

Remuneration policy

History

Version	Release Date	Description	Amended by	Reviewed by
<u>1</u>	<u>01/02/2017</u>	<u>Remuneration Policy</u>	<u>NA</u>	<u>Board of Directors/Conducting Persons</u>

Appendices

Reference	Description
Annex I	List of the Identified Staff

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1 Glossary

Term	Description
Company	ADVANTAGE, a self-managed investment company as defined in article 27 of the 2010 Luxembourg law
Advantage Financial	ADVANTAGE FINANCIAL S.A., an investment firm as defined under the law of 5 April 1993 on the financial sector
Identified staff	Categories of staff, including senior management, risk takers, control functions and any employee (i) receiving total remuneration that falls within the remuneration bracket of senior management and risk takers, and (ii) whose professional activities have a material impact on the risk profile of the Company
Board	Board of Directors of the Company
UCITS	Undertaking(s) for Collective Investment in Transferable Securities for which the Delegate performs investment management activities on behalf of the Management Company (as listed in Annex I)
ESMA	European Securities and Markets Authority

2 Applicable regulations

2010 Luxembourg law	Law of 17 December 2010 relating to undertakings for collective investment, as amended by the Law of 10 May 2016 transposing the Directive 2014/91/EU (UCITS V directive)
UCITS Directive	Directive 2009/65/EC, as amended by the Directive 2014/91/EU of the European Parliament and of the Council of 23 July 2014 amending Directive 2009/65/EC on the coordination of laws, regulations and administrative provisions relating to undertakings for collective investment in transferable securities (UCITS) as regards depositary functions, remuneration policies and sanctions (UCITS V)
ESMA Guidelines	ESMA Guidelines on sound remuneration policies under the UCITS Directive and AIFMD – ESMA/2016/411

3 Purpose of the policy

The remuneration policy and the subsequent measures provide principles and guidelines for the Identified Staff.

The policy aims at ensuring that the remuneration process adopted by the Company promotes sound and effective risk management and does not encourage risk taking which is inconsistent with the risk profiles, rules or instruments of incorporation of the Company.

The policy concerns all form of payments of benefits paid by the Company to the Identified Staff in exchange for professional service rendered to the Company.

4 Policy alignment

The Policy and the subsequent measures have been drafted to be appropriate to the Company size, internal organization, the nature, scope and complexity of its activities.

It is also fully aligned to its business strategy, objectives, value and interests of the Company.

5 Governance

The remuneration concerns different level of responsibilities within the Company:

- **Board of Directors**
 - Laid down remuneration guiding principles
 - Approval of the remuneration policy

- **Conducting officers**
 - Annual review of the remuneration principals
 - Review of the remuneration policy implementation

The Company ensures that the remuneration of those categories of staff is appropriate to their responsibilities, expertise, tasks and powers.

In consideration of the size and organization of the Company, it has been decided that a remuneration committee will not be put in place.

At least annually, a central and independent review of the implementation of the policy will be conducted in order to understand if the policy:

- is operating as intended;
- is compliant with national, international regulations principles and standards applicable to the sector within which the Company operates

The results of the periodic review, if not conformed to the intended remuneration system, are adequately followed up with the support of the Conducting Officers.

6 Remuneration structure

6.1 Employees

The remuneration of the Company's staff members only consists of a fixed remuneration encompassing the basic monthly gross salary, 13th month salary and benefits in kind supplied to the employees. It remunerates role, responsibilities and expertise.

This fixed component of the remuneration is determined in the employment contract and will evolve according to the Luxembourg-specific indexation of salaries or via salary increases for the employee as decided by the Company;

6.2 Board of Directors

The Board comprises (i) two members that are provided based on a service agreement between the Company and Advantage Financial dated 26 March 2012 and (ii) an independent director.

The members of the Board do not receive variable remuneration in exchange for professional services rendered for the Company.

Advantage Financial and the independent director receive a financial compensation in the form of an annual director's fee decided by the Company's annual general meeting.

6.3 Conducting Officers

The two Company's Conducting Officers provide their services within the framework of a service agreement dated 8 January 2015.

The Conducting Officers do not receive variable remuneration in exchange for professional services rendered for the Company.

7 Disclosure

The annual report issued by the Company will contain information relating to the total remuneration for the financial year paid by the Company to the members of the Board, the Conducting Officers and its staff members, taking into account the proportionality principle as well as the Directive 95/46/EC (personal data protection).

The remuneration policy shall be available on the Company's website.

Annex I: List of the Identified Staff as of 01/02/2017

Name	Position
Francesco CONFUORTI	Director (chairman)
Silvestro MARISCALCO INTURRETTA	Director
Giuseppe CONFUORTI	Director
Giovanni TROMBETTA	Conducting Officer
Chio OKAUE	Conducting Officer