

REMUNERATION POLICY OF HEDGE INVEST INTERNATIONAL FUNDS PLC

(March 2021)

Hedge Invest International Funds plc (“**Company**”) adopts the following remuneration policy (“**Remuneration Policy**”) for persons determined under clause 1 below (“**Identified Staff**”).

The Company is an investment company with variable capital incorporated on 10 June 2012 and authorised in Ireland as an undertaking for collective investment in transferable securities with segregated liability between its funds pursuant to the European Communities (Undertakings for Collective Investment in Transferable Securities) Regulations, 2011 (S.I. No. 352 of 2011) as amended by the European Communities (Undertakings for Collective Investment in Transferable Securities) (Amendment) Regulations, 2016 (S.I. No. 143 of 2016) (“**Regulations**”) as may be further amended, supplemented or consolidated from time to time.

The Company has not appointed an external management company and therefore the directors of the Company (“**Board**”) are directly responsible for the operating and organisational requirements of the Regulations, as well as ensuring that the Company meets the requirements of the Central Bank (Supervision and Enforcement) Act 2013 (Section 48(1) (Undertakings for Collective Investment in Transferable Securities) Regulations 2015 and related guidance issued thereunder (“**Central Bank Regulations**”).

The Company is self-managed and in preparing this Remuneration Policy, the Company has made an assessment of the nature, scale and complexity of its business in line with the Regulations, and has determined that overall, its business activity is relatively low risk when compared to other fund structures.

This Remuneration Policy also takes into consideration and is consistent with the requirement, as set out in EU Regulation 2019/2088 on sustainability related disclosures in the financial services sector (“**SFDR**”), to ensure that remuneration practices are consistent with the integration of sustainability risks in the investment decision making process (the “**Sustainable Remuneration Requirements**”).

1. Determination of Identified Staff

This Remuneration Policy applies to those categories of staff, including senior management, risk takers, control functions and any employee receiving total remuneration who fall within the remuneration bracket of senior management in addition to risk takers whose professional activities have a material impact on the risk profile of the Company.

The following persons are considered to be the “**Identified Staff**” of the Company, for the purposes of this Remuneration Policy:

- any member of the Board:

The Company does not intend to offer performance-related remuneration to its Identified Staff.

However, in the event that the Company decides to offer performance-related remuneration in the future, it will adhere to the Regulations and the ESMA Level 2 Guidance in relation to Directive 2014/91/EU (“**Guidance**”). This Remuneration Policy will be updated, as appropriate, in advance of the implementation date of the Guidance.

The remuneration of the Board, which is a set at a fixed amount, is set at a level that is on par relative to the funds industry market and reflects the qualifications and contributions required of the Board, in view of the Company's overall complexity.

2. Principles of Remuneration of the Board and Control Functions

The Board and designated individuals of the Board who carry out pre-approved control functions will not receive any additional fixed or variable remuneration in connection with their work as Board members.

Pensions policy

The Company does not make contributions towards the pensions of Identified Staff.

Payments related to the early termination of a contract

There is no policy currently in effect relating to remuneration in the event of the early termination of a contract.

3. Integration of Sustainability Risks

As described above, the Company is controlled and managed by the Board and the members of the Board are the "Identified Staff" of the Company. The Company only remunerates certain directors who are not involved in the investment decision making process. Accordingly, the Sustainable Remuneration Requirements are not applicable to the Company.

4. Review and amendments of the Remuneration Policy

The Remuneration Policy is reviewed by the Board at least once per year.

In reviewing the Remuneration Policy, the Board will consider whether the overall remuneration system:

- (a) operates as intended (in particular, that all agreed plans/programmes are being covered, that the remuneration pay-outs are appropriate relative to the complexities of the operation of the Company) and that the risk profile, long-term objectives and goals of the Company are adequately reflected; and
- (b) is compliant with national and international regulations, principles and standards.

Any proposed amendment to the Remuneration Policy requires:

- (c) firstly, an assessment of the proposed amendment by the Designated Person responsible for Risk Management in accordance with the principles set out under clause 2 above; and
- (d) secondly, approval by the Board, taken by a simple majority of those directors present or represented at the relevant meeting.

5. Disclosure

The Company discloses, without prejudice to confidentiality and data protection provisions, relevant information on the Remuneration Policy in its Annual Report, Prospectus and Key Investor Information Documentation.

At all times, this Remuneration Policy will be made available to Identified Staff.