



FIDEURAM
ASSET MANAGEMENT IRELAND

Remuneration and Incentive Policies

June 2026

TABLE OF CONTENT

1	Introduction.....	5
2	Regulatory framework.....	5
	<i>Section A - Procedures for Adopting and Implementing the Remuneration and Incentive Policies.....</i>	6
3	Roles, Responsibilities and Governance of the Remuneration Policies	6
3.1	Resolutions of Shareholders.....	7
3.2	The Board of Directors.....	7
3.3	The Remuneration Committee.....	8
3.4	Risk Management	9
3.5	Compliance	9
3.6	Human Resources.....	10
3.7	Internal Audit Function.....	10
3.8	Other Desks	11
4	Compensation of Board of Directors' Members	11
5	Fideuram Asset Management Ireland Remuneration and Incentive Policies	13
	<i>Section B - Remuneration and incentive principles, systems and instruments.....</i>	13
5.1	Purposes and principles of the remuneration and incentive Policies	13
5.2	Personnel segmentation	15
5.3	Remuneration components	17
5.3.1.	Fixed remuneration.....	17
5.3.2.	Variable remuneration.....	18
5.4	Pay-mix.....	21
5.4.1.	General Criteria.....	21
5.4.2.	Variable-to-fixed remuneration ratio.....	21
5.5	Annual Incentive Systems	23
5.5.1	Activation conditions.....	24
5.5.2	Group Bonus funding and deployment at Company level.....	25
5.5.3	Incentive system for all Intesa Sanpaolo Group Risk Takers and for Legal Entity Risk Takers and the Middle Managers not belonging to the Fund Managers category	27
5.5.4	Fund Managers Incentive System.....	32
5.5.5	Incentive System for Risk Takers and Middle Managers of start-up companies	36
5.5.6	The Annual Incentive System for Professionals.....	36
5.5.7	Individual access conditions	37
5.5.8	Corrective mechanisms of the bonus.....	38
5.5.9	Malus Conditions	39
5.5.10	Claw-back Mechanism.....	41
5.6	Payment method for the short-term variable remuneration	41
5.7	Long-Term Incentive Plans.....	50
5.7.1	Performance Share Plan.....	51
5.8	Termination of the employment agreement	58
5.8.1	Severance pay	58
5.8.2	Maximum limits	59

5.8.3	Accumulation of severance with variable remuneration.....	59
5.8.4	Payment methods	60
5.8.5	Criteria.....	60
5.9	Remuneration of Delegates	60
5.10	Hedging strategy	Error! Bookmark not defined.
	Section C - Criteria for the identification of personnel with a material impact on the risk profile of the asset management Company, the UCITs and the portfolio management companies of FAMI.....	63
6	Introduction.....	63
6.1	Qualitative and Quantitative criteria	64
7	Disclosure	67

Document Control

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2	October 2017	HR, Risks & Compliance Desk	Partial (Annual Review)
3	November 2018	HR, Risks & Compliance Desk	Partial (Annual review)
4	September 2019	HR, Risks & Compliance Desk	Partial (Annual review)
5	July 2020	HR, Compliance Desk, Risk Management	Partial (Annual review)
6	June 2021	HR, Compliance Desk, Risk Management	Partial (Annual review)
7	May 2022	HR, Compliance Desk, Risk Management	Partial (Annual review)
8	May 2023	HR, Compliance Desk, Risk Management	Partial (Annual review)
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1 Introduction

The “Remuneration and Incentive Policies of Fideuram Asset Management (Ireland)” (hereinafter also the “Policies”) have been designed on the basis of the Intesa Sanpaolo Group’s Remuneration and Incentive Policies (hereinafter also the “Group Policies”). The Policies are compliant with European and national regulations in the Asset Management industry, as regards those aspects that are not in conflict with, not governed by or more restrictive than such regulations.

The Policies gather in a systematic and structured way the principles that underpin the remuneration and incentive system for all staff of Fideuram Asset Management (Ireland) Designated Activity Company (hereinafter the “Company” or “FAMI”), the roles and responsibilities of the Bodies and structures responsible for its elaboration, approval and implementation. The remuneration and incentive system of the Company is updated at least annually.

The “Remuneration and Incentive Policies of Fideuram Asset Management (Ireland)” is divided into three sections:

- “Section A: Procedures for adopting and implementing the Remuneration and Incentive Policies” which show the roles and responsibilities of the corporate Bodies and functions involved in the process of defining the Company’s Remuneration and Incentive Policies;
- “Section B: Remuneration and incentive principles, systems and tools”, which details the remuneration and incentive systems of the Company;
- “Section C: Criteria for the identification of personnel with a material impact on the risk profile of the asset management Company, the UCITs and the portfolio management companies of FAMI, which describes the principles and criteria used to identify the Company’s risk takers.

Additionally, the annex “*Incentive System for the Portfolio Managers of Fideuram Asset Management Ireland Dac*” describes the rules regulating the incentive system for Portfolio Managers of the Company and constitutes an integral part of the Policies.

It should be noted that, in December 2026, the disposal of Fideuram Asset Management (Ireland) to Eurizon Capital SGR is expected, followed by its merger by incorporation. With regard to the identification of the financial instruments to be awarded to Managers for the purposes of the Incentive System, please refer to the document ‘Identification of the financial instruments to be assigned to the personnel of Fideuram Asset Management (Ireland) for the purposes of the Incentive System’, which defines the UCITS baskets assigned to the different population clusters with reference to the 2026 bonus.

2 Regulatory framework

For the purposes of this document, the set of rules in force within the Intesa Sanpaolo Group (hereinafter also the “Group” or the “ISP Group”) shall apply with specific reference to:

- “Guidelines regarding the remuneration, incentives and identification of Risk Takers” which define the roles and responsibilities of the Bodies and structures involved in the processes of elaboration, approval and application of the Group’s and individual Group Companies’ Policies, designing and implementation of specific incentive initiative, as well as identification and updating of the ISP Group Risk Takers list;
- “2026 Remuneration Discipline” of the Intesa Sanpaolo Group which describe (i) the Remuneration and Incentive Policies which defines the principles of the Group’s remuneration

and incentive system, (ii) the Implementing Provisions which govern the application criteria and the most important operating mechanisms regarding the structure of the remuneration and incentive system and (iii) the Rules for identifying Risk Takers;

- “Report on the remuneration policy and the remuneration paid” of the Intesa Sanpaolo Group S.p.A., submitted to the approval of the Shareholders’ Meeting, which contains the ISP Group’s Remuneration and Incentive Policies for 2026 (prepared in line with the afore-mentioned Guidelines) and the procedures used for their adoption and implementation.

For anything that is not regulated, not in conflict with or more restrictive than the banking sector regulation (Directive 2013/36/EU of 26 June 2013, recently amended by Directive (EU) 2019/878, the so-called “CRD V” and Bank of Italy Circular no. 285 of 17 December 2013 and subsequent updates), in compliance with which the Group regulations referred to above were defined, the regulatory framework of the asset management sector shall apply.

With reference to sector regulations, the Policies is prepared in compliance with:

- the UCITS V Directive (2014/91/EU) that was transposed into Irish law on 21 March 2016 pursuant to the European Communities (Undertakings for Collective Investment in Transferable Securities) (Amendment) Regulations 2016 – S.I. No. 143 of 2016, and subsequently amended in 2019 (S.I. No 430), 2021 (S.I. No 413), 2022 (S.I. No 262 and S.I. No 442);
- Guidelines on Sound Remuneration policies (hereinafter the “ESMA Guidelines”) issued by the Securities and Market Authority (hereinafter “ESMA”), under the UCITS Directive and AIFMD on 31 March 2016 which take effect from 1 January 2017. The provisions of the ESMA Guidelines have been considered and are referenced where applicable in this Remuneration Policies.

These Policies also takes into account the provisions of Regulation (EU) 2019/2088 of 27 November 2019 on sustainability-related disclosures in the financial services sector (Sustainable Finance Disclosures Regulation - SFDR).

Based on the relevant provisions of the UCITS Directive (art. 14-b on the “size, internal organisation and the nature, scope and complexity of their activities”), and ESMA guidelines (par. 7.2. on the “Proportionality with respect to the different characteristics of management companies”), the Company is deemed to qualify as not-significant asset management company.

Section A - Procedures for Adopting and Implementing the Remuneration and Incentive Policies

3 Roles, Responsibilities and Governance of the Remuneration Policies

In order to ensure that the remuneration and incentives systems are consistent with sound and prudent management of FAMI and respect the interests of all stakeholders, based on principles of fairness, sustainability and competitiveness, the Company has defined the roles and responsibilities of the Corporate Bodies and corporate functions involved in the process of defining the Remuneration and Incentive policies.

Specifically, those roles and responsibilities are defined in line with the ISP Group Regulations, as well as “FAMI Guidelines on remuneration, incentives and identification of staff that have a material impact on the risk profile of the Company” (hereinafter “the Company Guidelines”) approved by the Board of

Directors in 2021, and in compliance with the Local and European Regulations listed under previous paragraph.

3.1 Resolutions of Shareholders

- approves:
 - a limit on the ratio between the variable and fixed components of remuneration paid to individual employees set at more than 100%;
 - plans based on financial instruments;
 - the criteria for defining the remuneration to be recognized in view of or upon the early termination of the employment relationship (so-called “Severance”), including its maximum limit in terms of annual fixed remuneration and maximum amount;
- approves the compensation payable (fee) to the Members of the Board of Directors;
- is informed at least annually about how the Remuneration and incentive Policies have been implemented (so-called ex post report). Specifically, the information reported in the ex post report shall be disaggregated by Rules and Functions;
- is informed about the reports prepared by the Internal Audit Function at the end of any audit about the compliance and the correct implementation of the remuneration procedures and, if any, the corrective measures to be adopted.

3.2 The Board of Directors

The Board is constituted in a way that enables it to exercise competent and independent judgment on remuneration policies and practices and the incentives created for managing risk.

The Board of Directors is responsible for:

- approving and amending, with the support of the Remuneration Committee, the Policies, taking into account the long-term interests of shareholders, investors and other stakeholders in the Company. The Policies includes also the Criteria for the identification of personnel with a material impact on the risk profile of the Company (so called “Risk Takers”);
- approving at the list of personnel with a material impact on the risk profile of the Company containing also indication of those who are also ISP Group Risk Takers;
- overseeing the remuneration of the senior staff responsible for heading the Control Functions;
- approving, on proposal of Remuneration Committee the compensation payable (fee) to the Members of the Board of Directors with specific roles (eg. the Chairperson) and members of committees established within the Board;
- approving, taking into account the opinion of the Remuneration Committee, the fixed pay levels for the CEO and Managing Director, the Heads of the main business areas and corporate functions, those who report directly to the CEO and Managing Director and for the Heads of Control Functions;
- with regard to the CEO and Managing Director, the Heads of the main business areas and corporate functions, those who report directly to the CEO and Managing Director and the Heads of Control Functions, approving and reviewing with the support of the Remuneration Committee the assignment of the KPIs and targets of the performance scorecards, the assessment of the level of achievement against performance targets and the amount of the bonus to be paid;
- submitting to the Resolution of the Shareholders the proposal of:

- a limit on the ratio between the variable and fixed components of remuneration paid to individual employees set at more than 100%;
- plans based on financial instruments;
- the criteria for defining the remuneration to be recognized in view of or upon the early termination of the employment relationship (so-called “Severance”), including its maximum limit in terms of annual fixed remuneration and maximum amount;
- approving and submitting to the Resolutions of the Shareholders at least annually the ex post report. Specifically, the information reported in the ex post report shall be disaggregated by Roles and Functions;
- approving the funds basket to be used to pay part of the variable compensation;
- being informed, at least on an annual basis, about the funding of the bonus pool at Company level.

3.3 The Remuneration Committee

The Company decided to entrust the Remuneration Committee (hereinafter “the Committee”) with the advisory and consulting functions aimed to support the Board of Directors in all activities relating to remuneration, defined in accordance with the principles set out in the ESMA Guidelines on sound remuneration policies (ESMA 232/2013 and 411/2016). The Remuneration Committee is composed of non-executive members, the majority of whom are independent, including the Chairperson. External advisors can participate in the meetings of the Committee in relation to specific issues.

The role of the Committee includes the following tasks:

- conducting a preliminary analysis on the remuneration and incentive policies for employees and collaborators;
- monitoring the correct application of the rules on the remuneration of the internal control functions;
- evaluating the mechanisms adopted to ensure that the system of remuneration and incentive takes into account the risks, liquidity levels and assets under management and is aligned with the business strategy, objectives, values preparing the proposals to be submitted to the Board of Directors and to the competent structures of the Parent Company;
- supporting the Board of Directors in the Risk Takers identification;
- providing an opinion on the compensation payable (fee) to the Members of the Board of Directors with specific roles (eg. the Chairperson) and members of committees established within the Board;
- providing an opinion on the definition of the fixed remuneration pay level for the CEO and Managing Director, the Heads of the main business areas and corporate functions, those who report directly to the CEO and Managing Director and for the Heads of Control Functions taking into account the indications received from the competent structures of the Parent Company;
- with regard to the CEO and Managing Director, the Heads of the main business areas and corporate functions, those who report directly to the CEO and Managing Director and the Heads of Control Functions, providing an opinion on the assignment of the KPIs and targets of the performance scorecards, the assessment of the level of achievement against performance targets and the amount of the bonus to be paid taking into account the indications received from the competent structures of the Parent Company;

- providing an opinion on the funds basket to be used to pay part of the variable compensation.

To carry out effectively and responsibly its own duties, the Committee has the access to the Company information significant for this purpose.

3.4 Risk Management

The Risk Management Desk takes part in the process of definition of the asset management Company remuneration policies (that include also the Criteria for the identification of personnel with a material impact on the risk profile of the asset management Company, the UCITs and the portfolio management companies of FAMI), assessing the alignment of the remuneration structure with the risk profile of the Company. In particular, it provides a written opinion regarding the following aspects:

- the identification of the "Legal Entity Risk Takers" and the self-assessment of the size and complexity of the Company;
- the definition of the incentive system and the use of indicators (risk adjusted) to consider the risks assumed;
- the alignment of the variable remuneration related to the annual incentive system in respect to the risk's level of the Company and of the funds managed;
- the identification of funds basket to be used to pay part of the variable compensation in line with the current remuneration Policies provisions.

The Risk Management Desk participates, when appropriate, in the Remuneration Committee's meetings for the issues under its area of responsibility.

The Risk Management function involves, through the Chief Risk Officer of Fideuram, the Area of Government Chief Risk Officer of the Parent Company in order to verify the consistency of the policies and incentive systems specific to FAMI with Fideuram Group and ISP Group propensity to risk.

3.5 Compliance

The Compliance Desk examines that the Remuneration and Incentive Policies, that includes also the Criteria for the identification of personnel with a material impact on the risk profile of the Company, are consistent with the objectives of compliance, with the rules of the Articles of Association and with the Code of Ethics or other standards of conduct applicable to the Asset Management Company or to the Group, in order to avoid legal and reputational risk-taking inherent with the relationships with investors. In line with the purposes described above, it provides a written opinion taking into account remarks made by the Parent Company functions with reference to:

- the list of "Legal Entity Risk Takers";
- the compliance of FAMI Remuneration and Incentive Policies;
- the remuneration structure, with particular attention to: i) the balance between fixed and variable component, ii) the procedures for payment of the variable component for the different categories of personnel and the application of the adjustment mechanisms to the ex-post risk, iii) the overall compliance with the ex-ante risk adjusted mechanisms.

Moreover, the Compliance function involves the corresponding function of the Parent Company in order to verify the consistency of the Company's specific Policies and incentive systems with respect to those

of Fideuram Group, and, through the same, the ISP Chief Compliance Officer Governance to verify compliance with the relevant legislation for Intesa Sanpaolo Group.

3.6 Human Resources

The Human Resources Department:

- draws up FAMI Remuneration and Incentive Policies that include also the Criteria for the identification of personnel with a material impact on the risk profile of the asset management Company, the UCITS and the portfolio management companies of FAMI and ensures its full implementation. In this process, it involves the individual corporate functions insofar as their competences and it is supported by the Resources, Organization and Change Management of Fideuram, which coordinates the process of defining and managing the Remuneration Policies, in accordance with the Group guidelines;
- identifies (and periodically reviewing) the Legal Entity Risk Takers list and submits it to the Board of Directors, after sharing it with the Parent Company's Remuneration Policies & Learning department and the verification of the Compliance Function;
- proposes to the Remuneration Committee and to the Board of Director the fixed remuneration pay levels for the CEO and Managing Director, the Heads of the main business areas and corporate functions, those who report directly to the CEO and Managing Director and for the Heads of Control Functions for a subsequent approval by the Board;
- with regard to the CEO and Managing Director, the Heads of the main business areas and corporate functions, those who report directly to the CEO and Managing Director and the Heads of Control Functions, proposes to the Remuneration Committee and to the Board of Director the assignment of the KPIs and targets of the performance scorecards, the assessment of the level of achievement against performance targets and the amount of the bonus to be paid for a subsequent approval by the Board;
- proposes to the Remuneration Committee and to the Board of Director and monitors the incentive systems for the Company's employees;
- informs the Remuneration Committee and the Board of Directors, at least on an annual basis, about the funding of the bonus pool at Company level for acknowledgement by the Board.

3.7 Internal Audit Function

The Internal Audit function is outsourced to the ultimate Parent Company Intesa Sanpaolo (hereinafter also "ISP"). The Internal Audit function of ISP conducts an annual audit to check that the remuneration practices are consistent with the approved policies and are in line with the legislation in this area and it also checks the correct implementation of the process for identifying Legal Entity Risk Takers.

Any discrepancies found during the audit are brought to the attention of the Governing Bodies and the functions responsible for adopting any corrective actions required, which assesses the significance of such discrepancies in order to promptly notify the competent Supervisory Authorities.

It delivers an annual report to the Company's Board of Directors, containing the results of the audits carried out.

3.8 Other Desks

The General Manager - Head of HR, Business Support and Operations Department supports the Human Resources Desk in establishing the criteria for the identification of the "Risk Takers at Company level", to support the deployment of the remuneration criteria, in the context of the Remuneration Policies, considering the possibility to impact on the Company and Funds risk profile.

