



Sienna AM Luxembourg

Remuneration Policy Disclosure Statement

February 2023

Amendments since implementation of Version 1.0 as of February 2023

Version	Date	Change	Amended by	Reviewed and approved
1.0	17/02/2023	Set up of the Disclosure Statement		01/03/2023

Sienna's Remuneration Policy Disclosure Statement

Purpose

Sienna AM Luxembourg ("Sienna" or the "Company") is an Alternative Investment Fund Manager ("AIFM") according to the Luxembourg law of 12 July 2013 on alternative investment managers ("AIFM Law").

As required by the AIFM Law, Sienna has established a Remuneration Policy (the "Policy"), which is consistent with and promotes sound and effective risk management and does not encourage risk-taking which is inconsistent with the risk profiles, management regulations or instruments of incorporation of the funds it manages.

Moreover, the Policy includes information on the integration of sustainability risks within Sienna's remuneration structure, as required by the article 5 of the EU Sustainable Finance Disclosure Regulation ("SFDR").

Remuneration structure

Compensation of staff may consist of:

- a fixed remuneration which remunerates role, responsibilities and expertise.
- a variable component which remunerates personal performance and collective achievements, on a purely discretionary basis.

The Company ensures that the measurement of performance used to calculate the amount of variable remuneration to be allocated to the Staff members is determined taking into account financial and non-financial criteria (including sustainability factors and compliance with the Company's risk management and compliance policies).

The variable remuneration is not linked to the specific performance of a portfolio or a fund or to the level of risks (including sustainability risks) assessed within a fund. Therefore, there is no incentive to under- or over-estimate the level of risk (including sustainability risks) within a portfolio or a fund, which ensure promotion of sound and effective risk management.

Integration of sustainability risks within the Remuneration Policy

The Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector (referred to as "SFDR") came into force on 10 March 2021 to provide more transparency to investors on the integration of sustainability risks and sustainability factors (meaning environmental, societal and governance factors or "ESG") and on the consideration of adverse sustainability impacts in the investment processes.

As required by the article 5 of the SFDR, the Company integrates sustainability risks within this Remuneration Policy. Through the criteria established above, the Company ensures that its remuneration structure does not encourage to under- or over-estimate the level of sustainability risks and is aligned with the investors' best interests.

Consideration of sustainability initiatives within the variable remuneration

Although there are no explicit sustainability-related criteria as part of employees' performance measurement process, the variable remuneration structure may still reward adherence to sustainability-related initiatives at the Company.

All employees receive trainings and knowledge sharing on the Company's approach to sustainability-related initiatives. As such, where it is considered that a member of staff has made a significant effort or value-added contribution to the implementation of sustainability-related initiatives and/or has achieved good progress in the integration of sustainability within the Company's portfolio, a discretionary reward element may be awarded.



Periodic review

Sienna's Remuneration Policy is subject, at least once a year, to a central and independent internal review.

This periodic review shall assess if the Policy:

- is operating as intended; and
- is compliant with national, international regulations principles and standards applicable to the sector within which the Company operates.

The outcome of the periodic review is properly followed up and presented to the Board.