

Integration of sustainability risks in remuneration policy



EU Sustainable Finance Disclosure Regulation

On March 10, 2021, the EU Commission's Sustainable Finance Disclosure Regulation (EU) 2019/2088 (SFDR) entered into force. As an AIFM, Axcel's funds fall under the SFDR and Axcel ensures compliance with this regulation on behalf of its active funds. Axcel is required to provide information to investors with regards to the integration of sustainability risks in investment process, the consideration of adverse sustainability impacts, and the promotion of environmental or social characteristics.

This document addresses Article 5 of the Regulation: "Financial market participants and financial advisers shall include in their remuneration policies information on how those policies are consistent with the integration of sustainability risks and shall publish that information on their websites."

Integration of sustainability risks in remuneration policy

This document provides a summary of Axcel's Remuneration Policy. The full Remuneration Policy is available upon request.

Axcel's Remuneration Policy is adopted to ensure that the Manager is compliant with the regulation on remuneration and procedures set out in the Alternative Investment Fund Managers Act, Act no. 1166 of 19 September 2018 (the "AIFM Act"), Section 20-22 and Executive order no. 1151 of 24th October 2017 (the "Executive order"), pursuant to which the Manager shall ensure to maintain a sound and effective risk management, which does not encourage risk-taking and is inconsistent with the risk profiles, applicable law and the Articles of Association for the AIF.

The purpose of this Remuneration Policy is to facilitate:

- a sound and effective risk management
- that remuneration is paid in accordance with the Manager's strategy, values and targets
- that remuneration is paid in accordance with the interests of the Manager, the AIF and its investors
- measures to avoid conflicts of interest

Appropriate risk behaviour in all risk categories, including sustainability risk, is a central tenet of performance assessment. To the extent that any employee or partner is considered to have exhibited inappropriate risk conduct that would be reflected in any compensation award.

The Board of Directors is responsible for overseeing that the remuneration paid is compliant with the Remuneration Policy.

For further information regarding Axcel's sustainability practices, visit the Axcel website where further SFDR disclosures are available, as well as Axcel's Sustainability policy and Annual Review & Sustainability Report.

Version history

Version:	Date	Changes
1	1 June 2022	Document published on website.
2	20 February 2026	References added and template updated.