The Finance Desk supports the Human Resources Desk in the proposal of economic - financial goals to be included in the performance measures of the "Legal Entity Risk Takers" of the Company.

4 Compensation of Board of Directors' Members

The compensation payable to the Members of the Board of Directors, is defined by Intesa Sanpaolo as the controlling shareholder and as the entity that exercises a management and coordination role under the terms of the relevant civil law and banking regulations.

The remuneration policy for the Members of the Board of Directors is therefore in line with the following principles, applied uniformly across the Group, in compliance with the regulatory framework of the different countries in which Intesa Sanpaolo operates through its subsidiaries:

- the remuneration paid to the Members of the Board of Directors is commensurate with their tasks and responsibilities. Directors' remuneration is specifically determined with the aim of achieving uniformity and standardisation in line with Group Standards, taking into consideration the size of the balance sheet, the income statement and the organisational complexity of the Company, as well as other aspects of an objective and qualitative nature represented by the nature of the activity carried on by the Company, its operational risk profile and its geographical location. Similar criteria are also used to set the remuneration for Directors entrusted with specific tasks pursuant to article 2389 of the Italian civil code and similar provisions in foreign legislation;
- as a general rule, there are no provisions for variable components in the remuneration package, nor incentivising bonuses linked to results, nor profit sharing clauses or share subscription rights at a predetermined price. Any exceptions to this principle may only occur through justified dispensations, in compliance with any relevant regulations in force;
- in general, there are no differences in Directors' remuneration whether they are Group employees, freelance professionals, self-employed, etc. The emoluments of the Group employees appointed as Directors of subsidiaries are paid to the Company that maintains the employment relationship, unless otherwise agreed with the relevant Group HR function.

Board of Directors' Members are entitled to be reimbursed for the expenses incurred in the performance of their role.

In line with the best practice in international financial markets and taking into account the nature, size and operational complexity of the COMPANY and the ISP Group, the Parent Company Intesa Sanpaolo has taken out an insurance policy to cover the administrative liability of the Directors of the COMPANY, as well as all the Directors of the subsidiaries.

5 The Remuneration and Incentive Policies of the subsidiary Companies

Consistently with the provisions of the Bank of Italy Regulations and in compliance with the Group Policies, the Company applies the regulatory provisions set out in these Policies also to its subsidiaries wherever established, in accordance with any specificities at local level.

It being understood that Intesa Sanpaolo (the Parent Company) defines the remuneration to be paid to the members of the corporate bodies of the Group Companies, the competent structures of FAMI define the Remuneration and Incentive Policies of the COMPANY, transmitting them to their subsidiaries for their implementation, ensuring their overall consistency, as well as compliance with the Group Policies. The companies controlled by FAMI, as unlisted companies, define their own policies consistently with the FAMI Policies and in compliance with the regulatory specificities defined at local level. In defining the elements of their Remuneration and Incentive Policies, the subsidiary companies apply the most restrictive criteria among those of local legislation and those of the Group and coordinate with the equivalent structures of the COMPANY in order to ensure overall consistency with respect to the FAMI Policies, as well as with the Group as a whole.

The subsidiary companies remain, in any case, responsible for compliance with the legislation directly applicable to them and for the correct implementation of the guidelines provided by FAMI.

Finally, the COMPANY verifies the correct implementation of the indications provided by the individual subsidiaries; where it detects inconsistencies, the COMPANY urges the subsidiaries to carry out the appropriate adjustment measures.

6 Fideuram Asset Management Ireland Remuneration and Incentive Policies

In compliance with the Group Policies, the present chapter describes Principles, remuneration and Incentive Systems and Instruments (Section B) and the Criteria for the identification of personnel with a material impact on the risk profile of the asset management Company, the UCITS and the portfolio management companies of FAMI (Section C); the mentioned Sections, jointly, represent Fideuram Asset Management Ireland overall Remuneration and Incentive Policies.

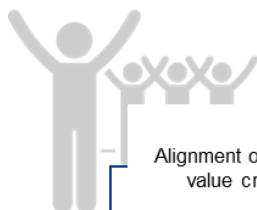
Section B - Remuneration and incentive principles, systems and instruments

This Section describes the remuneration and incentive principles, systems and instruments defined for 2026 and addressed to the staff of the Company.

6.1 Purposes and principles of the remuneration and incentive Policies

The Policies aim to align the management's and personnel's behaviour with the interests of all Stakeholders, guiding their action towards the achievement of sustainable medium-long term objectives within the framework of a prudent assumption of current and prospective risks, as well as to contribute to making FAMI an "Employer of choice" for its ability to attract, motivate and retain top resources.

In line with the principles adopted by Intesa Sanpaolo Group, the Policies of the Company are inspired by the following principles:



STAKEHOLDERS' INTEREST

Alignment of management and personnel conduct with the interests of all **Stakeholders**, with a focus on value creation for **Shareholders**, as well as on the social impact generated on the **Communities**



CORRELATION BETWEEN REMUNERATION AND RISK TAKING

- direction of management and personnel conduct towards the achievement of objectives within a **framework of rules** aimed at controlling corporate risks
- remuneration systems aligned with prudent **financial and non-financial risk** management policies (including legal and reputational risks), in line with what is defined in the Group Risk Appetite Framework
- definition of a sufficiently high fixed component to allow the variable portion to reduce significantly, even down to zero, upon occurrence of specific conditions



ALIGNMENT WITH MEDIUM AND LONG-TERM OBJECTIVES in accordance with Group Risk Tolerance

- definition of a set of Incentive Systems in order to drive performance over a **multi-year accrual** period and to share the medium-long term results consequent to the implementation of the Business Plan



MERIT

- **remuneration flexibility**: bonuses are linked to the results achieved and the risks undertaken
- **competitiveness**: focus on key staff members with high managerial skills, to whom competitive salary brackets, compared with the reference market, are reserved
- best performers' **recognition** through above-average bonuses



EQUITY

- **correlation** between fixed remuneration and the level of responsibility, measured through the Global Banding System or the seniority/professional role
- **differentiation** of salary brackets and the ratio of the variable component to the total remuneration according to the relevant professional category and/or geographical market, with the Banding bracket or the seniority/professional role being equal



GENDER NEUTRALITY

- **recognition of an equal level of remuneration**, for the same activities carried out, regardless of gender
- attention to the **gender pay-gap** and its **evolution over time**



SUSTAINABILITY: expenses reduction deriving from application of the policies to values compatible with the available economic and financial means

- selective reviews of fixed remuneration based on strict **market benchmarks**
- mechanisms to **adjust allocations** to the total incentive provisions according to the profitability and the results achieved by the Group
- **appropriate caps** on both total incentives and the amount of individual bonuses



REGULATORY COMPLIANCE

- compliance with **legislative and regulatory provisions, with codes of conduct and other self-regulation provisions** with focus on the Risk Takers (and among these on the so-called Top Risk Takers, including the Key Managers) and on the Control Functions
- **fairness in customer relations**

Focus: Gender neutrality

FAMI pays great attention to “Diversity, Equity and Inclusion” issues and undertakes to implement and disseminate a policy aimed at the inclusion of all forms of diversity, both inside and outside the Company. In this regard, in line with what was established by the ISP Group, the Company implemented the “Diversity, Equity and Inclusion Principles” pursuant to which specific commitments were undertaken to guarantee gender equality in HR processes and in human resource management. Compliance with these commitments is monitored periodically including for the purpose of implementing corrective measures.

In line with the ISP Group’s provisions, the Company adopts a gender-neutral Remuneration and Incentive Policies, which contributes towards achieving complete equality of personnel. It ensures that personnel have the same level of remuneration for the same work, including insofar as the conditions for payment and recognition.

In particular, the Company ensures that the definition of remuneration and incentive systems and the adoption of decisions regarding remuneration are not influenced by gender (or any other forms of diversity such as affective-sexual orientation, marital status and family situation, age, ethnicity, religious beliefs, political membership and trade union membership, socio-economic condition, nationality, language, cultural background, physical and mental conditions or any other characteristic of the person including those linked to the expression of his/her own thoughts) but are based on professional merit and skills and inspired by the principles of fairness.

To apply a gender-neutral Policy and assess its efficacy, the Company adopts:

- systems for measuring organisational positions that acknowledge the responsibilities and complexities managed by the various roles.
Specifically, for the management the Company has adopted the Global Banding System (see “Focus: Global Banding System” below) that is based on the grouping in homogeneous categories of managerial positions with similar levels of complexity and responsibilities, measured using the IPE (International Position Evaluation) methodology.
On the other hand, the professional cluster is segmented on the basis of the career title assigned according to certain criteria (i.e. seniority, autonomy, complexity and competencies) – in order to enhance in a granular way the level of professional contribution provided in their operations and the progressive specialisation of skills – or of the professional profile to which they belong;
- for the management, market remuneration references associated to each Global Banding bracket and differentiated according to the professional category and geographical area. Regarding the professional cluster at senior levels, annual market references are associated on the basis of their professional category and geographical area;
- incentive/reward systems linked to objective parameters that allow merit and performance to be recognised.

6.2 Personnel segmentation

The Policies are based on personnel segmentation logics that allow the principles of merit and fairness to be defined operationally in order to differentiate the total remuneration in an appropriate manner, as

well as to provide for specific mechanisms for its payment for the different clusters of personnel, with particular focus on those with regulatory relevance for which more stringent requirements are envisaged. In application of these logics, the following macro segments are identified:

- **Risk Takers;**
- **Middle Management¹;**
- **Professionals.**

Focus: Risk Takers

As asset management company, FAMI identifies the personnel whose professional activities have a material impact on the institution's risk profile (so-called "Company Risk Takers") based on the provisions of "Undertakings for Collective Investment in Transferable Securities" (Amendment) Regulations 2016 – S.I. No. 143 of 2016, stated in Section B, which form an integral part of the Remuneration and Incentives Policies.

In particular, the Legal Entity Risk Takers segment consists of:

- i. *Executive and non-executive members of the Board of Directors, including the CEO and Managing Director;*
- ii. *Members of Senior Management who report directly to the CEO and Managing Director;*
- iii. *Heads of control functions;*
- iv. *Employees that individually or collectively assume significant risks for the Company, for UCITS and for the assets managed;*
- v. *personnel whose total remuneration is in the same wage ranges as sub categories ii) and iv) if their activities have or could have a significant impact on the risk profile of the manager or of the UCITS and managed AIFs.*

Furthermore, as a Company belonging to a banking group, among the Company Risk Takers, those who have a significant impact on the risk profile of the ISP Group (so-called "**ISP Group Risk Takers**") are also identified in application of the provisions of Directive (EU) 2019/878 (so-called CRD V) as amended by the Directive 2019/878/EU and by the Delegated Regulation (EU) 2021/923 which concretely implements and integrates the provisions of the Directive and pursuant to Circular 285/2013 and represented in the " Rules for identifying Risk Takers" set out in the Parent Company's Policies. On the first working day of January 2026 FAMI Company Risk Takers were 12 people, including executive and non-executive members of the Board of Directors. Among these, it should be noted that no. 2 individuals are also identified as ISP Group Risk Taker at the same date.

Focus: Global Banding System

The Company adopts the ISP Group Global Banding System that is based on the grouping in homogeneous categories of managerial positions with similar levels of managed complexity and responsibilities, measured using the IPE (International Position Evaluation) methodology.

¹ All the Heads of Organisational Units not already included in the Risk Taker cluster are considered.

Focus: Global Banding System

Linked to Global Banding, a job titling system has also been adopted that clearly identifies the responsibilities and the contribution of the roles, overcoming the purely hierarchical and organisational forms of logic. In particular, the title of:

- Chief is used to identify those roles that define and/or exert a strong influence on the medium-long term strategies of the ISP Group or define the strategy of a Division, with an impact on the ISP Group's results in the medium-long term period;
- Executive Director is used to identify those roles that define and/or exert a strong influence on the function/business/country strategies, in line with the Division/Group strategies, and ensure their implementation even in highly complex contexts;
- Senior Director is used to identify those roles that define business/function policies and plans and lead their implementation by taking the managerial responsibility for financial and human resources;
- Head of is used to identify those roles that define or contribute to defining plans and programmes for their own organisational structure, also in coordination with other company structures, and ensure their implementation by taking managerial responsibility for human resources and, possibly, financial responsibilities.

While waiting for all the organizational units to be weighted for the purpose of attributing a specific job title to that position, all the person that are responsible for an organizational unit are considered Middle Managers.

Focus: External competitiveness of remuneration

Within the scope of defining total remuneration, FAMI pays constant attention to the external competitiveness in order to attract and retain the best resources. Taking into account market data and practices, the Company aims to align overall remuneration to median values, without prejudice to the possibility of making appropriate differentiations for particularly critical positions and/or resources of high management skills.

6.3 Remuneration components

The remuneration package is composed of:

- Fixed Remuneration;
- Variable Remuneration.

5.3.1. Fixed remuneration

The fixed component is the component of remuneration that is stable and irrevocable and is determined based on pre-established and non-discretionary criteria such as: the contractual framework, the role held, the responsibilities assigned, the particular experience and competence matured by the employee.

The fixed remuneration consists of:

- **gross annual base salary**, which reflects the level of professional experience and seniority of the staff;

- **indemnities** assigned in a non-discretionary manner and not linked to any type of performance indicator. This type of fixed remuneration is assigned to expatriate personnel, to cover any differences in cost, quality of life and/or salary levels specific to the target market;
- **indemnities and/or fees resulting from positions held in Corporate Bodies**, provided that they are not paid to the company to which they belong;
- any **benefits** aimed at increasing the motivation and loyalty of resources and assigned on a non-discretionary basis. These may be of a contractual nature (e.g. supplementary pension, health care, etc.) or derive from choices of remuneration policies (e.g. company car) and, therefore, provide for different treatment for different categories of personnel.

The **indemnities** paid to **expatriate staff** are designed to ensure fair net remuneration between what is received in the country of origin and the country of destination, thus covering any differences in cost, quality of life and/or remuneration levels specific to the market of destination.

Those allowances are fixed remuneration because they are:

- assigned to all expatriate personnel, in the event of a negative differential between the target country and the country of origin;
- not tied to any kind of performance indicator;
- defined on the basis of predefined and country-specific parameters, provided by a specialist consulting firm;
- communicated to the interested parties by means of an individual letter;
- paid as long as the person actual stays in the country in question.

5.3.2. Variable remuneration

The variable component is linked to personnel performance and proportional to the results achieved and the prudential risks taken, and consists of:

- annual incentive systems (see paragraphs 5.5.3 and 5.5.4);
- long-term variable components and, specifically:
 - the Performance Share Plan 2026-2029 addressed to, among the other Managers, the CEO and Managing Director of the Company and the General Manager (both identified as ISP Group Risk Takers), other ISP Group Risk Takers and those who expatriate from Italy² (see paragraph 5.7);
 - the LECOIP 2026-2029 Plan addressed to Professionals of Intesa Sanpaolo Group expatriate from Italy³;
- the Carried Interests, i.e. the share in the profits of the Undertakings for Collective Investment in Transferable Securities (UCITS) or Alternative Investments Funds (AIF) received by personnel as compensation for the management of the UCITS or AIF⁴;
- any short-term or long-term variable components, linked to permanence in the Company (non-competition agreements, one-off retention agreements) or exceptional (entry bonus, buy-out);

² As they have an Italian employment contract, even suspended.

³ As they have an Italian employment contract, even suspended.

⁴ However, the portion of *pro rata* profit assigned to personnel by virtue of any investments made by them in the UCITS or AIF, provided that they are proportional to the actual percentage of participation in the UCITS or AIF and not exceeding the return recognised to the other investors does not constitute remuneration. For a proper implementation of the regulation, managers must therefore be able to clearly identify the portions of profit which exceed the *pro rata* profit of the investments and that qualify as carried interest.

- any discretionary benefits.

The distinction of the variable component of remuneration into a short-term component and a long-term component favours the attraction and retention of resources, makes it possible to orient performance over a more than annual accrual period and to share the medium/long-term results arising from the implementation of the Business Plan of Intesa Sanpaolo Group.

Remuneration may not be paid in forms, instruments or methods aimed at avoiding regulatory provisions.

Focus: Carried Interest

With reference to the personnel of the “Investments” area, Carried Interest may be introduced, if new AIFs are established, as a further possible component of variable remuneration. The Carried Interest provides the use of equity instruments with strengthened rights, i.e. that imply a participation in the profits that is proportionally greater than that of the other investors.

This instrument aims to strengthen the alignment of the management’s interest with the interest of shareholders and investors.

Consequently, Carried Interest is subject to the achievement of a minimum return and it is postponed. In line with market best practices, Carried Interest is awarded:

- upon exceeding a certain minimum return threshold (hurdle rate);
- according to the European Waterfall model (“on a whole-fund basis”), i.e. calculated and paid only at the end of the entire investment’s life.

It should be noted that, for the aforementioned personnel, in line with the provisions of the Bank of Italy Regulation implementing Articles 4-undecies and 6, paragraph 1, letters b) and c-bis) of the Consolidated Law on Finance as last amended⁵, Carried Interest is not included in the ratio between the variable and fixed components of remuneration. Moreover, in accordance with the “Guidelines on sound remuneration policies under the AIFMD” issued by ESMA⁶, Carried Interest may be paid cash upfront since, taking into account the remuneration conditions set out above, the requirements on risk alignment of variable remuneration, award process and pay-out process⁷ (including, *inter alia*, those concerning deferral, payment in instruments, ex-post correction mechanisms) are deemed to be met.

At present, the Company do not yet use such a remuneration tool for their personnel.

Focus: Guaranteed bonuses

NO granting of guaranteed bonuses is provided.

⁵ In particular by the Measure of 23 December 2022 amending the Bank of Italy Regulation of 5 December 2019.

⁶ ESMA, Guidelines on sound remuneration policies under the AIFMD, paragraph XII.V.

⁷ In the ESMA Guidelines, it is clarified that the provisions on, *inter alia*, deferral and payment in instruments, malus and claw-back are deemed to be met when: “a) an AIFM must first return all capital contributed by the investors of the AIF it manages and an amount of profits at a previously agreed hurdle rate (if any) to the investors of the AIF, before the identified staff of the AIFM may receive any variable compensation for the management of the relevant AIF; and b) the compensation received by the identified staff of the AIFM is subject to clawbacks until the liquidation of the relevant AIF”.

