

Alpha Associates - Remuneration Policy

The Sustainable Finance Disclosure Regulation (SFDR) applied from 10 March 2021 requires financial market participants such as Alpha Associates 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.

Under the SFDR, the remuneration policy shall detail information on how it is consistent with the integration of sustainability risks, and financial market participants shall publish that information on their websites.

Remuneration and sustainability risks

Sustainability Risks, by their nature, may often only materialise over long time horizons and high magnitude risks are not always best captured by short-term indicators. Alpha Associates recognises that incentive structures can lead to harmful outcomes if improperly structured, and therefore must be adjusted to ensure continued alignment with the full range of desired outcomes. Therefore, Alpha Associates has adopted a Remuneration Policy effective as of 1 April 2022 intended to reflect not just short-term value contribution but, more importantly, long-term value creation of its business activities.

Variable Compensation

Among other forms of remuneration that are provided on a fixed basis, Alpha Associates awards employees variable discretionary bonuses on an annual basis. This is based on a comprehensive review of the employees' contributions across various criteria and further relates to an employee's relative contribution to sustainability initiatives of Alpha Associates. These criteria are applied among team members in line with their impact on the investment activities of Alpha Associates that may or may not be exposed to sustainability risks.

This Remuneration Policy is reviewed at least once a year by the Alpha Associates ESG Committee.