

Policy – Remuneration (Web version)

Genève Invest (Europe) S.A

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Approved by the Board of Directors on 19.04.2026.

1. Introduction

1.1. Presentation

Genève Invest (Europe) S.A. (hereinafter "**Genève Invest**" or "**the Firm**") is an investment firm (IF) incorporated in Luxembourg, authorized and regulated by the Commission de Surveillance du Secteur Financier ("CSSF") as a "Small and non-interconnected (SNI) Class 3 IF".

1.2. Purpose

The remuneration arrangements, procedures and practices are an integral part of sound internal governance arrangements in institutions and contribute to effective and sustainable risk management.

In line with these principles, Genève Invest (Europe) S.A. has established this remuneration policy (hereinafter "**the policy**") which adheres to the applicable regulatory framework and is proportionate to the nature, scale, and complexity of its activities. The policy sets out the remuneration practices, procedures, principles and rules applicable to the Firm.

1.3. Scope of Application

This remuneration policy applies, on a gender-neutral basis, to all staff employed by the Firm and remunerated for the activities carried out to Genève Invest (any type of remuneration, either through regular fixed monthly payments, variable remuneration or other payments) and regardless of the function or task assigned/assumed. The policy is also applicable at the level of the subsidiaries, branches and information offices.

2. Legal and Regulatory Background

This Policy has been developed in accordance with the following regulatory framework, as stated by the CSSF¹ within its remuneration requirements for Small and Non-Interconnected Investment Firms (class 3):

- CSSF Circular 10/437 on "Guidelines concerning remuneration policies in the financial sector";
- Law of 30 May 2018 on markets in financial instruments, transposing the requirements of the Directive 2014/65/EU on markets in financial instruments (MiFID II).
- Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments and amending Directive 2002/92/EC and Directive 2011/61/EU.

¹ In reference to the remuneration requirements for investment firms published by the CSSF: [Remuneration requirements – CSSF](#).

3. Proportionality principle

Pursuant to the CSSF Circular 10/437, financial institutions shall take into account the nature, the size as well as the specific scope of their activities when applying remuneration regulatory requirements set by the Circular.

Given its relatively small size, the Firm has been classified as a class 3 investment firm by the CSSF in line with Article 12 (1) of the IFR, subject to proportionate application of remuneration requirements. Consequently, considering the internal organization, nature and volume of its business and complexity of its activities, and in application of the proportionality principle, the Firm will not be subject to the remuneration rules for its identified staff regarding deferrals and payment in financial instruments, as well as the establishment of a Remuneration Committee.

4. General principles

The Remuneration Policy of Geneva Invest is designed and implemented based on the below general principles:

- The remuneration policy is consistent with and promotes sound and effective risk management and does not encourage risk-taking that exceeds the level of risk tolerated by Genève Invest.
- The remuneration policy is in line with the business strategy, objectives, values, long-term interests and sustainable growth of Genève Invest, including factors and risks related to environmental, social and governance (hereafter, “ESG”).
- The policy includes specific measures to prevent, identify and manage conflicts of interest, and is designed so that staff are not incentivized to recommend or sell particular products, or to route orders to particular venues, in a way that is not in the best interests of clients or that would infringe investor protection regulatory requirements (MiFID II).
- The policy encourages prudent risk taking, responsible business conduct and the fair treatment of clients, and ensures that remuneration structures do not compromise the objectivity and independence of staff.
- The policy aims to attract, retain and motivate qualified professionals in alignment with the Firm's culture and values.
- Variable remuneration will only be paid if it is sustainable according to the financial situation of Genève Invest as a whole. Without prejudice to the general principles of national contract and labour law, the total variable remuneration will normally be significantly reduced or entirely withheld if Genève Invest's financial performance is weak or negative, taking into account both current remuneration and reductions in the payment of previously earned amounts, including through malus or clawback provisions.
- Payments in connection with the early termination of a contract reflect performance over time and are designed in such a way that failure is not rewarded.
- Guaranteed variable remuneration is granted only in exceptional circumstances, limited to new hires and restricted to the first year of employment.
- Employees must not use personal hedging strategies or take out remuneration- or liability-related insurance that would counteract or undermine the risk-alignment mechanisms built into their remuneration requirements.

