

Ⓜ THETA CAPITAL

# Remuneration

# Remuneration Policy

This policy applies to Theta Capital Management B.V. (TCM).

## 1. Scope

This Remuneration Policy applies to TCM and comprises a mandatory framework which it is required to apply when granting remuneration, especially Variable Remuneration, to Employees.

TCM defines:

- Fixed Remuneration: Payments or benefits without performance criteria, such as base salaries.
- Variable Remuneration: Additional payments or benefits contingent on performance or other contractual criteria. This includes bonuses and incentives.

## 2. Purpose

Implementation of a proper remuneration policy is key for the identification, management and prevention of risks related to- or caused by unbalanced incentives. It ensures everyone's efforts align with company goals and encourages ethical behaviour. A fair remuneration policy is thus crucial for keeping the business running smoothly and ethical.

Acting in a Client's and Participant's best interest is of TCM's utmost priority. TCM does not remunerate or assess the performance of our Employees in any way that conflicts with this main objective as well as the Applicable Law. As such, this Remuneration Policy aims to align as much as reasonably possible the objectives and interests of (i) Participants and/or the Clients, (ii) the Employees and (iii) TCM. The Remuneration Policy should specifically prevent an unfair treatment of Clients and Participants. The Remuneration Policy must be transparent and consistent with compliance and sound and effective risk management and may not encourage risk-taking beyond the level of the risk appetite of TCM and the Clients and Participants.

The Remuneration Policy does not include incentives that undermine the obligation to act in the interests of Participants, Clients and other stakeholders, or other duties of care.

The Remuneration Policy stimulates intrinsic motivation in every Employee to achieve the objectives of TCM. The applied framework is designed to attract, motivate and retain qualified staff. This will ensure to align employee performance with company goals and show commitment to fair and competitive pay practices in line with the Applicable Law. To the effects of protecting the integrity of TCM and preventing financial disparities and conflicts of interest.

This Remuneration Policy is fair and understandable, it is gender neutral and guided by the principles of equality and non-discrimination.

The Remuneration Policy must support the long-term strategy of TCM focused on financial stability and continuity.

## 3. Responsibility for the Remuneration Policy

The Board is responsible for the preparation, approval, implementation, and evaluation of this Remuneration Policy. The Supervisory Board shall also approve of this Remuneration Policy to the extent the Remuneration Policy is applicable, and of each amendment. The Supervisory Board will ensure that this Remuneration Policy will be reviewed on an annual basis as a minimum.



#### **4. Sustainability**

The (performance) objectives for employees do not contain any incentives that could encourage them to take excessive (sustainability) risks. This means that employees do not receive additional compensation when sustainable investment titles are managed or advised. Employees involved in asset management and investment advice follow the required job-related training and the associated professional education program. This provides employees with tools to continuously and effectively weigh relevant investment and sustainability risks and, if necessary, limit them. It promotes that a product or service is suitable for a customer.

#### **5. Remuneration package**

- In 2023 the number of Employees that received remuneration of €1 million or more was null.
- The total variable remuneration for 2023 amounted to € 201,750.

This remuneration policy was last updated on the 21st of December 2024.

