

REMUNERATION POLICY

INTRODUCTION

This Remuneration Policy of NEW MILLENNIUM SICAV (the “SICAV”) covers the remuneration of:

- individuals who are members of the governing bodies of the SICAV
- senior managers,
- risk takers and control functions,
- any employees receiving any type of remuneration that takes them into the same remuneration bracket as senior management and risk takers;
- any employee of the SICAV. (together the “Identified Staff”)

In compliance with current laws and regulations, including those deriving from the implementation in Luxembourg of the Directive 2014/91/EU of 23 July 2014 on UCITS as regards depositary functions, remuneration policies and sanctions (“**UCITS V**”), the SICAV has adopted, for those categories of persons certain remuneration principles that are consistent with and promote sound and effective risk management and do not encourage risk-taking which is inconsistent with the risk profiles, rules or instruments of incorporation of the managed funds.

The policy is also in line with the business strategy, objectives, values and long-term interests of the managed sub-funds and is consistent with the principles relating to the protection of investors in the course of activities provided and the avoidance of conflict of interest as a result of the implementation of the said strategy.

These principles shall apply to remuneration of any type paid by SICAV, and to any transfer of shares of the SICAV, made to the benefits of identified categories of staff.

1. RESPONSIBLE PERSON

The remuneration policy is defined by the Board of Directors of the SICAV (the “BoD”).

The BoD is responsible for the implementation of the remuneration procedure, the Conducting Persons must control that the procedure is respected and must notify the BoD for any breach or violation they should be aware during the normal course of their assessment procedure.

2. SUPERVISION AND REVISION OF THE REMUNERATION POLICY

Any decision made in relation with the remuneration of the staff will be specifically documented. The implementation of the remuneration policy will be reviewed at least annually by the Conducting Persons and its compliance with Luxembourg legal requirements will also be reassessed regularly. Any finding or need for update identified by one of these functions will be directly reported to the BoD action.

In the implementation and supervision of the remuneration any event, circumstances or indication that may give rise to a potential risk of conflict of interest will be specifically documented.

Any change or update of the policy will be submitted to the BoD for approval.

4. REMUNERATION COMPONENTS AND PROPORTIONALITY PRINCIPLE

The SICAV intends to pay to the identified staff only a fixed remuneration. No variable remuneration to identified staff, based on performance, has been foreseen and it is not allowed.

In light of its size, nature and scope, the SICAV has decided to adopt the proportionality principle in the implementation the remuneration policy and in particular it has decided not to create a specific Remuneration Committee.

5. FIXED REMUNERATION

Member of the boards: The member of the Board of Directors, subject to the approval of the Annual General Meeting of Shareholders, are entitled to receive an annual remuneration (payable on a quarterly basis on arrear).

The lump sum approved by the Annual General Meeting of Shareholders of the Fund held on 20th April 2016 is equal 60.000 EUR.

The total remuneration foreseen for the members of the Board of Directors is equal to 51.000 EUR. The Chairman is entitled to receive 15,000 EUR in reason of his work of conducting of the board meeting while each Directors is entitled to receive 12.000 EUR

Fixed remuneration can be reviewed annually and has to be approved by the Annual General Meeting of Shareholders.

Senior managers and employees: The fixed remuneration of the Senior Managers and of the staff is negotiated at the beginning of the relation with the SICAV, on the basis of the individual role, including responsibility, job complexity, performance and local market conditions.

Fixed remuneration can be reviewed annually in the contest of an annual appraisal assessment of the employees and identified staff.

6. REMUNERATION OF THE DELEGATED CHARGED OF THE PORTFOLIO MANAGEMENT FUNCTION

The business model adopted by the SICAV foresees the delegation of the portfolio management function.

When delegating the portfolio management function, the SICAV will check, during the initial and on-going due diligence performed on yearly basis, according with the rules set in the Due Diligence Procedure, put in place by the SICAV, that the entities to which portfolio management function has been delegated should be subject to regulatory requirements on remuneration that are equally as effective as those applicable to the SICAV under the UCITS V law and regulations; and appropriate contractual arrangements should be put in place in order to ensure that there is no circumvention of the remuneration rules. These contractual arrangements should cover any payments made to the delegates' identified staff as compensation for the performance of portfolio or risk management activities on behalf of the SICAV.