------|--------------------|
|            |             | Max. 60%        | Min. 40%           |
| Cash       | Max.<br>50% | <b>Max. 30%</b> | <b>Max. 20%(*)</b> |
| Instrument | Min.<br>50% | <b>Min. 30%</b> | <b>Min. 20%</b>    |

(\*) the Group's Employee Share Plan may entirely or partially replace the deferred cash

For the highest levels of variable remuneration, for which the threshold is determined by the Board upon the recommendation of the Appointments and Remuneration Committee, the deferred proportion will amount to at least 60% and shall be paid as follows:

|  |  | Immediate | Deferred |
|--|--|-----------|----------|
|  |  | Max. 40%  | Min. 60% |

|            |             |                 |                    |
|------------|-------------|-----------------|--------------------|
| Cash       | Max.<br>50% | <b>Max. 20%</b> | <b>Max. 30%(*)</b> |
| Instrument | Min.<br>50% | <b>Min. 20%</b> | <b>Min. 30%</b>    |

(\*) the Group's Employee Share Plan may entirely or partially replace the deferred cash.

Deferred variable remuneration will be paid over a period of at least 3 years, beginning on the date on which the immediate portion of the variable remuneration is paid. Amounts payable under deferral arrangements may not be paid more quickly than pro rata. The Appointment and Remuneration Committee may decide on a new breakdown each year in accordance with the ESMA Guidelines.

EdRAML complies with the remuneration conditions defined by the Luxembourg Collective Bargaining Agreement for Bank Employees, for those of its employees who fall within the agreement. The Edmond de Rothschild Group also undertakes to draw up, put in place and maintain remuneration policies, procedures and practices that ensure equal pay between men and women for equal work or work of equal value, where they have equivalent skills, qualifications and experience.

As such, the Group's practices are as follows:

- The salary upon hiring is calculated based on the employee's skills, qualifications and experience. Under no circumstances may the employee's gender be a factor in determining remuneration.
- As part of annual pay reviews, the guidelines on determining fixed and variable remuneration systematically stress the importance and attention to be given to gender equality in this process.
- Employees, their managers and the Human Resources department are all key players in these processes, and their roles and responsibilities are clearly defined so that decisions are taken in an objective, fair and transparent manner.

In order to support this commitment to fairness and transparency, statistics on salary increases and variable remuneration by gender are presented at meetings of the Appointments and Remuneration Committee.

## 7. CHARACTERISTICS OF REMUNERATION BY JOB DESCRIPTION

The remuneration of employees includes a fixed portion and a variable portion. The composition and the amount of total remuneration are reviewed each year, ensuring that there is a fair balance between its components.

### a. Fixed portion

The fixed portion (base salary) is paid monthly and is composed of a basic monthly remuneration which does not take performance criteria into consideration, plus a thirteenth month. The fixed portion is determined according to the responsibilities and experience of the employee, rather than performance. Other benefits, the most common of which relates to the supplementary pension scheme, are also granted. The pension scheme is a regulated scheme that does not include any discretionary aspects. It is the result of strictly applying the formulas set out in the rules of the plan and communicated to all employees. The fixed portion is reviewed each year but is not necessarily revised.

### b. Variable portion

Variable compensation varies according to the performance of EdRAML, the Group, the business sector, the department and the individual performance of the employee. In general terms, the potential variable remuneration depends on the position held by the employee, his/her level of responsibility as well as his/her experience and individual and collective performances. It is determined in a manner that is consistent with relevant sector practices and is based on the nature and importance of the position and the specific characteristics of the business sectors in which EdRAML operates. It takes into account financial and non-financial criteria.

The variable portion depends on the extent to which all targets set at the employee's annual assessment are met. The evaluation is carried out over several years in order to ensure that it relates to long-term performance.

Other factors such as fairness and balance at EdRAML, present and future risks associated with performance, the individual's personal conduct and the alignment of individual objectives with EdRAML's long-term interests are also taken into account.

The variable portion for Identified Staff Members who do not benefit from the proportionality principle, typically comprises:

- a portion that is paid directly, made up of
  - an amount payable in cash
  - and/or in financial instruments comprising an award of units in a representative basket of AIFs and UCITS ("Representative basket of AIFs and UCITS Unit Plan") introduced by the Edmond de Rothschild Group based in Switzerland;
- another portion, the vesting and payment of which are deferred
  - the vesting of the deferred variable portion depends in particular on EdRAML's and the Group's financial situation during the vesting period (the "malus" clause). The total amount of variable remuneration is subject to malus provisions up to 100% depending on the financial situation and performance

data. The following situations in particular may justify the application of a malus:

- ✓ a significant decline in the performance of the Group, the entity or the operational unit in question;
  - ✓ a deterioration in the capital/equity position of the Group or the entity in question;
  - ✓ a level of risk observed during and at the end of the vesting period that is greater than the risk estimated on an ex ante basis at the time the variable remuneration is determined;
  - ✓ evidence of wrongful behaviour by the employee or serious errors in the conduct of his/her activities during the financial year in question.
- the deferred variable portion is made up of
    - ✓ an amount payable in cash or short-term financial instruments and/or under the Edmond de Rothschild Group's Employee Share Plan (as defined in Appendix 4), and
    - ✓ for at least half the amount, through the allocation of units in a representative basket of AIFs and UCITS ("Representative basket of AIFs and UCITS Unit Plan") introduced by the Edmond de Rothschild Group; or financial instruments whose value is linked to the value of shares in the holding company.