Focus: Entry Bonus and Buy-out

To encourage the attraction of new personnel, it is possible to offer:

- an entry bonus to be paid upon hiring, without prejudice to the accurate assessment and analysis of market practices. According to the Supervisory Regulations, this type of bonus is not subject to any requirement applicable to variable remuneration, including those on variable remuneration cap and pay-out schemes, if recognized in a single instalment (known as **welcome bonus**). It should be noted that, in any case, the mentioned bonus can be assigned only once to the same staff member at ISP Group level;
- a bonus as indemnification for the deferred variable remuneration reduced or cancelled by the previous employer due to termination of the contract. This type of bonus (**buy-out**) cannot, however, compensate new personnel for reductions or cancellations of remuneration due to malus or clawback mechanisms and it is in any case subject to all the rules governing variable compensation, including those on variable remuneration cap and pay-out schemes.

Focus: One-off retention

Any retention bonuses tied to the period of employment of the personnel:

- are paid for a certain period of time or until a given event;
- are awarded not before the end of this period or upon the occurrence of the event;
- contribute to the calculation of the cap between the variable and fixed component of remuneration;
- are subject to the payment methods of the variable remuneration.

It is understood that the recognition of the retention bonus cannot lead to a situation in which the total variable remuneration is no longer linked to the performance of the individual, the single business unit, as well as the Bank and the Group.

Furthermore, multiple retention bonuses (for example, an individual retention bonus and another one deriving from a collective plan) may be awarded to the same staff member in exceptional and suitably justified cases, providing that the payment of the retention bonuses takes place at different times and provided that there are specific reasons for the recognition of each of them.

As regards retention bonuses, FAMI – in line with Intesa Sanpaolo Group definition and the industry practises – envisages a **minimum duration agreement** (or **stability agreement**), i.e. an agreement with which the beneficiary undertakes not to exercise the right to withdraw from the employment agreement for the duration of the Agreement, against a payment made at the end of such period, and which provides a penalty in case of breach of the commitment.

Focus: Discretionary pension benefits

Should discretionary pension benefits – which are currently NOT envisaged – be introduced, these will be assigned to beneficiaries in accordance with the applicable regulations, according to which they are similar to variable remuneration, and, therefore:

- in the case of resources who are not entitled to receive a pension, they shall be invested in UCITS units managed by the Company or other related instruments, equity or equity related instruments or other equivalent non-monetary instruments that are equally effective in terms of aligning incentives, held by the Company for a period of no less than five years and subject to ex-post adjustment mechanisms related to the Group's performance net of risk;

Focus: Discretionary pension benefits

- in the case of resources entitled to a pension, they shall be invested in UCITS units managed by the Company or other related instruments, equity or equity related instruments or other equivalent non-monetary instruments that are equally effective in terms of aligning the incentives and subject to a holding period of not less than five years;
- they contribute to the calculation of the cap between the variable and fixed component of remuneration.

6.4 Pay-mix

5.4.1. General Criteria

The term pay mix refers to the weight, in percentage terms, of the total remuneration, of the fixed component and the variable part.

The Company, in full compliance with the regulatory indications, adopts a pay mix appropriately balanced in order to:

- i. allow flexible management of labor costs, as the variable part may contract significantly until it is zeroed in relation to the level of results achieved in the reference year or when the ISP Group is not able to maintain or restore a solid base of capital;
- ii. to discourage behaviors focused on achieving short-term results, especially if deriving from the assumption of high risks.

5.4.2. Variable-to-fixed remuneration ratio

To achieve the aforementioned purposes, it is the practice of the ISP Group and the Company to establish ex ante maximum and balanced limits to the variable remuneration for all staff clusters, by defining specific “caps” to increase bonuses in relation to any over-performance.

In compliance with current sector regulations, as well as Group Policies, the maximum limit on variable remuneration compared to the fixed remuneration is:

- 400% for Personnel belonging to the Investment Area (including Risk Takers);
- 200% for ISP Group Risk Takers not belonging to the Control Functions;
- 100% of the fixed remuneration for the remaining personnel not belonging to the Control Functions;
- 33% of the fixed remuneration for personnel belonging to the Control Functions.

The components of variable remuneration included in the cap are:

- the short-term component relating to the Incentive Systems;
- the long-term component assigned through the Long-Term Incentive Plans i.e. the Performance Share Plan 2026-2029 or LECOIP 2026-2029; this component has an impact on the pro-rata variable remuneration for the entire accrual period;
- any variable short- and long-term components, tied to the period of employment in the company (stability, non-competition, one-off retention agreements) or extraordinary agreements;
- severance payments in the event of termination of the employment agreement or early termination of the office, except for the amounts agreed and paid:

- based on a non-competition agreement, for the portion which, for each year of duration of the agreement, does not exceed last year's fixed remuneration;
- within an agreement reached in order to settle a current or potential dispute (independently from the context in which the agreement is drawn up), if calculated according to a predefined calculation formula approved previously by the Resolutions of the Shareholders, as provided in paragraph 5.8.

With specific reference to the cap set for the Fund Managers, the increase up to a maximum of 400% was defined in accordance with the faculty granted by the update of the Supervisory Regulations published on the Official Journal of the Italian Republic on 12 November 2018. This update has, in fact, introduced a novation about maximum limits to variable remuneration, attributing to Intermediaries the right to derogate from those established by Community legislation for personnel working in the Asset Managements, SICAVs and SICAF subsidiaries.

This change, approved by the Shareholders' Meeting of the Parent Company Intesa Sanpaolo in 2019, is motivated by the need to foster international growth in Wealth Management, and to attract and retain key resources in countries other than Italy in which there are both independent players, who have no regulatory restrictions about variable remuneration limits, and operators belonging to local Banking Groups, who often derogate from the cap requirement in their subsidiaries belonging to the asset management sector.

The resources of the Company to which the increase in the cap would be applied up to 400% are about n. 24 out of which n. 0 ISP Group Risk Taker and n. 1 person identified as Risk Taker at Company level⁸.

The aforementioned rationales and the related impacts on the capital of the ISP Group and the COMPANY remain unchanged compared to what was in place in 2019 and was the subject of a previous shareholders' resolution. In particular:

- mechanisms are envisaged to ensure economic and financial sustainability, as the bonus pool allocated to the COMPANY is defined on a top-down basis as a percentage of that accrued at ISP Group level; therefore, in the event that bottom-up requirements exceed the availability of the aforementioned bonus pool, individual bonuses are reduced proportionally;
- the performance measurement systems adopted for the purpose of incentivizing personnel operating within the "Investments" value chain are deterministic and highly selective, with the effect that only a limited number of resources historically exceed the assigned performance targets, even in years of booming markets;
- enhanced mechanisms are envisaged for determining the bonus and the related payment methods (see paragraph 5.6).

⁸ Data as at 31 December 2025.

5.5 Annual Incentive Systems

Annual Incentive Systems adopted by the Company, in accordance with the ISP Group:

- are aimed at achieving the medium and long-term objectives set out in the Business Plan;
- consider the Fideuram Group and ISP Group's Risk Appetite and Risk Tolerance – as expressed in the RAF – as well as the Company's capital requirements and the risk / return profile of the various assets managed;
- are aimed at promoting value creation goals for the current year, within a framework of sustainability, given that the premiums paid are related to the available financial resources as well as to align the conduct of management and staff with the interests of all Stakeholders and, in particular among these, of investors / customers.

Reported below is a summary of the operating mechanisms and the main characteristics of the incentive systems. Further details are provided in the following paragraphs.

STEP	OBJECTIVE	MECHANISM	
BONUS POOL	Solidity and sustainability in a prudential approach	Gate and Funding	<ul style="list-style-type: none"> • The bonus pool is activated only if main capital and liquidity requirements are satisfied, namely the minimum regulatory conditions of solidity at ISP Group, Fideuram Group and Company level, together with the economic and financial sustainability condition (see par. 5.5.1) • The funding of the bonus pool at Group level (quantum), as far as relevant for the SGR, is based on the available resources resulting from economic and financial results achieved, adjusted for the non-financial risks incurred (see par. 5.5.2)
BONUS ALLOCATION	Alignment of behaviors and managerial conduct with medium and long-term objectives of the Group Business Plan within a framework of risk prevention	Incentive Systems	INCENTIVE SYSTEMS FOR SPECIFIC CLUSTERS
			Incentive system for all Group Risk Takers and for Legal Entity Risk Takers and Middle Managers not belonging to the Fund Managers category (see par 5.5.3)
			Fund Managers Incentive System (see par 5.5.4)
BONUS PAY-OUT	Adjustment based on conduct/ monitoring the impact of managerial conduct over time	Individual access conditions	Failure to satisfy individual access conditions precludes any bonus payout and the settlement of deferred portions to be paid during the year (see par. 5.5.7)
		Malus conditions	Failure to satisfy malus conditions leads to the reduction, even down to zero, of the deferral portions of bonus to be paid during the year (see par. 5.5.9)
		Claw-back	Return of bonuses already paid as a result of disciplinary measures due to personnel fraudulent behavior or serious misconduct (see par. 5.5.10)

Focus: Integration of sustainability risks into Incentive Systems – Regulation (EU) 2019/2088

The Policies of the Company is also consistent with the provisions on the integration of sustainability risks pursuant to Regulation (EU) 2019/2088 of 27 November 2019 of the European Parliament and of the Council.

In particular, consistency is guaranteed at the annual Incentive Systems level:

Focus: Integration of sustainability risks into Incentive Systems – Regulation (EU) 2019/2088

- on the one hand, allocating within the scope of the Incentive System of all ISP Group Risk Takers and those Legal Entity Risk Takers and Middle Management who do not belong to the “category of Fund Managers” a specific “ESG” KPI among the strategic action objectives (see paragraph 5.5.3);
- on the other hand, foreseeing for the population belonging to the “category of Fund Managers” (i.e. ISP Group Risk Takers, Company Risk Takers, Middle Management and Professionals), a mechanism that corrects the bonus associated with the activity carried out in terms of sustainability risk management (see paragraph 5.5.4).

5.5.1 Activation conditions

The annual incentive systems for FAMI personnel are subject to the minimum activation conditions required by the Regulator, and failure to achieve even one of these results in the non-activation of the annual Incentive Systems.

The activation conditions are based, on a priority basis, on the principles envisaged by the prudential regulations on capital strength and liquidity, represented by the consistency with the limits established by the RAF at ISP Group level, Fideuram Group level (to which FAMI belongs to) and Company level, as well as the principles of financial sustainability of the variable component of the remuneration represented by the verification the availability of sufficient economic and financial resources to meet the expenditure needs.

The conditions set are:

- At ISP Group Level (Group conditions)

Capital strength condition	Common Equity Tier 1 (CET1) Ratio	≥	Hard limits set by the RAF at Group level
	Leverage Ratio	≥	
	Minimum requirement for own funds and eligible liabilities (MREL)	≥	
	Assessment of the results of the ICAAP and of the Recommendations on distributions by competent authorities and European Supervisory Authorities		
Liquidity condition	Net Stable Funding Ratio (NSFR)	≥	Hard limits set by the RAF at Group level
Sustainability condition	No loss and positive Gross Income*	>	∅

In particular, the Gross Income (condition of sustainability) is measured net of: (i) profits from the buyback of the Bank’s own liabilities, (ii) fair value of the Bank’s own liabilities and (iii) income components arising from accounting policies following changes to the internal model on core deposits.

- At Fideuram Group Level (sub-holding conditions)

Capital strength condition	Common Equity Tier 1 (CET1) Ratio	>	Hard limits set by the RAF at Fideuram Group level
	Leverage Ratio	>	
	Minimum requirement for own funds and eligible liabilities (MREL)	>	Early Warning set by the RAF *
Liquidity condition	Net Stable Funding Ratio (NSFR)	>	Hard limits set by the RAF at Fideuram Group level
Sustainability condition	No loss and positive Gross Income	>	∅

* Limit calculated at the Sub-holding level (i.e., Fideuram).

With reference to the sustainability conditions, it is specified that the condition of no loss and positive Gross Income is verified on the basis of the results of the individual balance sheet drawn up according to the local accounting principles of Fideuram and the Company.

- At Company Level:
 1. Capital requirements at least equal to 110% of the regulatory capital.

It should be noted that failure to comply with the capital requirements at Company level constitutes a non-activation condition of all the Incentive Systems of FAMI to which the resources are addressed, even when the Group and/or subholding ones are positively verified.

5.5.2 Group Bonus funding and deployment at Company level

All incentive systems for FAMI personnel are financed by a structured bonus pool mechanism that ensures its financial sustainability.

In particular, as far as relevant to FAMI, the financing mechanism of the Bonus Pool at ISP Group level is:

- defined with a "top down" approach;
- determined according to the ISP Gross Income achieved at the consolidated balance sheet level;
- allocated to finance all the Private Banking Division's annual incentive systems and, within the Private Banking Division (to which FAMI belongs to), these of the Company.

In line with the provisions of the Group Policies and consistently with the principle of financial sustainability, the bonus pool allocated to the Private Banking Division is "modulated" depending on the level of the Gross Income reached by the same. In case that this level is lower than the predefined access Threshold, only a portion of the Division bonus pool is available (once the ISP Group gates are activated).

In addition, the portion of the bonus pool so allocated to the Division is subject to the following correction mechanisms based on:

- non-financial risks; specifically, with reference to:
 - the risk related to Operation Loss, a reduction of 10% of the bonus pool allocated to the Division is provided in case of breach of the "hard limit" set in the ISP Group RAF;

- the Integrated Risk Assessment, the reduction of the bonus pool allocated to the Division is differentiated according to the level of residual risk (i.e. a reduction of 10% in case of residual risk equivalent to the 4th level or 5% in case of residual risk equivalent to the 3rd level);
- the level of deviation from the Economic Value Added (EVA) target assigned to the Division; more in detail, this mechanism acts as a de-multiplier if the target level is exceeded beyond a certain tolerance level. In particular, it is provided a reduction of 10% of the Divisional bonus pool in case of failure to achieve the 90% of the Economic EVA target assigned at budget.

Finally, as regards the population clusters eligible for the annual Incentive Systems, these depend on the level of achievement of the Gross Income at ISP Group, Division and, in some specific cases, also at FAMI level or alternatively of its subsidiaries.

The following is a schematic representation of the population clusters eligible for the Incentive Systems, according to ISP Group, Private Banking Division and Company's Gross Income.

ISP Group Gross Income	Division Gross Income		
	≥ Threshold	< Threshold and ≥ 0	< 0
≥ Threshold	<div style="border: 1px solid black; padding: 5px; margin-bottom: 5px;">Risk Takers</div> <div style="border: 1px solid black; padding: 5px; margin-bottom: 5px;">Middle Managers</div> <div style="border: 1px solid black; padding: 5px;">Professionals</div>	<div style="border: 1px solid black; padding: 5px; margin-bottom: 5px;"> FAMI a.s. or its Subsidiaries Gross Income </div> <div style="border: 1px solid black; padding: 5px; margin-bottom: 5px;"> ≥ Budget <div style="border: 1px solid black; padding: 2px; margin-left: 20px;">Risk Takers</div> <div style="border: 1px solid black; padding: 2px; margin-left: 20px;">Middle Managers</div> <div style="border: 1px solid black; padding: 2px; margin-left: 20px;">Professionals</div> </div> <div style="border: 1px solid black; padding: 5px;"> < Budget <div style="border: 1px solid black; padding: 2px; margin-left: 20px;">Professionals</div> </div>	<div style="border: 1px solid black; padding: 5px;">Professionals</div>
< Threshold and ≥ 0	<div style="border: 1px solid black; padding: 5px; margin-bottom: 5px;"> FAMI a.s. or its Subsidiaries Gross Income </div> <div style="border: 1px solid black; padding: 5px; margin-bottom: 5px;"> ≥ Budget <div style="border: 1px solid black; padding: 2px; margin-left: 20px;">Risk Takers</div> <div style="border: 1px solid black; padding: 2px; margin-left: 20px;">Middle Managers</div> <div style="border: 1px solid black; padding: 2px; margin-left: 20px;">Professionals</div> </div> <div style="border: 1px solid black; padding: 5px;"> < Budget <div style="border: 1px solid black; padding: 2px; margin-left: 20px;">Professionals</div> </div>	<div style="border: 1px solid black; padding: 5px; margin-bottom: 5px;"> FAMI a.s. or its Subsidiaries Gross Income </div> <div style="border: 1px solid black; padding: 5px; margin-bottom: 5px;"> ≥ Budget <div style="border: 1px solid black; padding: 2px; margin-left: 20px;">Middle Managers</div> <div style="border: 1px solid black; padding: 2px; margin-left: 20px;">Professionals</div> </div> <div style="border: 1px solid black; padding: 5px;"> < Budget <div style="border: 1px solid black; padding: 2px; margin-left: 20px;">Professionals</div> </div>	
< 0	<div style="border: 1px solid black; padding: 5px;">Professionals</div>	<div style="border: 1px solid black; padding: 5px; margin-bottom: 5px;"> FAMI a.s. or its Subsidiaries Gross Income </div> <div style="border: 1px solid black; padding: 5px; margin-bottom: 5px;"> ≥ Budget <div style="border: 1px solid black; padding: 2px; margin-left: 20px;">Professionals</div> </div> <div style="border: 1px solid black; padding: 5px;"> < Budget <div style="border: 1px solid black; padding: 2px; margin-left: 20px;"></div> </div>	

As “Budget” it is meant the agreed budget lines defined as a target.

5.5.3 Incentive system for all Intesa Sanpaolo Group Risk Takers and for Legal Entity Risk Takers and the Middle Managers not belonging to the Fund Managers category

The incentive system for all ISP Group Risk Takers and for Legal Entity Risk Takers and the Middle Managers not belonging to the Fund Managers category is designed to address managerial behaviors and actions towards the achievement of the objectives set in the Business Plan, consistently with the interests of the Company, of the managed individual and collective assets and of the underwriters, to reward the best annual performances evaluated according to a perspective to optimize the risk / return ratio.

This System is formalized through the so-called Performance Scorecards which:

- for Risk Takers and Middle Managers with the title of Senior Director, are managed through the Managers' Performance Accountability (MAP) system;
- for Middle Managers with the title of Heads of, are managed through the #Newton system.

