CODA PARTNERS AS – REMUNERATION POLICY

Coda Partners AS ("the company") is an investment firm authorised by the Financial Supervisory Authority of Norway.

The company shall publish on its website how the requirements for the remuneration policy are met.

Remuneration policy and decision-making process

The Board of Directors is ultimately responsible for the company's remuneration policy and sets out the principles governing how remuneration within the company is to be determined, applied and monitored. The remuneration policy is adapted to the company's size, organisation and the nature, scope and complexity of its business.

Remuneration shall promote sound and effective risk management, be consistent with the company's business strategy and long-term interests, and help to avoid conflicts of interest. The remuneration policy applies to all employees of the company. Specific rules apply to employees who have a significant impact on the company's risk profile, such as:

- The managing director and those who effectively direct the business (senior executives)
- The compliance officer and the risk function (staff with control functions)
- Board members

Board members receive only fixed remuneration as compensation for their role in the company.

The remuneration policy distinguishes between fixed and variable remuneration. Fixed remuneration is determined on the basis of relevant experience and agreed duties and responsibilities.

For employees who have a significant impact on the company's risk profile, variable remuneration must not exceed the fixed remuneration, and the fixed component must be sufficiently high to allow the company to elect not to pay the variable component.

The company has a discretionary bonus scheme. Variable remuneration must be consistent with the company's overall objectives, risk tolerance and long-term interests, and must not encourage risk-taking that is incompatible with the company's risk profile. The amounts and criteria are determined by the board. The company's remuneration policy is designed to be consistent with the integration of sustainability risks into the investment process, in accordance with the company´s SFDR policy.

The company may require a reduction in or repayment of variable remuneration in the event of, amongst other things, reprehensible conduct, significant losses, dismissal or damage to the company's reputation.

The Board reviews the implementation of the remuneration policy annually and prepares a written report. The report is reviewed by the auditor and submitted to the Financial Supervisory Authority upon request. This disclosure is updated in connection with the annual review.