

**Information Statement**  
**on How Fisher Asset Management, LLC's**  
**AIF Staff Remuneration Policy**  
**is Consistent with the Integration of Sustainability Risks**

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**Sustainable Finance Transparency**

The European Union has introduced a series of legal measures (the primary one being the Sustainable Finance Disclosures Regulation (Regulation (EU) 2019/2088) requiring firms that manage investment funds to provide transparency on how they integrate sustainability considerations into the investment process with respect to the investment funds they manage.

**Approach to Sustainable Investment**

Fisher Asset Management, LLC, doing business as Fisher Investments ("FI"), may act as sub-manager, either directly or as sub-manager to Fisher Investments Europe Limited ("FIE"), to certain funds based in Europe and regulated by European statutory provisions that are considered to be Alternative Investment Funds ("AIF") in the meaning of the Directive 2011/61/EU of the European Parliament and of the Council of 8 June 2011 on Alternative Investment Fund Managers and amending Directives 2003/41/EC and 2009/65/EC and Regulations (EC) No 1060/2009 and (EU) No 1095/2010 ("AIFMD").

The Investment Manager evaluates and integrates sustainability risks and environmental, social and governance ("ESG") factors at multiple stages throughout the investment and portfolio construction process. The Investment Manager believes Fund investors are best served by an investment process that considers both top-down and bottom-up factors. Integrating ESG analysis at the country, sector and security levels consistent with a Fund's investment goals and any applicable ESG policies maximizes the likelihood of achieving desired performance and improving environmental and social conditions worldwide.

**What is a Sustainability Risk?**

In this context a sustainability risk is considered to be an ESG event or condition that, if it occurs, could cause an actual or potential material negative impact on the value of an investment.

**Information on How the Investment Manager's AIF Staff Remuneration Policy (the "Remuneration Policy") is Consistent with the Integration of Sustainability Risks**

*Regulatory Requirements in relation to the Investment Manager's Remuneration Policy for AIF Staff*

The AIFs are managed by European management companies that are considered to be alternative investment fund managers ("AIFMs") in the meaning of the provisions of the AIFMD. FI does not act as an AIFM itself. The AIFMD has introduced detailed requirements with regard to the remuneration restrictions to which AIFMs' portfolio management and certain other staff will be subject.

Since FI may act as an entity to which portfolio management for AIFs is delegated (or sub-delegated), FI is required to implement a remuneration policy that covers any payments made to certain categories of staff for the performance of portfolio management activities on behalf of the respective AIFM.

### *Scope of Remuneration*

The individual elements of AIF Staff's remuneration packages are fixed pay (base salary and other employee benefits), performance-related incentive opportunities (variable incentives), and/or long-term incentive opportunities (stock options or stock ownership). The size of the various remuneration elements will differ, dependent upon the nature of an individual's role, so that the overall remuneration package is competitive, relevant, performance enhancing and appropriately risk-balanced.

Fixed and variable components of total remuneration for AIF Staff, for only that portion of their work for AIFs, are appropriately balanced and the fixed component represents a sufficiently high proportion of the total remuneration to allow the operation of a fully flexible policy on variable remuneration components, including the possibility to pay no variable remuneration component. Specifically, variable remuneration for AIF Staff, for only that portion of their work for AIFs ("AIF Variable Remuneration"), will not exceed 100% of that portion of their fixed remuneration apportioned for AIFs, except in exceptional circumstances.

The total amount of remuneration for AIF Staff, for only that portion of their work for AIFs, is in any event based on a combination of the assessment of the performance of the individual and of the AIFs concerned and of the overall results of FI, and when assessing individual performance, financial as well as non-financial criteria are taken into account.

Guaranteed variable remuneration is exceptional and occurs only in the context of hiring new staff and is limited to the first year.

### *Variable Remuneration*

Variable remuneration is paid in cash. The purpose of providing variable remuneration opportunities for AIF Staff, for only that portion of their work for AIFs, is to incentivize the attainment of performance goals at the company, individual levels and for the AIFs.

### *Remuneration Process*

One-third of the AIF Variable Remuneration will be determined based on AIF Staff individual non-financial performance for the year based on factors set forth in FI's Company Vision and Values in Action and similar factors; one-third of the AIF Variable Remuneration will be determined based on FI overall performance for the year; and one-third of the AIF Variable Remuneration will be determined based on the AIFs' performance in relation to their benchmarks over the prior three years (or since inception if less than three years).

In addition, and specifically in consideration of how the Investment Manager integrates the consideration of sustainability risks into the remuneration process, the following factor is also taken into account (for 25% of variable remuneration, thus reducing the proportion of the other factors noted above to 25% each):

- where the Investment Manager takes into consideration an environmental or social characteristic in its investment decision-making with respect to a Fund or a Fund has sustainable investment as one of its objectives, how such Fund has compared to its benchmark index over the past year with respect to such environmental or social characteristic or sustainable investment objective, as applicable, as measured by one or more scoring metrics.

It is recognised that the above factor may be considered and applied subjectively to an individual, dependent on their role within the Investment Manager.

Finally, as an overriding and discretionary factor, the Investment Manager will ultimately be mindful of the need to ensure that the Remuneration Policy promotes sound and effective risk management, does not encourage risk taking that is inconsistent with the risk profiles of the Funds and is consistent with the Investment Manager's approach to the integration of sustainability risks.

### **Further Information**

This Information Statement is issued for informational purposes only.

This Information Statement is not intended as investment advice and is not an offer or a recommendation about managing or investing assets and should not be used as the basis for any investment decision.

The information contained herein is current as of the date of issuance and is subject to change without notice.

The Investment Manager does not make any express or implied warranties or representations as to the completeness or accuracy or accept responsibility for errors.

No risk management technique can guarantee the mitigation or elimination of risk in any market environment.

**Past performance is not a guarantee or a reliable indicator of future results and an investment could lose value. All investments involve risk, including the possible loss of capital.**

Any updates made to this Information Statement will be published on <https://www.fisherinvestments.com/en-us/aif>.