

## **REMUNERATION PERFORMANCE DISCLOSURE**

This document sets out the remuneration disclosure relating to CHN Investment Management Limited for the performance period 01/01/2025 to 03/07/2025.

**Important Note** – the first performance cycle is not yet complete and will be due in early 2026 for the performance period 01/01/2025 to 31/12/2025, however, we list below our approach to this area in the interests of transparency and regulation.

### **Approach to Remuneration**

This policy outlines our firm's approach to remuneration. The objective of our remuneration policy is to ensure that our firm does not remunerate or assess the performance of any of our employees in a way that conflicts with our duty to act in the best interests of our clients.

We will not make any arrangement by way of remuneration, sales targets or otherwise that could provide an incentive to our employees to recommend a product or service to a client when our firm could offer a different solution, or none at all, where that would better meet the needs of that client.

Our firm maintains a separate conflicts of interest policy, which determines our overall approach to identifying, preventing and/or managing all types of conflicts including firm level arrangements and our firm's requirements in relation to gifts and hospitality payments.

### **Scope of coverage**

This policy applies to all staff and will mitigate the potential for any conflicts arising and will ensure we act in the best interests of a client. This will include all employees with an impact directly or indirectly on the services provided by our firm and will include both financial and non-financial criteria.

This policy applies to all staff who engage in the activities or are responsible for any other person or business unit that engages in the activities, of MiFID business on behalf of our firm.

All our staff will be made aware of this policy to highlight and emphasise the importance of acting in accordance with our firm's policies and procedures.

### **Oversight**

Our firm's senior management will have the overall responsibility to ensure that our firm operates remuneration practices that aim to ensure that our firm acts in the best interests of our clients at all times and in line with the FCA's rules and guidance.

The senior management of our firm will be responsible for the day-to-day implementation of our remuneration policy and the monitoring of compliance risks related to this policy.

Our remuneration policy will be reviewed annually in accordance with SYSC 19G and the policy and its reviews will be conducted to ensure our firm's remuneration practices, of any kind, does not affect our ability to ensure a solid capital base at all times.

Where necessary, our firm will undertake ad hoc reviews of its remuneration policy. This may be required as a result of internal monitoring, a change to regulations, following an independent review of our firm's remuneration practices or any other relevant circumstances.

### REMUNERATION PERFORMANCE PERIOD REVIEW

Name and title of person responsible	Period covered by the review
Sophie Thornhill	01/01/2025 - 03/07/2025 (See above - first performance cycle is not yet complete)

#### **Main Performance Objectives**

The objectives of the Policy are:

- To attract, retain and motivate talented employees of the quality required to manage the business successfully, whilst ensuring that remuneration is not excessive or detrimental to the health of the firm as a whole, including its clients.
- To motivate and reward good, long term performance.
- To meet relevant regulatory requirements, including the requirements of the FCA Remuneration Code

The principles of the Policy are:

- To ensure that total remuneration is set at a level that is competitive versus peers, taking account of size, complexity and sector, whilst taking into account market practice.
- To maintain appropriate proportions of fixed and performance-related pay, to help to drive performance over the short and longer term, maintain a flexible cost base, and avoid creating incentives for excessive risk taking.
- To align incentive plans with the business strategy, prudent risk management and client interests.
- To ensure that culture and values are prioritised when assessments are made.
- To consider ESG factors in assessments.

Our company's risk tolerance is aligned with our commitment to delivering long-term value to our clients while prudently managing investment risks. We strive to achieve attractive risk-adjusted returns within an acceptable risk framework. Our risk tolerance is guided by the following firm values:

- Preservation of Capital
- Consistency of Returns
- Client Outcomes
- Long term thinking
- Regulatory and Legal Compliance
- Market and Economic Conditions
- Risk-Return Trade off
- Transparency and Communication

This risk tolerance framework is linked to remuneration as follows:

1. Identification of Key Risk-Taking Roles: This includes senior managers, certified persons, and employees who have the authority to make decisions that can significantly affect the company's risk profile, including investment decisions.
2. Performance Metrics: Our performance metrics reflect both financial and non-financial aspects of risk management. These metrics are specific, measurable, attainable, relevant, and time-bound (SMART) and aligned with the company's risk appetite. Examples of performance metrics include risk-adjusted returns, compliance with risk limits, risk mitigation efforts, and adherence to risk management policies.
3. Incorporation of Risk Metrics into Remuneration: Integration of risk metrics identified into our remuneration policy. This involves linking a portion of employees' variable compensation (such as bonuses) to the achievement of risk-related targets. The proportion of variable compensation tied to risk metrics reflects the significance of risk-taking responsibilities in each role.
4. Evaluating Performance and Risk Culture: We regularly assess individual and team performance against the established risk metrics. This evaluation considers not only the outcomes but also the risk management processes employed. Additionally, we foster a risk-aware culture by promoting open communication, accountability, and ethical behaviour throughout the organisation.
5. Awareness and Positive Application of ESG Principles: Staff members must always consider environmental, social and governance factors when making both business and investment decisions. Our firm strives to 'think long term' and behave in a way that does not prioritise short term goals over long term performance.

6. Variation of Remuneration: Based on the performance evaluations, remuneration is adjusted accordingly. We recognise and reward employees who demonstrate sound risk management practices, achieve risk-related targets, and contribute to the organisation's risk culture. Conversely, we consider reducing or withholding remuneration for individuals or teams that take excessive risks or fail to meet risk-related expectations.
7. Monitor and Review: We continuously monitor and review the effectiveness of the risk appetite-remuneration linkage. This includes assessing whether the remuneration policy is effectively incentivising desired risk behaviours and driving appropriate risk management practices. Adjustments may be necessary over time to ensure continued alignment with the company's evolving risk landscape.

