



Banque Havilland S.A.

SFDR Disclosure on Sustainability Risk in our Group Remuneration Policy

Banque Havilland has adopted a Group Remuneration Policy that sets the framework for coherent and consistent compensation practices across the Group.

The aim of the policy is to create a framework that encourages sustainable behaviour and development in line with the business model and the Risk Appetite framework of the Bank. Diversity and equal pay are key areas in focus.

Variable remuneration is aligned with long-term objectives and subject to meeting various non-financial targets.

The Bank does not leave room for unsustainable behaviour, expecting the respect of social and governance practices. The Bank seeks to ensure that its employees act in a responsible manner, aligning stakeholders' and business' needs and expectations.

To supplement Group Remuneration Policy, the Bank expects all employees of the Group to respect the values of the Group and adhere to Group Code of Conduct policy.

Any unethical behaviour or disrespect of internal and external regulation is investigated and actioned for possible disciplinary measures. Our Group Remuneration Policy does not create incentives for taking inappropriate risk, nor does it create incentives that lead to any conflicts of interest among employees or in relationships with our clients.

Where appropriate, our remuneration process enables for the option of reducing or cancelling prior year variable remuneration.

Banque Havilland promotes at all-time a fair treatment, diversity and equal opportunities approach in its remuneration process.