As for the procedure for paying the variable remuneration of members of EdRAML's ExCom, insofar as they have been identified as Material Risk Takers at the Bank level (see section 5(b)), a five-year vesting period applies if they exceed the threshold provided for by the CRD V, as for members of the Bank's Executive Committee, but an instrument specific to EdRAML is used (in accordance with the AIFMD/UCITS V sector regulations).

In line with CSSF Circular 17/658, the remuneration of employees executing independent control functions must enable EdRAML to hire qualified and experienced staff for these functions. The remuneration of employees exercising control functions is mostly fixed in order to take account of the nature of their responsibilities.

The total variable remuneration (including the part allocated in the Employee Share Plan) of Identified Staff Members will in no case exceed 100% of their fixed remuneration (with the exception of the provisions of Art. 38-6, g) ii) of the LSF).

Within the limits of the applicable law, the Board may request that its members of staff repay all or part of bonuses that were awarded for performance on the basis of data that has subsequently proven to be erroneous or fraudulent ("repayment clause").

c. Golden parachutes/replacement remuneration/guaranteed variable remuneration

Under no circumstances may a "golden parachute" clause be granted to an employee if it would reward failure in the event of early termination of a contract, except where the compensation is to reward actual performance. Severance payments are determined based on clear and objective criteria, such as the performance evaluation or the evaluation of risks/costs in the event of a dispute. The components of the proposed package are subject to an approval process which includes the local and overall HR manager, the local CEO and the head of division or business line. In the event that guaranteed or replacement variable remuneration is granted as part of the recruitment of a new employee, it will be granted on an exceptional basis and will be limited to

the first year of the employment contract. The terms and conditions of any replacement remuneration must, as far as possible, be similar to the remuneration given up by the new employee, particularly in terms of the payment schedule. Severance payments and the allocation of guaranteed variable or replacement remuneration must also be approved using the following procedure:

- The proposed package is reviewed by the local HR Department.
- The proposal is sent for approval:
  - to the head of the Group function/business line (if any)
  - to the Group Head of Human Resources
  - to the local CEO

For Authorised Senior Managers and the heads of the control functions, decisions relating to severance payments and the allocation of guaranteed variable or replacement remuneration must systematically be approved by the Appointments and Remuneration Committee.

#### d. No personal hedging

Pursuant to article 38-6(p) of the LSF, all employees undertake not to use personal hedging strategies or remuneration or liability insurance to counteract the incidence of alignment with the risks incorporated into their terms of remuneration. They are reminded of this at the time of their recruitment, during their evaluations and at information sessions.

The prohibition does not apply to special hedging against fluctuations in exchange rates for employees whose fixed compensation is paid in a currency other than the euro.

#### e. Directors' remuneration

The remuneration of directors is composed of a fee (or percentage) decided on each year by the Shareholders' General Meeting, convened to approve the annual financial statements for the previous financial year, at the proposal of the Board ruling on the basis of a recommendation by the Appointments and Remuneration Committee, where relevant. Directors may not receive any variable remuneration linked to results or to any other performance criteria. They are not entitled to stock options and may not join a non-statutory pension scheme. EdRAML shall bear the cost of directors' subsistence expenses for the meetings they attend in order to carry out their duties on the Board and its committees.

#### f. Delegation of certain functions

Where EdRAML delegates certain functions such as portfolio management or risk management, it systematically ensures that:

- Delegates apply an equivalent remuneration policy within the meaning of the ESMA Guidelines or Directive 2013/36/EU as amended.
- The agreements entered into by EdRAML with the delegates provide that the rules on remuneration set out in the ESMA Guidelines must not be "circumvented" and cover any form of payment made to Identified Staff Members.



## 8. PROCESS FOR AWARDING REMUNERATION

The overall variable remuneration pool to be allocated among the employees as a whole (top-down process), including MRTs, based on the results of the performance assessment process described in the following section (bottom-up process), is determined as follows:

- In terms of ex-ante performance indicators, the Group and its subsidiaries take into account their gross operating profit and their respective operating margins, as well as the change in these indicators from the previous financial year. Other criteria such as risk and compliance criteria are also taken into account.
- Each entity monitors and controls its own risk and ex-ante performance indicators within the framework defined by the Group.
- As far as EdRAML is concerned, the Appointments and Remuneration Committee recommends the overall amount of the variable remuneration pool, broken down by business line, department, sub-department, and individual employee, to the Board of Directors for its approval.
- The process for determining the variable remuneration pool is documented, in order to justify the methods used.

Other criteria such as the overall capacity of the Group, the Bank and EdRAML to distribute variable remuneration as well as compliance criteria are also taken into account. In the event of substantial losses or a significant downturn in the economic environment or when payment of variable remuneration could compromise the solidity of the capital or liquidity levels, the Board reserves the right to reduce or eliminate the payment of variable remuneration for the period concerned.

