

APHILION

QUANT DRIVEN INVESTMENTS

APHILION SIF

SOCIÉTÉ D'INVESTISSEMENT À CAPITAL VARIABLE – FONDS D'INVESTISSEMENT SPÉCIALISÉ
60, AVENUE JOHN F. KENNEDY
L-2085 LUXEMBOURG
R.C. LUXEMBOURG B 138.962

INTEGRATION OF SUSTAINABILITY RISK INTO REMUNERATION POLICY – WEBSITE DISCLOSURE

This document sets out disclosure by Aphilion IM as an authorised AIFM, managing the AIF Aphilion SIF, in respect of the integration of sustainability risks into its Remuneration Policy, as required by the EU Sustainable Finance Disclosure Regulation (SFDR).

This document specifically addresses Article 5 of the Regulation:

“Financial market participants and financial advisers shall include in their remuneration policies information on how those policies are consistent with the integration of sustainability risks, and shall publish that information on their websites.”

Remuneration policy considerations in relation to the integration of sustainability risks

Aphilion IM’s Remuneration Policy aims to promote sound and effective risk management with respect to sustainability risks, ensuring that the structure of remuneration does not encourage excessive risk-taking with respect to sustainability risks.

Aphilion IM considers the effect of potential conflicts of interest on remuneration in a way that is consistent with the integration of sustainability risk, including (but not limited to), any activities that give rise to greenwashing, misselling, or misrepresentation of investment strategies.

The Remuneration Policy has been adopted by the Board of Aphilion IM in accordance with binding rules implementing EU directive 2011/61/EU on Alternative Investment Fund Managers and relevant implementing regulations (together, the AIFMD), and in accordance with the principle of proportionality.

Board approval and revision

The Remuneration Policy is approved by the Board of the Manager, Aphilion IM. It shall be reviewed by the Board at least annually and updated if deemed necessary or desirable.