The Performance Scorecards of the Risk Takers and the Middle Managers with the title of Senior Directors include:

- quantitative KPIs, economic-financial and non-economic-financial ones⁹; these KPIs are expressed according to a risk/return logic, aimed at supporting the sustainability of results over time and reducing and/or mitigating the risks defined in the RAF;
- qualitative KPIs¹⁰; these may be strategic actions or projects that represent enabling factors to achieve the economic-financial KPIs or obtain the results set out in the Business Plan, or they may be objectives that promote virtuous behaviour, particularly with regard to business and areas that involve direct customer relations.

Identification of KPIs, on which incentives granting is based, is carried out by the competent functions, considering the most significant economic and financial indicators for the achievement of the budget objectives, periodically monitored through the internal reporting tools available both to Company and/or Division and/or consolidated level.

This allows the selection of a complex mix of qualitative and quantitative parameters – anyway transparent, objective and measurable – allowing a 360-degree evaluation of company's performances both in terms of profitability and prudentially-assumed risks.

The Performance Scorecards of the Risk Takers and Middle Managers with the title of Senior Directors include:

- **a quantitative section**, whose overall weight is 65%, that consists of economic-financial and non-economic-financial KPIs¹¹ defined in line with the ISP Group's and Company's strategic drivers as well as the levers managed by Risk Takers/Middle Managers. These objectives are measured across the scope of the ISP Group, the Division, the Company or the relevant area of responsibility. In particular, the section includes:
 - at least one KPI measured at ISP Group level, common to all the Scorecards of Risk Takers and Middle Managers in Business and Governance Functions. For 2026, in continuity with previous

⁹ Examples: Net Inflows, OI/Average RWAs, Revenues/Assets, Cost/Income, Operating Losses/OI.

¹⁰ ESG.

¹¹ It should be noted that the Company Control Functions and similar roles are not assigned objectives linked to economic results.

- financial years and in line with ISP Group Remuneration and Incentive Policies, the Group transversal KPI Net Income was assigned with a weight of 15%;
- at least one KPI shared with the higher hierarchical level, with a weight from 10% and up to 30%, provided that the Performance Scorecard remains consistent with the levers effectively managed by the manager;
 - for Business Functions, at least one economic-financial KPI related to the management of the specific risks of the activities performed must be included. Similarly, where possible, Governance Functions are also required to include at least one quantitative KPI linked to risks and/or sustainability.
- **a qualitative section**, whose overall weight is 35%, that consists of KPIs relating to the implementation of actions set out in the Group Business Plan or to the assessment of managerial skills (possibly also individual), whose evaluation is objectified by identifying drivers defined ex-ante which guide the ex-post assessment and/or subject to evaluation by the Head. For 2026, in continuity with previous financial years and in line with ISP Group Remuneration and Incentive Policies the Group transversal KPI “Environmental, Social and Governance (ESG)” was assigned, identified among the strategic actions, with a weight of 15%.

Focus: ISP Group “ESG” cross KPI

FAMI is aware that its impact on the social and environmental context in which it operates is significant and therefore chooses to focus not only on profit, but also on creating long-term value for the Company, its people, its customers, the community and the environment.

The Company wishes to be responsible and generate long-term value, in the awareness that innovation, development of new products and services and the responsibility of businesses can help reduce the impact on society of phenomena such as climate change and social inequality.

Regulators and all the Company’s Stakeholders have shown an interest in environmental, social and governance factors as well.

Indeed, the new 2026–2029 Business Plan strengthens the ISP Group’s commitment in this area, with the aim of confirming its positioning among the global leaders in terms of social impact, supporting clients in the sustainable transition, decarbonising portfolios and reducing its own emissions. In addition, as well an enabling factor for the achievement of all objectives, significant investments in people are envisaged, including the strengthening of the Group’s culture. In light of the above, and in line with the provisions of Regulation (EU) 2019/2088 the Company confirmed, in line with the guidelines defined by the Intesa Sanpaolo Group, among the strategic action objectives to be assigned to all management, a specific “ESG” KPI. This KPI, an evolution of the one that has been assigned since 2021, and consistent with the new Business Plan, has a dual nature, incentivising both the strengthening of the culture and the continuation of the Group’s ESG initiatives.

The ESG KPI is evaluated at ISP Group level, with a view to recognising the Group’s commitment as a whole, and at the level of the Division to which FAMI belongs, to enhance the action areas of the individual Group structures. In particular:

Focus: ISP Group “ESG” cross KPI

- at ISP Group level, the progressive involvement of all Group personnel in a training/awareness event on corporate culture and the values stated in the Diversity Equity and Inclusion (DE&I) policies is assessed during the Business Plan;
- at Private Banking Division level, the implementation of strategic initiatives relating to corporate culture based on the results of the Culture Survey 2025;
- at Company level, Engagement activities with issuers carried out by FAMI (calculated as a % of the portfolio issuances within the scope of Net Zero targets).

Each KPI is assigned a weight equal to at least 10% to ensure the relevance of the objective, and no more than 30% to guarantee appropriate weighting of the numerous objectives.

The performance evaluation period (accrual period) is annual.

Focus: Structure of the Performance Scorecard for Risk Takers and Middle Managers with the title of the Senior Directors

The sum of the weights allocated to the KPIs in each section equals the overall weight of the section; this weight is 65% for the quantitative section and 35% for the qualitative section.

Here is a summary representation of the Performance Scorecard for each category.

Risk Takers and Middle Managers with the title of Senior Directors of the Business and Governance Functions:

	KPI	Weight range on the Performance Scorecard	
		BUSINESS	GOVERNANCE
Quantitative objectives	ISP Group Net income	15%	15%
	Economic-financial and non-economic-financial KPIs in line with the strategic guidelines, whose scope of evaluation is the Fideuram Group/FAMI level or area of responsibility	50%	50%
Qualitative objectives	ESG	15%	15%
	Other managerial skills (if any) Strategic actions/Projects – consistent with the Business Plans and measured on the basis of strategic drivers	20%	20%

Focus: Structure of the Performance Scorecard for Risk Takers and Middle Managers with the title of the Senior Directors

Risk Takers and Middle Management with the title of the Senior Directors of the Control Functions:

KPI		Weight range on the Performance Scorecard
Quantitative objectives	Non-economic-financial KPIs in line with the main specific activities of the area of responsibility	65%
	ESG	15%
Qualitative objectives	Other managerial skills (if any)	20%
	Strategic actions/Projects – consistent with the Business Plan and measured either through quantitative parameters or on the basis of strategic drivers	

The performance evaluation period (accrual period) is annual.

If the total score of the performance scorecards is lower than 80% for Risk Takers and Middle Managers in Business and Governance Functions or 90% for Risk Takers and Middle Managers in Control Functions, then the bonus does not accrue under any circumstances.

Focus: Structure of the Performance Scorecard for Middle Managers with title of Head of in the Governance and Control Functions

The performance evaluation is carried out and documented through #Newton, the Intesa Sanpaolo Group's performance appraisal system.

In #Newton, the Performance Scorecards of Professional includes the following sections:

- **KPI section** (40% weight), containing KPIs related to projects or activities in which the employee is involved. The projects are evaluated according to one of the following metrics: Respect for the deadlines, Quality level, Risk monitoring, Cost Compliance, Level of innovation
- **Behaviour section** (60% weight) containing KPIs relating to the areas of Think, Act, and Interact and broken down according to the job role and the level of Title or equivalent attribute applicable to the Appraisee.

The evaluation is expressed on a 7-level evaluation scale (Inadequate, Below Expectations, Partially In Line with Expectations, In Line With Expectations, Above Expectations, Highly Above Expectations and Excellent).

The total amount due is assigned annually based on the evaluation of the results of the individual performance scorecard¹² and is defined with different calculation methods depending on the population

¹² It should be noted that the individual performance scorecards with a score below the minimum level (i.e. 75% for Middle Managers with the title of Head Of in the Governance Functions and in the Control Functions, 80% for the Risk Takers of the Business and Governance Functions and Middle Managers with title of Senior Director and with title of Head Of of limited to Business functions, 90% for Risk Takers and Middle Managers with title of Senior Director in Control Functions and similar roles) do not allow, in any case, the awarding of the bonus.

cluster. This calculation is based on the so-called Division "ranking" for ISP Group Risk Takers and is linked to the evaluation of results for Legal Entity Risk Takers and Middle Management.

This ranking is obtained by ordering the scores of the results of the individual performance scorecards, assigned to each ISP Group Risk Taker. For the purpose of determining the bonus, this ranking is then broken down into brackets.

With particular reference to the ISP Group Risk Takers belonging to the category of Fund Managers, in addition to the possible bonus accrued according to the position reached in the abovementioned Division "ranking" and given the availability of the allocated bonus pool, an Extra Bonus related to the Performance of Managed Products is provided when the KPI "Performance of Managed Products"¹³ exceeds the target level set within the Performance Scorecard. In particular, when the "Performance of Managed Products" is above the target level, the Extra Bonus amount increases linearly up to the maximum range of the brackets shown below.

In any case, if the KPI "Performance of Managed Products" does not reach the "threshold" level, no bonuses will be paid to the ISP Group Risk Takers belonging to Fund Managers category.

The tables below sintetically represent the ranking mechanism for ISP Group Risk Takers belonging to Business and Governance functions and for those (among them) belonging to the Fund Managers category. In particular, the following are:

- the reference bonus awarded to each ranking bracket;
- the minimum and maximum range of the brackets within which a possible proposal for the increase/reduction of the bonus by the Direct Head must be included;
- the Extra Bonus provided for those belonging to the Fund Manager category if the KPI "Performance of Managed Products" exceeds the threshold.

Ranking brackets for Business and Governance functions (not belonging to Fund Managers category)

Bracket	Reference bonus based on the ranking	Minimum Bracket	Maximum Bracket
1	150% Fixed remuneration (+\10%)	100% Fixed remuneration	Max Bonus opportunity ¹⁴
2	80% Fixed remuneration (+\10%)	40% Fixed remuneration	130% Fixed remuneration
3	30% Fixed remuneration (+\10%)	0% Fixed remuneration	70% Fixed remuneration

Ranking brackets for ISP Group Risk Takers belonging to Fund Managers category

Bracket	Reference bonus based on Ranking	Bracket minimum	Bracket maximum	Extra Bonus for Performance managed products > target
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¹³ For more details on the indicator, please refer to the focus of paragraph 5.5.4.

1	150% Fixed remuneration (+/-10%)	100% Fixed remuneration	Bonus opportunity max	+ 200% Fixed remuneration
2	80% Fixed remuneration (+/-10%)	40% Fixed remuneration	130% Fixed remuneration	+ 165% Fixed remuneration
3	30% Fixed remuneration (+/-10%)	0% Fixed remuneration	70% Fixed remuneration	+100% Fixed remuneration

Finally, it is noteworthy that the evaluation of the performance scorecard covers a period of one year and that the pro-quota bonus may be paid only if the person has been employed for at least six months. Furthermore, in the event of a transfer between organizational units, the evaluation will be carried out with reference to the performance related to the role predominantly held during the year. Moreover, the payment of this variable remuneration component requires that the employment relationship exist at the time of payment of the first upfront portion of the bonus, without prejudice to the provisions regarding Severance.

5.5.4 Fund Managers Incentive System

The population of the Fund Managers¹⁵ (both UCITS and Portfolio Management) is the recipient of a specific Incentive System aimed at supporting the achievement of the performance objectives of the products managed in risk / return terms over a multi-year period.

The incentive system applied to the Fund Managers category also takes into account the integration of sustainability risks within the scope of the investment process, as governed in the document *“Integration of sustainability Risks into the Remuneration and Incentive Policies of Fideuram Asset Management Ireland”*.

Focus: Integration of sustainability risks in the investment process

In line with Regulation (EU) 2019/2088, FAMI has adopted a specific *“Sustainable and responsible investment Policy”* available on the Company’s website which describes the methods for integrating “sustainability risks”¹⁶ for products – mutual funds and portfolio management – managed by the Company.

The Company has therefore envisaged specific methodologies for the selection of financial instruments, suitably graded according to the characteristics and objectives of the individual products managed, which take into account environmental, social and governance (ESG) factors and principles of Sustainable and Responsible Investments (SRIs).

The criteria for the selection and monitoring of issuers based on ESG and SRI profiles supplement the traditional financial analyses of the risk/return profiles of the issuers that the Company takes into consideration when making its investment choices, to prevent environmental, social and governance conditions from having a significant actual or potential negative impact on the value of the investments of the managed assets.

¹⁵ Included Company Risk Takers.

¹⁶ What is meant is an environmental, social or governance event or condition which could have a significant actual or potential negative impact on the value of the investment if it came to pass.

For the purposes of the Incentive System, the reference population is divided into n. 6 clusters according to role (Head of Investment Management Function, Investment Management Team Leader, Head of Investment Support Function, Senior Portfolio Manager, Associate Portfolio Manager and Investment Support Specialist).

Within the 6 clusters, several Reference Bonuses are identified, representing the target bonus and awarded to the Fund Manager based on the evaluation of some specific criteria (i.e. AUM managed, number of products managed, commercial relevance and level of innovation of the products managed, performance track record, managed complexity, seniority in the role, qualitative performance, managerial assessment, leadership assessment).

The System is formalized through a Performance Scorecard with two sections:

- a quantitative section in which a synthetic KPI (“Performance of Managed Products”) is identified, which measures in a normalised and weighted form the performance of the funds managed by a Manager;

Performance of Managed Products KPI:

For the purpose of evaluating the performance of the products managed, a balanced set of quantitative indicators is used, differentiated according to the type of products managed.

As regards the **managed products compared to a benchmark**, the reference indicators are:

- Excess Return (ER);
- Information Ratio (risk-adjusted performance indicator) that expresses the return of a portfolio compared to that of its reference benchmark in relation to the relative risk measured by the Tracking Error Volatility (TEV).

With regard to the **flexible products** instead, reference is made to the following indicators:

- absolute return;
- *Sharpe Ratio*¹⁷ (risk-adjusted performance indicators);
- *downside* protection measures based on Drawdown¹⁸.

As regards the reporting, reference is made to the report prepared by the Risk Management Function.

- a non-financial – qualitative section that focuses on the Manager’s managerial or professional skills.

Non-financial – qualitative KPIs:

Quantitative performance indicator has been properly complemented in order to enhance the achievement of individual (non-financial – qualitative) objectives by each manager, which can measure the achievement of KPIs related to the Business Plan implementation or to behavioural/managerial skills, whose reporting is usually objectified by defining project milestones and/or assessment drivers which guide *ex post* assessment made by each Direct Head.

¹⁷ The Sharpe Ratio is calculated by using the gross return with respect to the Barclays Euro Treasury Bills “risk free” index and is a measure of the risk premium calculated per unit of volatility, where a higher indicator indicates a higher value creation per unit of risk assumed.

¹⁸ The drawdown represents the loss accrued by an investment, measured as the difference between a relative maximum point (“peak”) and the subsequent minimum point (“trough”).

A total of two non-financial – qualitative objectives is set, which correspond to a total amount of 20 points (overtarget) for each scorecard. Each objective therefore weighs a maximum of 10 points.

The bonus accrued by each Fund Manager is a deterministic function of the overall score achieved by the Performance Scorecard.

For application purposes, the following additional details are provided below regarding the structure of the Performance Scorecards:

- the KPI evaluation scale;
- the mechanism for calculating the score on the Performance Scorecard.

KPI evaluation scale

The evaluation scale for the KPIs differs according to the type of objective.

For financial – quantitative KPIs (performance objectives *of the managed products*) the level of achievement of these KPIs is mathematically determined on the basis of the following evaluation scale, which is differentiated according to the type of indicator adopted:

- excess return (for managed vs benchmark products), absolute return and drawdown measures with respect to asset allocation portfolios (for absolute/total return products)

Minimum	Threshold	Target	Overtarget
-100%	0%	+50%	+100%

- risk-adjusted return measures

Threshold	Target	Overtarget
0%	+50%	+100%

The quantitative performance indicator of the MBO "Performance of Managed Products" for each Fund Manager is the result of the aggregation of the performance of individual products and / or asset management. The relative evaluation scale is reported below:

Minimum	Threshold	Target	Overtarget
-100%	0%	+50%	+100%

As far as individual non-financial – qualitative objective KPIs are concerned, the score is expressed based on evaluation drivers and the report on activities performed on the basis of the following discrete evaluation scale:

Below expectations	Partially in line with expectations	In line with expectations	Above expectations	Outstanding
-10	-5	0%	+5	+10

The mechanism for calculating the scores on the Performance Scorecard

The score of the performance scorecard is determined by the algebraic sum of the score related to the performance objective of the managed products and that related to the two non-financial - qualitative objectives.

Therefore, the performance scorecard range is equal to 0% - 120% because, if the score related to the performance objective of the managed products is below zero (i.e., threshold), the qualitative assessment is not effective.

The scorecards with scores below the minimum level (0%) do not enable the award of the bonus in any event¹⁹.

Finally, it should be noted that the incentive curves on the basis of which the bonus actually accrued is calculated according to the score obtained by the Performance Scorecard are differentiated to recognize the different degree of contribution to the results of the clusters of the roles targeted by the Incentive System. Therefore, these clusters of roles are grouped into two macro clusters:

- a) Investment Management Head of Function, Team Leader, Senior Portfolio Manager
- b) Investment Support Head of Function, Investment Management Associate/Portfolio Manager and Investment Support.

To the first macro cluster is associated a more competitive incentive curve.

In any case, the maximum bonus that can be awarded is set at six times the Reference Bonus, notwithstanding the cap defined for personnel belonging to the Investment Area (i.e. 4:1).

¹⁹ In any case, for the professional population, the payment of the bonus is subject to a professional evaluation at least equal to “in line with expectations”.

For more details on the Incentive System please refer to the document “Incentive System for the Portfolio Managers of Fideuram Asset Management Ireland dac”.

5.5.5 Incentive System for Risk Takers and Middle Managers of start-up companies

A specific and selective Annual Incentive System is envisaged for the Risk Takers and Middle Managers belonging to start-up companies²⁰.

The System aims to support the alignment of Risk Taker and Middle Management performance with the growth objectives of the Business Plan for a period of time that allows the start up to achieve a positive and/or minimum level of profitability (as set out in the multi-year business plan), within ISP Group context where anyway the capital, liquidity and sustainability conditions shall be met.