## 9. PERFORMANCE MANAGEMENT

### 9.1 INTRODUCTION

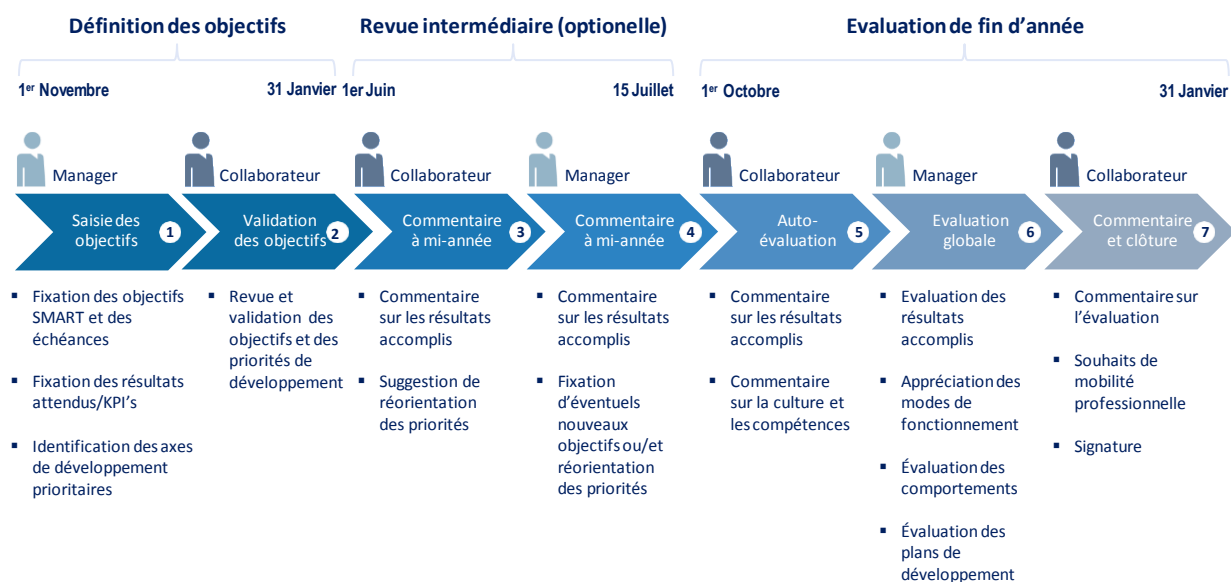
The Performance Management process is continuous and a formal evaluation, both qualitative and quantitative, is conducted annually for each member of staff. This performance evaluation is taken into account to determine remuneration, particularly the variable portion. Furthermore, the results of the evaluation are compared with those of previous years to ensure continuity in the performance evaluation of each member of staff (multi-annual evaluation principle).

The amount of the variable portion is established according to individual evaluations, evaluations at department level and also at EdRAML level, as well as the financial health of the Bank and the Group. For control functions, the criteria for assessing performance are based on specific objectives in terms of control.

As set out above, the variable portion is also determined so as to avoid incentives which could lead to conflicts of interest between employees and existing and potential clients or non-compliance with the rules of good conduct in respect of those clients, for example in the form of sales targets or any other mechanism or remuneration encouraging employees to recommend a particular product to the detriment of the client's interests or actual needs.

### 9.2 OVERVIEW OF THE PROCESS

The performance management process extends throughout the year, from the setting of targets to annual evaluations, including interim reviews:



### 9.3 THE SETTING OF TARGETS AND EVALUATION PROCESSES

Each employee sets targets with his/her manager, as follows:

- Various targets specific to the function and employee, combining both quantitative targets (for example, targets relating to business development indicators for front office functions) and qualitative targets (for example, compliance with procedures, good collaboration between departments or the success of a particular project).
- A Group qualitative target, relating to compliance with risk management and compliance rules and procedures and with, in all cases, a 20% weighting in the overall performance rating.
- A "Competence and Culture" target linked to the values of the Edmond de Rothschild Group: "Success is built step by step, Yes I can, Get on board, Working together is the solution, Details make all the difference, Have the courage to speak out, Targets are there to be exceeded, Roll up your sleeves, Fight for our name, Be curious about all our activities."
- For executives, managerial targets linked to team management, leadership, communication, etc.
- Finally, and more specifically for the Identified Staff Members, and in particular the management functions and the sales forces, mainly qualitative objectives relating to sustainability risks as set out in the Sustainability Risk Policy<sup>23</sup>.

In addition, the targets are set by reference to the "SMART" method:

- **S**pecific: precise, unambiguous
- **M**easurable: quantifiable, must contain a numerical criterion
- **A**chievable: requires effort (a challenge) but is still achievable

---

<sup>2</sup> Article 5 of Regulation No 2019/2088 of 27 November 2019 on sustainability-related disclosures in the financial services sector (hereinafter the "Disclosure Regulation") provides for the integration of sustainability risks (ESG risks) in the development of remuneration policies. The Disclosure Regulation thus establishes harmonised rules for financial market participants on transparency with regard to the integration of sustainability risks and the consideration of negative sustainability impacts in their processes as well as the provision of sustainability information with regard to financial products. The Disclosure Regulation also requires financial market participants and financial advisors to publish written policies on the integration of sustainability risks and to ensure the transparency of such integration. With regard to remuneration, the objective is to (i) achieve greater transparency, in qualitative or quantitative terms, with regard to remuneration policies, (ii) promote sound and effective risk management with regard to sustainability risks, and (iii) ensure that the remuneration structure does not encourage excessive sustainability risk-taking, and that it is linked to risk-adjusted performance. In order to comply with these provisions, *the Bank* has updated this Policy with regard to the integration of sustainability risks and has published this information on its website.

- **Realistic:** in line with available resources and means
- **Time-bound:** time-limited, with a maximum time for achievement

A rating of between 1 (maximum) and 5 is given for each evaluation criteria:

The employee is evaluated by his/her manager who allocated a rating for each target as well as an overall rating. Depending on the performance evaluation and rating received, support is put in place to improve performance and encourage future targets to be met.

For all employees, a performance below a minimum threshold in relation to risk management and compliance targets brings the rating down and may even cause the employee to be ineligible for variable remuneration.

