Policy

Name: Remuneration Policy

Responsible Unit: Group Human Resources General Division

Version: -6.0

Valid as of: -06.07.2020

Applicable to: Eurobank Fund Management Company (Luxembourg) S.A.

Purpose: The Remuneration Policy is applicable to all Eurobank Fund Management Company (Luxembourg) S.A. employees and covers their total remuneration. It aims to create a competitive remuneration framework in order to attract, engage and retain its employees.

1. Introduction

Eurobank Fund Management Company (Luxembourg) S.A ("Company") has established a Remuneration Policy that is applicable to all Company employees and covers their total remuneration. The Remuneration Policy forms an integral part of the Company's corporate governance practice and is developed in accordance with its operational model, business strategy, objectives, long-term interests of the Company as well as the long-term value creation for shareholders and incorporates measures to avoid conflict of interest.

Also, the Remuneration Policy promotes sound and effective risk management and is consistent with the objectives of the Company's business and risk strategy, corporate culture and values, long term interests of the Company and the measures used to avoid conflicts of interest and should not encourage excessive risk-taking on behalf of the Company. Changes of such objectives and measures are taken into account when updating the Remuneration Policy.

Accordingly, the operating standards and mechanisms which have been adopted ensure that the levels of remuneration are directly linked to results and desired behaviors.

The Remuneration Policy has been drafted and is being implemented in accordance with L. 4261/2014, which has transposed into Greek law Directive 2013/36/EU, BoG Executive Committee's Act 158/10.05.2019 which adopted EBA Guidelines on sound Remuneration Policies under Articles 74(3) and 75(2) of Directive 2013/36/EU and disclosures under Article 450 of Regulation (EU) No 575/2013, EBA Guidelines on remuneration policies and practices related to the sale and provision of retail banking products and services (EBA/GL/2016/06) and BoG Act 2577/2006, as well as the Relationship Framework Agreement with the HFSF, the CSSF Circular 10/437, the Law of 17 December 2010 as amended by the Law of 10 May 2016 which transposes the Directive 2014/91/EU of the European Parliament and of the Council of 23 July 2014. The principle of proportionality as defined by the ESMA Guidelines has been applied only with respect to the requirements regarding the Remuneration Committee.

The current Remuneration Policy supersedes, consolidates and replaces any other remuneration policy. There shall not be any exceptions to the Policy. Any legacy contracts should be aligned with the current Policy upon their renegotiation / renewal.

2. Implementation at Group Level

The basic principles and requirements of the current Remuneration Policy are aligned with the Eurobank Ergasias S.A. ("Eurobank") Remuneration Policy in order to promote consistent application on a consolidated basis throughout the Eurobank Group (the "Group"), taking also into consideration any further obligation applied to the Company.

The non- executive members of the Eurobank's Board of Directors ("BoD") monitor the implementation of the Remuneration Policy at Group level.

3. Remuneration Policy Basic Principles

The Company has established a competitive remuneration framework in order to attract, engage and retain its employees. Its basic principles are to:

- Safeguard that remuneration is sufficient to retain and attract executives with appropriate skill and experience.
- Monitor that internal equity between all Units is applied.
- Avoid excessive risk taking.
- Link remuneration with long-term performance.

The continuous monitoring of market trends and best practices on domestic and global levels ensures a competitive Remuneration Policy that is governed by transparency and internal equity.

Moreover, the Company has adopted a remuneration framework the main objective of which is to provide an unified remuneration management approach within the Group and a common framework taking into consideration the need for flexibility in the decision making process and the diverse operational models of the all units.

The Company's remuneration framework is based on a two dimensional grading structure for each position:

- Job Family, depending on the nature of business (for example IT, Finance).

- Band which is linked to position requirements, range of responsibilities and professional experience.

The Company's band structure is set using a specific methodology, which evaluates each position based on 3 parameters:

- Know How

- Problem Solving

- Accountability

4. Remuneration Policy Adoption, Overview of Implementation and Revision

The members of the BoD ("BoD") approve and periodically review the Remuneration Policy and are responsible for overseeing its implementation.

