REMUNERATION POLICY

GENERAL

The remuneration policy applied by the Company is based on parameters designed to optimize its smooth, effective, substantive, and lawful operation, while remaining competitive in terms of fee levels, especially as regards its executives. At the same time, it aims at eliminating the exposure to risks that have been deemed undesirable or the mitigation thereof to acceptable and safe frameworks where risk taking is allowed, as well as at the avoidance of conflicts of interest. It mainly concerns senior Management members, risk-takers in business units, staff responsible for internal control and any employee receiving total remuneration that takes them into the same remuneration bracket as senior management and risk takers.

Furthermore, the remuneration policy is consistent with and promotes sound and effective risk management – explicitly including sustainability risk as defined in the Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector – and does not encourage excessive risk-taking and/or risk-taking which is inconsistent with the risk profiles, funds' rules or instruments of incorporation of the UCITS and AIFs that the company manages, while it provides for the link of the remuneration structure – in particular for the risk-takers – to the risk-adjusted performance.

An important parameter for the design and implementation of remuneration policy is proportionality. It is estimated that the company, despite its licensing as Alternative Investment Fund Manager, does not have a complex structure and its other activities and its size allow it to be relatively flexible as regards the remuneration policy.

The general remuneration policy is more inclined to fixed remuneration and less to variable remuneration. Variable remuneration is provided when important goals are achieved and in conjunction with corporate financial results.

Any additional variable remuneration is usually provided in cash. In the case of an option plan, the placement price was not far from the market prices, while it concerned almost all staff.

METHODOLOGY FOR DETERMINATION

The Company has appointed a three-member remuneration committee, whose members do not perform any executive function in the company. The remuneration committee is chaired by a non-executive member of the Board of Directors of the Company, while the other members are persons of recognized status and experience.

The committee, after considering the annual - usually - staff evaluation and following communication with the competent officers of each department for any explanations - clarifications, shall propose to the Board of Directors the general fixed remuneration policy that should be followed. At the same time, in November, the heads of the departments have the opportunity to submit to the remuneration committee proposals for the reward of specific employees for whom they are responsible.

The committee shall also propose a range of fees for executives who are considered to be of minor importance to the operation of the Company. The final decision shall be taken by the Board of Directors, which shall consider a number of parameters in view of its ultimate purpose for the smooth operation of the Company and the Group. For example:

- The research and study of the competitive environment
- Meritocracy and fair reward of both executives and other employees of all levels, combined with their overall performance
- Legislation and working rules
- The interest of its shareholders and the expected profitability of the Company and the Group
- The avoidance of excessive risk-taking explicitly including sustainability risk and the avoidance of conflicts of interest
- The impact of salary and non-salary cost on the liquidity, capital adequacy ratios etc.

Any variable fees are not guaranteed and are at the sole discretion of the Company and are usually related to the performance or consistency of employees in achieving the relevant goals set. The prevailing economic circumstances and the financial condition and viability of the company in the given period are significant factors for the provision of variable fees. Variable fees, when paid, are considered as not significant as a percentage on the turnover and the general operating costs. Part of the variable fees may not be in cash, but in Company shares or other financial instruments managed by the company, when the conditions for such moves allow it or are considered favorable.

Variable fees not exceeding 100% of the fixed annual fees per employee shall not be subject to the pay-out deferral limitation. Said fees shall not imply limitations in terms of their liquidity, when concerning pay-outs of UCITS units or pension plans, other than the relevant contractual limitations in force.

The remuneration policy and, subsequently, the remuneration of managers and staff are annually reviewed. The extremely volatile and unstable economic environment of recent years has resulted in a more regular - at the discretion of the Board of Directors - review, sometimes leading indeed to painful consequences, both in terms of wages and human resources.

Due to the size and structure of the Company, the control of the remuneration policy shall be carried out collectively mainly by the Board of Directors, making every effort for its compliance with the principle of good administration and for reflecting a sense of justice.

The Company has concluded an agreement with an insurance company and provides a pension plan to some of its staff, deeming it as to the interest both of the Company and employees.

The organizational structures, the nature, the internal entity structure and the size of the company allow the uninterrupted control of risks the Company is exposed to and the smooth design of its remuneration policy. Furthermore, any existing risks are limited by the choice of financial instruments and the avoidance of investments that are complicated, obscure and therefore difficult to control. The internal procedures for the smooth operation of the various departments, the avoidance of various risks and the avoidance of conflicts of interest are considered adequate, while no significant cases of malfunction have been observed or reported in the context of financial and investment activity.