

## Remuneration Policy Addendum

### **Nedgroup Investments Funds PLC (“The Fund”)**

**All references made in this document, to the Fund Manager, the management company or management companies, means the Fund.**

UCITS V has introduced a requirement that UCITS management companies establish and apply remuneration policies and practices meeting prescribed conditions. In order to promote a consistent application of remuneration requirements ESMA issued “guidelines on sound remuneration policies under the UCITS Directive”.

The Recommendation advises that “in taking measures to comply with the remuneration principles management companies should comply in a way and to the extent that is appropriate to their size, internal organisation and the nature, scope and complexity of their activities.” It further states that not all management companies should have to give substance to the remuneration in the same way and to the same extent. Proportionality should operate both ways, some will need to apply more sophisticated policies or practices in fulfilling the requirements; other companies can meet the requirements in a simpler or less burdensome way. It is the responsibility of the management company to assess its own characteristics and to develop and implement remuneration policies and practices which appropriately align the risks faced and provide adequate and effective incentive to its staff.

In applying proportionality, ESMA states in its letter of 31 March 2016, “it is the responsibility of the fund manager to review how each remuneration principle should apply to it in a way that it aligns the interests of its staff with those of the underlying investors and having taken into account its size, internal organisation and the nature, scope and complexity of its activities”.

All elements of the Remuneration Principles have been considered. As required, the Fund has documented the process and is able to demonstrate, with the support of objective evidence, the way in which the relevant remuneration principles have been applied.

#### Summary of the findings:

- The Fund is a Self-managed investment company and as such employs no staff.
- All responsibilities are delegated to service providers under contractual arrangements.
- The Fund has a Board of Directors consisting of 5 non- executives, 3 of which receive a fixed annual salary and no variable payment or bonus is paid in cash or shares.
- The nature of the Fund is considered non- complex. There are currently 5 sub-funds with risk ratings of between 3 and 5 (low to medium risk) and the documentation of the Fund explains the investment strategy and objectives. The investment strategy and objectives may not be amended in any way without the approval of shareholders.

As the delegate responsible for the investment management of the Fund, Nedgroup Investments (IOM) Limited has, by way of contractual arrangement, confirmed that it meets the requirements of the UCITS Directive and the ESMA guidelines on sound remuneration policies under the UCITS Directive.