The implementation of the Remuneration Policy is subject to annual internal audit review from the Group Internal Audit Unit. Internal Audit's findings and proposals for potential revision of the Remuneration Policy are reported to the BoD.

The Remuneration Policy is accessible to all employees through a common folder for HR issues.

5. Individuals with Material Impact on the Company's Risk Profile

The individuals who have a material impact on the Company's risk profile ("identified employees") according to the EU Regulation 604/2014 are identified with respect to the following qualitative and quantitative criteria:

5.1 Criteria

(I) <u>Qualitative Criteria</u>

1. Executive Directors of the BoD & CEO ;
2. Non-Executive Directors of the BoD & BoD Committees' Directors;
3. Senior Managers:
   - **(i)** Members of Executive Committee (ExCo) of the Company;
   - **(ii)** General Managers & Heads of General Divisions;
4. Employees who are responsible and accountable to the management body for the activities of the independent risk management function, compliance function or internal audit function;
5. Heads of Risk Units within material business units ("material business unit" is the unit as defined in the Article 3 of EU Regulation 604/2014);
6. Heads of material business units;
7. Employees that have managerial responsibility in one of the units referred to in point (4) or in a

material business unit and report directly to the Heads of points (4) or (5);

8. Employees that have managerial responsibility in a material business unit and report directly to the Heads of material business units;

9. Employees who are the heads of a function responsible for legal affairs, finance including taxation and budgeting, human resources, remuneration policy, information technology or economic analysis;

10. Employees who are responsible for, or are members of Committees responsible for the management of a risk category other than credit risk and market risk:

- **(i)** Counterparty Risk;
- **(ii)** Residual Risk;
- **(iii)** Concentration Risk;
- **(iv)** Securitization Risk;
- **(v)** Interest Risk arising from non – trading book activities;
- **(vi)** Operational Risk;
- **(vii)** Liquidity Risk;
- **(viii)** Risk of excessive leverage;

11. With regard to credit risk exposures of a nominal amount per transaction which represents 0.5% of the Company's Common Equity Tier 1 capital and at least € 5 million:

- **(i)** Employees who are responsible for initiating credit proposals or structuring credit products which can result in such credit risk exposures; or
- **(ii)** Employees who have authority to take, approve or veto a decision on such credit risk exposures;
  or
- **(iii)** Employees who are members of Committees which have the authority to take the decisions referred to in points (i) or (ii);

12. Employees who individually or, as members of Committees, have authority to take, approve or veto a decision on transactions on the trading book which in aggregate meet one of the following thresholds:

- **(i)** where the standardized approach is used, an own funds requirement for market risks which represents 0.5% or more of the Company's Common Equity Tier 1 capital; or
- **(ii)** where an internal model-based approach is approved for regulatory purposes, 5% or more of the Company's internal value-at-risk limit for trading book exposures at a 99% ;

13. Employees with managerial responsibility for a group of employees who have individual authorities to commit the Company to transactions and either of the following conditions is met:

- **(i)** the sum of those authorities equals or exceeds a threshold set out in point 11(i), point 11(ii) or point 12(i);
- **(ii)** where an internal model-based approach is approved for regulatory purposes those authorities amount to 5 % or more of the Company's internal value-at-risk limit for trading book exposures at 99%. Where the Company does not calculate a value-at-risk at the level of that employee the value-at-risk limits of employees under the management of this employee shall be added up;

14. Employees who have the authority or, are members of Committees that have the authority to approve or veto the introduction of new products;

15. Employees who have managerial responsibility for employees who meet one of the criteria set out in points (1) to (14);

