

REMUNERATION POLICY

The remuneration policy of Intesa Sanpaolo Wealth Management S.A. is formulated so as to encourage responsible business conduct, fair treatment of clients and avoidance of conflict of interest as well as preventing excessive risk taking. Pursuant to Regulation (EU) 2019/2088 of 27 November 2019 on sustainability-related disclosures in the financial sector (“SFDR”), the remuneration policy of Intesa Sanpaolo Wealth Management also accounts for sustainability risks.

Sustainability risk refers to any environmental, social or governance (ESG) event or condition which, if it occurs, could have an actual or potential negative impact on the value of an investment.

As a general principle, Intesa Sanpaolo Wealth Management as part of its activities, ensures that it follows a policy of limited risk taking. On this basis, Intesa Sanpaolo Wealth Management has adopted the structure of the remuneration so as to ensure the responsible management of sustainability risk within the investment process.

Furthermore, employees are not incentivized to recommend or sell specific financial products or instruments, be they ESG-oriented or not. Rather, the remuneration is defined so as to support the Bank’s objective to conduct its business in an honest, fair and professional manner in order to best serve the interest of its clients. As such, investment decisions and investment advice shall always be embedded within the investment objectives and preferences as expressed by the client.

The remuneration policy is available upon request by email at the following address: marketing@intesasnpaolowm.lu