

## Salary policy – Schmiegelow Fondsmæglerselskab A/S

17.4.2024

### Legislation

Executive Order on Remuneration Policy and Disclosure Obligations on Remuneration in Financial Undertakings, etc. Chapter 11 of the Act on Stockbroking Companies.

### Introduction and definition

In accordance with the Executive Order on Remuneration Policy and Disclosure Obligations on Remuneration in Financial Undertakings, etc." and the Danish Act on Stockbroking Companies, this policy covers the remuneration of the Board of Directors, the Executive Board and other employees whose activities have a significant impact on the company's risk profile.

These other employees are identified by the Board of Directors and include portfolio managers and other employees in those parts of the organisation who, through financial instruments, may take significant risks on behalf of the Company for the Company's funds, as well as the Head of the Risk Management, Compliance and Internal Audit functions.

In accordance with the above-mentioned executive order and law, it is also the responsibility of the Board of Directors to determine the company's salary policy, pension policy and guidelines for the allocation of variable salary components, severance pay and identification of other employees whose activities have a significant impact on the company's risk profile.

For the purposes of this policy, variable pay means remuneration schemes where the final remuneration is not known in advance, including bonus schemes, performance contracts, one-off payments and other similar schemes that are not part of the fixed salary.

Taking into account the size and organisation of the company as well as the scope and complexity of the company's activities, the Board of Directors has identified the following as employees with a significant influence on the company's risk profile (significant risk takers):

Peter Schmiegelow

Reference is also made to the company's key employee policy.

## Objectives and Policy

In formulating the remuneration policy, the Company has sought to promote remuneration practices that are consistent with and promote sound and effective risk management, that do not encourage excessive risk-taking, ensure competitive remuneration, promote business development and are consistent with the Company's business strategy, values and long-term objectives, including a sustainable business model.

The remuneration policy has also been prepared to ensure the overarching considerations in section 9 of the Executive Order on Remuneration Policy, including that the remuneration policy is in harmony with the principles of protection of customers and investors.

The company's employees are not performance paid and there are no option programs. The company currently has only a few permanent employees, some of whom are part of the company's circle of owners.

In addition, the company has students who make updates and minor analyses. The remuneration of the Board of Directors is determined as follows:

Kim Høibye (Chairman). DKK 50,000 per year. The remuneration of the Executive Board is determined as follows:

The remuneration of the Executive Board is set out in the employment contract. However, there is an annual negotiation/assessment of the remuneration.

The remuneration of the Executive Board shall be determined at a level that partly reflects the requirements for the Executive Board and partly enables the retention of the Executive Board. The remuneration of the Executive Board may, within a fixed framework, consist of a fixed salary, free car, pension and, if applicable, anniversary bonus.

In addition, members of the Executive Board receive a free telephone and PC scheme. Employees' remuneration is determined as follows:

Employment is on a contractual basis. There is an annual negotiation/assessment of the remuneration. The remuneration is set at a level that partly reflects the requirements of the contract staff and partly makes it possible to retain the individual. The salary may consist of a fixed salary, pension and possibly anniversary bonus.

Bonuses or variable salaries are not included as part of the company's remuneration model. No remuneration will be paid upon resignation.

The company's remuneration must not entail conflicts of interest between employees or discriminate on the basis of gender, race, religion or disability.

## Roles and Responsibilities

The board of directors is responsible for determining the company's salary policy.

The Board of Directors reassesses significant risk takers among the company's employees, once a year.

The Executive Board is responsible for implementing the company's salary policy and translating it into specific salary agreements with the company's employees.

The Executive Board is responsible for implementing a procedure where the company's compliance officer performs checks in the area of remuneration.

### Control and monitoring

The need for management and monitoring is considered limited as the company does not operate with variable salary components.

The Executive Board submits the company's salaries to the Board of Directors for approval once a year. Any salary increases can be granted on an ongoing basis by the Executive Board within a framework of 10% annually. Salary increases above this level must be approved by the Board of Directors.

### Reporting

Once a year, the Executive Board reports on the current situation regarding the company's salaries, including the company's salary level in relation to the market in general.