(II) Quantitative Criteria

16. Employees who have a material impact on the Company's risk profile whose:

- **(i)** total remuneration was more than € 500,000 in the preceding financial year (taken in consideration that the remuneration should not exceed the total remuneration of the Governor of the Bank of Greece no employees are identified);
- **(ii)** total remuneration is within the 0.3 % of the employees, rounded up to the next integer, who have been awarded the highest total remuneration in the preceding financial year;
- **(iii)** total remuneration was in the preceding financial year equal to or greater than the lowest total remuneration awarded in that financial year to an employee who meets any of the criteria in points (1), (3), (5), (6), (8), (11), (12), (13) or (14);

Point 16(iii) does not include the following employee categories:

- **(i)** employees who only carry out professional activities and have authorities in a business unit which is not a material business unit; or
- **(ii)** employees who have no material impact on the risk profile of a material business unit through the professional activities carried out.

5.2 Identification Process of the Employees with Material Impact on the Company's Risk Profile

The identification process of the identified employees is based on the aforementioned qualitative and quantitative criteria as set out in Commission Delegated Regulation (EU) No 604/2014 and, where needed, additional criteria have been set by the Company that reflect the levels of risk of different activities within the Company and the impact of employees on the Company's risk profile.

Employees that fall or are likely to fall under the aforementioned criteria for a period of at least three months in a financial year are treated as identified employees.

The identification process of the identified employees is performed on an annual basis.

More specifically, the identification process is as follows:

- Group Human Resources General Division ("Group HR") finalizes the list of key assumptions to be used in the identification process of the identified employees.

- Group HR sends the list of assumptions to the Company's HR ("HR").

- HR with the assistance of the relevant internal control functions validates the list of assumptions and verifies whether they are in line with applicable regulations or whether there must be some modifications.

- HR uses the final list of assumptions to proceed with the identification of identified employees. If during this process HR identifies the need to deviate from the initial list of assumptions at individual level, then they should discuss these deviations with the control functions and justify each deviation.

- HR submits the list of assumptions together with the list of identified employees to Group HR for review and approval.

- HR submits the list of assumptions for subsequent review and approval to the Group Remuneration Committee. Any deviations should be properly documented and provided to the Group Remuneration Committee.

- Following Group Remuneration Committee's approval, the assumptions and the list of identified employees together with the respective local approval is sent to Group HR.

- Group HR consolidates all such data from all Subsidiaries in order to obtain the final approvals at Group Remuneration Committee level.

6. Categories of Remuneration

Remuneration plays a significant role in attracting and retaining talent whose contribution in the Company's results is deemed critical. Remuneration mechanisms incorporate principles that take into account employees' skills and performance while supporting at the same time long term business objectives.

The Company has developed a remuneration framework that is based on total remuneration ranges that differ among hierarchical levels and nature of business. Total remuneration ranges are reviewed annually taking into consideration market trends and current legal requirements. To this end, data from Compensation and Benefits Surveys, provided from external consultants, is used as benchmark.

It should be noted that employees engaged in internal control functions are independent from the business units they oversee and have appropriate authority, and are remunerated in accordance with the achievement of the objectives linked to their functions, independent of the performance of the business areas they control.

The remuneration of the employees in the independent control functions is predominantly fixed, to reflect the nature of their responsibilities. The variable remuneration of control functions is not based on the financial performance of the Units they monitor. On the other hand, the variable remuneration is based on simple and clear criteria formed on the basis of control objectives and to some extent on the performance of the Company as a whole.

Employees' total remuneration consists of fixed and variable components.

6.1 Fixed Remuneration General Principles

Fixed remuneration reflects the educational level, experience, accountability, position evaluation in comparison with peers, and the position's functional requirements. In addition, fixed remuneration does not provide incentives for risk assumption.

Individual increases proposals are based on market data and employee performance.

6.2 Separation Agreement Schemes

The Company may provide separation agreement schemes for employees taking into consideration current legislation.

A minimum and maximum amount as well as other specific terms is each time determined for each Separation Agreement Scheme applied to employees.

6.3 Variable Remuneration General Principles

The Company may provide variable remuneration in order to reward employee performance in alignment with unit and / or Company performance taking into consideration the general principles set below.