For the purpose of determining the incentive due, the Company’s performance is measured with respect to the achievement for each year of the milestones envisaged (e.g. Company Profit/Loss) by the specific long-term Business Plan for the start-up, in line with the medium-long term objectives characterizing all the Company Incentive Systems. In compliance with the principle of financial sustainability, the total amount of the incentives to be accrued is, in any case, limited and compatible with the economic and financial context of the Company.

The multi-year plan of the start-up and the adoption of the related incentive system must be approved both at Legal Entity level and by the parent company. In the event of a revision of the plan, any changes must be submitted to both the Board of Directors of the Legal Entity and that of the parent company.

The adoption of the aforementioned incentive system and its year-on-year developments must also be communicated to the relevant structures within the Chief People & Culture Officer Governance Area of ISP Group.

5.5.6 The Annual Incentive System for Professionals

The Incentive System for the Professionals aims to reward the best annual performance assessed with a view to optimise the risk/return ratio.

The individual awarding of the bonus is at the discretion of the Direct Head, taking into account the results of the performance evaluation, both in absolute and relative terms. In other words, the bonus proposal must be consistent with the level of performance achieved, also taking into account Peers.

The performance evaluation is carried out and documented through #Newton.

In #Newton, the Performance Scorecards of Professional includes the following sections:

- KPI section (40% weight), containing KPIs related to projects or activities in which the employee is involved. The projects are evaluated according to one of the following metrics: Respect for the deadlines, Quality level, Risk monitoring, Cost Compliance, Level of innovation;
- Behaviour section (60% weight) containing KPIs relating to the areas of Think, Act, and Interact and broken down according to the job role and the level of Title or equivalent attribute applicable to the Professional.

²⁰ Entities for which a ‘turnaround’ plan is envisaged - understood as a strategic relaunch initiative aimed at strengthening profitability - are considered comparable to start-up Legal Entities and are therefore subject to the same rules.

The evaluation is expressed in a 7-level evaluation scale (Inadequate, Below Expectations, Partially in Line with Expectations, In Line With Expectations, Above Expectations, Highly Above Expectations and Excellent).

The bonus accrued by the Professional is subject to the demultiplier mechanism related to the mandatory training and specifically, failure to comply with mandatory training fulfillment within the expected deadlines will lead to a 10% reduction of the bonus accrued.

Finally, it is noteworthy that the pro-quota bonus may be paid only if the person has been employed for at least six months and his/her employment relationship still exists at the time of disbursement of the bonus.

5.5.7 Individual access conditions

The payment of the individual bonus is, in any case, subject to the verification of the absence of the so-called individual compliance breaches:

- disciplinary measures involving at least the suspension from service and pay for a period equal to or greater than one day, also due to serious findings received from the control functions;
- in the event of violations sanctioned by the supervisory Authorities of the obligations in matters of professionalism, integrity and independence and following in relation to related parties and obligations regarding remuneration and incentives set out in CRD V, involving a sanction of an amount equal to or greater than € 30,000;
- behaviors that do not comply with the provisions of the law, regulations, the articles of association or any ethical or conduct codes established ex ante by the Group or the Company and from which a “significant loss” has resulted for the Group, for the Company, for managed funds or for customers.

In particular, failure to verify the conditions of individual access entails the non-payment of the bonus for the year in which the compliance breach was committed, as well as canceling the deferred portions whose vesting conditions refer to the same year.

If the compliance breach is ascertained in a year following the one in which it was committed:

- the bonus pertaining to the year in which it was committed, or, in the event of deferral, the portions already paid out of the same; as well as
- any deferred portions whose vesting conditions refer to the year in which it was committed

are subject to claw-back (possibly also by offsetting with additional amounts due as variable remuneration) within the 5 years following the payment. In the event of termination of the employment agreement, the company reserves the right to evaluate the application of this mechanism in terms of costs and benefits.

Furthermore, if the bonus pertaining to the year in which the compliance breach was committed was subject to deferral mechanisms, the disbursement of any unpaid portions is definitively ceased. Lastly, it should be noted that these claw-back mechanisms are also taken into account when defining any ongoing disputes with personnel.

With exclusive reference to the Fund Managers, two additional access conditions are envisaged:

1. a condition of compliance with the structure of limits established for the individual product is defined which, in the presence of significant and persistent exceedances of the limits, acts as a possible de-multiplier of the bonus achieved up to a possible zeroing.
 In particular, in the presence of significant and persistent exceedances of the limits, a reduction equal to:
 - 20% in the case of the severity level of the "average" exceedance²¹;
 - 50% in the event of a "high" severity level²².
 In any case, the deduction can lead to the cancellation of the bonus in case of exceedances that can negatively impact the assets of the Company.
2. the payment of the bonus must be subject to:
 - for those in this category that are ISP Group Risk Takers, reaching at least the threshold level of the "Performance of Managed Products" KPI within the Performance Scorecard;
 - for those in this category who are identified as Legal Entity Risk Takers or who belong to the Middle Management and Professionals segment, reaching a score equal to or greater than zero in the quantitative section of the Performance Scorecard, corresponding to the "Performance of Managed Products".

5.5.8 Corrective mechanisms of the bonus

The bonus accrued based on the level of achievement of the KPIs is subject to the possible application of the following corrective mechanisms:

Risk	Recipients	Relevant limits and trigger events	% bonus reduction
Residual Risk	Risk Takers (RT) and Middle Management (MM)*	Detection of residual risk at very-high / high levels (Q-factor)	max -20%
ESG Risk	RT, MM* and Professional belonging to the Fund Managers category	Deviation of the sustainability rating class of the portfolio with respect to the target	-10% / +10%
Conduct Risk	RT and MM as well as Professional belonging to the Fund Managers category	Failure to comply with the expected deadline/results for the compulsory training ²³	-10%

(*) Regardless of the Incentive System to which they are recipients

With specific reference to the mechanism that measures the residual structure risk level (Q-Factor), it acts as a possible de-multiplier of the bonus achieved which is reduced by:

- 20% in case of a "very high" Q-Factor;
- 10% in case of a "high" Q-Factor.

²¹ A situation characterized by more than 10% of working days with an exceeding of the limit greater than 20% of the limit itself is considered an average level of severity.

²² It is considered a high level of severity in the presence of more than 10% of the working days characterized by exceeding the limit greater than 30% of the limit itself.

²³ For avoidance of doubt, compulsory training includes both courses assigned through the Appendo platform and the ones defined by the Company and assigned and communicated to all the staff.

The Q-Factor is based on factors relating to the control system and also considers other elements that are useful for the evaluation (Operational Losses, Findings of the Supervisory Authorities, Trends and weights of the critical issues in the Tableau de Bord of the Audit). The evaluation is based on a quantitative scale to which the residual risk judgement corresponds: Very High, High, Medium, Low.

Finally, with reference to the corrective mechanism of the bonus linked to the the activities carried out in terms of sustainability risk management (the “**sustainability corrective mechanism**”), It is specified that this mechanism is based on a comparison between the “sustainability rating class” of the single Fund Manager’s portfolio (i.e. the rating class determined on the basis of the average score of the single product managed by the individual Manager with reference to ESG factors) and the related target level identified (i.e. the rating class determined on the basis of average score of the parameter – product benchmark, benchmark or investment universe – associated with the Manager).

Depending on the deviation of the sustainability rating class of the portfolio compared to the target, the sustainability corrective mechanism may confirm the Manager’s bonus determined within the scope of the Incentive System or act to increase or decrease the rating. In particular:

- if the Fund Manager Portfolio’s sustainability rating class is one notch higher than the target rating, the bonus is increased by 5%;
- if the Fund Manager Portfolio’s sustainability rating class is two or more notches higher than the target rating, the bonus is increased by 10%;
- if the Fund Manager Portfolio’s sustainability rating class is one notch below the target rating, the bonus is reduced by 5%;
- if the Fund Manager Portfolio’s sustainability rating class is two or more notches below the target rating, the bonus is reduced by 10%;
- if the Fund Manager Portfolio’s sustainability rating class is in the same class as the target rating, the bonus is confirmed.

The corrective factor determined at the single product level is aggregated at the manager level according to the aggregation rules used for the determination of the MBO Performance Indicator.

The methods for calculating the rating are set forth in the documents “*Incentive System for the Portfolio Mangers of Fideuram Asset Management Ireland dac*” and “*Integration of sustainability Risks into the Remuneration and Incentive Policies of Fideuram Asset Management Ireland dac*”.

5.5.9 Malus Conditions

In case of deferment (see paragraph 5.55.6), each deferred portion is subject to an ex post adjustment mechanism - the so-called malus condition - according to which the relative amount recognized, and the number of any assigned financial instruments may be reduced, to zero, in the year in which the deferred portion is paid, in relation to the level of achievement of the minimum conditions set by the Regulator regarding the sound capital base and liquidity, as well as the condition of financial sustainability.

Those conditions are:

• **at Intesa Sanpaolo Group level**

Capital strength condition	Common Equity Tier 1 (CET1) Ratio	≥	Hard limits set by the RAF at Group level
	Leverage Ratio	≥	
	Minimum requirement for own funds and eligible liabilities (MREL)	≥	
	Assessment of the results of the ICAAP and of the Recommendations on distributions by competent authorities and European Supervisory Authorities		
Liquidity condition	Net Stable Funding Ratio (NSFR)	≥	Hard limits set by the RAF at Group level
Sustainability condition	No loss and positive Gross Income*	>	∅

In particular, the Gross Income (condition of sustainability) is measured net of: (i) profits from the buyback of the Bank's own liabilities, (ii) fair value of the Bank's own liabilities and (iii) income components arising from accounting policies following changes to the internal model on core deposits.

• **at Fideuram Group level**

Capital strength condition	Common Equity Tier 1 (CET1) Ratio	≥	Hard limits set by the RAF at Fideuram Group level
	Leverage Ratio	≥	
	Minimum requirement for own funds and eligible liabilities (MREL)	≥	Early Warning set by the RAF *
Liquidity condition	Net Stable Funding Ratio (NSFR)	≥	Hard limits set by the RAF at Fideuram Group level
Sustainability condition	No loss and positive Gross Income	>	∅

* Limit calculated at the Sub-holding level (i.e., Fideuram).

• **at Company level:**

1. Capital requirement at least equal to 110% of the regulatory capital;
2. Absence of loss and positive Gross Income.

With reference to the sustainability conditions, it is specified that the condition of no loss and positive Gross Income is verified on the basis of the results of the individual balance sheet drawn up according to the local accounting principles of Fideuram and the Company.

In the event that one of the conditions of capital strength or of liquidity does not occur individually, the deferred portion is reset to zero; if the sustainability condition (Gross Income) is not met, the deferred portion is reduced by 50%.

For the verification of the malus conditions it shall be considered the perimeter of the Legal Entity where the person was employed when awarded the bonus to which the deferred portions are referred to.

5.5.10 Claw-back Mechanism

The Company reserves the right to activate claw-back mechanisms for all personnel, namely the return of bonuses already paid as required by regulations, as part of:

- initiatives and disciplinary measures envisaged in the face of fraudulent behavior or gross negligence of the personnel;
- behaviors that do not comply with the provisions of the law, regulations, articles of association or any ethical or conduct codes established ex ante by the ISP Group and from which a "significant loss" has arisen for the Company or customers.

These mechanisms can be applied in the 5 years following the payment of the single portion (up-front and deferred, if any) of variable remuneration.

5.6 Payment method for the short-term variable remuneration

The remuneration payment methods are regulated by specific indications in the Group Policies, defined in accordance with the Supervisory Provisions taking into account the specific regulatory requirements for the asset management sector.

Below are the schemes for paying the variable remuneration adopted by the Company.



Deferral

- Deferred amount
- ① 70% of variable remuneration is deferred for a period of **5 years** in the event of:
 - variable remuneration awarded to the **ISP Group and Legal Entity Risk Takers belonging to the Fund Managers category**, if the amount exceeds the materiality threshold and exceeds 300% of the fixed remuneration
 - ② 60% of variable remuneration is deferred for a period of **5 years** in the event of:
 - “**particularly high**” amount of remuneration, for each cluster of staff
 - remuneration awarded to the **ISP Group and Legal Entity Risk Takers belonging to Fund Managers category**, if the amount exceeds the materiality threshold and is between 200% and 300% of the fixed remuneration
 - remuneration awarded to **Fund Managers category** (no Risk Taker), if the amount exceeds the materiality threshold and exceeds 300% of the fixed remuneration
 - ③ 50% of variable remuneration is deferred for a period of **4 years** in the event of remuneration awarded to:
 - remuneration awarded to the **ISP Group Risk Takers belonging to the Fund Manager category**, if the amounts exceeds the materiality threshold and is comprised between 100% and 200% of the fixed remuneration
 - other **ISP Group Risk Takers**, if the amount exceeds both the materiality threshold defined at Group level and 100% of fixed remuneration
 - ④ 60% of variable remuneration is deferred for a period of **3 years** in the event of remuneration awarded to:
 - remuneration awarded to **Legal Entity Risk Takers belonging to the Fund Manager category**, if the amounts exceeds the materiality threshold and is comprised between 100% and 200% of the fixed remuneration
 - other **Legal Entity Risk Takers**, if the amount exceeds the materiality threshold and higher than 100% of fixed remuneration
 - remuneration awarded to **Fund Managers category** (no Risk Takers) if the amounts exceeds the materiality threshold and is comprised between 200% and 300% of the fixed remuneration
 - ⑤ 40% of variable remuneration is deferred for a period of **4 years** in the event of remuneration awarded to:
 - **ISP Group Risk Takers belonging to the Fund Manager category**, if the amount exceeds the materiality threshold and is equal to or lower than 100% of fixed remuneration
 - other **ISP Group Risk Takers**, if the amount exceeds the materiality threshold and equal to or lower than 100% of fixed remuneration
 - ⑥ 40% of variable remuneration is deferred for a period of **3 years** in the event of remuneration awarded to:
 - **Legal Entity Risk Takers belonging to the Fund Manager category**, if the amount exceeds the materiality threshold and is equal to or lower than 100% of fixed remuneration
 - other **Legal Entity Risk Takers**, if the amount exceeds the materiality threshold and equal to or lower than 100% of fixed remuneration
 - **Fund Managers category** (no Risk Takers) if the amount exceeds the materiality threshold and is comprised between 100% and 200% of the fixed remuneration
 - **Middle Managers and Professionals** if the amount exceeds both the materiality threshold and 100% of fixed remuneration
 - ⑦ 40% of variable remuneration is deferred for a period of **2 years** in the event of remuneration awarded to:
 - **Legal Entity Risk Takers** (not belonging to the Fund Managers category) if the amount exceeds the 100% of fixed remuneration and is equal to or lower than the materiality threshold,
 - **Fund Managers category** (no Risk Takers), if the amount exceeds the **materiality threshold** and is equal to or lower than 100% of fixed remuneration, or if it is equal to or lower than the materiality threshold and exceeds 100% of fixed remuneration
 - **Middle Managers and Professionals**, if the amount exceeds the **materiality threshold** and is equal to or lower than 100% of fixed remuneration, or if it is equal to or lower than the materiality threshold and exceeds 100% of fixed remuneration

Up-front amount

The remaining part of the variable remuneration is paid out up-front.

For each cluster of staff the variable remuneration is entirely paid out up-front, if the amount is **equal to or lower than both the materiality threshold and 100% of fixed remuneration**

Focus: “Particularly high” amount of variable remuneration

In line with the provisions of the Group Policies and therefore with the Supervisory Regulations of the banking sector, at least every three years the Intesa Sanpaolo Group is obliged to define the “**particularly high**” amount of variable remuneration, as the lower between:

- the 25% of the average Italian high earners total compensation, as reported in the last EBA report. Such amount is equal to 436,933€ according to the EBA report on the December 2022 data;
- 10 times the average total remuneration of Intesa Sanpaolo Group employees. Intesa Sanpaolo calculated this amount as the average of the remuneration paid to employees in the years 2022, 2023 and 2024 equal to 548,560€.

For greater prudence, the smaller between the two above-mentioned amounts (i.e., 436,933 euro – gross) is rounded down and, as a consequence, for the three-year period 2025-2027, variable remuneration of over € 400,000 is considered “particularly high”.

It should be noted that Group Companies that pay remuneration in a currency other than the euro must convert this amount using the exchange rate published by the Financial Planning and Budget Committee for the last month of the Company's financial year.

Focus: Materiality threshold

In line with the Group Policies, the Company has defined a materiality threshold, differentiated by personnel cluster, beyond which the variable remuneration is considered “significant”.

In particular:

- for ISP Group Risk Takers, in compliance with the regulations applicable to the banking Parent Company, the variable remuneration is considered “significant” if it exceeds the amount of €50,000 or if it represents more than one third of the total remuneration;
- for Company Risk Takers, Middle Management and Professionals, the materiality threshold is equal to **€ 150,000** gross.

It should be noted that Group Companies that pay remuneration in a currency other than the euro must convert these amounts using the exchange rate published by the Financial Planning and Budget Committee for the last month of the Company's financial year.

Below are the financial instruments for the variable remuneration payment adopted by the Company:



Payment instruments

Financial instruments	<p>① 70% of variable remuneration is paid out in financial instruments for:</p> <ul style="list-style-type: none"> ○ ISP Group and Legal Entity Risk Takers belonging to Fund Manager category, if the amount exceeds the materiality threshold defined at Group level and 300% of fixed remuneration <p>② 60% of variable remuneration is paid out in financial instruments for:</p> <ul style="list-style-type: none"> ○ those receiving a “particularly high” amount of variable remuneration which exceeds 100% of fixed remuneration, for each cluster of staff ○ ISP Group and Legal Entity Risk Takers belonging to the Fund Managers Category if the amount exceeds the materiality threshold and is comprised between 200% and 300% of the fixed remuneration ○ Fund managers category (no Risk Taker), if the amount exceeds both the materiality threshold and 300% of fixed remuneration <p>③ 55% of variable remuneration is paid out in financial instruments for:</p> <ul style="list-style-type: none"> ○ those receiving a “particularly high” amount of variable remuneration which is equal to or lower than 100% of fixed remuneration, for each cluster of staff <p>④ 50% of variable remuneration is paid out in financial instruments for:</p> <ul style="list-style-type: none"> ○ ISP Group and Legal Entity Risk Takers belonging to the Fund Managers Category if the amount exceeds the materiality threshold and is lower than 200% of fixed remuneration ○ other ISP Group and Legal Entity Risk Takers ○ Fund managers category (no Risk Taker), if the amount exceeds the materiality threshold and is comprised between 100% and 300% of fixed remuneration ○ Middle Managers and Professionals, if the amount exceeds both the materiality threshold defined by the Group and 100% of fixed remuneration
Cash	<p>The remaining part of the variable remuneration is paid out in cash</p> <p>For each cluster of staff the variable remuneration is paid out in cash, if the amount is equal to or lower than both the materiality threshold and 100% of fixed remuneration</p>

It should be noted that interest in line with market rates is calculated on deferred bonus portions paid in cash.