For MRTs, the final rating in respect of the risk management and compliance target is awarded by the employee's manager. In the event of incidents relating to risks and non-compliance issues, this rating is determined in consultation with the heads of the Risk Management and Compliance functions, with a review by the Appointments and Remuneration Committee.

EdRAML is aware of the importance of aligning individual targets with those of the Bank and the Group as a whole. It consequently emphasises ethics and compliance in the culture it promotes among its employees. It does not approve of and sanctions employees who take inappropriate risks to maximise the variable component of their remuneration.

|          |  |   |
|----------|--|---|
| <b>1</b> | <b>Excellent</b>                           | The employee has made an outstanding contribution: he/she has achieved results that far exceeded expectations on all his/her targets, and has conducted himself/herself in an exemplary manner throughout the year. |
| <b>2</b> | <b>Very good</b>                           | The employee has made a contribution that clearly exceeds expectations: several targets have been far exceeded and he/she has conducted himself/herself in an exemplary manner throughout the year.                 |
| <b>3</b> | <b>Good</b>                                | The employee has performed well: he/she has achieved all his/her targets, has fully met the expectations of his/her position and has conducted himself/herself in an appropriate manner throughout the year.        |
| <b>4</b> | <b>Partially in line with expectations</b> | The employee has not achieved some of his/her targets, or some targets have been partially achieved, and/or some aspects of his/her conduct are not in line with expectations.                                      |
| <b>5</b> | <b>Unsatisfactory</b>                      | The employee has not met the requirements of his/her role.  |

In accordance with articles 38-6 (c) and (f) of the LSF, this approach allows a flexible and personalised remuneration policy to be adopted. The fixed and variable components of the total remuneration are balanced appropriately and the total volume of variable remuneration does not limit the Bank's capacity to strengthen its capital base.

## 9.4 TOOL AND TEMPLATES

There is also a dedicated digital platform, through which both employees and their managers can actively participate in the performance management process, under the supervision of the Human Resources Department.



An evaluation form template is also included in the appendix.

## 9.5 LINK BETWEEN PERFORMANCE AND VARIABLE REMUNERATION

The variable remuneration pool is distributed between all eligible members based on the importance of the function and activity carried out, as well as performance ratings (evaluation rating for targets, evaluation rating for risk management and compliance criteria, evaluation rating for values/culture, etc.) attributed to the employees in question.

The other criteria to be taken into account when determining variable remuneration also include external benchmarks (if available).

To ensure consistency and objectivity when allocating variable remuneration, compensation managers must include justifications based on objective criteria and reasons in the event of any increase in the salary and variable remuneration allocated. Justifications for the variable remuneration allocated may include a review of consistency compared with performance (including performance relating to the risk management and compliance objective), the risks and seniority of the employee in question as well as a comparison with functions at a similar level and an impact assessment.

## 9.6 EVALUATION AND REMUNERATION OF CONTROL FUNCTIONS

The variable component of the remuneration of the heads of the Risk Management, Compliance and Internal Audit functions is relatively limited in order to reflect the nature of their responsibilities. This is also set based on the achievement of the objectives linked to their functions, independently of the performance of the business sectors they control.

The remuneration of these managers is also directly supervised by the Appointments and Remuneration Committee, which checks that the level of remuneration is sufficient to ensure the

recruitment and retention of employees with the required skills and qualifications and that remuneration does not contain any components that are inappropriate for those functions.

Their performance assessments are carried out by their immediate manager. However, if any of these managers considers that their evaluation, or remuneration decision, has been unfairly influenced by any critical observations or other actions undertaken in good faith in the exercise of their duties, they may appeal that decision to the Appointments and Remuneration Committee or the Board.

## 10. DISTRIBUTION OF THE REMUNERATION POLICY

As required by UCITS V, the following information concerning the Policy are published in the UCITSs' financial statements or in a separate statement:

- The total amount of remuneration for the financial year, broken down into fixed and variable remuneration, paid by EdRAML to its employees, and the number of recipients, as well as, where applicable, any amount paid directly by the UCITS itself, including any performance fees;
- The aggregate amount of remuneration, broken down by categories of employees or other staff members referred to in Articles 111bis par. (3) of the Law of 17 December 2010 (as amended) and Article 12 of the Law of 12 July 2013;
- A description of the criteria used for performance measurement and risk adjustment;
- A description of the way in which the remuneration and benefits have been calculated;
- The results of reviews of variable remuneration that has been paid, including any irregularities that may have occurred;
- Any significant amendment to the Policy.

As required by the AIFMD, the following information concerning the Policy are published in the AIFs' financial statements or in a separate statement:

- The total amount of remuneration for the financial year, broken down into fixed remuneration and variable remuneration, paid by EdRAML to its employees, and the number of beneficiaries, and any carried interest paid by the relevant AIF;
- The aggregate amount of remuneration, broken down between senior management and EdRAML's employees whose activities have a material impact on the risk profile of the relevant AIF.

The prospectuses and annual reports of the UCITSs and AIFs must include a list of documents made available to the public and the way in which they may be obtained.

The key principles of the Policy are published on EdRAML's website. The Policy is also made available to EdRAML's employees. Employees are notified of future amendments as quickly as possible.