The amount of variable remuneration awarded appropriately reflects changes of the performance of the employees, the business unit and the Company overall. In such variable remuneration schemes, the Company specifies how the variable remuneration reacts to performance changes and the performance levels. This also includes performance levels where variable remuneration decreases down to zero.

As a result, it is upon Company's discretion to award variable remuneration to employees as long as financial sustainability is maintained. The Company has the right to partly or fully revoke the distribution of variable remuneration to its employees.

The total variable remuneration pool, as well as, the distribution parameters used for its allocation among different business units, should be determined after taking into consideration the following parameters:

- The Eurobank's, Company's and business units' profitability.
- The cost of tied-up capital which is associated to risks undertaken (credit risk, market risk, operational risk) spread over a period of time, and is calculated based on the existing regulatory framework.
- Key developments in terms of credit risk, liquidity risk and market risk which further adjust the Company's total variable remuneration pool.
- Additional criteria for measuring the effectiveness and efficiency of employees which include qualitative factors (qualifications, skills, compliance with Company's policies, contribution to the unit's performance, and personal competencies such as continuous improvement, customer orientation, team spirit, change leadership and people management) as well as factors related to the management of risks undertaken.

The variable remuneration pool allocated to each business unit, should be further adjusted through additional unit specific risk parameters (such as provisions from non - performing loans, Value at Risk, credit, market & liquidity risk, losses incurred by fraud, etc.) thus stressing the importance of the prudent management of such risks.

In case that the Company grants variable remuneration to its employees the appropriate risk alignment process should be followed as per the respective EBA's "Guidelines on sound remuneration policies under Articles 74(3) and 75(2) of Directive 2013/36/EU and disclosures under Article 450 of Regulation (EU) No 575/2013". The Bank reserves the right to apply malus or clawback arrangements to the variable remuneration awarded to employees.

In cases where variable remuneration is awarded to identified employees according to the EU Regulation 604/2014 additional requirements are applied to the variable remuneration amounts *(as described in Section "Variable Remuneration for Identified Employees")*.

6.4 Other Variable Remuneration Components

6.4.1 Guaranteed Variable Remuneration

The Company may provide guaranteed variable remuneration which should be exceptional, occur only when hiring new staff and where the Company has a sound and strong capital base and is limited to the first year of employment.

The amount of guaranteed variable remuneration may not be included in the calculation of the ratio between the fixed and variable components of the total remuneration (as described in Section "Ratio Between Fixed and Variable Remuneration") for the first performance period, where the guaranteed variable remuneration is awarded when hiring new staff before the first performance period starts.

As part of the arrangements guaranteeing this part of variable remuneration, the Company may not apply the requirements on malus and clawback arrangements to guaranteed variable remuneration. In addition, the Company may pay out the full amount in non-deferred cash.

6.4.2 Incentive Schemes

The Company may provide incentive schemes addressed to employees aiming at:

- Supporting the goals of the organization by aligning employee goals with them;
- Motivating employees to increase individual / Unit performance;
- Improving retention; and
- Emphasizing the importance of teamwork in achieving Group goals.

It should be noted that incentive schemes parameters ensure that employees are not rewarded in a way that constitutes a conflict to the Company's Policy to protect its customers. More specifically, employees are not provided with incentives that would encourage them to propose to customers specific financial instruments instead of other instruments that would best serve the customers' needs.

The Incentive Schemes' payouts are directly linked to the Business Units' profitability results (for example lending balances and profitability, liquidity, portfolio quality) or NPE's reduction as well as operating expenses' containment cascading down to the individuals' targets and in line with the Bank's principles on variable remuneration as stated in this document.

6.4.3 Retention Schemes

The Company may provide retention schemes to retain employees.

The retention amount complies with the general principles on variable remuneration, including the ex post risk alignment, payment in instruments, deferral, retention, malus and clawback. Retention amounts are not based on performance, but on other conditions (i.e. the circumstance that the employee stays in the Company for a predetermined period of time or until a certain event), therefore ex ante risk adjustments are not necessary.

