

Information on how Davy's remuneration policy is consistent with the integration of sustainability risks (pursuant to Art 5 SFDR)

Version 1.0

March 2021

J & E Davy has in place a Remuneration Policy which promotes sound and effective risk management and does not encourage risk-taking that exceeds the level of tolerated risk of the Group. Underpinning the Remuneration Policy, J & E Davy has procedures in place for assessing variable remuneration to ensure that employees are remunerated in a manner that promotes sound and effective risk management in their conduct of business. The procedures seek to ensure that excessive risk taking is not rewarded. J & E Davy aligns the payment of variable remuneration to its business cycle and the risks of the Group. Appropriate deferral arrangements are in place to allow adjustment of variable remuneration for risk outcomes, together with the application of ex post risk adjustments (malus or clawback) if required.

J & E Davy recognises that sustainability risks can have a material impact on the value of investments and their associated returns. Investment Managers will assess the degree to which sustainability risk is a factor in the individual fund or portfolio solution and this will be documented in the Client Suitability Report. The completion of this assessment will be a factor taken into consideration in the determination of variable remuneration