

# **Remuneration Policy – Public Summary**

Sycomore Asset Management

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## **Preamble and Objectives**

Sycomore Asset Management ("Sycomore AM") has developed a remuneration policy to ensure, on a sustainable basis, the alignment of interests between investors, Sycomore AM, and its employees. It aims to promote sound and effective risk management at both portfolio and organizational levels, considering the nature, scope, and complexity of the activities carried out. In this respect, the policy complies with applicable European and national requirements for management companies (AIFMD, UCITS V, MiFID II, SFDR, ESMA guidelines, AMF doctrine) and reflects the Company's commitments as a mission-driven enterprise.

The policy is based on principles of fairness and transparency: it prohibits incentives for risk-taking incompatible with clients' interests and establishes a remuneration framework designed to encourage sustainable performance, cooperation, and compliance. The performance evaluation period corresponds to the calendar year, ensuring consistent assessment of individual and collective contributions.

### **1. General principles and components of remuneration**

Total remuneration includes a fixed and a variable component, supplemented where applicable by collective schemes (profit-sharing, incentive plans, employee savings and retirement plans) and benefits in kind or equity participation. The fixed component represents a sufficiently high proportion to guarantee full flexibility regarding the variable component, including the possibility of paying no variable remuneration when conditions are not met.

Sycomore AM reaffirms its commitment to gender pay equality. At hiring and during annual reviews, fixed and variable remuneration are assessed based on objective, fair, and transparent criteria under the supervision of the Human Resources department. The policy is structured to avoid conflicts of interest and prevent excessive risk-taking, whether in financial management or business development.

### **2. Remuneration governance**

The adoption and evolution of the policy fall under the responsibility of the Board of Directors, upon recommendation of the CEO and after review by the Remuneration Committee. This Committee assists the Board by preparing recommendations for executives and staff whose variable remuneration is significant or subject to deferral. It ensures consistency with strategy, values, and clients' interests and verifies that risks, liquidity, and asset levels are duly considered.

Control functions play an active role: the Compliance and Internal Control Officer ("RCCI") provides an opinion on the impact of the remuneration structure regarding legal and regulatory requirements

and conducts an annual, centralized, and independent assessment of the implementation of remuneration policies and practices. The Risk Management department evaluates the impact of variable remuneration on the Company's risk profile and validates risk-related adjustment data. The HR department ensures social consistency and contributes to talent attraction and retention in line with long-term objectives and mission-driven status.

### **3. Regulated population: Identified staff**

In accordance with regulations, "Identified Staff" include employees whose professional activities may have a significant impact on the Company's risk profile or managed products. This perimeter includes executives, investment teams, sustainability officers, certain commercial and marketing functions, and support/control departments (HR, operations, middle office, finance, legal, compliance, risk management, IT). Employees whose total remuneration is equivalent to these categories and whose activities influence the risk profile are also included. Internal audit, which is outsourced, is excluded. The perimeter is defined annually by HR, validated by the RCCI, and approved by General Management.

### **4. Budget and account determination**

At year-end, the Company calculates the value added it has generated and allocates it, after taxes and charges, between employees and the Company to finance its development. This value added is based on operating revenues (fixed and performance fees), minus all expenses except total remuneration costs. A limited percentage of this value added constitutes the overall remuneration budget, including fixed pay, variable pay, profit-sharing, and any voluntary contribution to the employee savings plan.

Each employee undergoes an annual evaluation supervised by HR. Indicators and objectives are proposed by relevant managers and validated by the Executive Committee after review by the Remuneration Committee. They determine fixed remuneration for the coming year and variable remuneration for the past year, considering market practices and current regulation. To ensure fairness and sustainability, the policy provides for allocation of envelopes with decreasing volatility (higher for investment teams, intermediate for commercial/marketing, lower for control, operations, and IT).

