

Absolute Return Investment Advisers (ARIA) Limited

Remuneration Policy

December 2019

This policy sets out our policy with regards to the remuneration packages and incentive schemes within our firm.

All of our remuneration packages and incentive schemes are designed to ensure that our clients are treated fairly and their interests are not impaired, for example, by our remuneration policies creating a conflict of interest that encourages staff to act against the interests of any of our clients.

Scope of policy

This policy will apply to all Relevant Persons within a Regulated Person who can have a material impact, directly or indirectly, on Services and Ancillary Services provided by the Regulated Person or on its corporate behaviour regardless of the type of Clients, to the extent that the remuneration of such persons and related non-financial incentives may create a conflict of interest that encourages them to act against the interests of the Clients.

Below mentioned individuals with the aforesaid designations will fall under the scope of this policy:

Name	Designation
Andrew McKenzie-Smart	BOD
Matthew Brittain	BOD
David Brimacombe	BOD
Kasia Januchowska	Compliance Officer
Chloe Thompson	Head of Platform & Investment Admin
James Hindmarch	Portfolio Manager
James Slaney	Financial Adviser
Lars Singleton	Financial Adviser

Definition of remuneration

For the purpose of this policy, 'remuneration' means all forms of financial or non-financial benefits or payments made by our firm (directly or indirectly) to individuals who provide investment services to our clients.

"Remuneration Bracket" would mean the range of the total remuneration of each of the staff members in the senior manager and risk taker categories – from the highest paid to the lowest paid in these categories;

Our firm's remuneration and incentive schemes

Any remuneration package or incentive scheme we have in place, or may introduce in the future, will not:

- Remunerate or assess performance of our staff in any way that conflicts with our duty to act in the best interest of our clients.

- Include any arrangement by way of remuneration, sales targets or otherwise, that could provide an incentive to our staff to recommend a particular product to a retail client where a different product could be offered that would better suit their needs
- Create a conflict of interest that would encourage individuals to act against the interests of any of our clients
- Be solely or predominately based on quantitative commercial criteria

And:

- Will ensure the fair treatment of our clients and the quality of service provided
- Will take appropriate qualitative criteria into account
- Maintain a balance between fixed and variable remuneration so the structure doesn't favour our firm or staff over those of our clients

Details of ARIA's approach to remuneration include:

- measuring the performance of individuals including both financial and non-financial metrics. Bonus schemes must include the quality of advice/service provided to the clients, not only the number of clients/revenue generated for the company.
- ARIA ensures that its remuneration policies are in line with its business strategy, objectives, values and long-term interests by being reviewed by the Board of Directors on an annual basis.
- Whenever a potential conflict of interest arises, the conflicts register is maintained which reviewed by Compliance Officer. Compliance Officer also reviews remuneration policies ensuring that the conflicts are managed in a fair way.

Remuneration packages

Bonus schemes

We have the following bonus schemes in place:

List any bonus schemes or other reward or compensation schemes (including those for partnerships and other legal structures) that will be in place to reward relevant staff for performance during the current performance year and provide a high-level description of each scheme, including:

- A discretionary bonus scheme, paid annually after financial year end;
- Of which all staff are party to, except for Board Members;
- Bonuses relate to a number of factors including the company's profitability, key metrics achieved such as new client conversions, efficiency KPI's or client satisfaction scores;
- There may also be shorter term quarterly bonuses awarded to staff in line with hitting pre-determined quarterly metrics.

Senior management responsibilities

The Management body of the organisation shall approve the remuneration policy, after taking Advice from the Compliance Officer. Senior management of the organisation shall be responsible for the day-to-day implementation of the remuneration policy and the monitoring of compliance risks related to the policy.

When designing remuneration policies and practices, a Regulated Person shall ensure that the ratio between the fixed and variable components of the remuneration is appropriate in order to consider the best interests of their Clients.

The remuneration policies and practices shall allow for the operation of a flexible policy on variable remuneration, including, where appropriate, the possibility to pay no variable remuneration at all.

Reviewing this policy

To ensure this policy continues to accurately reflect the process we follow the Managing Director and Compliance Officer will review this policy on an annual basis.