

Remuneration Policy for SB1 Markets AS

SB1 Markets AS (“SB1M”) has established its remuneration framework in accordance with the Financial Institutions Regulation. According to the Sustainable Finance Disclosure Regulation (“SFDR”), included in the Sustainable Finance Act, financial market participants and financial advisers shall integrate all relevant financial risks in their investment advice, including how companies' remuneration policies take into account sustainability risks. In the following SB1M will inform how the company complies with this.

Competent and dedicated employees are key to create value for SB1M’s clients and hereby contribute to the company’s long-term development. In pursuit of the firm’s vision and goals, SB1M must provide employees with a remuneration framework that is both competitive and aligned with market standards, while also ensuring protection of shareholder interests. The overarching purpose of the remuneration manual is to (i) generate sustainable financial results for the firm (ii) serve as an attractive and motivating factor for employees, and (iii) avoid excessive risk taking or other behaviour having a negative impact on the firm’s overall performance.

SB1M’s remuneration framework should reward individual performance and encourage long-term value creation combined with balanced risk-taking. The remuneration framework covers all compensation, including fixed salary, variable remuneration, pension schemes, benefits in kind and more.

When assessing the remuneration of the individual employee, each employee will be assessed against pre-defined factors that covers both financial and non-financial performance. Employee’s fixed salary should be sufficiently high in order for the firm to be able to refrain from paying a variable component of the total remuneration. Variable remuneration is determined by evaluating the performance and capabilities of the individual employee, the business unit of which the employee belongs and the firm as a whole. Integration of sustainability is included in SB1M's remuneration policy. Variable remuneration must not be composed in a way that encourages excessive risk-taking, including ESG risk.

The Board of Directors (the “Board”) has approved SB1M’s remuneration model and is responsible for maintaining it. SB1M has established a Remuneration Committee that monitors compliance with the firm’s remuneration policy on the behalf of the Board. The firm’s internal auditor KPMG conducts an annual independent audit of SB1M’s remuneration scheme, which is reported directly to the Board.