- Variable remuneration is not paid through vehicles or methods that facilitate the circumvention of the requirements of this remuneration policy.

5. Identified staff

Based on article 1.2 of CSSF Circular 10/437, the remuneration policy shall cover remuneration of persons whose professional activities have a material impact on the risk profile of the Firm. In this context, the Firm identified the following categories of employees as Identified Staff:

- Members of the Management Body in its Supervisory Function: The Board of Directors.
- Members of the Management Body in its Management Function: The members of the Authorized Management.
- Members of the Senior Management: The Chief Investment Officer.
- Staff member having managerial responsibilities for the activities of a control function: The Chief Compliance Officer and the Chief Risk Officer. The Chief Internal Auditor is excluded, as the internal audit function is currently outsourced.

The list of “identified Staff” shall be reviewed and assessed on annual basis to ensure the adequate and up-to-date categorization of these staff members.

6. Remuneration structure

The present policy defines the components of the employee remuneration at the Firm, either fixed or variable remuneration. As a general rule, the fixed salary represents the employee's main remuneration, while the bonus is a conditional additional payment depending on the assessment of predefined performance criteria.

6.1. Fixed remuneration

The fixed remuneration means payments or benefits which an employee is contractually entitled to receive that are permanent, irrevocable in nature, predetermined and non-discretionary, based on the predefined criteria, such as the employee's roles, the assigned responsibilities, the relevant experience and the acquired expertise.

6.2. Variable remuneration

6.2.1. General principles

All employees of Genève Invest can be eligible for variable remuneration in the form of a discretionary bonus (“the bonus”). The bonus is awarded based on the performance of employees in respect of performance targets and objectives set during the annual performance evaluation process.

There is no contractual right or entitlement to a bonus. Variable remuneration is entirely discretionary. Guaranteed variable remuneration is granted only in exceptional circumstances, limited to new hires and restricted to the first year of employment. Additionally, Genève Invest does not provide a pension scheme.

Variable remuneration is transparent for employees, who are regularly informed about their remuneration, the performance criteria applied and the link between performance evaluations and remuneration; this enables the Authorized Management to align the interests of stakeholders in the best possible way by rewarding the achievement of defined targets.

6.2.2. Principles under MIFID II

The Firm's remuneration policy and practices are designed to comply with MiFID II requirements, particularly to encourage responsible business conduct, fair treatment of clients as well as protecting best interests of consumers and avoiding conflict of interest as set within section 8. of this policy, ensuring proper measures are in place regarding "relevant persons".

6.2.3. Ex-post risk adjustment

The Firm reserves the right i) to require repayment of all or part of any bonus awarded to an employee for performance or ii) to withhold or to reduce the value of all or part of any variable remuneration, in circumstances deemed relevant by the Firm, such as fraudulent conduct by the employee or significant breach of regulatory requirements (including MIFID II and CSSF Circular 10/437) or the imposition of a regulatory sanction on the employee. The above principles are also applicable in case deferral on significant bonus is applied.

6.3. Balance of fixed and variable remuneration components

The variable component of the remuneration of all staff shall not exceed 100% of the fixed component of the remuneration.

6.4. Remuneration of the Board of Directors

The members of the Board of Directors only receive a fixed remuneration per meeting attended in consideration of their duties as Board members or a fixed hourly rate for additional work. The amount of these payments is reviewed and determined annually by the shareholders of the Firm at the General Meeting.

6.5. Remuneration of the Authorized Management

The performance assessment of the members of the Authorized Management is performed by the Board of Directors who will determine the variable remuneration based on the results of this assessment.

6.6. Remuneration of Internal Control Functions

Staff engaged in internal control functions (Risk Management, Compliance, Internal Audit) shall be remunerated in a manner that is independent of the performance of the business areas they oversee, does not compromise the objectivity or independence of the internal control function and reflects the achievement of control objectives linked to their functions.

The remuneration of staff members having managerial responsibilities for the activities of internal control functions shall be subject to direct oversight by the Board of Directors, in line with the above-mentioned principles.