The rate used for the calculation of interest is that defined based on the return on BTP Italian government bonds (source Bloomberg), as an alternative investment valuation.

Focus: Financial Instruments

The Regulation for the personnel in significant asset management companies provides that a substantial part of the variable remuneration is composed of units or shares of the UCITS or AIFs managed, or of a combination that takes into account as much as possible the proportion of these, or of equivalent equity interests, instruments linked to units or shares or from other equivalent non-monetary instruments that are equally effective in terms of aligning incentives. Therefore, in compliance with these provisions, the financial instruments assigned consist of a specific basket of Phantom UCITS representing the asset classes managed by the Company. The Phantom UCITS are a unit of measurement which virtually represents the managed UCITS.

In this context, the Company:

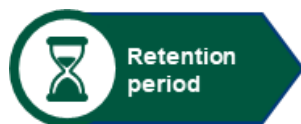
Focus: Financial Instruments

- defines the UCITS basket representing the funds managed by the Company to be assigned to the personnel (i.e. Risk Takers – including those are identified as ISP Group Risk Takers, Middle Managers and Professional) belonging or not to the Fund Managers category;
- identifies the principles of selection, in terms of representativeness of the activity carried out, of the additional baskets of UCITS to be assigned, in addition to the representative one of the funds managed by the Company, to the personnel belonging to the Fund Managers category.

Criteria used to identify the baskets of financial instruments to be assigned to the staff of the Company are detailed in the document "Identification of the financial instruments to be assigned to the staff of Fideruam Asset Management Ireland for the purposes of the incentive system".

According to the current authorization granted by the Central Bank of Ireland and the CSSF, the UCI managed by the Company are not distributed retail in Ireland. Therefore, the variable remuneration assigned in Phantom UCITS will be paid after the retention period in cash, equivalent to the countervalue of the shares and units of Phantom UCITS that are included in the basket.

For the variable remuneration assigned in UCI units, a holding period is envisaged:



① The **up-front** and **deferred** components of variable remuneration assigned in financial instruments are subject to a retention period of **1 year**

In application of the above, the Company has defined the following pay-out schemes differentiated primarily according to whether they belong to the Fund Managers category.

In particular, for personnel NOT belonging to the Fund Managers category, in accordance with the provisions of the Group Policies, the schemes are subsequently differentiated according to the category of personnel (ISP Group Risk Taker, Company Risk Taker, Middle Management and Professional), the amount of variable remuneration (higher or lower than the Significant amount or the materiality threshold) and the incidence of variable remuneration compared to the fixed (greater or equal / less than 100%).

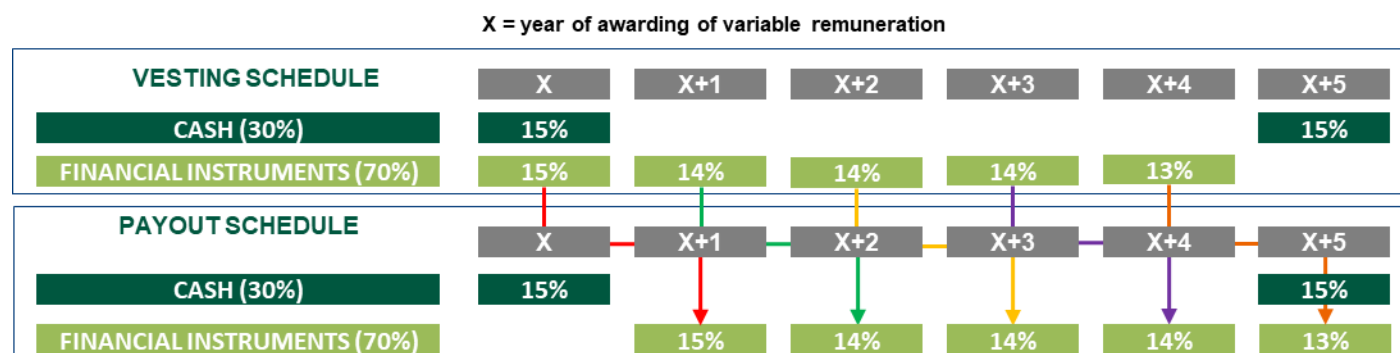
Instead, with reference to the personnel belonging to the Fund Managers category, the schemes were further differentiated according to the category of personnel (Risk Taker, Middle Management and Professional), the amount of the variable remuneration (above or below the materiality threshold) and the increasing incidence of variable remuneration compared to fixed (equal to/less than 100%, between 100% and 200%, between 200% and 300%, greater than 300%). It should be noted that the year of awarding of variable remuneration is 2027 (i.e. in the accrual and settlement layouts the "X" is equivalent to 2027).

The pay-out schemes are shown below.

Scheme 1

In case that the **ISP Group Risk Takers and Legal Entity Risk Takers belonging to the Fund Managers category** accrue a variable remuneration **higher than the materiality threshold and greater than 300% of the fixed remuneration**, 30% up-front will be paid (of which 15% cash and 15% in units of UCIs) and 70% (of which 15% cash and 55% in units of UCIs) over a 5-year time horizon of deferral.

The pay-out scheme is shown below:



Scheme 2

In cases where:

- the personnel, regardless of their macro segment, accrue a variable remuneration of a **"particularly high" amount and greater than 100% of the fixed remuneration**,
- **the ISP Group and Legal Entity Risk Takers belonging to the Fund Managers category** accrue a variable remuneration for an **amount greater than the materiality threshold** defined by the Group and **between 200% and 300%** of the fixed remuneration,
- the personnel (non-Risk Taker) **belonging to the Fund Managers category** accrue a variable remuneration **higher than the materiality threshold and greater than 300% of the fixed remuneration**,

40% up-front will be paid (of which 20% in cash and 20% in units of UCIs) and 60% (of which 20% cash and 40% in units of UCIs) over a 5-year time horizon of deferral.

The pay-out scheme is shown below:

X = year of awarding of variable remuneration

VESTING SCHEDULE		X	X+1	X+2	X+3	X+4	X+5
CASH (40%)		20%			4%	4%	12%
FINANCIAL INSTRUMENTS (60%)		20%	12%	12%	8%	8%	

PAYOUT SCHEDULE		X	X+1	X+2	X+3	X+4	X+5
CASH (40%)		20%			4%	4%	12%
FINANCIAL INSTRUMENTS (60%)			20%	12%	12%	8%	8%

Scheme 3

In case that the personnel, regardless of their macro segment, accrue a variable remuneration of a **"particularly high" amount and equal to or less than 100% of the fixed remuneration**, 40% up-front will be paid (of which 20 % cash and 20% units in UCIs) and 60% (of which 25% cash and 35% in units of UCIs) over a 5-year horizon of deferral.

The pay-out scheme is shown below:

X = year of awarding of variable remuneration

VESTING SCHEDULE		X	X+1	X+2	X+3	X+4	X+5
CASH (45%)		20%		4%	4%	5%	12%
FINANCIAL INSTRUMENTS (55%)		20%	12%	8%	8%	7%	

PAYOUT SCHEDULE		X	X+1	X+2	X+3	X+4	X+5
CASH (45%)		20%		4%	4%	5%	12%
FINANCIAL INSTRUMENTS (55%)			20%	12%	8%	8%	7%

Scheme 4

In cases where:

- the **ISP Group Risk Takers belonging to the Fund Managers category** accrue a variable remuneration **above the materiality threshold** and **between 100% and 200% of the fixed remuneration**,
- the **other ISP Group Risk Takers NOT** belonging to the Fund Managers category accrue a variable remuneration **above the materiality threshold** and **above 100% of the fixed remuneration**,

50% up-front will be paid (of which 25% cash and 25% in units of UCIs) and 50% (of which 25% cash and 25% in units of UCIs) over a 4-year horizon of deferral.

The pay-out scheme is shown below:

X = year of awarding of variable remuneration

ACCRUAL SCHEDULE	X	X+1	X+2	X+3	X+4
CASH (50%)	25%		6,25%	6,25%	12,5%
FINANCIAL INSTRUMENTS (50%)	25%	12,5%	6,25%	6,25%	

SETTLEMENT SCHEDULE	X	X+1	X+2	X+3	X+4
CASH (50%)	25%		6,25%	6,25%	12,5%
FINANCIAL INSTRUMENTS (50%)		25%	12,5%	6,25%	6,25%

Scheme 5

In cases where:

- the **ISP Group Risk Takers (belonging or not to the Fund Managers category)** accrue a variable remuneration **higher than the materiality threshold but equal to or less than 100% of the fixed remuneration**

60% up-front will be paid (of which 30% in cash and 30% in units of UCIs) and 40% (of which 20% cash and 20% in units of UCIs) over a 4-year horizon of deferral.

The pay-out scheme is shown below:

X = year of awarding of variable remuneration

ACCRUAL SCHEDULE	X	X+1	X+2	X+3	X+4
CASH (50%)	30%		5%	5%	10%
FINANCIAL INSTRUMENTS (50%)	30%	10%	5%	5%	

SETTLEMENT SCHEDULE	X	X+1	X+2	X+3	X+4
CASH (50%)	30%		5%	5%	10%
FINANCIAL INSTRUMENTS (50%)		30%	10%	5%	5%

Scheme 6

In cases where:

- the **Legal Entity Risk Takers belonging to the Fund Managers category** accrue a variable remuneration **higher than the materiality threshold and between 100% and 200% of the fixed remuneration,**

- **the other Legal Entity Risk Takers NOT belonging to the Fund Managers category** accrue a variable remuneration **higher than the materiality threshold** and **higher than 100% of the fixed remuneration**,
- **the personnel (not Risk Taker) belonging to the Fund Managers category** accrue a variable remuneration **higher than the materiality threshold** and **between 200% and 300% of the fixed remuneration**,

40% up-front will be paid (of which 20% in cash and 20% in units of UCIs) and 60% (of which 30% cash and 30% in units of UCIs) over a 3-year horizon of deferral

The pay-out scheme is shown below:

X = year of awarding of variable remuneration

ACCRAUAL SCHEDULE	X	X+1	X+2	X+3
CASH (50%)	20%		10%	20%
FINANCIAL INSTRUMENTS (50%)	20%	20%	10%	

SETTLEMENTSCHEDULE	X	X+1	X+2	X+3
CASH (50%)	20%		10%	20%
FINANCIAL INSTRUMENTS (50%)		20%	20%	10%

Scheme 7

In cases where:

- **Legal Entity Risk Takers belonging to the Fund Managers category** accrue variable remuneration **higher than the materiality threshold** but **equal to or lower than 100% of fixed remuneration**,
- **the other Legal Entity Risk Takers** not belonging to the the Fund Managers category accrue variable remuneration **higher than the materiality threshold** but **equal to or lower than 100% of fixed remuneration**,
- **personnel (not Risk Takers) belonging to the Fund Managers category** and operating in Companies in EU countries who accrues variable remuneration **exceeding the materiality threshold and between 100% and 200% of fixed remuneration**,
- **Middle Management and Professionals (not belonging to the Fund Managers category)** and operating in Companies in EU countries who accrue variable remuneration **higher than the materiality threshold and 100% of fixed remuneration**,

60% is paid up-front (of which 30% in cash and 30% in units of UCIs) and 40% (of which 20% in cash and 20% in units of UCIs) over a 3-year time horizon.

The pay-out scheme is shown below:

X = year of awarding of variable remuneration

ACCRUAL SCHEDULE	X	X+1	X+2	X+3
CASH (50%)	30%		7%	13%
FINANCIAL INSTRUMENTS (50%)	30%	13%	7%	

SETTLEMENT SCHEDULE	X	X+1	X+2	X+3
CASH (50%)	30%		7%	13%
FINANCIAL INSTRUMENTS (50%)		30%	13%	7%

Scheme 8:

In cases where:

- **Legal Entity Risk Takers** (not belonging to the Fund Managers category) accrue variable remuneration **higher than 100% of fixed remuneration** but **equal to or lower than the materiality threshold**,
- **Middle Management** and **Professionals** (not belonging to the Fund Managers category) as well as **personnel** (not Risk Takers) **belonging to the Fund Managers category** accrue variable remuneration **equal to or lower than 100% of fixed remuneration** but **exceeding the materiality threshold** or **exceeding 100% of fixed remuneration** but **equal to or lower than the materiality threshold**,

payment is fully in cash, of which 60% is paid up-front and 40% over a 2-year time horizon.

The pay-out scheme is shown below:

X = year of awarding of variable remuneration

ACCRUAL SCHEDULE	X	X+1	X+2
CASH (100%)	60%	20%	20%

SETTLEMENT SCHEDULE	X	X+1	X+2
CASH (100%)	60%	20%	20%

5.7 Long-Term Incentive Plans

In conjunction with the launch of the 2026-2029 Business Plan, the Intesa Sanpaolo Group confirmed the use of Long-Term Incentive Plans (LTI) for the motivation and loyalty of its resources, whose involvement and enhancement, at all levels of the organization, are key and enabling factors for the achievement of results.

In fact, in line with its principles of inclusiveness and cohesion, the Group believes that shareholding favours the identification (ownership), alignment with medium / long-term objectives and constitutes a desirable form of sharing the value created over time.

With reference to the 2026-2029 LTI Plans, taking into account the levels of ambition and challenge of the new Business Plan, the Group confirms the approach that has been adopted since 2018 that consists in clearly differentiating objectives, purposes and consequently long-term incentive instruments intended respectively to:

- the CEO and Managing Director and General Manager of the Company (as both ISP Group Risk Takers), other ISP Group Risk takers and those who expatriate from Italy²⁴, among the other Managers²⁵;
- the Professionals of Intesa Sanpaolo Group of the Italian perimeter expatriate from Italy²⁶.

The detailed description of LECOIP 2026-2029 is contained in ISP Group Remuneration and Incentive Policies to which reference is made on the contrary the detailed description of Performance Share Plan (PSP) 2026-2029 is contained in the following paragraph.

5.7.1 The “Performance Share Plan 2026-2029” Long-Term Incentive Plan

The PSP 2026-2029 is aimed at:

- enhancing the alignment with the long-term objectives of the 2026-2029 Business Plan;
- guaranteeing a close link between the Company's performance over time and the long-term variable remuneration of the Managers;
- rewarding the Managers according to the value creation for shareholders;
- steering performance towards long-term sustainability(ESG).

Below is a summary of the key features of the PSP 2026-2029.

Key Features of the Performance Share Plan	
Topic	Features
Beneficiaries	FAMI CEO and Managing Director and FAMI General Manager, the other ISP Group Risk Takers ²⁷ and those who expatriate from Italy, among the other Managers. (overall about 3.500 staff members)
Financial Instrument	Intesa Sanpaolo ordinary shares subject to performance conditions (Shares).
Plan Operating Mechanism	At the start of the Plan the beneficiaries are granted a certain number of PSP Rights, each of which entitles the holder to receive one Share upon expiry of the Plan, provided that specific Gateway Conditions are met and depending on the level of achievement of the Performance Objectives and of the possible application of De-multipliers.
Methodology for the calculation of value at grant	Fair Value of Performance Shares defined on the basis of the Black-Scholes' model, adjusted for the availability constraints and probability of employees being still employed at the end of the Accrual Period as well as of the achievement of the performance conditions set out in the Plan, in compliance with the Fair Value Policy adopted by Intesa Sanpaolo.
Initial Grant	Each Manager is granted PSP Rights (Initial Grant), each of which has a value equal to the average market price of the Share in the 30 days prior to the award. The number of PSP Rights to be granted to each Manager is calculated by dividing the value defined as a percentage of the base salary/gross annual remuneration and it is differentiated by the organisational roles. The Initial Grant ranging between a maximum of 100% of the base salary for roles not belonging to the Company

²⁴ As they have an Italian employment contract, even suspended.

²⁵ As approved by Intesa Sanpaolo Shareholders' meeting on April 29th, 2022, for Managers it is meant all Management of the Group in the Italian and foreign perimeter. With reference to the foreign perimeter, ISP Group Risk Takers and selected Strategic Managers are included only if the granting of ISP shares complies with the Bank Remuneration and Incentive Policies.

²⁶ As they have an Italian employment contract, even suspended.

²⁷ Including ISP Group Risk Takers (if any) who do not hold managerial positions.

Key Features of the Performance Share Plan	
Topic	Features
	Control Functions and the minimum of 20% of the gross annual remuneration for roles belonging to the latter.
Inclusion in the cap (maximum limit on variable remuneration with respect to fixed remuneration)	In accordance with the Supervisory Provisions, an amount equal to the value of the PSP Rights granted at the launch of the Plan is included in the cap (i.e. the limit on the ratio between variable and fixed remuneration) on a straight-line pro rata basis in each year of the duration of the Plan.
Gateway conditions at Intesa Sanpaolo Group	<p>In line with regulatory requirements.</p> <p>ISP Group-level gates that must be achieved each year of the Plan:</p> <ul style="list-style-type: none"> • CET1 \geq Hard Limit set by the Group RAF • Leverage Ratio \geq Hard Limit set by the Group RAF • Minimum requirement for own funds and eligible liabilities (MREL) \geq Hard Limit set by the Group RAF • NSFR \geq Hard Limit set by the Group RAF • No loss and positive Gross Income . <p>Additionally, also the following gates at ISP Group level must be assessed:</p> <ul style="list-style-type: none"> • at the launch of the Plan (2026) and at the end of the Plan, the result of the ICAAP; • and at the end of the Plan, the recommendations on distributions by competent authorities and European Supervisory Authorities, which could result in a possible reduction down to the zero of the accrued bonus.

