



# The Prism Group Remuneration Policy

Version Type	Version No..
In effect	2.0
Approved by	Effective from
BoD	25 April 2025

Type	Name
Policy	PrismFP Group Remuneration Policy

## Background

The PrismFP Group Remuneration Policy sets forth the policies and procedures governing remuneration for its staff, as remuneration is a driver of behaviour for firms and individuals. Through this Policy, PrismFP Group aims to balance motivating its staff, while discouraging negative or inappropriate behaviours.

## Approach

PrismFP's approach to remuneration is designed to support the long-term business interests of the firm, to reflect its approach to risk management and to deliver long-term sustainability. Specifically, this Policy is designed to:

- Ensure greater alignment between risk and individual remuneration reward;
- Discourage excessive risk-taking;
- Encourage effective risk management; and
- Support positive behaviours and a strong and appropriate conduct culture within the firm.

This approach is applied across the entire PrismFP Group such that it is:

- Regionally consistent, underpinned by a common philosophy and guiding principles which are overseen and supervised by the Remuneration Committees of each appropriate PrismFP entity;
- Consistent with and promotes effective risk management;
- Consistent with the interests of both the clients and investors; and
- In line with business goals and results.

## Performance and Variable Pay

At an individual level, a detailed performance assessment takes place for each member of staff, at least once a year. The performance assessment includes both qualitative and quantitative elements, including assessments regarding contributions to culture. The variable pay structure for rewarding good performance is discretionary and determined by individual performance, as well as overall firm affordability.

## Annual Analysis concerning Diversity & Inclusion

The firm believes strongly in diversity and inclusion and is committed to promoting equality of opportunity and avoiding unconscious bias. Accordingly, the Remuneration Committees shall review and assess the remuneration across its personnel on an annual basis to determine if there are any inappropriate pay discrepancies that should be remedied.

## Risk Management

The risks taken by the firm are almost exclusively operational and agency risks and are taken within documented risk parameters. Within this context, there is a qualitative element to all bonuses which can be adjusted as appropriate to reflect behaviours and performance in relation to risk and compliance behaviours. Any risk and compliance issues, breaches or failures that may be relevant to



# The Prism Group Remuneration Policy

Version Type	Version No..
In effect	2.0
Approved by	Effective from
BoD	25 April 2025

Type	Name
Policy	PrismFP Group Remuneration Policy

remuneration decisions are considered by the Remuneration Committees and the Remuneration Committees can make adjustments as deemed appropriate to reflect those issues.

## Governance

On an annual basis, the Remuneration Committees of each PrismFP entity will review this Policy and assess whether the firm's overall remuneration framework operates as intended and is compliant with the obligations on remuneration as set out within the relevant legal and regulatory requirements.

### 1. UPDATE AND FOLLOW-UP ON THE POLICY

- 1.1. The policy shall be reviewed when deemed necessary by the Board of Directors, but at least once a year.

Version	Legal basis	Approved	Changes
1.0	Law No 1155 of 08/06/2021 on brokerages and investment services and activities.		In connection with the application for authorization to operate as a fund brokerage company.
2.0	" "	25 April 2025	Updated Firm's address