

# Remuneration Policy

VERSION 1.01 – JANUARY 2017



**Calamatta Cuschieri**  
INVESTMENT MANAGEMENT

Calamatta Cuschieri Investment Management Ltd is part of the Calamatta Cuschieri Group. Registered Office: Ewropa Business Centre, Triq Dun Karm, Birkirkara, Malta. Calamatta Cuschieri Investment Management Ltd is licensed to conduct investment services by the Malta Financial Services Authority (MFSA) and is a founding member of the Malta Stock Exchange. Company No: C53094, VAT No: MT20793815.

## 1. Introduction

In accordance with its obligations pursuant to Directive 2014/91/EU of the European Parliament and of the Council (“the UCITS V Directive”), CCIM (the “Company”), as a licensed investment management company by the Malta Financial Services Authority manages a number of UCITS funds and as the appointed “Investment Manager” of the UCITS under management, is required to have remuneration policies and practices in place.

## 2. Identified Staff

The term “Identified Staff” is broadly defined in the UCITS Directive (as amended by the UCITS V Directive) and includes senior management, risk takers, control functions and other employees in same remuneration bracket, whose professional activities have a material impact on the company’s risk profile or of the UCITS it manages. Accordingly, it has been determined that the following staff members would fall within the definition of “Identified Staff”. These include the Board of Directors of the managed UCITS Company by CCIM, CCIM senior management, Investment Managers and Designated Fund Managers, Investment Analysts, other employees involved in the investment decision and risk taking process, and senior staff engaged in Control Functions. If any of the activities are delegated, as allowed under regulatory rules, then the delegated party will be included in the “Identified Staff” list.

This remuneration policy will not apply to those staff who do not fall into the “Identified Staff” category.

## 3. Scope

For the purposes of this policy, “remuneration” consists of all forms of fixed and variable remuneration paid to Identified Staff and includes all payments and benefits, whether monetary or non-monetary, paid to “Identified Staff”.

Remuneration may comprise both a fixed and a performance based or variable component. Fixed remuneration is determined on the basis of the role of the individual identified staff member, his or her professional experience, responsibility, job complexity, as well as according to relevant market conditions. Performance based remuneration is based on a combination of an assessment of the individual’s performance and CCIM’s overall results, and takes into account the interests of investors of the managed UCITS and its other stakeholders. No performance based remuneration is guaranteed. Measures are in place to avoid or appropriately manage conflicts of interest preventing such conflicts from having an adverse effect on the interests of CCIM and/or the underlying investors of the managed UCITS Company.

## 4. Remuneration Disclosures

“Identified Staff” receive fixed salaries or fixed fees only but can also receive performance based remuneration, calculated on the criteria mentioned above, which is a small percentage (less than 10%) of their overall fixed salaries or fees, therefore avoiding a potential conflict of interest. The basic fee of a Non-Executive Board member is set at a level that is on par with the rest of the market and reflects the qualifications and contribution required in view of the managed UCITS Company’s complexity, the extent of the responsibilities and the number of board meetings. Non-Executive Board Member’s remuneration is outlined in the agreements entered into by the UCITS Company appointing them and the level of remuneration will be fixed taking into account market rates and the level of risk and complexity of the UCITS Company.

## 5. Application of the UCITS V Directive Remuneration Rules to Delegates

The Company will seek confirmation from the “delegate” that it is subject to regulatory requirements on remuneration that are equally as effective as those applicable under the UCITS V Directive, including, in particular, the European Securities and Markets Authority guidelines on sound remuneration policies under UCITS V.

## 6. Annual Review and Oversight

This Remuneration Policy will be subject to annual compliance review to ensure that the policy reflects available guidelines and regulatory requirements. The Board will take appropriate measures to address any deficiencies, if any.

The Remuneration Policy does not form part of any Identified Staff member’s terms and conditions of employment or engagement and is implemented and subject to amendment at the Board’s sole discretion.

Records relating to this Remuneration Policy are kept for a period of at least 5 years.

## 7. Disclosure

The Company’s accounts are audited by (auditors) who will ensure that the necessary disclosures are made in relation to remuneration in the annual audited accounts.

## 8. Effective date

The effective date of this Remuneration Policy is 1<sup>st</sup> January 2017.