Key Features of the Performance Share Plan				
Topic	Features			
Performance Objectives	Managing Director and CEO, the remaining Group Top Risk Takers and the other Group Risk Takers and Managers of Business and Governance			
	KPI	threshold	target*	
	OI/average RWA	9.15%	9.3%	9.38%
	<i>% accruable PSP Rights</i>	20%	40%	50%
	RoE	20%	22%	23%
	<i>% accruable PSP Rights</i>	20%	40%	50%
	Sustainable Lending²⁸	29%	30%	31%
	<i>% accruable PSP Rights</i>	10%	20%	30%
	* The target levels are those set in the Business Plan for 2029			
	Group Top Risk Takers and the other Group Risk Takers and Managers of the Company Control Functions (including the Manager Responsible for the Company's Financial Report)			
	KPI	threshold	target	
	Quality of operation and effectiveness of Company Control Functions action in terms of:			
<ul style="list-style-type: none"> accuracy and reliability of the integrated documentation required by the internal control system as part of the activities of the Group Control Coordination and Non-Financial Risks Committee and submitted to the BoD ability to promptly identify and manage emerging risks²⁹ as represented in the documents submitted to the BoD ability to oversee key activities, initiatives and projects in each function 	<p>The documents submitted by CCFs to the BoD are accurate and their contents are complete</p>	<p>In addition to the threshold level:</p> <ul style="list-style-type: none"> the emerging risks were promptly reported in documents and managed appropriately the Performance Scorecard trend over the 2026-2029 Plan for Top Risk Takers of the CCFs (i.e. the average of the average annual Performance Scorecard scores for Top Risk Takers of the CCFs over the period of the Plan) is greater than 100% 		
<i>% accruable PSP Rights</i>	50%	100%		
It is specified that:				
<ul style="list-style-type: none"> for performance levels below the threshold, no portion of shares is paid for performance levels higher than the overtarget, no further increases are envisaged in the portion of shares awarded (so-called cap principle). <p>The total amount of Awarded Shares at the end of the Accrual Period cannot, in any case, exceed 100% of the Shares assigned at target for the set of KPIs. In other words, the only case where it is possible for the Managers of the Business and Governance Functions to accrue a number of Shares higher than that envisaged at target for a given KPI whose performance is higher than the target is if the performance of another KPI is lower than the respective target, since this does not determine the assignment of Shares corresponding to its target.</p>				
Performance Accrual	In line with the 2026-2029 Business Plan.			

²⁸ I.e. flow of new sustainable lending disbursed in the four-year period and total flow of new medium-long term lending disbursed in the four-year period.

²⁹ Both risks linked to the changing situation – such as, for example, among those currently known, geopolitical risks, technological risks (AI, digital assets, third parties, etc.), ESG risks – and those relating to more traditional operations (credit, liquidity, etc.) are considered emerging risks. In any case, those risks that become relevant in this regard during the Plan will be considered.

Key Features of the Performance Share Plan		
Topic	Features	
Period		
De-multipliers	Managers of Business and Governance Capital Target (CET 1) <ul style="list-style-type: none"> • Compliance, in each year of the Plan’s duration, with the CET1 level above the target defined in the 2026–2029 Business Plan (i.e., > 12.5%); • Reduction in the number of shares vesting by 10% for each year of breach (maximum 40% over the entire accrual period). 	Managers of the Company Control Functions Capital (CET1) and liquidity (NSFR) levels <ul style="list-style-type: none"> • Compliance, in each year of the Plan’s duration, with the Early Warning limits set in the Group’s RAF, respectively for CET1 and NSFR; • Reduction in the number of shares vesting by 2.5% for each year of breach of each limit (maximum 20% in total over the entire accrual period).
Individual access conditions	Absence of the compliance breaches as set in the 2022 FAMI Remuneration and Incentive Policies. Specifically: <ul style="list-style-type: none"> • disciplinary measures involving suspension from service and pay for a period equal to or greater than one day, also due to serious findings received from the control functions; • in the event of violations sanctioned by the supervisory Authorities of the obligations in matters of professionalism, integrity and independence and following in relation to related parties and obligations regarding remuneration and incentives set out in CRD V, involving a sanction of an amount equal to or greater than € 30,000; • behaviors that do not comply with the provisions of the law, regulations, the articles of association or any ethical or conduct codes established ex ante by the Group or the Company and from which a “significant loss” has resulted for the Group, for the Company, for managed funds or for customers. 	
Pay-out Schedule	Pay-out schedules as defined in the 2026 Group Remuneration and Incentive Policies, i.e.: <ul style="list-style-type: none"> • Differentiated according to whether or not the beneficiary belongs to the Risk Taker segment and the amount of the total variable remuneration (higher or lower than the “particularly high” amount or than the “materiality threshold” as defined in FAMI Remuneration and Incentive Policies 2029) and its ratio to the fixed remuneration. • Payment will be made for 50% (maximum) in Intesa Sanpaolo shares and for (at least) the remaining 50% with the financial instruments adopted by the Company for the purpose of granting variable remuneration, in accordance with the provisions set out in the FAMI Remuneration and Incentive Policies in force at the time each instalment of the bonus is paid (the “COMPANY Financial Instruments”)³⁰, except for residual cases³¹. In particular: <ul style="list-style-type: none"> • for ISP Group Takers for the ISP Group Risk Takers and Legal Entity Risk Takers belonging to the Investment Area who accrue a variable 	

³⁰ The funding for the COMPANY Financial Instruments will be provided through the sale of a portion of the Shares vested, as described in greater detail in the Plan Regulations.

³¹ In such cases, it will be entirely in Shares.

Key Features of the Performance Share Plan	
Topic	Features
	<p>remuneration above the materiality threshold and above 300% of the fixed remuneration, 70% of the accrued variable remuneration is deferred over a 5-year time horizon and 70% of it is assigned in COMPANY Financial Instruments subject to a retention period (the remaining part is attributed instead in shares not subject to a retention period);</p> <ul style="list-style-type: none"> • for (i) personnel, regardless of the macro-segment to which they belong, who accrue a overall variable remuneration of a "particularly high" amount and greater than 100% of the fixed remuneration; (ii) the ISP Group Risk Takers and the Legal Entity Risk Takers belonging to the Investment Area who accrue a overall variable remuneration higher than the materiality threshold and between 200% and 300% of the fixed remuneration; nonché (iii) personnel (non-Risk Takers) belonging to the Investment Area who accrue a total variable remuneration for an amount higher than the materiality threshold and higher than 300% of the fixed remuneration, 60% of the accrued variable remuneration is deferred over a 5-year time horizon and 60% of it is assigned in COMPANY Financial Instruments subject to a retention period (the remaining part is attributed instead in shares not subject to a retention period); • for personnel, regardless of the macro-segment to which they belong, who accrue an overall variable remuneration of a "particularly high" amount and equal to or less than 100% of the fixed remuneration, 60% of the accrued variable remuneration is deferred over a 5-year time horizon and 55% of it is assigned in COMPANY Financial Instruments subject to a retention period (the remaining part is attributed instead in shares not subject to a retention period); • for (i) the ISP Group Risk Takers belonging to the Investment Area who accrue an overall variable remuneration above the materiality threshold and between 100% and 200% of the fixed remuneration; e (ii) the other ISP Group Risk Takers (not belonging to the Investment Area) who accrue an overall variable remuneration above the materiality threshold and above 100% of the fixed remuneration, 50% of the accrued variable remuneration is deferred over a 4-year time horizon and 50% of it is assigned in COMPANY Financial Instruments subject to a retention period (the remaining part is attributed instead in shares not subject to a retention period); • for (i) the ISP Group Risk Takers belonging to the Investment Area who accrue an overall variable remuneration higher than the materiality threshold but equal to or less than 100% of the fixed remuneration; e (ii) the other ISP Group Risk Takers (not belonging to the Investment Area) who accrue an overall variable remuneration above the materiality threshold but equal to or less than 100% of the fixed remuneration, 40% of the accrued variable remuneration is deferred over a 4-year time horizon and 50% of it is assigned in COMPANY Financial Instruments subject to a retention period (the remaining part is attributed instead in shares not subject to a retention period); • for (i) the Legal Entity Risk Takers belonging to the Investment Area who accrue an overall variable remuneration above the materiality threshold and between 100% and 200% of the fixed remuneration; (ii) the other Legal Entity Risk Takers (not belonging to the Investment Area) who accrue an overall variable remuneration above the materiality threshold and above 100% of the fixed remuneration; (iii) personnel (non-Risk Takers) belonging

Key Features of the Performance Share Plan	
Topic	Features
	<p>to the Investment Area who accrue an overall variable remuneration above the materiality threshold and between 200% and 300% of the fixed remuneration, 60% of the accrued variable remuneration is deferred over a 3-year time horizon and 50% of it is assigned in COMPANY Financial Instruments subject to a retention period (the remaining part is attributed instead in shares not subject to a retention period);</p> <ul style="list-style-type: none"> • for (i) the Legal Entity Risk Takers belonging to the Investment Area who accrue a variable remuneration higher than the materiality threshold but equal to or less than 100% of the fixed remuneration; (ii) the other Legal Entity Risk Takers (not belonging to the Investment Area) who accrue a variable remuneration higher than the materiality threshold but equal to or less than 100% of the fixed remuneration; (iii) personnel (non-Risk Takers) belonging to the Investment Area who accrue a variable remuneration above the materiality threshold and between 100% and 200% of the fixed remuneration; (iv) Middle Management and Professionals (not belonging to the Investment Area) who accrue a variable remuneration above the materiality threshold and 100% of the fixed remuneration, 40% of the accrued variable remuneration is deferred over a 3-year time horizon and 50% of it is assigned in COMPANY Financial Instruments subject to a retention period (the remaining part is attributed instead in shares not subject to a retention period); • for (i) the Legal Entity Risk Takers (not belonging to the Investment Area) who accrue an overall variable remuneration higher than 100% of the fixed remuneration but equal to or lower than the materiality threshold; (ii) Middle Management and Professionals (not belonging to the Investment Area) who accrue a total variable remuneration equal to or less than 100% of the fixed remuneration but higher than the materiality threshold or higher than 100% of the fixed remuneration but equal to or lower than the materiality threshold; (iii) personnel (non-Risk Takers) belonging to the Investment Area who accrue a total variable remuneration equal to or less than 100% of the fixed remuneration but higher than the materiality threshold or higher than 100% of the fixed remuneration but equal to or lower than the materiality threshold, 40% of the accrued variable remuneration is deferred over a 2-year time horizon and 50% of it is assigned in COMPANY Financial Instruments subject to a retention period (the remaining part is attributed instead in shares not subject to a retention period); • For the remaining Managers, 40% of the variable remuneration accrued is deferred over a 2-year horizon and 100% of it is granted in shares not subject to a retention period.
Malus conditions	Malus conditions operate as mechanisms to reduce the portions of deferred shares that have vested but not yet been paid, up to the full cancellation of such portions. They are symmetrical to the gateway conditions and to the individual access conditions.
Clawback	As defined in 2026 FAMI Remuneration and Incentive Policies. Specifically, this mechanism provides for the repayment of the bonus already disbursed as provided for in the regulations, in the context of: (i) initiatives and disciplinary measures envisaged in the face of fraudulent behavior or gross negligence of the personnel, also taking into account the legal, contributory and tax-related profiles in the matter; (ii) behaviors that do not comply with the

Key Features of the Performance Share Plan	
Topic	Features
	<p>provisions of the law, regulations, articles of association or any ethical or conduct codes established ex ante by the ISP Group and from which a "significant loss" has arisen for the Company or customers.</p> <p>These mechanisms can be applied in the 5 years following the payment of the single portion (up-front or deferred) of variable remuneration.</p>
Termination of the employment relationship	<ul style="list-style-type: none"> • Bad Leaver Cases: eligibility to participate to the PSP is lost in case of resignation, termination for cause or justified reason, mutual termination of the employment relationship except for cases classified as good leaver and all cases not classified as good leaver; • Good Leaver Cases: payment at the end of the Plan of a number of PSP Rights calculated on a pro rata basis, in the event of termination of employment relationship due to the fulfilment of direct pension requirements; death of the Manager or permanent disability or illness resulting in the termination of the relationship; mutual termination of the employment relationship in the event that: (i) this results from the elimination of the position; or (ii) the employee has contributed positively to the achievement of the objectives of the 2026-2029 Business Plan³²; transfer of the business line or of the subsidiary where the manager is employed to third parties, it being understood that in this case the ISP Group reserves the right to grant Managers 100% of their rights if the ISP Group retains even a minority stake³³.
Extraordinary Events	<ul style="list-style-type: none"> • In the event of substantial changes to the Group's ownership structure as part of transactions—whether hostile or non-hostile—that determine a change of control, the Plan will be accelerated, with the payment, in accordance with the applicable Payment Schedules, of a cash amount determined on a pro-rata basis based on the value of the ISP share at the first market close following public disclosure of the transaction. • In the event of extraordinary events affecting the company and/or the Group and/or the relevant market – including, for example, extraordinary transactions involving the share capital and other transactions involving changes in its composition, the shareholders' equity of the company or the number of underlying instruments, or regulatory changes –, the Board of Directors shall have the right to resolve on any amendments and/or supplements to the rules of the Plan that are necessary and/or appropriate to make it consistent with the changed context and/or to manage its impact on the beneficiaries, in accordance with the key features of the Plan approved by the ordinary Shareholders' Meeting and in line with its purposes, including, depending on the case, adjusting the number of PSP Rights or awarded but not yet delivered shares, in accordance with the rules commonly accepted by financial market practice and, as far as possible, in line with any adjustments set by Borsa Italiana, and/or the acceleration and payment of bonuses on a pro rata basis. In any case, changes to KPIs, related threshold levels, targets and overtargets, as well as increases in the amount of bonuses accruable, are excluded.

³² Meaning that the person must have participated in the PSP 2026-2029 for at least one year and received an annual performance scorecard score at least equal to the minimum in each of the performance years prior to termination.

³³ In this case, the pro-rata for the purpose of payment will be calculated as of the effective date of the transaction that led to the individual's exit from the Group perimeter.

5.8 Termination of the employment agreement

The Termination of the service of employees for retirement purposes as well as in the event of death³⁴, does not affect the right to receive the variable remuneration, including any deferred amounts. In all other cases, as rule the outstanding payments are not due unless the Company decides in a different way.

Furthermore, individual ex ante agreements can be reached for the definition of the remuneration to be granted in the event of early termination of the employment agreement, provided that such agreements must comply with all the conditions set out in the Remuneration Policies and in the Supervisory Provisions. It should be noted that at present there are no individual ex ante agreements.

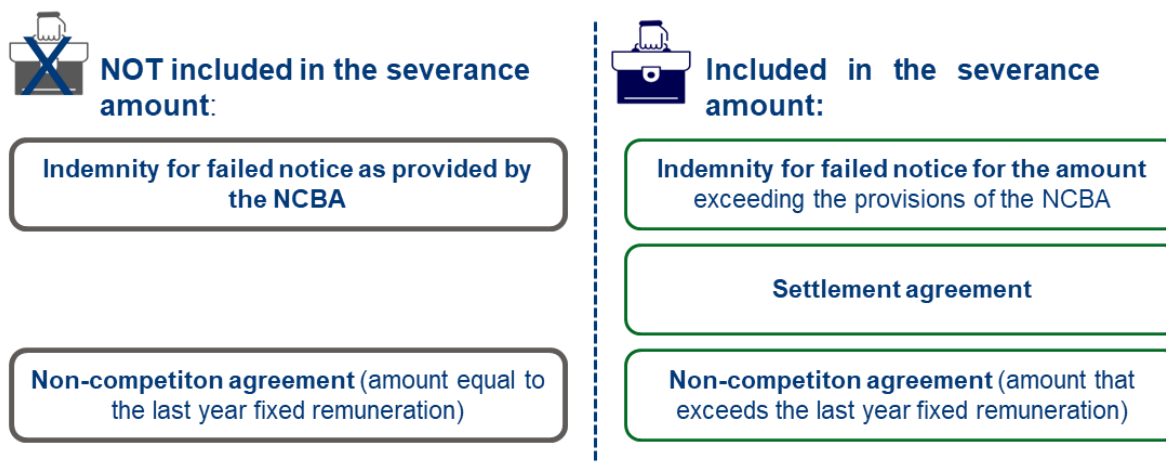
Finally, in the event of extraordinary transactions and/or company restructuring processes, in line with the provisions set out in the ISP Group Remuneration and incentive Policies and the Supervisory Provisions, specific exceptions to the applicable regulations are envisaged with regards to the amounts agreed in view of or upon the early termination of the employment relationship or the early termination of the office or to incentives for redundancy, provided that the requirements of the Supervisory Provisions are met.

5.8.1 Severance pay

In compliance with the Group Policies that implement the Supervisory Provisions of the banking sector with regard to remuneration, and with reference to the rules set out for Severance Pay, the asset management company applies the rules defined at the Ultimate Parent Company level that is ISP Group. In this regard, according to the Regulatory Framework on remuneration, the payment agreed in any way and/or form in view of or upon early termination of the employment agreement or early termination of office for the amount exceeding the provisions of the Italian National Collective Bargaining Agreement (NCBA) concerning payments related to the indemnity for failed notice (where required) constitutes the so-called severance. The non-competition agreement is included among these, depending on the total amount paid.

The following is a representation of the components of the severance, in compliance with the Supervisory Provisions and the Group Policies:

³⁴ In the event of death, the right to the payment of the amounts due, including any deferred portions, is transferred to the heirs under the same conditions, terms and timing of payment/allocation.



With regard to the components that are included in the severance payment, the applicable Supervisory Provisions require that the limits and criteria to be submitted to the approval of the Resolutions of the Shareholders should be defined ex ante.

5.8.2 Maximum limits

Based on international and national best practices, the ISP Group has set a maximum limit equal to **24 months of the fixed remuneration** for compensation paid by way of severance. The adoption of this limit can lead to a maximum disbursement of **656,000 euro**³⁵.

5.8.3 Accumulation of severance with variable remuneration

As required by Bank of Italy Supervisory Provision and in compliance with EBA guidelines, the compensation paid by way of severance is included in the calculation of the variable-to-fixed remuneration ratio of the last year of employment at the Company.