### **5. Evaluation and criteria by function**

Variable remuneration is based on a combination of quantitative and qualitative criteria, weighted according to the nature of the role. For portfolio managers, financial and ESG analysts, weighting prioritizes multi-year performance, revenue contribution, and investment process quality. Qualitative dimensions—compliance, commercial contribution, teamwork, and expertise development—complement the assessment.

For commercial and marketing teams, variable pay considers fundraising and retention objectives, client service quality, and project contributions, assessed against compliance and mission-driven objectives. Control functions (compliance and risk) are evaluated independently of the performance of controlled sectors, focusing on control quality, advisory capacity, project management, and operational reliability. Support functions have objectives tailored to their specific roles, balancing quantitative and qualitative criteria, with compliance and risk prevention as transversal benchmarks.

## **6. Payment terms and deferral mechanisms**

Unless proportionality provisions apply, variable remuneration for non-identified staff and identified staff below the threshold becomes vested and payable in February. For identified staff (excluding control functions) whose variable remuneration exceeds the reference threshold, payment occurs in two stages: - Half is vested and paid in cash in February; - The other half is deferred and paid pro rata over three calendar years.

To align interests between employees and clients, the deferred portion is indexed to a collective investment scheme (or basket of funds) managed by the Company, selected after Compliance and Remuneration Committee review and approved by General Management.

For control functions, deferred variable remuneration is paid in cash without indexation. A simplification measure may apply if the employee holds an equivalent amount in Company-managed funds during the period. In all cases, payment of any variable remuneration—including deferred tranches—remains subject to the Company's overall financial situation and the performance of units, portfolios, and individuals, assessed against compliance with policies, procedures, and ethical standards, and the absence of excessive risk-taking or fraudulent behavior.

The policy prohibits personal hedging strategies or insurance to neutralize the impact of deferral mechanisms or associated responsibilities. It also forbids instruments or methods circumventing regulatory or internal requirements. Salary advances may be granted occasionally, in reasonable amounts, with formal authorization from General Management after HR review, and must be fully repaid within 12 months; they do not constitute an advance on unvested deferred amounts.

## **7. Proportionality principle**

Under the proportionality principle, the deferral mechanism applies only to identified staff whose variable remuneration exceeds a reference threshold of €200,000 gross. Other employees continue to receive a single payment in February, subject to general conditions.

## **8. Guaranteed variable remuneration and retention mechanisms**

Guaranteed variable remuneration is exceptional; it may only be considered upon hiring and is limited to the first year, subject to Remuneration Committee review. Additionally, to address retention challenges, the Company may exceptionally grant a benefit in cash or in kind, freely determined in amount and form, after review by the Remuneration Committee.

## **9. Early termination of contract**

In case of contract termination and where deferred variable remuneration remains unpaid, such remuneration is canceled, except when termination results from mobility within the Generali Group (or a strategically linked entity) or dismissal without just cause. Payments related to termination are linked to long-term performance and expressly designed not to reward failure. If settlement of deferred amounts is considered, it remains discretionary and may occur only if compatible with the Company's financial situation and justified by unit and individual performance; it may follow the initial schedule or take the form of a lump-sum payment after six months, unless a serious prejudice to the Company or clients is discovered during this period. Any financial and payment conditions in this context require Remuneration Committee review.

## **10. Integration of sustainability risks (ESG)**

Sycomore AM's investment strategies are primarily socially responsible or incorporate environmental, social, and governance criteria. The ESG selection methodology permeates all management approaches and enables integration of sustainability risks, notably those related to climate change and biodiversity. The policy adjusts portfolio managers' variable component to reflect effective integration of these risks and contribution to the mission-driven objectives: fostering a more sustainable and inclusive economy and generating positive impacts for all stakeholders.

## **11. Important notices**

This public summary aims to present the key principles and mechanisms of the policy. The full internal document, not for external distribution, remains the reference for all detailed provisions. No numerical data on actual remuneration paid is published in this summary; such information is disclosed in appropriate regulatory reports or documents where applicable.