

# Remuneration Policy

This policy is applied to WAY Fund Managers Limited and Fund Partners Limited trading under the name Fund Partners (FP) all reference to FP will incorporate both entities.

The overarching objective of the policy is to ensure investors in the Collective Investments in Transferable Securities (UCITS) and Alternative Investment Funds (AIF) Funds that FP manage are not disadvantaged or exposed to unacceptable practices or risk taking due to the remuneration methods or incentives available to employees.

This will be achieved by the remuneration policy being;

- consistent with and promoting sound and effective risk management,
- discouraging risk-taking which is inconsistent with the risk profiles, rules or instruments of incorporation of the Funds which FP manage,
- aligned to FP's business strategy, objectives, values and interests,
- aligned to the interests of the investors of the Funds FP manage, and including measures to avoid conflicts of interest,
- capturing fixed and variable components of remuneration, including salaries and discretionary pension benefits,
- not rewarding failure.

There are regulatory requirements for UCITS and AIF fund which require FP to establish and apply a remuneration policy and practices for its staff that have a material impact on the risk profile of FP or the Funds under management. FP has applied those requirements to its policy. Practices must be consistent with and promote sound and effective risk management, not encourage risk taking which is inconsistent with the risk profile of the fund as detailed in the instrument of the fund or the prospectus and does not impair FP's compliance with its duty to act in the best interest of the fund it manages.

FP deems themselves as lower risk due to the nature of the activities it conducts and the size of the firm. Therefore the remuneration strategy is governed by the FP Board and FP has chosen not to have a Remuneration Committee.

The FP Remuneration Policy applies to those categories of staff whose professional activities have a material impact on the risk profiles of FP or the Funds it manages This includes senior management, risk takers, control functions, and any employees receiving total remuneration that takes them into the same remuneration bracket as senior management and risk takers. The policy will also encompass staff who receive compensation for the performance of portfolio management or risk management activities on behalf of FP.

Based on FP's assessment, the remuneration code will apply to the following roles:

- Chief Executives; captured in their capacity as Board members, CF1 and CF3.
- Director of Risk and Compliance; captured in their capacity as Board members, CF1, CF10 and CF11.
- Technical Director; captured in their capacity as Board members, CF1
- Head of Finance; captured in their capacity as the CF10a and due to total remuneration amount taking them into the same remuneration bracket as senior management and risk takers.
- Executive Director; captured in their capacity as Board members, CF1
- Non-Executive Director; captured in their capacity as Board members, CF2
- Head of Product Management and Client Relations; captured due to total remuneration amount taking them into the same remuneration bracket as senior management and risk takers.

### **Delegated activity**

Based on FP's assessment, appropriate arrangements are in place for all the delegates who are deemed to comply with remuneration regulation considered for this policy and are deemed equivalent under the UCITS and AIFMD Directives.

This assessment is reviewed on an annual basis together with a review of the Remuneration Policy and is ratified by the FP Board.

**Fund Partners Ltd** (registered in England and Wales No 4162989). Authorised and regulated by the Financial Conduct Authority

**WAY Fund Managers Ltd** (registered in England and Wales No 4011838). Authorised and regulated by the Financial Conduct Authority

**Registered address details for both companies:** Cedar House, 3 Cedar Park, Cobham Road, Wimborne, Dorset,

BH21 7SB London office: 8/9 Lovat Lane, London, EC3R 8DW

'**Fund Partners**' is a trading style of Fund Partners Ltd and WAY Fund Managers Ltd