The retention amount is not awarded to merely compensate for performance-related remuneration that is not paid due to insufficient performance or the Company's financial situation.

The Company sets the retention period as a specific period of time or by defining an event when the retention condition is met, after which the retention amount is awarded.

The retention amount is taken into account within the calculation of the ratio between the variable and the fixed remuneration as variable remuneration (as described in Section "Ratio Between Fixed and Variable Remuneration"). The retention amount is taken into account either with an annual amount in each year of the retention period which is calculated on a linear pro rata basis independent of the fact that the full amount is awarded after the end of the retention period, or with the full amount when the retention condition is met. Where the exact length of the retention period is not known upfront, the Company sets and duly documents a period considering the situation and measures taken that justify the payment of a retention amount. The calculation of the ratio is based on the period set.

For awarded instruments (as described under paragraph 7.1) a retention period of at least one year is set. Longer periods are set in particular where ex post risk adjustments mainly rely on changes of the value of instruments which have been awarded. Where the deferral period is at least five years, a retention period for the deferred part of at least six months may be imposed for employees other than members of the BoD and senior management for whom a minimum retention period of one year should be applied.

6.4.4 Discretionary Pension Benefits

As a rule, discretionary pension benefits are not granted and in any case if they may be provided they should constitute a form of variable remuneration.

The Company ensures that where an employee leaves the Company or retires discretionary pension benefits are not paid without the consideration of the economic situation of the Company or risks that have been taken by the employee which can affect the Company in the long term.

As far as the identified employees are concerned the full amount of discretionary pension benefits is awarded as follows:

- when an identified employee leaves the Company before retirement, the Company holds the full amount of any discretionary pension benefits in instruments at least for a period of five years without the application of pro rata vesting;

- when an identified employee reaches retirement, a five-year retention period is applied to the full amount paid in instruments.

The Company ensures that malus and clawback arrangements are applied in the same way to discretionary pension benefits as to other elements of variable remuneration.

7. Variable Remuneration for "Identified Employees"

For identified employees additional requirements to their variable remuneration awarded are applied according to L. 4261/2014 which has incorporated the Directive 2013/36/EU.

7.1 Deferral, Retention and Method of Payment Requirements

For any variable remuneration over the limit of €-50,000[1] the following deferral requirements apply:
for Board Members and / or Board Committee members who are also Company's Employees:

- for variable remuneration between €50,000-€ 149,000 a 40% deferral is applied;
- for variable remuneration between € 150,000-€ 349,000, a 50% deferral is applied; and
- for variable remuneration over € 350,000[2], a 60% deferral is applied;

for the rest of the identified employees:

- for variable remuneration between €50,000-€ 349,000 a 40% deferral is applied; and
- for variable remuneration over € 350,000, a 60% deferral is applied;

The deferral amount is deferred over a period which is not less than three years, with the exception of the Board Members and / or Board Committee members for which the deferral period is five years. In addition, the deferral amount vests no faster than on a pro-rata basis and is correctly aligned with the nature of the business, its risks and the activities of the employee in question. The first deferred portion should not vest sooner than 12 months after the start of the deferral period. The deferral period ends when the awarded variable remuneration has vested or where the amount was reduced to zero as malus was applied.

[1] *Any variable remuneration awarded that does not exceed the gross amount of € 50,000 is awarded in cash and is not subject to retention and deferral policies.*

[2] *An amount of € 350,000 and above is deemed to be variable remuneration of a "particularly high amount".*

Variable remuneration (deferred and non-deferred) is awarded or vests only if it is sustainable according to the financial situation of the Bank as a whole, and justified on the basis of the performance of the Bank, the business unit and the employee concerned. Without prejudice to the general principles of national contract and labour law, the total variable remuneration shall generally be considerably contracted where subdued or negative financial performance of the Bank occurs, taking into account both current remuneration and reductions in payouts of amounts previously earned, including through malus or clawback arrangements.

