

**SFDR Article 5 Remuneration Disclosure**  
**January 2026**

In accordance with Article 5 of Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector (“SFDR”), Andbank Asset Management Luxembourg’s (“AAML”) confirms that its remuneration policies are consistent with the integration of sustainability risks.

AAML’s remuneration framework is designed to promote sound and effective risk management and does not encourage excessive risk-taking with respect to sustainability risks. Where relevant, sustainability risks are taken into account as part of the overall risk management processes and performance assessment applicable to relevant staff.

AAML disciplined pay-for-performance framework focuses on Total Compensation – base salary and incentive pay - so that pay is commensurate with the overall performance of AAML, respective businesses and individual performance. This includes a balanced discretionary approach to assess the employee’s performance throughout the year against four broad dimensions - business results, client/customer/stakeholder, teamwork and leadership, and risk, controls and conduct.

These performance dimensions appropriately consider short, medium and long-term priorities that drive sustained shareholder value, while accounting for risk, controls, and conduct objectives. To promote a proper pay-for-performance alignment, AAML does not assign relative weightings to these dimensions and also considers other relevant factors, including market practices.

When conducting this balanced assessment of performance, for select employees in the Portfolio Management population, regard is given to the performance of relevant funds / strategies. Each Portfolio Manager’s performance is evaluated annually based on a number of factors, including, but not limited to:

- The primary consideration which is blended investment performance relative to the competitive indices or peers, with investment performance generally weighted more to the long term;
- individual contribution relative to the client’s risk and return objectives;
- adherence with AAML’s compliance, risk, regulatory and client fiduciary responsibilities including adherence to the sustainability risk policies; and
- Compliance with internal ESG or sustainability risk policies and procedures.

An individual performance assessment using the criteria above, in addition to the overall performance of the relevant business unit and investment team is integrated into the final assessment for an individual Portfolio Manager as part of the assessment of Business Results.