

REMUNERATION POLICY STATEMENT

For External Use

1. SIM's Remuneration Philosophy

SIM has adopted a single remuneration policy that governs all personnel. SIM seeks to ensure that its remuneration policy and practices:

- Are consistent with and promote sound effective risk management
- Do not encourage risk-taking which is inconsistent with the risk profiles and constitutions of the funds
- Include measures to avoid conflict of interest,
- Are in line with SIM's business strategies, objectives, values and long-term interests and with those of the funds which it manages and
- Support positive behaviour and a strong conduct culture within the firm.

SIM's shareholders, management, and employees understand that the ultimate objective of the FCA remuneration codes is to ensure that remuneration practices, structures, and incentives at SIM do not encourage any behaviour or activity which could be detrimental to, or conflict with, the long-term interest of the funds and the investors in the funds.

SIM has two types of shareholders:

- The A shareholders who hold in excess of 100% of the shares.
- The B shareholders, who currently hold 100% of SIM's profits.

SIM intends to have all its employees become B shareholders once they are eligible and they demonstrate the qualities to be shareholders in SIM. Employees who are not yet shareholders are granted a discretionary bonus. Eligibility to become a B shareholder starts after 18 months of employment.

SIM's remuneration and performance assessment period is from 1 January to 31 December each year.

The B share scheme, therefore, aligns the interests of the B shareholders with the long-term profitability and sustainability of SIM, which is linked to the management fees generated from managing the funds and segregated accounts, as this is the firm's only source of revenue. No performance fees are levied. The assets under management depend on both investors being willing to invest their money and the ongoing investment performance of the portfolios. It is therefore, very much in SIM's interests (and the shareholder's interests) to ensure that the funds and portfolios perform in a manner that is consistent with their stated investment objectives. As a result, there is a natural alignment between fund investors' interests, the interests of SIM, and the interests of the shareholders and employees.

In addition, a proportion of the shareholders' investable wealth is invested in the funds.

2. Application of the Remuneration Policy

SIM has identified itself as a Remuneration Code Proportionality Level Three Firm and consequently has adopted a proportioned approach to its remuneration policy. SIM considers its needs on an

ongoing basis and where appropriate disapplied certain provisions in accordance with FCA and Committee of European Banking Supervisors/European Banking Authority guidance. SIM will review any provisions which have been disapplied on at least an annual basis, to ensure that it continues to be appropriate for the Firm not to apply such provisions.

Regardless of the nature, scale, and complexity of its business and the nature and range of the investment services and activities undertaken in the course of that business, SIM has deemed it, on proportionality grounds, to be appropriate to establish and maintain a Remuneration Committee ("ARC"). The ARC reviews the remuneration policy and the remuneration of Staff on an annual basis. The ARC makes recommendations to the Board which analyses SIM's profits for the calendar period and determines whether to allocate a set amount of the profits for the year to:

- a) Meet basic remuneration requirements;
- b) Meet an incremental increase in basic remuneration; and
- c) Meet any variable remuneration requirements

3. Performance and Variable pay

Variable remuneration levels are established on an individual basis dependent on that individual's contribution to the overall growth of the Firm's business and are not just determined on the individual contribution to profitability as outlined above. The application of variable remuneration is limited to people that are in the firm's share scheme. As such, variable remuneration is a temporary measure as most people go onto share scheme. Total variable remuneration is either generally considerably contracted when the Firm's performance is subdued or is not established for a period of negative performance. SIM does not use a pre-set formulaic matrix to determine either basic remuneration or variable remuneration.

Variable remuneration levels to be awarded are based on the individual's specific contribution to the business during the period in question. All members of SIM's staff, including Remuneration Code Staff, receive a basic salary, pension and sickness benefits and where appropriate a discretionary bonus or a dividend. In very limited cases some individuals will be compensated with a combination of the former and the latter. This is the case for the Marketing person.

For staff eligible for a bonus:

Once the basic and variable remuneration levels have been established, SIM reviews the proposals for any risks and/or conflicts and as part of the Firm's continuing risk management arrangements before authorising the new remuneration package for each Remuneration Code Staff. An individual's contribution to the overall business is a key factor in the determination of their specific remuneration.