On February, the 28<sup>th</sup> 2022  
The Board of Directors

Approved by the Board on February, the 28<sup>th</sup> 2022  
Effective date: 1 January 2022  
EDMOND DE ROTHSCHILD ASSET MANAGEMENT (LUXEMBOURG)  
4, rue Robert Stumper  
L-2557 Luxembourg  
Grand Duchy of Luxembourg  
T. +352.24.88.1  
www.edram.lu

# APPENDICES



## APPENDIX 1: IDENTIFIED STAFF MEMBERS

Employees occupying any of the following positions are categorised as Identified Staff Members

|   |  |
|---|--|
| Conducting Officer and Chief Executive Officer        | Responsable Adjoint Conformité Réglementaire |
| Conducting Officer and Chief Operating Officer        | Responsable Corporate Secretary              |
| Conducting Officer and Chief Compliance Officer       | Responsable Discretionary Portfolio Manager  |
| Conducting Officer and Chief Risk & Oversight Officer | Responsable Due Diligences & Oversight on IM |
| Gestionnaire de Portefeuille Senior                   | Responsable External Provider                |
| Gestionnaire Opérationnel Senior                      | Responsable Finance & Invoicing              |
| Gestionnaire Senior Conformité AML/CFT                | Responsable Institutional Mandates           |
| Head of Asset Management & Partnerships               | Responsable Investments                      |
| Head of Business Development IFS                      | Responsable Middle Office                    |
| Head of IFS - Structuring & Domiciliation             | Responsable MOA Luxembourg                   |
| Head of Investment Fund Compliance                    | Responsable Private Equity Desk              |
| Head of ManCo Services, Governance & Projects         | Responsable Relationship Manager             |
| Responsable Adjoint Fund Engineering                  | Responsable Reporting AM Groupe              |
| Responsable Adjoint Risque Management "Alternatives"  | Responsable Risk Management                  |
| Responsable Adjoint Risque Management "UCITS LIKE"    | Responsable RM Fonds Groupe & Dédiés         |
| Responsable Business Analysis Risk Management         | Responsable Valuation                        |
| Responsable Business Development                      | Secrétaire Générale                          |
| Responsable Client Relationship Management            | Risk, oversight and valuation expert         |
| Responsable Client Service                            | Senior Client Investment Specialist          |
| Responsable Contrôle Interne                          | Valuation Officer                            |
| Responsable Conformité Réglementaire                  |  |

## **APPENDIX 2: PERFORMANCE MEASUREMENT INDICATORS ADJUSTED FOR RISKS**

### **A. Funding of the “bonus pool”**

Performance measurement indicators adjusted for risks incorporate quantitative criteria measured over a sufficiently long period to reflect the risk taken by EdRAML, business units and employees.

These may include risk adjusted return on capital (RAROC), return on risk-adjusted capital (RORAC), indicators concerning the number of operational errors or financial results based, among other things, on budget, productivity and profit.

### **B. Allocation and payment of individual bonuses**

EdRAML emphasises compliance in the culture it promotes among its employees. EdRAML expects responsible business conduct from its employees in order to create sustainable performance and does not approve of and does not encourage employees to take inappropriate risks to maximise the variable component of their remuneration.

When measuring performance of all employees, the risk and compliance criterion is therefore included and allocated a minimum weighting of 30%.

#### 1. Behaviours and competencies

- Behave appropriately personally in terms of risk management and compliance and actively encourage your employees to do the same
- Comply with the internal regulatory framework\* as well as applicable regulatory requirements and keep up to date with the latest developments in your areas of responsibility (e.g. via optional training courses offered by EdR)
- Avoid any action, practice or disclosure\*\* which could harm the EdR brand, our reputation or our clients' interests
- Play your role effectively in terms of your line of defence and take responsibility in terms of risk/compliance in your scope of activity by making or recommending improvements when necessary.

#### 2. Contributing to controls and remediation

- Carry out checks in your areas of responsibility and take corrective measures when necessary
- Take these measures immediately and support the Audit, Compliance and Risk functions' controls and projects.
  - ✓ If you are in contact with clients, that means carrying out regular checks to ensure that no compulsory document is missing from their files and that any missing compulsory document is obtained by the specified deadline
  - ✓ Including all KYC controls, RM enquiries and FATCA reviews
  - ✓ Including all reviews (KYC, PEP, FATCA, etc.) in terms of relationships/accounts
  - ✓ Including the Front Office's first line Of defence, for those subject to this rule

## **Examples of Key Performance Indicators (KPIs)**

- No incidents of risk tolerance limits being exceeded within your areas of responsibility and no other infractions against the risk policy
- No incidents of violations of laws, regulations or compliance policies (e.g. Anti-Money Laundering directives, crossborder activities, product suitability and call-backs) in your areas of responsibility
- No breach of directives concerning travel or representation expenses
- Successful implementation in your areas of responsibility, and by the specified deadlines, of all recommendations by the supervisory authority, the Audit department and the Risk & Compliance departments
- Successful monitoring, by you and all your employees, of all regulatory certification programmes and all compulsory training
- Feedback to appropriate levels of management, and to the Risk & Compliance departments, of all information which needs to be fed back according to applicable internal policies
- No missed deadlines for the implementation of actions under the Remediation Plan.
- No missed deadlines in the implementation of action plans following serious/very serious incidents
- No missed deadlines in the implementation of action plans following mappings/RCSAs and following the introduction of new products/services.
- Escalation and quality of incident reports in line with expected standards
- Respect for the Credit Policy in terms of quality of the application (comprehensiveness of information) ahead of the Credit Committee meeting
- No missed deadlines in the implementation of controls.
- Compliance with the duty to inform clients as well as general compliance with rules concerning the fair treatment of clients
- The indicators established by the Bank also include the monitoring of action plans in relation to recommendations made by control functions (Audit, Compliance, Risk) and the regulator by the deadlines set, as well as a control of all compulsory training by the deadlines set;
- No missed deadlines in the implementation of the recommended action plans for all reports issued
- Acceptance of risk/non-closure of auditing issues: maximum of three/year and limited to medium and low levels of risk after documented justification;
- Proactive procedure in the case of request for deferred implementation of actions following auditing issues (prior approval required, see art. 57 of CSSF Circular 12/552 as amended).

