



**LOMBARD ODIER**  
INVESTMENT MANAGERS

# Details of the Remuneration Policy

## Lombard Odier Funds (Europe) S.A.

July 2019

Lombard Odier Funds (Europe) S.A. (the “Firm”) has established a remuneration policy applicable to its employees (the “Employees”) and directors in accordance with applicable laws and regulations pertaining to remuneration, in particular the Luxembourg law dated 12 July 2013 on alternative investment fund managers, the Luxembourg law dated 17 December 2010 relating to undertakings for collective investment and any applicable ESMA guidelines (the “Remuneration Rules”).

The total remuneration of Employees consists of two components, the fixed remuneration and the variable remuneration. However, there is no entitlement to any variable remuneration.

The performance objectives of each Employee are reviewed on an annual basis. The annual review lays down the basis for the determination of variable remuneration and possible increase in fixed remuneration. Performance criteria include a comprehensive adjustment mechanism to integrate all relevant types of current and future risks.

The Firm’s remuneration structures are designed to reduce its exposure to liquidity and capital risk.

Where remuneration is performance related, the total amount of remuneration is based on a combination of the assessment of the performance of the individual and of the business unit and of the overall results of the Lombard Odier Group, and when assessing individual performance, financial as well as non-financial criteria are taken into account.

Variable remuneration is only paid out of risk adjusted profits or from sources which will not undermine the capital base of the Firm or expose it to any risk in respect of its future capital commitments.

Variable remuneration for Employees with a control function will be determined in accordance with the achievement of the objectives linked to their functions, independent of the performance of the business areas they control.

The Employee’s direct manager proposes the variable remuneration. The proposal is reviewed by the Unit Head, LOIM Finance and LOIM Human Resources.

Based upon the principle of proportionality contained in the Remuneration Rules, the Firm has decided to disapply the payment and retention period of variable remuneration in instruments, the deferral of the payment of a portion of variable remuneration and the establishment of a remuneration committee.