

# COMGEST ASSET MANAGEMENT INTERNATIONAL LIMITED

## REMUNERATION POLICY SUMMARY

Version 1.4

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## 1. INTRODUCTION

Comgest Asset Management International Limited (“CAMIL” or the “Company”) is a subsidiary of Comgest Global Investors (“CGI”), the holding company of the Comgest group of companies consisting of various group entities operating in France, Hong Kong, Singapore, Japan, Ireland, Germany, Holland, Italy, Belgium, the United Kingdom and the United States (together the “Comgest Group” or the “Group”).

CAMIL is authorised by the Central Bank of Ireland under Regulation 8 (3) and deemed authorised under Regulation 5 (2) of the Statutory Instrument No. 375/2017 European Union (Markets in Financial Instruments) Regulations 2017 (the ‘MIFID Regulations’). The Company’s principal activity is the provision of portfolio management services, to collective investment schemes authorised pursuant to Directive 2009/65/EC (“UCITS Directive”) (“UCITS”) and Directive 2011/61/EU (“AIFMD”) (“AIFs”) and to private investment mandates (together the “Funds”).

It is a key corporate strategy of the Company to attract, retain, motivate and reward talented individuals committed to serving the long-term interests of the Company and the Group. The Company has established a Remuneration Policy to ensure that its remuneration system and structure do not encourage risk taking that is inconsistent with the risk profile of the Company, the Group and the portfolios that the Company manages, in line with the overall business strategy, objectives, values, investment philosophy and long-term interests of the Company and the Group.

The purpose of this document is to summarise the remuneration practices of the Company in relation to all members of staff including those senior management, risk takers and control functions, whose professional activities may have a material impact of the risk profile of the Company.

## 2. REMUNERATION REQUIREMENTS

Although CAMIL is not regulated under the UCITS Directive or AIFMD, as a delegated investment manager of UCITS and AIFs, it is indirectly subject to the relevant remuneration requirements prescribed under these directives. In particular, under the Guidelines on Sound Remuneration Policies under the UCITS Directive and AIFMD, CAMIL is subject to regulatory requirements on remuneration that are equally as effective as those applicable to entities directly subject to UCITS V and AIFMD.

CAMIL, as an Investment Firm, is subject to the remuneration requirements of Directive 2014/ 65 EU (“MiFID II”) and associated delegated directives and regulation. In addition CAMIL is subject to the remuneration requirements of Regulation (EU) 2019/2088 on sustainability disclosures in the financial services sector (“SFDR”).

CAMIL is required by the Central Bank of Ireland (“CBI”) to adhere to all other relevant remuneration requirements and generally, to govern this area appropriately so as not to provide excessive incentives for risk taking.

## 3. IDENTIFIED STAFF

Under the UCITS regime, the remuneration policies and practices prescribed must cover all staff whose professional activities have a material impact on the risk profile of the UCITS Manager or of the UCITS it manages at either fund or sub-fund level. An assessment of identified staff is reviewed annually or

earlier in the event of a material change in circumstances or job functions. For this purpose, materiality is determined relative to the following criteria:

1. The ability of the staff member, either on an individual or collective basis, to cause a material financial gain or loss to the Company, the Funds or the assets under management.
2. The ability of the staff member, either on an individual or collective basis, to cause disruption to the proper functioning of CAMIL's business.
3. The ability of the staff member, either on an individual or collective basis, to breach legal or regulatory requirements that are applicable to CAMIL.
4. The ability of the staff member, either on an individual or collective basis, to incur substantial reputational damage to CAMIL or Comgest in the marketplace over the short, medium or long-term time horizon.

Further, in determining whether an individual staff member should be categorised as 'Identified Staff', the Company considers the staff member's variable remuneration as a proportion of his/her total remuneration package, as well as whether or not the individual's total remuneration package brings him/her into the remuneration bracket of senior managers.

#### 4. RISK ALIGNMENT

The Company's Remuneration Policy is designed to align remuneration with prudent risk taking. In this regard, it is a fundamental policy of the Company that:

- its Remuneration Policy is consistent with and aligned with its risk management policy and strategy;
- the Company has in place a Conflicts of Interest Policy. The Remuneration Policy and its implementation will be subject to the requirements of that Conflicts of Interest policy.
- the Company does not link the payment of any bonus or other variable benefits to the achievement of personal objectives that are directly linked to the financial results of the Company, the Comgest Group or the Funds;
- the total remuneration (including the fixed and variable components) payable by the Company to its staff members:
  - is in line with the business strategy, objectives and long-term interests of the Company, the Group and the Funds;
  - does not encourage risk-taking that exceeds the risk appetite of the Company, the Group and the Funds;
  - is based on objective quantitative and qualitative criteria and parameters, that take into account the current and future risks that the Company may incur;
  - constitutes a reasonably low percentage of the total income of the Company;
  - allows for the maintenance by the Company of an adequate capital base/ 'Own Funds' (in accordance with its capital adequacy requirements under CRD III); and
- the remuneration of staff engaged in control functions is determined independently of the performance of the business areas for which they are responsible. Objectives set are based on function specific objectives which do not compromise an individual's independence.
- "Identified staff" may be subject to deferred compensation arrangements with regard to their variable compensation. The deferral period in such instances is 3 years.

## 5. GOVERNANCE

CAMIL recognises that an effective governance framework for remuneration is an essential prerequisite in aligning its Remuneration Policy with regulatory requirements and the overall business strategy and long-term interests of the Company and the Group.

As a member of the Comgest Group, the implementation and oversight of the Company's remuneration practices is performed through a multi-level governance framework, which includes both the Company's oversight function (horizontal governance) and the Group's oversight function (vertical governance).

CAMIL has in place a Remuneration Committee of the Board. Its terms of reference include implementing the principles, parameters and governance framework of CAMIL's Remuneration Policy.

The Company's Remuneration policy is adopted by the Board and is reviewed at least annually.

The Internal Control Functions are responsible for ensuring that the Remuneration Policy and process is established, implemented and maintained in accordance with the relevant Remuneration Principles applicable to CAMIL.

## 6. EMPLOYEE SHAREHOLDING

CAMIL, along with all other entities within the Comgest Group, is a wholly owned subsidiary of CGI. CGI is 100% owned by the employees and founders of the Comgest group entities.

The Comgest Group is independent and focused solely on asset management and more particularly, investment in quality growth companies with a long-term investment horizon pursuant to its disciplined, fundamental investment strategy.

The opportunity to become a shareholder in the Group is designed to encourage employees to become partners in the business for the long term. The process of accumulating a stake in the business spans many years and requires the use of one's personal finances. The employee's financial commitment in purchasing the shares reinforces a commitment to the long-term success of the Company and the Funds and the alignment of the Company's interest with those of its clients. The employees' investment in the shares through the Share Scheme or direct acquisition results in a natural diversification and deferral of their bonus. Employees retain the shares for a much longer period than that required under the Remuneration Principles and generally throughout their stay in CAMIL.

## 7. DISCLOSURE

A breakdown of the total amount of remuneration for the financial year (split into fixed and variable remuneration) is disclosed in the audited annual report of the Company. Within the organisation, staff are provided with the complete Remuneration Policy.