### APPENDIX 3: COMPOSITION OF THE APPOINTMENTS AND REMUNERATION COMMITTEE

EdRAML's Appointments and Remuneration Committee meets as often as required, and at least once a year, in order to ensure adequate supervision of the design and implementation of the remuneration system. It has the following members and reports to EdRAML's Board of Directors.

|                               |  |
|-------------------------------|--|
| <b>Chair</b>                  | Marc Saluzzi   |
| <b>Members</b>                | <ul style="list-style-type: none"> <li>• Christophe Caspar</li> <li>• Katherine Blacklock</li> </ul>   |
| <b>Guests</b>                 | <ul style="list-style-type: none"> <li>• Ariane de Rothschild</li> <li>• François Pauly (Group CEO)</li> <li>• Diego Gaspari (Group Head of Human Resources, Swiss employee)</li> <li>• Estelle Brahinski (Head of Human Resources)</li> <li>• Patricia Bouvard (AM Head of Human Resources)</li> <li>• Serge Weyland (CEO EdRAML)</li> <li>• Yves Stein (CEO EdR Europe)</li> </ul> |
| <b>Secretary (non-member)</b> | Sandrine Polo (Head of Total Reward)   |

## APPENDIX 4: EMPLOYEE SHARE PLAN IMPLEMENTED AT THE EDMOND DE ROTHSCHILD GROUP LEVEL

At the Group level, an Employee Share Plan may be established and applied to certain EdRAML employees. This includes participation certificates, bonus shares or share options.

The eligibility criteria for the Employee Share Plan are:

- Sustainable High Standard Performance, assessed through objective business metrics  
INDIVIDUAL CRITICALITY
- Key Roles & Responsibilities from business (impact, continuity) or regulatory standpoints  
ROLE CRITICALITY
- Key Talents & High Potential recognised as role model or expert  
INDIVIDUAL CRITICALITY
- Retention: Key contributor whose departure would significantly damage business results  
INDIVIDUAL CRITICALITY
- Annual Review of Participants list: Eligibility is not automatically renewed year over year

Description of the deferred, vesting and retention mechanism

### 1. Employee Share Plan - ExCom

The members of EdRAML's ExCom may receive non-voting shares in Edmond de Rothschild Holding S.A.

They vest over a period of five years, one-fifth each year.

Once the shares have vested, the Participants become shareholders and will receive dividends as set by the Board of Directors of Edmond de Rothschild Holding S.A.

In order to comply with regulations the participation certificates may not be redeemed until an additional holding period of one year has passed.

| Employee Share Plan 2022 LUX COMEX | 1 <sup>ère</sup> échéance | Période d'acquisition (12 mois) | Période de blocage (12 mois) | Période de vente (60 mois)   |                              |                              |                              |                            |
|------------------------------------|---------------------------|---------------------------------|------------------------------|------------------------------|------------------------------|------------------------------|------------------------------|----------------------------|
|                                    | 2 <sup>ème</sup> échéance | Période d'acquisition (24 mois) |                              | Période de blocage (12 mois) | Période de vente (48 mois)   |                              |                              |                            |
|                                    | 3 <sup>ème</sup> échéance | Période d'acquisition (36 mois) |                              |                              | Période de blocage (12 mois) | Période de vente (36 mois)   |                              |                            |
|                                    | 4 <sup>ème</sup> échéance | Période d'acquisition (48 mois) |                              |                              |                              | Période de blocage (12 mois) | Période de vente (24 mois)   |                            |
|                                    | 5 <sup>ème</sup> échéance | Période d'acquisition (60 mois) |                              |                              |                              |                              | Période de blocage (12 mois) | Période de vente (12 mois) |
|                                    | échéance                  |                                 |                              |                              |                              |                              |                              |                            |

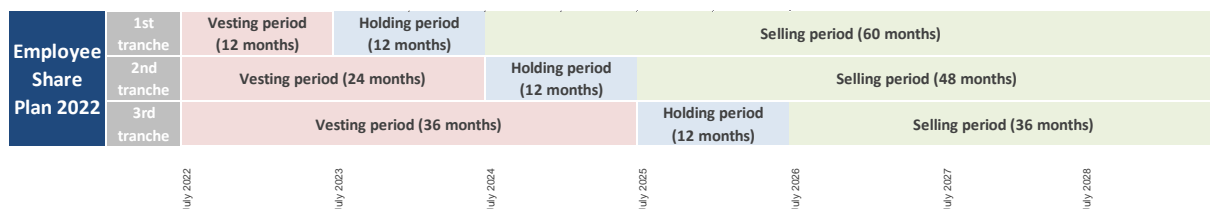
The price of the shares is communicated and set once a year in June by an independent expert who uses the same methodology each year.

At the end of the holding period, and for a period of up to five years, the participation certificates may be sold once a year during a window lasting a minimum of 30 days (around September/October).

Seven years after the date they are granted, the participation certificates are automatically bought back by Edmond de Rothschild Holding S.A.

Special conditions apply for the cases of departure, malus and claw back, in accordance with the rules of the plan.

## 2. Employee Share Plan - employees



The participants can receive participation certificates in Edmond de Rothschild Holding S.A.

