Altum Luxembourg S.A.

Remuneration Policy – Executive Summary

Altum Luxembourg S.A. ("Altum" or the "Company") has established and applies a remuneration policy (the "Remuneration Policy") and practices that are consistent with, and promote, sound and effective risk management and that do not encourage risk-taking that exceeds the level of risk tolerated by the Company. The Remuneration Policy supports the Company's business strategy, objectives and values and promotes the fair and responsible remuneration of employees.

The Remuneration Policy sets out the legal and regulatory requirements, as well as the related principles and governance arrangements, which the Company applies in order to meet its obligations as a Specialised Professional of the Financial Sector ("PSF") authorised under the Law of 5 April 1993 relating to the financial sector, as amended. The Remuneration Policy incorporates the requirements of CSSF Circular 10/437 and related regulatory expectations regarding sound remuneration practices and effective risk management.

The Remuneration Policy includes fixed and variable components of remuneration and applies to all employees, including those categories of staff whose professional activities have a material impact on the risk profile of the Company ("Identified Staff"). The Company maintains and reviews its Identified Staff population in accordance with applicable regulatory requirements.

The Remuneration Policy is aligned with the business strategy, objectives, values and long-term interests of Altum and includes measures designed to avoid conflicts of interest and promote prudent risk-taking.

Identified Staff

The Company has identified those categories of staff whose professional activities have a material impact on the Company's risk profile. These individuals may include members of the Board of Directors, senior management, control function personnel and other employees whose responsibilities, decision-making authority or remuneration level may materially influence the Company's risk

profile. The Identified Staff population is reviewed on a regular basis to ensure continued compliance with regulatory requirements.

Performance Assessment

The assessment of performance is conducted within a multi-year framework designed to support the long-term performance and sustainability of the Company. Performance assessments take into account both quantitative and qualitative criteria, including risk management, compliance, governance, operational effectiveness and behavioural expectations, ensuring that excessive risk-taking is not encouraged.

Performance assessments consider individual performance, business-unit outcomes and the overall performance of the Company and wider Altum Group. Remuneration decisions are made with regard to both the results achieved and the manner in which those results are achieved.

The assessment of performance is conducted within a multi-year framework designed to support the long-term performance and sustainability of the Company. Assessed criteria are both quantitative and qualitative in order to ensure that excessive risk-taking activities or behaviours are not fostered.

Fixed vs. Variable Remuneration

The fixed and variable components of total remuneration are appropriately balanced and the fixed component represents a sufficiently high proportion of total remuneration to allow the operation of a fully flexible policy on variable remuneration, including the possibility to pay no variable remuneration component.

Variable remuneration, where awarded, is based on a balanced assessment of individual performance, business-unit performance and the overall performance of the Company and wider Altum Group. The Board may reduce, defer, withhold or cancel variable remuneration where performance conditions have not been satisfied or where the financial position of the Company warrants such action.

The Company may also apply malus or clawback arrangements where variable remuneration has been awarded on the basis of information that is subsequently

found to be materially inaccurate or where misconduct or material risk failures are identified.

Compensation of staff engaged in control functions is determined in accordance with the achievement of objectives linked to their functions and independently of the performance of the business areas that they oversee.

Proportionality

The Company applies remuneration requirements in a manner that is proportionate to its size, internal organisation and the nature, scope and complexity of its activities. Where permitted by applicable regulations, certain remuneration requirements may be disapplied in accordance with the proportionality principle.

Sustainability Risks

The Remuneration Policy integrates sustainability considerations and does not encourage excessive sustainability-related risks. The remuneration framework supports prudent decision-making and aligns remuneration outcomes with sustainable and risk-adjusted business performance.

Equity-Based Variable Remuneration

Where equity or equity-linked instruments form part of variable remuneration, they are structured to align employees' interests with the long-term success of the Company while promoting sound and effective risk management. Such awards may be subject to appropriate vesting, retention or other conditions and are communicated and applied in a fair, transparent and proportionate manner.

Disclosures

The Remuneration Policy is reviewed periodically to ensure continued compliance with applicable legal and regulatory requirements and alignment with the Company's business objectives and governance framework. Additional remuneration information may be disclosed in accordance with applicable laws and regulations.

Proprietary Information

The information contained in this document is the exclusive property of Altum Luxembourg S.A. except where otherwise indicated. No part of this document, in whole or in part, may be reproduced, stored, transmitted or used for any purpose without the prior permission of the Company.

Schedule of Changes

Owner: Compliance

Version	Detail of Change	Creation Date	Approved by	Date dd/mm/yyyy
1.0	Initial version of the summary	25/09/2026	Authorised Management	25/09/2026

This summary provides an overview of the remuneration principles applied by Altum Luxembourg S.A. It is intended to satisfy applicable regulatory disclosure requirements and should be read as a summary only. The full Remuneration Policy contains additional governance, operational and regulatory provisions that are applied internally.