

EU Sustainable Finance Disclosure Regulation

The Sustainable Finance Disclosure Regulation (“SFDR” or “the Regulation”) entered into force on 10 March 2021. The Regulation requires financial market participants like Helveteq AG (Helveteq) to provide information to investors with regards to the integration of sustainability risks, the consideration of adverse sustainability impacts, the promotion of environmental or social characteristics, and sustainable investment.

This document specifically addresses Article 5 of the Regulation:

“Financial market participants and financial advisers shall include in their remuneration policies information on how those policies are consistent with the integration of sustainability risks, and shall publish that information on their websites.”

More information related to the SFDR, and Helveteq’s approach to ESG and Responsible Investment in general, can be found on Helveteq’s website (<https://helveteq.com/sfdr/>), including:

- Sustainability risk policy
- Principal adverse impact statement
- Sustainability Statement

Helveteq’s Remuneration Policy

This document provides a summary of Helveteq’s Remuneration Policy with respect to sustainability risks.

Helveteq’s Remuneration Policy aims to promote sound and effective risk management, and to discourage risk-taking which is inconsistent with the criteria set out for the sustainability and structure of the products that are being issued, and to avoid conflicts of interest.

Remuneration policy considerations in relation to the integration of sustainability risks

Helveteq's Remuneration Policy promotes sound and effective risk management with respect to sustainability risks, ensuring that the structure of remuneration does not encourage excessive risk-taking with respect to sustainability risks. Helveteq also considers the effect of potential conflicts of interest on remuneration in a way that is consistent with the integration of sustainability risk, including (but not limited to), any activities that give rise to greenwashing, misselling, or misrepresentation of investment strategies. The rules and criteria for structure and sustainability of our products are laid out in a very strict manner and carefully implemented via four eyes principle. Thereby, any of the above-mentioned risks are eliminated.

Remuneration

Remuneration of Helveteq employees having a material impact on the products' risk profile comprises of fixed and variable remuneration. Remuneration levels shall be justified according to performance of the individual concerned. The total amount of variable remuneration shall be based on a combination of the assessment of the performance of the employee and the overall results of the products, as well as the conduct of the employee under the internal procedures and compliance requirements applicable.

This includes an assessment of the performance of the employee under Helveteq's Sustainability Statement. This assessment is discretionary and shall be based on how the employee has made an effort to strengthen Helveteq's position and ecosystem with regards to the implementation of our sustainability goals.

Board approval and revision

The Remuneration Policy is approved by the Board of Directors. It shall be reviewed by the Board at least annually and updated if deemed necessary or desirable.