Each individual's contribution (where applicable) to the Firm's profitability; the composition and the contribution of staff eligible to receive a bonus; current market practices; achievement of

objectives; business development in terms of clients, revenue, infrastructure and control, as well as the overall effective functioning of SIM taking into account the Firm's budgeted expenditure and plans for the future are all the main criteria in determining an individual's remuneration. It is not based solely on the level of revenue generated by each individual.

SIM does not use the services of any external consultants to either determine or assist in the determination of its RPS. The Firm has included the following categories of members of its staff as Remuneration Code Staff: Seilern has deemed that all Significant Influence

Functions (“SIFs”), senior managers, and investment managers should be included as remuneration code staff. SIM has identified six Remuneration Code Staff in total for 2018. For Staff eligible for a dividend:

The remuneration of B shareholders is made up of a fixed salary (which can be revised from time to time) and a pre-determined fixed proportion of SIM's net profit. This is not related to individual or fund performance and can be varied. Accordingly, a number of remuneration principles relating to variable remuneration are not relevant to shareholders' profit share in SIM. However, if it transpires that shareholders were wrong to conclude that their profit share/dividends were not variable remunerations, the shareholders would have felt justified in dis-applying these requirements on grounds of proportionality.

4. SIM's Approach to Proportionality

In accordance with FCA rules, SIM will disapply following rules of the Remuneration Code for proportionality reasons:

- the requirement to retain shares or other instruments (SYSC 19C.3.47R);
- the deferral requirements (SYSC 19C.3.49R);
- performance adjustment (SYSC 19C.3.51R); and
- the ratios between fixed and variable components of total remuneration (SYSC 19C.3.44R).

While having decided that certain aspects of SYSC 19 C can be disapplied, SIM's Board has decided that 25% of the amount distributable as a dividend to each shareholder shall be retained by SIM for the entire duration of the employment of the shareholder. Each employee will become in time a shareholder and will also align her / his interests with the Funds' investors, the interests of the Firm and the interests of her / his fellow shareholders. In doing so SIM and its employees that are also shareholders fully and naturally align their interests to the Funds' investors.

5. Remuneration Structure

The employees' remuneration package comprises:

- A basic salary
- The possibility of being awarded an annual discretionary bonus, if the employee is not a B shareholder
- A set of benefits, including an auto-enrolment pension, a health plan (including dental, cash plan) and a travel insurance.

The basic salary of an employee is in line with current market practice. The payment of a bonus is at SIM's entire discretion and will depend on the financial position of the Firm and the outcome of the individual's appraisal and performance review. The appraisal and performance review process take into account a range of factors including the individual's performance and their broader contribution to the business.

Those employees working in specific functions such as risk management, compliance or finance have their personal objectives set by reference to their specific functions and will be rewarded according to the achievement of those objectives, rather than the performance of the business more generally. Any discretionary bonus award is recommended by the ARC for approval and authorisation by the Board.

For pension benefits, SIM follows the basic auto-enrolment guidance, with an option to upgrade the Firm's and the individual's contributions. SIM does not guarantee any annual

bonus award, except where this is necessary in the context of hiring a new employee in the first year of their employment.

SIM's policy is not to pay employees leaving the Firm an early termination payment, other than the contractual notice. SIM's employees are prevented from investing in the Seilern Universe: this rule is clearly stipulated in the Firm's personal account dealing policy

6. Risk Management

The Firm does encourage risk taking which is inconsistent with the risk profiles of the Funds, the Funds' investors and its clients with segregated mandates. Sound and effective risk management is a key element of SIM's investment strategy. The same strategy is adopted for all the sub-funds and segregated accounts. The investment process is always rigorously adhered to. SIM does not offer financial incentives to employees to take risks which are not consistent with the risk profiles of the funds. SIM does not have any practice of remunerating its investment personnel for generating high returns in the short term.

7. Governance

SIM's Board is responsible for ensuring that a robust remuneration policy is developed to align the SIM's remuneration practices with its risk tolerance. The Board is responsible for the total process of risk management, which includes remuneration risk. The Board sets the risk profile of the Firm and its related policies and procedures. This Policy is reviewed by the Board at least annually.