The participation certificates are shares that have all economic rights attached except voting rights

They are vested over a period of three years, one-third each year  
Once the shares are vested, the Participants become shareholders and will receive dividends as set by the Board of Directors of Edmond de Rothschild Holding SA

In order to comply with regulations, the participation certificates may not be sold until an additional holding period of one year has passed.

The price of the shares is communicated and set once a year in June by an independent expert who uses the same methodology each year.

At the end of the holding period, and for a period of up to five years, the participation certificates may be sold once a year during a window lasting a minimum of 30 days (around September/October).

Seven years after the date they are granted, the participation certificates are automatically bought back by Edmond de Rothschild.

Special conditions apply for the cases of departure, malus and claw back, in accordance with the rules of the plan.

## **APPENDIX 5 - PERFORMANCE MANAGEMENT FORM**



## EdR Performance Process 2021 for [Demo Employee](#)

Manager: [Demo Manager](#)

### Overview

Click [here](#) for additional information about the EdR performance process.



### Year-End Manager Appraisal

Please rate and comment separately each component of the performance, and then the global performance. Please indicate precisely the key development priority for the coming year.

## General Information

### Employee Information

|                 |                         |                          |                    |
|-----------------|-------------------------|--------------------------|--------------------|
| <b>Name</b>     | Demo Employee           | <b>EdR joining date</b>  | 01/12/2015         |
| <b>Business</b> | xLegacy_Risks & Credits | <b>Current job title</b> | Contrôleur Risques |
| <b>Country</b>  | France                  |                          |                    |

### Manager Information

|                  |               |                 |             |
|------------------|---------------|-----------------|-------------|
| <b>Name</b>      | Demo Manager  | <b>Business</b> | - Select -  |
| <b>Job title</b> | Auditeur test | <b>Country</b>  | Switzerland |

### Objectives

All fields marked with an asterisk (\*) are mandatory.

#### Group Performance Management Objective (for managers only)

|  |                  |
|--|------------------|
| <b>Name:</b>   | <b>Weight:</b>   |
| Group Performance Management Objective (for managers only) |                  |
| <b>Description &amp; Expected Results/ KPI:</b>            | <b>Period:</b>   |
|  | 2021             |
|  | <b>Status:</b>   |
|  | In Draft         |
|  | <b>Category:</b> |
|  | <b>Deadline:</b> |



1. Complete the 2020 evaluation form by February 28th, including all the sections and particularly:
  - Evaluation of the 2020 objectives of all my direct reports
  - Assessment of the new section « competencies and culture »
2. Complete the 2021 objective setting form by February 28th, focusing mainly in:
  - Writing down the objectives in a SMART way (Specific, Measurable, Achievable, Relevant, Time based)
  - In the development plan section: define at least one development priority for eachone of my direct reports, with at least one "on the job" activity to better acquire and apply the competency in the current job.

### Ratings

Objective Rating:

3 - Good/Meets expectations

### Comments

Employee's Mid-year Comment:

Employee's Year-end Comment:

Manager's Mid-year Comment:

Manager's Year-end Comment:

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### Group Risk & Compliance Objective

Name:

Group Risk & Compliance Objective

Description & Expected Results/ KPI:

Weight:

Period:

2021

Status:

In Draft

Category:

Deadline:

Ensure at all times that all the activities under his/her responsibility\* are strictly compliant with the applicable regulatory framework and implement all measures recommended by the Group Direction to achieve this objective.

Expected behaviours:

- A. Behave appropriately and comply fully with the Group compliance, prevention and risk management requirements applicable to the occupied position.
- B. Fully respect the banking regulations and the internal regulatory framework, among others the Code of Ethics as well as all guidelines applicable to the activity (Code of Conduct (incl. Market abuse), AML, Cross-border, international sanctions, suitability & appropriateness, Call-Back, etc.).
- C. Take all the relevant measures to comply with the requirements and guarantee the protection of all processed data, as required by the information security guidelines, namely the protection of client and personal confidential information.
- D. Pass all assigned mandatory trainings in due time.
- E. Maintain appropriate records and effect all relevant controls to the required quality standards.
- F. Report immediately any identified problem or violation. In particular declare all identified incidents as required by the applicable procedures.
- G. Collaborate fully to all compliance/remediation efforts following recommendations from Risk & Compliance, Audit or the regulator.
- H. Use all available resources and make all efforts to limit the potential of loss and the recurrence of operational incidents (specifically severe or very severe) as applicable to his/her activity

## Ratings

Objective Rating:

3 - Good/Meets expectations

## Comments

Employee's Mid-year Comment:

Employee's Year-end Comment:

Manager's Mid-year Comment:

Manager's Year-end Comment:

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## Global objectives rating

Rating ★ 3 - Good/Meets expectations

Competencies & Culture

All fields marked with an asterisk (\*) are mandatory.

## Key Competencies

► CLIENT / RELATIONSHIP

2 - Above expectations

#### Client service excellence

Anticipates internal and external client needs and develops a productive relationship to exceed client expectations in the best interest of the Group.

#### Collaboration and availability

Is proactively supporting others by sharing information and knowledge and puts collective interest above personal interest.

#### Impactful Communication

Uses appropriate interpersonal skills and active listening to clearly convey messages/ideas to drive engagement and commitment.

#### Partnership and alliances creation

Works to achieve business goals by identifying and by leveraging Group expertise where ever they are across teams and organisations.

#### True and honest relationship

Is trustworthy and reliable, interacts with others treating people with respect, dignity and fairness.