#### Details of variable remuneration schemes or long-term incentive plans

All staff members have basic salaries, and there are currently no discretionary or performance-based bonuses relating to staff of CHN Investment Management Limited.

#### Types of remuneration paid (All staff)

Fixed Remuneration total	Variable Remuneration Total
Salary – first performance cycle not yet complete, to be published in line with regulation in early 2026.	None

#### Details of how performance assessment is carried out

The firm emphasises the importance of long-term returns and outcomes for clients as a number one priority. However, we recognise the importance of regular internal performance reviews of staff members. Therefore, we assess performance annually versus quantitative and qualitative items for each staff member.

The process follows the following stages in turn:

##### Firm performance

has the firm made sufficient profit (measured as profit before tax) to firstly, at least maintain its required Own Funds Threshold Requirement plus a buffer, and secondly: make discretionary awards to staff in the form of bonuses.

##### Individual quantitative assessment

1. Investment Performance:
  - Achieved Investment Return vs Benchmark
  - Staff member's contribution to investment performance

- Adherence to Investment Strategy
- 2. Risk Management:
  - Risk-Adjusted Performance
  - Risk Control Measures
  - Compliance with Risk Limits
  - Response to Risk Events
- 3. Portfolio Management:
  - Asset Allocation
  - Diversification
  - Portfolio Optimisation
  - Rebalancing
- 4. Research and Analysis:
  - Investment Research
  - Due Diligence
  - Investment Recommendations
- 5. Compliance and Ethics:
  - Regulatory Compliance
  - Conduct Rules
  - Confidentiality
  - Personal Trading Compliance

#### Individual qualitative assessment

1. Professionalism and Integrity:
  - Demonstrates a high level of professionalism and ethical conduct in all interactions.
  - Maintains confidentiality of sensitive information and adheres to compliance and regulatory requirements.
  - Upholds the company's code of conduct and acts with integrity in all business dealings.
2. Teamwork and Collaboration:
  - Works effectively as a team member, actively contributing to the achievement of team goals.
  - Collaborates with colleagues across departments, sharing knowledge and expertise to enhance overall team performance.
  - Builds positive working relationships and fosters a cooperative and inclusive work environment.
3. Communication Skills:
  - Communicates clearly and effectively, both verbally and in writing, with internal and external stakeholders.
  - Listens attentively, demonstrates empathy, and responds appropriately to the needs and concerns of others.

<ul style="list-style-type: none"> <li>• Presents complex information in a concise and understandable manner.</li> </ul>
<p>4. Leadership and Initiative:</p> <ul style="list-style-type: none"> <li>• Takes initiative and demonstrates a proactive approach to problem-solving and decision-making.</li> <li>• Shows leadership qualities by providing guidance and support to colleagues when needed.</li> <li>• Takes ownership of tasks and projects, driving them to completion in a timely manner.</li> </ul>
<p>5. Adaptability and Resilience:</p> <ul style="list-style-type: none"> <li>• Adapts quickly to changing priorities, market conditions, and client needs.</li> <li>• Handles pressure and setbacks with resilience, maintaining a positive attitude and finding solutions to challenges.</li> <li>• Demonstrates flexibility in embracing new technologies, tools, and methodologies.</li> </ul>
<p>6. Client Focus:</p> <ul style="list-style-type: none"> <li>• Places the needs of clients at the forefront, striving to deliver exceptional service and exceed client expectations.</li> <li>• Builds strong client relationships based on trust, responsiveness, and a deep understanding of their investment objectives.</li> <li>• Seeks opportunities to add value and provide tailored solutions to meet client needs.</li> </ul>
<p>7. Continuous Learning and Development:</p> <ul style="list-style-type: none"> <li>• Actively seeks opportunities for professional growth and development.</li> <li>• Demonstrates a commitment to staying updated with industry trends, regulations, and investment strategies.</li> <li>• Shares knowledge and expertise with colleagues, contributing to a culture of continuous learning.</li> </ul>

#### How has the firm maintained and how will it continue to maintain effective risk management plans

Although no bonus is available to employees of CHN Investment Management Limited. The firm may consider and adjust the level of any future annual bonuses, including to zero if appropriate, to mitigate any of the following material events:

- underlying financial performance
- risk management or regulatory compliance issues
- personal performance

The firm reserves the right to hold back bonuses against the quantitative and qualitative assessment data should it foresee significant risks and challenges in the coming year that may incur losses and require further capital to maintain a strong capital position.

<b>Overview of how conflicts of interest are managed or mitigated and how responsible business conduct is achieved</b>

The firm maintains a robust conflicts of interest policy which is reviewed annually and maintained by senior management. Any conflicts are registered against individuals and considered when relevant risks arise.

We make use of best-in-class external consultants who - at least annually - review these arrangements and advise us in such a way to mitigate risks as far as possible.

<b>Details of the firm's remuneration disclosures made and any changes required</b>
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The firm has not yet completed its first performance cycle. The relevant information will be disclosed for the period 01/01/2025 to 31/12/2025 in early July.

Review completed on and confirmed to satisfy the Equality Act 2010	Date of next review
03/07/2025	01/01/2026