The ARC will monitor SIM's RPS in connection with its liquidity and capital requirements. The Compliance Officer of SIM, has the specific role for identifying, measuring and monitoring the risk profile of SIM on a regular basis and reporting to the Board. The Compliance Officer will ensure the Firm's RPS complies with the relevant legislation and regulations. This is reviewed at least annually, taking account of the current and future risks and the costs and quantity of capital and liquidity required, having regard to SIM's financial forecasts.

8. Individual Remuneration Framework

In establishing the Firm's top-down remuneration framework, the Board takes into consideration the performance of:

- The overall results of the business;
- The business line; and
- The individual (both financial and non-financial performance)

SIM is dedicated to ensuring that individuals are not remunerated for exceeding the risk tolerances of the business. When assessing individual performance, SIM takes account of financial as well as non- financial criteria.

SIM's non-financial criteria is a combination of effective risk management and compliance with its policies and procedures. Poor performance in SIM's non-financial criteria may pose a threat to the Firm's financial soundness. SIM's remuneration framework takes into account non-financial criteria as well as metrics of financial performance.

SIM seeks to ensure that individuals making subjective judgments remain objective by having established a framework for making such judgments. This includes:

- Clearly documented parameters and key considerations;
- Documented final decisions regarding risk and any performance adjustments;

- Input from individuals in Certification Functions; and

9. Guaranteed Variable Remuneration

SIM does not generally enter into agreements to guarantee variable remuneration (i.e., variable remuneration which is normally subject to performance and/or profit and would normally be classed as variable remuneration). Exceptions to this rule are generally only made where such a payment:

- Is exceptional with respect to specific individuals (it is not made to all members of staff);
- Occurs in the context of hiring members of staff; and
- Is limited to the early period of service.

Such a payment may be in the context of 'buying-out' variable remuneration earned at the immediate past employer, and generally will not be more generous in terms or quantity than the employee would have received at their previous employer.

In determining whether to offer guaranteed variable remuneration, the Board will have regard to the individual's qualifications and experience, SIM's need for an individual with such experience and the likely impact on the Firm.

In exceptional circumstances SIM may offer key members of staff a one-off retention award.

10. Alignment with Business Strategy and Interests in the Funds

SIM's management has identified two primary types of risk which could arise within a typical asset management business from inappropriate remuneration structures:

1. incentives related to investment performance, which could give rise to a focus on short-term investment performance and potentially increase the risks for the investors; and
2. incentives related to sales, which could encourage employees to inappropriately sell a Fund to investors for whom it is unsuitable. SIM has set stringent and limitation rules as to how a salesperson will be compensated: it, inter alia, includes a set of criteria for attributing a sale to the salesperson as well as a freeze of the invested NAV for the entire duration of the investment.

The nature of SIM's business, the nature of the Funds which it manages, and the nature of its remuneration practices are designed to mitigate these risks. From an investment perspective, the risk identified above is controlled through SIM's investment process and as noted above, there is no incentivisation of investment staff based on short-term investment performance. Investment decisions are only made by the Chief Investment Officer or a fund manager. Inclusion in the Seilern Universe are subject to the scrutiny of SIM's chairman who solely holds a right of veto for entry in the universe.

From a sales perspective, given the clear and simple nature of the investment strategy, the Funds are generally suitable for most investor types, including retail investors, but SIM only markets the Funds to institutional investors. SIM emphasises the long-term nature of the investment strategy in the Fund literature and other documentation and seeks to ensure that investors understand that the strategy is not appropriate for those seeking short-term returns.

11. Remuneration Code Staff

In accordance with applicable rules, SIM has identified individuals whose professional activities have a material impact on the risk profiles of the Company, including:

- statutory directors;
- senior management;
- the heads of the control functions;
- other risk takers such as: all staff members whose professional activities – either individually or collectively, as members of a group – can have a material influence on the risk profiles of the Company or the Fund.

The Board approves the list of Remuneration Code Staff annually and individuals are notified of their identification and the implications of this status on at least an annual basis.

12. Governance and Review

This Remuneration Policy has been recommended by the ARC in conjunction with SIM's Compliance Officer. The Remuneration Policy will be reviewed by the Board at least annually, after remarks and notes provided by the ARC.