



Compensation policy

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Introduction

The general compensation policy aims to attract and retain the most competent, most talented individuals, while encouraging all employees' commitment to customer satisfaction.

In accordance with the recommendations of the "UCITS V" Directive, Graphene Investments ("the Company") designs and implements policies and procedures that aim to align its shareholders' and employees' interest to that of its customers over the long-term.

For this purpose, it aims to promote a sound, efficient management of risk, to prevent behaviors that may be incompatible with risk profiles or investment constraints applicable to managed portfolios, and to avoid any conflict of interest that may lead risk-taking to be excessive or incompatible with clients' interest.

The Compensation Policy sets a number of principles that apply to individual compensations to serve this purpose. Incentive plans, dividends and other advantages awarded to certain employees as part of their holding shares in the Company are out of this Policy's scope.

Individual Compensation Principles

Employees' compensation is comprised of two components: the base salary rewards the proper execution of the tasks listed in each job description, whereas the "bonus" is a variable complement, which rewards individual or collective achievements that surpassed expectations.

Each employee's annual appraisal is carried out against individual objectives, which relate to the Company's activity and the employee's specific position. It covers, in a balanced way, actual achievements and individual behavior, in all areas, which may impact the long-term interest of the Company and its customers. Each employee is appraised by his/her direct supervisor, in light of a detailed knowledge of his activity, and on the basis of objective criteria that measure his contribution's quality in a long-term perspective. The integration of durability risks, whose influence on the investment process is described in the ESG policy, is not assessed separately. It is taken into account, together with many other aspects, in the appraisal of the quality and depth of each individual's research work.

The appraisal should not refer to purely quantitative criteria unless these can be designed to exclude the influence of any exogenous factors with all the required degree of detail. In particular, no component of individual compensation may rely on a formula (percentage, etc) that links it formally to quantifiable criteria that may encourage risk-taking (performance, AUM growth etc).

The Company's bonus pool is determined each year by the Management, which ensures that its amount doesn't threaten the Company's financial health, nor impede its ability to invest in the resources and tools which may be necessary for its long-term development.