

IPCONCEPT (LUXEMBURG) S.A.

REMUNERATION POLICY

I. INTRODUCTION

IPConcept (Luxembourg) S.A. (hereinafter 'IPConcept' or 'Company') is a management company authorised in accordance with Chapter 15 of the Law of 17 December 2010 on undertakings for collective investment (hereinafter 'UCITS Law') and is also authorised as an alternative investment fund manager (hereinafter 'AIFM') in accordance with the Law of 12 July 2013 on alternative investment fund managers (hereinafter 'AIFM Law'). IPConcept, based in Luxembourg, is a subsidiary of DZ PRIVATBANK S.A. and thus part of the DZ PRIVATBANK Group (hereinafter 'DZPB'). It is regulated by the financial supervisory authority Commission de Surveillance du Secteur Financier (hereinafter 'CSSF'). In addition to the statutory and regulatory remuneration requirements applicable to UCITS management companies and AIFMs, in particular Directive 2009/65/EC (UCITS Directive), Directive 2011/61/EU (AIFM Directive), ESMA Guidelines on Sound Remuneration Policies (ESMA/GL/2016/575, ESMA/GL/2016/579), the provisions of the Remuneration Ordinance for Institutions (Institutsvergütungsverordnung, hereinafter 'InstitutsVergV') are observed based on the affiliation to the Group.

II. REMUNERATION POLICY IN GENERAL

The remuneration policy was adopted by the Supervisory Board of IPConcept. The Supervisory Board defines the general principles of the remuneration system that are appropriate to the size and internal organisation and the type, scope and complexity of IPConcept's business. It monitors their implementation and reviews them at least once a year.

IPConcept has established a Remuneration Committee, which makes competent and independent judgements on remuneration policy and practice as well as the incentives created for risk management. This committee comprises the members of the company's Supervisory Board. The Remuneration Committee is responsible for making recommendations on remuneration, including decisions affecting the risk and risk management of IPConcept or the UCIs¹ concerned, which are to be taken by the company's Supervisory Board. In particular, the Remuneration Committee is responsible for directly reviewing the remuneration of senior executives in the areas of risk management and compliance.

IPConcept's remuneration policy is in line with the strategic objectives, values and interests of DZPB, IPConcept as the management company and the UCIs it manages as well as its investors. It is compatible with and conducive to sound and effective risk management. It does not encourage the disproportionate assumption of risks that are incompatible with the risk profiles, contractual conditions or articles of association of the UCIs it manages and it does not prevent IPConcept from acting dutifully in the best interests of the UCIs. The remuneration policy is committed to the principles of transparency and basic security as well as performance and result dependency.

The remuneration policy applies to all IPConcept employees and is gender-neutral. It considers the various categories of employees, including the Management Board, risk takers, employees with a total remuneration in the same income bracket as the Management Board and risk takers, employees with control functions and employees whose activities have a significant influence on the risk profile of IPConcept or the special funds it manages.

¹ The generic term UCI in this remuneration policy includes the UCITS, AIFs and German special funds managed by IPConcept.

The remuneration policy is organised through the remuneration systems adopted by the Supervisory Board. In addition to fulfilling regulatory requirements, the overriding aim of the remuneration systems is to promote sustainable and risk-conscious behavior among employees and to align them with the business model, sustainable success and risk structure of the company and the UCIs it manages. At the same time, performance should be rewarded and motivated employees should be retained at IPConcept without incentivizing them to take undesirable risks.

III. REMUNERATION SYSTEMS AND STRUCTURE

When structuring the remuneration systems at IPConcept, a distinction is made between risk takers, employees not covered by collective agreements and employees covered by collective agreements. The remuneration systems generally comprise fixed and variable remuneration elements and, where applicable, fringe benefits. These are proportionate to each other, with the focus always being on fixed remuneration. The fixed remuneration is calculated in such a way that a solid basic standard of living is ensured and the fixed salary is sufficient to enable employees to enjoy a reasonable standard of living even without the variable component.

Guaranteed variable remuneration is only paid in exceptional cases in connection with the recruitment of new employees and is also limited to the first year.

IPConcept employees are obliged not to take any personal hedging or other countermeasures that restrict or cancel the risk orientation of their remuneration. This includes, in particular, external hedging transactions with the establishment of a performance obligation by third parties and the conclusion of financial futures transactions, insofar as these limits or excludes the risk of lower variable remuneration.

In general, bonuses may only be paid if the regulatory requirements are met at the time of payment and a sufficient bonus pool has been determined at DZPB and IPConcept level. In addition, individual bonus factors can be set to zero if and to the extent required by (regulatory) law.

For some of the employees, the provisions of the Luxembourg collective banking agreement apply, which grant employees appropriate remuneration. For all other IPConcept employees, the remuneration system for non-tariff employees or the remuneration system for identified employees applies.

Remuneration system for non-tariff employees: The remuneration of non-tariff employees (hereinafter 'non-tariff employees') is made up of an appropriate fixed annual salary and a performance- and results-based bonus. The fixed salary and the corresponding reference bonus are derived from the system of responsibility levels. The allocation is based on criteria.

The bonus system links the contractually agreed reference bonus with performance at several levels. The bonus calculation considers not only individual performance, but also the result of the respective organizational unit and the success of DZPB or IPConcept, including the performance of the managed UCIs. Individual performance is determined on the basis of a transparent and comprehensible performance appraisal based on a closed target agreement as part of the annual employee appraisal and converted into an individual performance factor. In principle, quantitative and qualitative targets are agreed in a balanced relationship to one another. The performance parameters on which the

bonus system is based are derived from the objectives of the business and risk strategy and thus support the achievement of the strategic objectives of IPConcept and DZPB.

If an employee was responsible for or significantly involved in negative performance contributions, the variable remuneration may also be reduced or cancelled in individual cases.

Due to regulatory requirements, there are special rules for employees in control units that ensure that their remuneration does not run counter to the particular importance of their function.

Remuneration system for identified employees: The remuneration of identified employees (also referred to as 'risk takers'), whose activities have a material impact on the risk profile of the company or managed UCIs, is also made up of an appropriate fixed annual salary and a performance- and results-based bonus. The remuneration system largely corresponds to the remuneration system for non-tariff employees, but provides for a maximum bonus in the area of variable remuneration. There is no entitlement to a minimum bonus. The target agreement system considers quantitative and qualitative targets in the form of company, segment and individual targets. 60 per cent of the targets are set over a multi-year assessment period of three years, while the remaining targets have a one-year assessment basis. If no sufficient bonus pool is identified, no bonus may be paid out. If an identified employee was responsible for or significantly involved in negative performance contributions, the variable remuneration is reduced or cancelled completely. The supervisory authority may also prohibit the payment of variable remuneration in full or in part.

If the variable remuneration exceeds the defined threshold of EUR 50,000 or one third of the total annual remuneration, this is withheld in part and subject to a blocking period. Of the variable remuneration, 20 per cent of the bonus amount is paid out immediately in the following year. A further 20 per cent is subject to a one-year blocking period. The remaining 60 per cent of the fixed bonus is withheld and spread over a period of at least four years. The variable remuneration is not earned during the retention period. The withheld variable remuneration is also subject to an additional one-year blocking period. During the retention and vesting periods, 100 per cent of the retained variable remuneration depends on sustainable performance. In the event of negative performance contributions, the variable remuneration can be reduced or cancelled completely. In addition, IPConcept may reclaim bonuses already paid out under certain conditions (claw back).