

# Gresham House Asset Management Ireland Limited (the AIFM)

## Remuneration Policy (extract)

August 2022

### **Introduction:**

Gresham House Asset Management Ireland Limited (Gresham House, Ireland) is authorised by the Central Bank of Ireland as an Alternative Investment Fund Manager pursuant to the European Union (Alternative Investment Fund Managers) Regulations, 2013.

### **Purpose:**

Gresham House, Ireland meets the definition of a Financial Market Participant (“FMP”) under the Sustainable Financial Disclosure Regulation (the SFDR). This extract is a carve out of the Gresham House Asset Management Ireland Limited remuneration policy for the purpose of investor awareness and SFDR compliance. While applying the proportionality guidelines, Gresham House, Ireland does not currently possess a remuneration/compensation committee however, all employee’s remuneration is governed by the remuneration policy (hereinafter called “the policy”). The policy has been drafted taking into consideration AIFM remuneration guidelines and the aim of this policy is to ensure all employees receive fair, consistent and competitive salaries. The policy will always remain under constant review as required to ensure compliance with regulatory obligations and to ensure it is fit for purpose.

### **Performance management:**

Performance management is measured by senior management in both a quantitative and qualitative capacity with performance evaluations take place on at least an annual basis. In line with SFDR, the AIFM has identified the Gresham House Global Thematic Multi-Asset Fund as a socially responsible investing fund whilst not pursuing a sustainability mandate or objective. For all other funds under management, sustainability among other risk factors is considered prior to investment. As stated above, the AIFM considers and monitors the integration of sustainability risk / ESG factors (please see risk factors of prospectus for further information) across day-to-day portfolio management, and like all other risks, this is considered as part of the policy. The policy is considered consistent and appropriate given the Company’s approach to socially responsible investing. The policy is in effect, providing for sound risk management principles and is to discourage excessive risk taking from those in a material risk taking function. As bottom-up investors we consider all relevant ESG factors prior to purchase relevant to an individual security and apply an ESG risk level to all our equity and fixed income holdings. Where we believe there is a high risk of a significant adverse impact from ESG factors on a security, we will not hold it in our portfolios. It is the responsibility of our in-house team of portfolio managers to conduct this research prior to purchasing a stock which is overseen by our internal risk department.

Gresham House, Ireland has identified the members of the Investment Management Team as the material risk takers (MRT’s) listed below:

Niall Dineen – CIO (Gresham House Global Multi-Asset Fund & Gresham House Global Thematic Multi-Asset Fund)

John Mattimoe – Senior Fund Manager (Gresham House Global Small Company Fund)

Pat Kilduff – Senior Fund Manager (Gresham House Euro Liquidity Fund)

Derek Heffernan – Senior Fund Manager (Gresham House Global Equity Fund)

**Fixed Remuneration:**

MRT's receive a fixed remuneration which reflects, skill, experience as well as the local market. Base salaries are paid monthly and other benefits to MRT's are available such as health insurance, pension benefits.

**Variable Remuneration:**

The MRT's may be eligible for a variable annual performance award. The level of award will depend on performance of the Investment Team as a whole and the overall firm performance. The variable remuneration is at the total discretion of the firm. To reinforce the emphasis on sustainability, the firm not only considers what was achieved, but how the results were achieved when deciding on variable remuneration.

The Gresham House, Ireland remuneration principles are designed to attract a diverse and talented workforce, align reward with consideration of risk factors and support appropriate and controlled risk taking in line with fund objectives and strategies.