As a result, at least 50% of the variable remuneration awarded should consist of a balance of the following:

- shares or equivalent ownership interests;
- where possible, other instruments within the meaning of Article 52 or 63 of Regulation (EU) No 575/2013 or other instruments which can be fully converted to Common Equity Tier 1 instruments or written down, that in each case adequately reflect the credit quality of the Bank as a going concern and are appropriate to be used for the purposes of variable remuneration in accordance to the relevant clauses of Regulation (EU) No 527/2014; and
- variable remuneration should not be paid through vehicles or methods that facilitate the non-compliance with L. 4261/2014 or Regulation (EU) No 575/2013.

Moreover, if an identified employee receives incentive amounts from more than one scheme:

- In cases where the schemes are based on the achievement of differing goals and targets, the ceiling of € 50,000, applies on the cumulative amount, above which there will be a deferred element,
- In cases where the incentive schemes are based on the achievement of the same goals and targets, the €50,000 ceiling applies to the cumulative amount.

Identified employees are required not to use personal hedging strategies or remuneration- and liability-related insurance to undermine the risk alignment effects embedded in their remuneration arrangements.

7.2 Ratio Between Fixed and Variable Remuneration

Provided that variable remuneration is awarded to employees, the following rules should apply:

- The variable component cannot exceed 100 % of the fixed component of the total remuneration.
- The Company's Annual General Meeting may approve a higher maximum level of the ratio between the fixed and variable components of remuneration provided the overall level of the variable component shall not exceed 200% of the fixed component of the total remuneration for each individual and according to the process described under the clauses of L. 4261/2014.
- The effective ratio is calculated as the sum of all variable components of remuneration that have been awarded for the last performance year as set out in this Remuneration Policy, including amounts awarded for multi-year accrual periods, divided by the sum of fixed elements of

remuneration awarded for the same performance year. For multiyear accrual periods that do not revolve annually, the Company alternatively takes into account in each year of the performance period the maximum amount of variable remuneration that is awarded at the end of the performance period divided by the number of years of the performance period.

- The ratio between the variable and fixed remuneration components is set independent of any potential future ex post risk adjustments or fluctuation in the price of instruments.

7.3 Malus and Clawback Arrangements

For variable remuneration awarded to identified employees the risk alignment process comprised from the following elements:

- The Company is able to apply malus or clawback arrangements up to 100% of the total variable remuneration in accordance with Article 94 (n) of EU Directive 2013/36/EE regardless of the method used for the payment, including deferral or retention arrangements.

- When setting criteria for the application of malus and clawback in accordance with Article 94 (n) of EU Directive 2013/36/EE~~,~~ a period during which malus or clawback will be applied is also set. This period at least covers deferral and retention periods.

- The criteria used to apply malus and clawback arrangements as set out in Article 94 (n) of EU Directive 2013/36/EE, are the following:

  - evidence of misconduct or serious error by the employee (e.g. breach of code of conduct and other internal rules, especially concerning risks);

  - whether the Company and/or the business unit subsequently suffers a significant downturn in its financial performance (e.g. specific business indicators);

  - whether the Company and/or the business unit in which the employee works suffers a significant failure of risk management;

  - significant increases in the Company’s or business unit’s economic or regulatory capital base;

  - any regulatory sanctions where the conduct of the employees contributed to the sanction.

- Where malus can only be applied at the moment of vesting of the deferred payment, clawback on variable remuneration may be applied without prejudice to the general principles of national contract or labour law

- Malus and clawback arrangements lead to a reduction of the variable remuneration where appropriate. Under no circumstances should an explicit ex post risk adjustment lead to an increase of the initially awarded variable remuneration or, where malus or clawback was already applied in the past, to an increase of the reduced variable remuneration.

8. Benefits

The Company may offer various benefits to its employees and their families in line with the approved Benefit's Policy. The Benefits' Policy (types of benefits, coverage, etc.) is approved by the BoD following proposal by Company's CEO and /or Managing Director.