#### Employee's comments

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### ► TEAM MANAGEMENT

2 - Above expectations

#### Feedback culture and open communication

Creates an open environment conducive to feedback, being a role model in making fair judgment and providing regular constructive feedback.

#### Leading people through change

Ensures people have full understanding of the need for change, increasing the level of engagement and reducing the resistance.

#### Performance management

Manages performance reviews with impact, setting clear objectives with challenging and achievable development goals.

#### Talent Development and Mentoring

Plans for and enables the development of individual's skills and competencies to enhance effectiveness and growth.

#### Team Engagement

Inspires and mobilizes people, creating best conditions for them to contribute and perform at higher standards.

#### Employee's comments

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## 10 Principles

### Cultural principles description:

- Be curious about our whole universe
- Fight for our name
- Roll up your sleeves
- Yes I can
- Success is built step by step
- Go the extra mile
- Details matter
- Have the courage to speak out
- The answer lies in working together
- Be responsible and get involved

### Employee Year-end self assessment

#### The cultural principle I consider a strength

4. Yes I can

#### The cultural principle I need to develop

9. The answer lies in working together

#### Comments on 10 Principles

Lorem ipsum dolor sit amet, consectetur adipiscing elit, sed do eiusmod tempor incididunt ut labore et dolore magna aliqua. Ut enim ad minim veniam, quis nostrud exercitation ullamco laboris nisi ut aliquip ex ea commodo consequat. Duis aute irure dolor

### Manager Year-end appraisal

#### The cultural principle my employee is particularly strong at \*

4. Yes I can

#### The cultural principle my employee needs to develop \*

7. Details matter

#### Comments on 10 Principles

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## Manager's comments on Competencies & Culture

**Comments \*** Lorem ipsum dolor sit amet, consectetur adipiscing elit, sed do eiusmod tempor incididunt ut labore et dolore magna aliqua. Ut enim ad minim veniam, quis nostrud exercitation ullamco laboris nisi ut aliquip ex ea commodo consequat. Duis aute irure dolor

## Global Competencies & Culture rating

**Rating \*** 3 - Meets expectations

### Development Plan

Please define at least 1 development priority (maximum 3) and for each, describe precisely what needs to be developed and why.

Then for each development priority:

- Define at least 1 "on the job" activity to help your employee acquire and apply this competency in his current job.
- You can also select and assign relevant training activities available on "My Learning".

### 5 areas of skills & examples to support the identification of development priorities

#### • Technical skills:

Examples: specific business processes & knowledge, languages, IT tools, etc.

#### • Cognitive reasoning skills:

Examples: problem solving, decision making, risk analysis, creativity & innovation, defining a strategy, etc.

- **Relational & soft skills** (applicable to internal and external clients):  
Examples: collaboration with diverse stakeholders, selling & pitching, communication, building trust & credibility, developing qualitative relationships across the organization, helping others, etc.
- **Execution skills:**  
Examples: managing constraints as Quality, Time & Cost, planning and making a proper use of resources, improving processes, working efficiently under time pressure
- **Management & leadership skills:**  
Examples: day to day team management, giving feedback and sharing information, managing performance and developing team members, managing change, delegating & holding people accountable, engaging and inspiring others, etc.

#### Development Area 1

**Development Priority:**

Development priority n°1

**Period:**

2021

**Description:**

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**Approval Status:**

In Draft

#### Learning Activities

Learning activity n°1

Not Started

[View](#)

#### Assessments & Comments

**Employee's Mid-Year Comment:**

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**Manager's Mid-Year Comment:**

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**Employee: Please comment on your progresses and efforts:**

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**Manager: Please comment on progresses and efforts made:**

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**The development plan allowed me to develop on this competence:**

Yes totally

**Has the employee completed the activities defined in the plan?:**

Yes totally

**I changed my behavior following the learning activities:**

Partially

**I observed a change of behavior with regards to this development priority:**

Partially

**Acquiring/ reinforcing this competence had a significant impact on my performance:**

No

**The employee's performance has improved as a result of developing this priority:**

Partially

Career Expectations



All fields marked with an asterisk (\*) are mandatory.

### Career expectations

Continue to evolve in my current position:

☒

Move to a new position: ☐

Specify:

Timing: - Select -

Move to another country:

☐

Specify:

Timing: - Select -

Move to a managerial role:

☐

Timing: - Select -

### Overall performance



All fields marked with an asterisk (\*) are mandatory.

### Overall Comments

#### Employee's Mid-year Comments

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#### Manager's Mid-year Comments

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#### Employee's Year-end Comments

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#### Manager's Year-end comments \*

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### Overall Performance Rating

#### Rating Scale Legend

|                              |  |
|------------------------------|--|
| Excellent                    | The employee has made an exceptional contribution: he/she has obtained results that exceed expectations by far on all objectives, and he/she demonstrated role model behaviours across the year.     |
| Very good                    | The employee has made a contribution that is clearly above expectations : several objectives have significantly exceeded expectations and he/she demonstrated role model behaviours across the year. |
| Good                         | The employee has achieved a good performance: he/she has achieved all his/her objectives, has met all the job expectations and has demonstrated appropriate behaviours across the year.              |
| Partially meets expectations | The employee missed achieving some of his/her objectives, or, some objectives were not fully achieved or/and he/she failed to demonstrate some behaviours at the required level for the role.        |
| Unsatisfactory               | The employee did not meet the requirements of his/her mission.   |

Overall Performance  
Rating \* 3 - Good

Attachment(s) 

Filename