In particular, the compensation paid by way of severance is added to the bonus due for the last year of employment at the company, excluding those compulsorily paid pursuant to national employment legislation and the amounts agreed and recognised:

- based on a non-competition agreement, for the portion which, for each year of duration of the agreement, does not exceed last year's fixed remuneration;
- within an agreement reached in order to settle a current or potential dispute (independently from the context in which the agreement is drawn up), if calculated according to a predefined calculation formula approved previously by the Shareholders' Meeting.

The Company, in compliance with the Group Policies, adopts the following formula differentiated by cluster of personnel and indexed to the number of years of employment at the company.

Employees assigned a job title as part of the Global Banding System

ISP Group Tenure (years)	Severance
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³⁵ The fixed remuneration includes the gross annual remuneration, the Company's contributions to the pension fund and any role allowance and/or remuneration received for the office and not transferred.

Up to 2 years	2 months of fixed remuneration
More than 2 and up to 21	2 months of fixed remuneration + half month for each year of employment (starting from the third year)
More than 21	12 months of fixed remuneration

Remaining personnel

ISP Group Tenure (years)	Severance
Up to 2 years	1 month of fixed remuneration
More than 2 and up to 21	1 month of fixed remuneration+ a quarter of month for each year of employment (starting from the third year)
More than 21	6 months of fixed remuneration

5.8.4 Payment methods

The components included in the severance are treated as variable remuneration and as such they are subject to the payment methods reported in the paragraph 5.6³⁶.

5.8.5 Criteria

In ISP Group, the principles for the definition of severance – inspired to both the correlation between severance pay and ongoing performance criteria and the control of potential litigations – are:

- protecting the level of sound capital base required by the Regulations;
- “no reward for failure”;
- unobjectability of individual behaviour (consistency with compliance breach absence criteria).

Please also note that the same activation (see paragraph 5.5.1), individual access (see paragraph 5.5.7), malus (see paragraph 5.5.9) and clawback conditions (see paragraph 5.5.10) set for variable remuneration for each population cluster are applied to severance.

The payments set for early termination of the employment relationship or for early termination from the office are subject to the aforesaid Regulations only in cases where this would not be contrary to the provisions of law relating to the early termination of the employment relationship in a single country, or to the provisions laid down by the authority.

5.9 Hedging strategy

The Company does not pay or grant payments or other personnel benefits through vehicles, tools or methods that are in any case elusive of the regulatory provisions.

³⁶ For Middle Managers and Professionals not identified as Risk Takers, severance may be paid in cash and upfront even if the amount exceeds the materiality threshold and/or 100% of fixed remuneration where it is recognised as part of an agreement to settle a dispute, both in a judicial or an extra-judicial context.

The Company, in line with the provisions adopted by the Parent Company, requires its personnel, through specific agreements, not to use personal hedging strategies or insurance on remuneration or other aspects that may alter or undermine the risk alignment effects inherent in the Remuneration and Incentive Policies and the related compensation mechanisms adopted by the ISP Group and FAMI. To this end, within the scope of the rules for implementing the Remuneration and incentive policies, the Intesa Sanpaolo Group also defines the types of financial transactions and investments that, if made, directly or indirectly, by the ISP Group and Legal Entity Risk Takers could constitute forms of hedging with respect to exposure to risks deriving from the attribution of shares of the Parent Company or instruments connected to them and following the application of the remuneration and incentive Policies.

These types of financial transactions and investments are:

#	Financial Instruments category	Description
1.	Derivative instruments (non-securitised) having as underlying ISP shares	Financial instruments that allow directly or synthetically to take a short position on Intesa Sanpaolo shares: <ul style="list-style-type: none"> - purchase of put options on ISP shares - sale of call options on ISP shares - linear combinations of the above options (synthetic forwards, collars, etc.) - repurchase agreements on ISP shares (securities lending from brokers on ISP securities and corresponding sale on the market) - Total Return Equity Swap on ISP shares or Contract for Difference on ISP shares - other derivative instruments (non-securitised) with underlying ISP shares.
2.	Derivative instruments (non-securitised) with ISP reference entity	Financial instruments that allow directly or synthetically to take a short position on the Intesa Sanpaolo name: <ul style="list-style-type: none"> - Purchase of protection through Credit Default Swaps with ISP reference entity - Repurchase agreements on ISP bonds (securities lending from brokers on ISP securities and corresponding sale on the market) - Total Return Swaps on ISP bonds - other derivative instruments (non-securitised) with underlying ISP bonds
3.	Other derivative instruments (non-securitised) with underlying assets partially linked to ISP securities	Financial instruments similar to those mentioned above on baskets of shares, stock indices, baskets of names, credit indices where ISP is present with a weight exceeding 20%.

4.	Short investment instruments (other than non-securitised derivatives) linked to the ISP security	<p>Other financial instruments (such as Certificates and ETFs) with a short investment strategy with underlying:</p> <ul style="list-style-type: none"> - ISP share - ISP bonds - indexes directly connected to ISP (e.g. ISP Credit Spread) - derivatives in turn connected to an ISP share or bond (ISP stock futures) - basket of shares, stock indices, basket of names, credit indexes where ISP is present with a weight exceeding 20%. <p>In general, these are financial instruments (other than non-securitised derivatives) which (with or without leverage) benefit from the decline in the value of the underlying. In this regard, the replication of the reference underlying is exactly the opposite of its actual performance, allowing the investor to bet against the underlying asset (and to obtain profits even in bear market circumstances).</p>
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The prohibition on hedging strategies is also applicable to the managed UCIs assigned to the personnel of the COMPANY.

It should be noted that the types of financial transactions and investments as described in the abovementioned points 1, 2 and 3 are already prohibited according to Article 5 of the ISP Group Internal Code of Conduct. With reference to the transactions in point 4 (i.e. short investment instruments (other than non-securitised derivatives) linked to the ISP security), the ISP Group Internal Code of Conduct prevents all employees from carrying out transactions with leverage effect; however, in order to align the compensation mechanisms to risks, the investment transactions in financial instruments linked to the ISP security without leverage as per the aforementioned point 4 are also prohibited by these Provisions.

With reference to Risk Takers only:

- the prohibition of carrying out the transactions shown in the table is also extended to the family members of the relevant person, namely:
 - the spouse of the relevant person or other partner equivalent to the spouse according to the national law;
 - the dependent children of the relevant person;
 - any other relative of the relevant person who lived for at least one year with the relevant person at the date of the transaction in question;
- it is forbidden, always and in any case, to initiate – directly or indirectly – transactions in breach of the hedging prohibition, including those on the accounts or deposits on which the Risk Taker has a power of attorney also with other financial intermediaries;

- it is required to communicate to the People Management & HR Transformation Head Office Department the existence or activation of custody and administration accounts with other intermediaries not belonging to the Intesa Sanpaolo Group.

The Internal Audit Function, with the support of ISP Group Chief Audit Officer, performs sample checks on the employees' compliance with the hedging prohibition, in the context of the controls envisaged by the Regulations on personal transactions.

The prohibition relating to these types of financial transactions and investments is to be considered extended and applicable also to the Company personnel if assignee of shares or instruments connected to them of the Parent Company deriving from Incentive Systems to which it was or is the recipient (e.g. personnel coming from by the Parent Company and transferred to the Company with deferred shares in outstanding shares).

5.10 Remuneration of Delegates

In the event of the delegation of portfolio management or risk management of UCITS, the Outsourcing and Delegation Monitoring function verifies that

- a) the delegate is subject to remuneration obligations equivalent to those applicable to the Company. The equivalence of the rules applicable to the delegated manager shall be deemed to be respected if (i) the delegate is subject to the CRD, UCITS or AIFM about remuneration disciplines; and (ii) the most relevant staff of the delegate are subject to the rules of CRD, UCITS or AIFM in remuneration disciplines. A provision is included in the Investment Management Agreement that requires delegated managers to provide a copy of their Remuneration Policy if so requested.

Section C - Criteria for the identification of personnel with a material impact on the risk profile of the asset management Company, the UCITs and the portfolio management companies of FAMI

6 Introduction

In order to graduate the application of the entire discipline according to the effective capacity of the individual figures to influence the risk profile of the Company, of the UCITs and of the portfolio management, a process of identification of the "Risk Takers" is carried out in compliance with the provisions of "*Undertakings for Collective Investment in Transferable Securities*" (Amendment) Regulations 2016 – S.I. No. 143 of 2016.

The criteria to be used in order to assess whether the professional activities of personnel have a material impact on the Company's risk profile must:

- be based on a survey and assessment of individual positions (responsibilities, hierarchical levels, activities carried out, operating powers, etc.);
- take into account the internal organisation of FAMI, the characteristics, size, nature, scope and complexity of the activities carried out, as well as the number and size of UCITs and portfolio management.

6.1 Qualitative and Quantitative criteria

As FAMI is an asset management company belonging to a banking group, the Risk Takers identification process takes place at two levels:

- 1st level: at Group level, in application of the provisions of Directive (EU) 2019/878, so-called CRD V or the Directive and with Regulation (EU) 923/2021 which concretely implements and integrates the provisions of the Directive and in accordance with the Circular 285 of the 17 December 2013 of the Bank of Italy, represented by the “*Guidelines on Remuneration, Incentives and identification of Risk Takers*”;
- 2nd level: at Company level, in accordance with “*Undertakings for Collective Investment in Transferable Securities*” (Amendment) Regulations 2016 – S.I. No. 143 of 2016, and with the “*Criteria for the identification of personnel with a material impact on the risk profile of the asset management company, the UCITs and the portfolio management companies of FAMI*”.

The Company provided a self-assessment in order to identify the so-called “Legal Entity Risk Takers” or “Company Risk Takers”, that are all those whose professional activities have or may have a material impact on the risk profile of the Company or on the funds managed.

In addition, given that Intesa Sanpaolo Group has implemented the provisions of Directive (EU) 2019/878 and of the Regulation (EU) 923/2021 in all Group companies through the self-assessment process instructed, some of FAMI’s Legal Entity Risk Takers may be identified also within the perimeter of the Risk Takers of Intesa Sanpaolo Group (so-called “Group Risk Takers”).

This process, carried out by the Human Resources Desk with the support of the Risk Management, Compliance Desk and the Other Desks, is based on an assessment of each individual position in order to verify the relevance of each subject in terms of risks assumptions with respect to the asset management Company and the funds managed.

The Risk Takers perimeter includes:

- i. Executive and non-executive members of the Board of Directors, including the CEO and Managing Director;
- ii. Members of Senior Management who report directly to the CEO and Managing Director
 - **General Manager and Head of HR, Business Support and Operations;**
 - **Head of Finance;**
 - **Head of Investments;**
 - **Head of Risk Management;**
 - **Head of Compliance.**
- iii. Heads of control functions³⁷:
 - **Head of Risk Management**
 - **Head of Compliance;**

³⁷ The Head of Internal Audit is not identified as Risk Taker at Company level because he/she is outsourced and performed by the Audit Department of the ultimate Parent Company Intesa Sanpaolo.

- iv. Employees that individually or collectively assume significant risks for the Company or for the assets managed.
In order to identify these persons, the Company shall establish the possibility of taking risk positions for the manager or for the managed UCITs, generating profits or affecting the financial position of the funds and of the manager as a whole.
On the basis of the delegated powers and responsibilities assigned, therefore, there are **no other persons** who can take on significant risk position for the Company and/or the managed UCITs.
- v. This cluster includes subjects who meet the following both conditions:
- i. Personnel whose total remuneration is in the same wage³⁸ ranges as sub categories ii) and iv) and
 - ii. Personnel that has a substantial impact on the risk profile of the Company, via the Sub-funds managed, according to the delegations of power and the related structure of operational delegation.

For the purposes of the calculation of the level of remuneration:

- all components, monetary and non, of both fixed and variable remuneration, are taken into account;
- the fixed remuneration as at December 31st of the previous year and the variable remuneration awarded in the previous year (based on the results of the year before that)³⁹ are included, independently from whether the payment itself was deferred;
- if a performance assessment period (accrual period) of more than one year is provided for the purposes of the award of the variable component, the pro rata remuneration (i.e. relating to the period of the assessment) is taken into account, even if this amount is disbursed later, only at the end of the accrual period;
- the remuneration which has been awarded but has not yet been paid shall be valued as at the date of the award without taking into account the possible application of the reductions in payouts, whether through clawback or malus.

All amounts shall be calculated before tax and gross of contributions and on a full-time equivalent basis.

According to the above criteria the following individuals have been entitled to a total remuneration in the same wage ranges of sub categories ii) and iv):

- Head of Credit;
- Head of Global Equities and Quant Solutions;
- Head of Global Bonds;
- Head of Asia & Emerging Markets Equities;
- Senior Portfolio Managers of all Investments desks.

However, it is worth noting that **none** of the aforementioned employees has a material impact on the risk profile of the Company, according to the delegations of power and the related structure of operational delegation. In fact, the Board of Directors of the Company has specifically appointed the Head of Investments to implement the decisions taken by the Board, pertaining to

³⁸ Wage analysis included: base salary, bonus, and pension fund.

³⁹ Including the buy-out.

investment activities and to define operational limits to be assigned to specific Portfolio Managers.

The Head of Investments:

- provides the CEO and Managing Director with macro-economic and specific market related analysis and proposals for the Company's general investment strategy to be submitted to the Board of Directors;
- in relation to the Company's investment strategy and the investment strategies carried out, guides the investment process, carries out specified investment decisions and decides on asset allocation;
- gives specific operational powers to a reporting "Head of Functions" or other executives in the specific area of responsibility, within the scope of the conferred role or/and the operational limits given.

The Delegation of Investment Powers are carried out considering the Investments General Guidelines given by the CEO and Managing Director in his role of supervisor of the investment activities carried out by the Company. The CEO and Managing Director Guidelines states limits for each relevant asset class/portfolio group.

The delegations of operational authority are assigned to specific Portfolio Managers by the Head of Investments, through specific documents (i.e.: Delegation of Powers and Structure of operational Delegations), which must be accepted by the appointed person.

In particular, the Structure of operational Delegations introduces several and strict operational limits⁴⁰ applicable to each Portfolio Manager (in relation to each Sub-fund) in the event of buy/sell trades carried out and/or positions held directly by the relevant Portfolio Manager. Any temporary breach to the operational limits should be authorized by the Head of Investments to whom FAMI's Board of Directors has assigned Powers to implement all resolutions affecting the investment activities. The assigned delegation of operational authority is valid until it is revoked and authorizes the appointed person to implement, relative to the portfolio to which the delegation refers, buying / selling operations in compliance with the strategies and limits deliberated by the Board of Directors of the Company and of the CEO and Managing Director.

By applying the aforementioned criteria v.i) and ii) **no Legal Entity Risk Takers have been identified.**

⁴⁰ By means of example (the list is not intended to be exhaustive and is for illustrative purposes only):

- Bond: duration limit, delta duration versus benchmark, maximum exposure per single issuer (Investment grade and high yield) on NAV, total maximum exposure on corporate high yield on NAV, total maximum exposure of emerging markets bond calculated on NAV, maximum exposure per sovereign issuer on NAV, maximum exposure per corporate issuer on NAV, maximum exposure per Co.Co. bonds on NAV, maximum exposure per distressed securities on NAV, off benchmark securities maximum exposure on assigned portfolio, minimum market exposure calculated on NAV, total securities outside the opportunity set, maximum exposure not rated securities on assigned portfolio per Sovereign and Corporates in Benchmark, maximum exposure not rated securities on assigned portfolio per Sovereign and Corporates off-Benchmark, maximum exposure unlisted securities on assigned portfolio per Sovereign and Corporates in Benchmark;
- Equity: maximum net exposure on NAV, maximum exposure per single issuer on NAV, off benchmark securities maximum exposure on assigned portfolio;
- Commodity: maximum exposure on NAV;
- Derivatives: maximum exposure per OTC derivatives in absolute value on NAV, maximum exposure per credit derivatives in absolute value on NAV, maximum exposure per TRS in absolute value on NAV, maximum exposure per structured securities in absolute value on NAV;
- UCITS: maximum overall exposure on NAV, maximum exposure per single fund on NAV;
- Currency exposure: maximum exposure per single currency on NAV, maximum total exposure non-euro developed countries currencies on NAV, single position maximum exposure on non-Euro Developed Country currency on NAV.

In order to summarize the outcome of the Risk Takers' identification process described above, please find below the list of Risk Takers identified:

- i. Executive and non-executive **members of the Board of Directors**, including the **CEO and Managing Director**;
- ii. Members of Senior Management who report directly to the CEO and Managing Director:
 - **General Manager and Head of HR, Business Support and Operations**;
 - **Head of Finance**;
 - **Head of Investments**;
 - **Head of Risk Management**;
 - **Head of Compliance**.
- iii. Heads of control functions:
 - **Head of Risk Management**;
 - **Head of Compliance**;
- iv. Employees that individually or collectively assume significant risks for the Company or for the assets managed: **no subject has been identified**, in addition the Head of Investments, already identified within the previous category n° ii);
- v. Personnel whose total remuneration is in the same wage⁴¹ ranges as sub categories ii) and iv) and that has a substantial impact on the risk profile of the Company: **no subject has been identified**.

Finally, it is noteworthy that as the first working day of January 2026, the **CEO and Managing Director** is also Risk Taker at Intesa Sanpaolo Group level and, thus, is classified as "**Group Risk Taker**".

The aforementioned Risk Takers identification process takes into account the internal organization (organization relatively simple respect to the size, mainly due to the ownership (100%) by an Italian Parent Company which allow the outsourcing of some functions and activities, short structure, organizational levels, absence of committees with decision-making powers, etc.), operational (concentration of powers and delegations in charge of senior level managers; the overall complexity of FAMI appears relatively limited and coherent with the size and with the internal organization; the firm manages solely UCITS products and, although the range of funds offered is ample, the complexity of the vast majority of the strategies applied on the funds is not high; the strategies are mostly based on the market direction, on relative value between securities or on allocation among asset classes) and size (about 66 resources) of the Company.

7 Disclosure

The information on the remuneration of the Company staff is reported in the Annual Report of the Funds managed.

The prospectus of the managed funds describes updated information on the Remuneration Policies or the website where those pieces of information are disclosed.

⁴¹ Wage analysis included: base salary, bonus, benefit and pension fund.

In accordance with the provisions within the ESMA Guidelines, the asset management company shall prepare an annual report with the criteria and principles underlying the definition of the Remuneration Policies.

The Remuneration Policies of the Company and its updates are published on the corporate intranet in order to make it accessible to employees of the Company.