-9. Remuneration Approval Process

REMUNERATION APPROVAL PROCESS EUROBANK FUND MANAGEMENT COMPANY (LUXEMBOURG) S.A.

Employee Category	Remuneration Components	Proposal	Approval
Board of Directors	Total Remuneration	Group Management	Group Remuneration Committee / Non Executive members of the BoD of Eurobank Ergasias S.A./ pending final ratification by Country Annual General Meeting
All employees	Total Remuneration framework	Group Global Markets & Wealth Management General Manager / Board of Directors	Group Remuneration Committee
Employees with material impact on the Bank's risk profile	Total Remuneration within the approved framework	Responsible Unit	Group Global Markets & Wealth Management General Manager / Head Group HR General Division / Country CEO (1)
Employees with material impact on the Bank's risk profile	Total Remuneration exceeding the approved framework	Group Global Markets & Wealth Management General Manager / Board of Directors	Group Remuneration Committee
All other employees	Total Remuneration	Responsible Unit	Group Global Markets & Wealth Management General Manager / Country CEO (1)
All employees	Total performance related remuneration pool for the Company	Group Remuneration Committee	Non Executive members of the BoD of Eurobank Ergasias S.A.
All employees	Total performance related remuneration pool allocation among Business Units	Country Management	Board of Directors
All employees	Retention Schemes	Group Global Markets & Wealth Management General Manager / Board of Directors	Group Remuneration Committee / Non Executive members of the BoD of Eurobank Ergasias S.A.
All employees	Separation Agreement Schemes	Group Global Markets & Wealth Management General Manager / Board of Directors	Group Remuneration Committee / Non Executive members of the BoD of Eurobank Ergasias S.A.

(1) The Group Remuneration Committee & the Country Remuneration Committee are informed ex post, on a quarterly basis, for the total remuneration adjustments for employees with material impact on the Bank's risk profile

10. Disclosures

The Company makes separate disclosures regarding the remuneration policy in the Audited Annual Reports of the Funds under management, according to Luxembourg standards, in the Notes to the Financial Statements under the title "Unaudited information, Remuneration Policy UCITS V". Disclosures regarding remuneration are also included in the Notes for the delegate who performs risk and investment management services for the Funds, under the title “Disclosures of remuneration of delegates”. On a consolidated basis relevant disclosures are made by the parent company Eurobank S.A.

11. Appendices

12. References

13. Terminology

14. Amendments Table

Version	Date	Change Description
1.0	30.06.2014	Following CSSF Circular 10/437
2.0	20.03.2014	Amendment as per UCITS IV Requirements and CSSF Circulars 10/437, 11/505 and 12/546
3.0	24.11.2015	Amendment as per UCITS IV Requirements and CSSF Circulars 10/437, 11/505 and 12/546
4.0	15.12.2017	Amendments on EBA Guidelines on sound Remuneration Policies under Articles 74(3) and 75(2) of Directive 2013/36/EU and disclosures under Article 450 of Regulation (EU) No 575/2013
5.0	14.12.2018	Amendments on EBA Guidelines on sound Remuneration Policies under Articles 74(3) and 75(2) of Directive 2013/36/EU and disclosures under Article 450 of Regulation (EU) No 575/2013
6.0	06.07.2020	Amendment of the deferral period for Board Members and / or Board Committee Members and increase of the minimum limit of any variable remuneration as well as amendment of the Section “Disclosures”

15. Table of Creation, Issuance and Approvals

Unit	Authorized Personnel	Date
Created by: Risk Manager, Compliance Officer and AML/CFT responsible Compliance Officer **Mrs C. Zormpa** **06.07.2020**		
Issued by: Risk Manager, Compliance Officer and AML/CFT responsible Compliance Officer **Mrs C. Zormpa** **06.07.2020**		
Approved by: Directors of the Board **06.07.2020**		