

## Introduction

Luna Wealth Asset Management Ltd (hereinafter: “**LWAM**” or “**the Company**”), whose headquarters are at 20 Ionos Street, Floor 1 Flat 1, 2406 Nicosia, Cyprus, is a company incorporated and registered in the Republic of Cyprus under Cyprus Company Law and is authorized and regulated as a Cyprus Investment Firm (CIF) by the Cyprus Securities and Exchange Commission (hereinafter the “**CySEC**”), under License Number 379/19, in accordance with the Investment Services and Activities and Regulated Markets Law of 2017 (L. 87(I)/2017) (the “**Law**”), as amended from time to time, and subject to the European Parliament Markets in Financial Instrument Directive II (“**MiFID II**”).

## Legislative Framework

Pursuant to CySEC’s Directive DI144-2014-14 for the prudential supervision of investment firms, the Company is required to explain how it ensures compliance with the requirements of paragraphs 18, 19, 20, 21 and 22 of the Directive and of sections 24 and 25 of the Law. As such, the Company must maintain a remuneration policy and practices that comply on the one hand with the aforementioned directive and on the other hand with requirements of the Law (s24 on conflicts of interest and s25 general principles and information to clients), Regulation (EU) No 575/2013 and Circular C031, C138 and C240 of the CySEC.

## Remuneration Policy Statement

The Remuneration Policy of LWAM is an internal document that has been set and approved by the Board of Directors of the Company and its provisions are applicable to each Director, Officer and Employee. The remuneration varies for different positions/roles depending on each position’s actual functional requirements and reflects the level of knowledge, experience, accountability and responsibility needed for an employee to perform in each position/role.

The remuneration mechanisms employed are well known management tools that factor in the staff’s skills, experience and performance, whilst supporting at the same time the Company’s long-term business objectives.

With respect to the principles laid out in paragraph 20 of the Directive, the Company **does not** incentivize sales of financial instruments or services via increased remuneration, variable remuneration or performance-related remuneration. The Company discourages excessive risk taking by not offering variable remuneration to any employee. All staff members and directors are remunerated on the basis of fixed remuneration (monthly salary). Staff engaged in control functions are remunerated independently of the business areas they control.

The Board of Directors directly oversees the implementation of the Company’s remuneration policy and reviews it annually.

With respect to paragraph 21 of the Directive, the Company does not offer variable remuneration.

In relation to paragraph 22 of the Directive, the Company has not formed a remuneration committee, as it is not classified as a ‘significant CIF’.

### Regulation (EU) No 575/2013

Pursuant to article 450 of Regulation (EU) No 575/2013 on prudential requirements for credit institutions and investment firms, the Company is obliged to disclose the following information, regarding its remuneration policy and practices.

Information concerning the decision-making process used for determining the remuneration policy	The Board of Directors has decided that it is in the Company's best interest to discourage excessive risk by adopting any elements of variable remuneration. As such all members of staff are remunerated via a fixed monthly salary.	
The number of meetings held by the main body overseeing remuneration during the financial year	The Board of Directors meets at least once a quarter.	
Information about the composition and the mandate of a remuneration committee and the external consultant whose services have been used for the determination of the remuneration policy	<p>The Company has not established a Remuneration Committee as it is not a 'significant CIF'.</p> <p>The Board of Directors is the management body that directly oversees the Remuneration Policy.</p>	
Aggregate quantitative information on remuneration, broken down by business area	<b>Annual Aggregate Remuneration by Business Area (€)</b>	
	<b>Business Area</b>	<b>Aggregate Remuneration (€)</b>
	Compliance and regulation	33,000
	Finance	Outsourced
	Client Administration	23,500
	Risk	Outsourced
	Trading	55,000
	Investment Advice & Portfolio Management	48,000
	Dealing on Own Account	20,400
	I.T.	Outsourced
	Internal Audit	Outsourced

Aggregate quantitative information on remuneration, broken down by senior management and members of staff whose actions have a material impact on the risk profile of the Company, indicating the amounts of remuneration for the financial year, split into fixed and variable remuneration, and the number of beneficiaries;		<b>Individuals</b>	<b>Fixed Remuneration (€)</b>	<b>Variable Remuneration (€)</b>
	<b>Executive Directors</b>	2	103,000	-
	<b>Non-Executive Directors</b>	2	24,000	-
	<b>Total</b>	4	127,000	-