6.7. Remuneration of identified Staff

The remuneration of identified staff is directly overseen and approved by the Board of Directors, based on the results of the performance assessment.

6.8. Significant Bonus

Significant amount of bonus, as defined within Genève Invest, awarded to member staff shall be subject to the formal approval of the Board of Directors and deferred on a period of three years.

7. Performance Assessment

The Firm has defined a multi-year framework for the assessment of the performance of its employees.

The evaluation process and methodology are regularly reviewed and validated by the Authorized Management; it focuses on how employees meet defined objectives linked to their role within the Firm.

The determination of the variable remuneration awarded to each employee will depend on the degree of achievement of the qualitative and quantitative criteria, taking into consideration i) ESG related criteria and ii) qualitative criteria aligning the interest of the Firm and relevant persons with clients' interests.

The determination of variable remuneration follows the principle of sustainability and reflects the Firm's conservative risk culture.

8. Conflict of Interest

The principles of the policy are designed and implemented to ensure the adequate prevention of conflicts of interest and avoid to create conflict of interest or incentive that may lead to favor an employee or the Firm's interests to the potential detriment of any client.

9. Governance

9.1. Board of Directors:

Given the size, the internal organization, nature and volume of its business and complexity of its activities, and considering the principle of proportionality, the Firm did not establish a dedicated remuneration committee.

The Board of Directors shall define and approve the generale principle of the remuneration policy and oversee its effective implementation throughout the organization to ensure the adequate maintenance of its guiding principles and ensure the proper alignment and effective implementation with the Firm's overall corporate governance framework, risk culture, risk appetite and the related governance processes.

9.2. Authorized Management:

The Authorized Management is part of the design of the remuneration policy and is responsible for implementing the remuneration policy in line with the guiding principles approved within this policy and decisions taken by the Board of Directors. It also reports on a regular basis to the Board of Directors on the proper adherence to this policy.

9.3. Internal Control Functions:

9.3.1. Compliance and Risk Management functions:

The Compliance and Risk Management Functions are part of the design of the remuneration policy and ensure on a regular basis the assessment of the remuneration practices to ensure:

- The compliance of the remuneration principles and practices with the legislation, regulations and internal policies, performed by the Compliance function who will report any identified compliance issues to the governing bodies of the Firm.
- The alignment of the remuneration structure and practices with the risk profile of the Firm, performed by the Risk Management function.

The Compliance and Risk Management functions also contribute to the annual review and assessment of the categorization of the staff members as “identified staff”.

9.3.2. Internal Audit function:

On annual basis, the Internal Audit function reviews and verifies compliance of remuneration practices with policies and procedures defined by the Board of Directors and with relevant regulatory requirements, reporting on the outcome of this review to the Board of Directors. A copy of the corresponding reports is made available to the CSSF.

9.4. Head of HR

The Head of HR is closely involved in the design of the remuneration policy and is responsible for its ongoing maintenance with the relevant governing bodies and internal control functions of the Firm. In particular, it is mainly responsible for preparing, updating, and maintaining the remuneration policy and monitoring its consistent application across the Firm;

The Head of HR also ensures that remuneration arrangements are sufficiently competitive to attract and retain qualified staff, while remaining aligned with the Firm’s risk appetite, long-term interests and the protection of clients.

10. Disclosure

The Firm ensures that this remuneration policy, as well as any amendments to it, is disclosed in a clear, transparent, accessible and easily understandable manner to all relevant internal and external stakeholders.

11. Review and Update

This Remuneration Policy is reviewed at least annually by relevant entities within the Firm (Board of Directors, Authorized Management, Compliance Function, Risk Management Function) and updated as needed.

It shall also be reviewed on an ad hoc basis in case of regulatory changes/updates or significant changes to the Firm's business model, organization, risk profile, or any other changes that could affect the effectiveness of remuneration principles and practices or compliance with applicable regulations.

The review of the remuneration policy can be performed on assistance with external experts.

Amendments to this Policy shall be submitted and approved by the Board of Directors and shall be brought to the attention of the staff of the Firm.

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