

Information on how the CFIL remuneration policy is consistent with the integration of sustainability risks (pursuant to Art 5 SFDR)

Cantor Fitzgerald Ireland Limited

December 2023

1. INTRODUCTION

As a MIFID firm, Cantor Fitzgerald Ireland Limited (“CFIL”) is required to comply with ESG and sustainability related remuneration principles, as set down in the regulations and guidelines below, which must be applied in a proportionate manner commensurate to the size, internal organisation, the nature, scope and complexity of the firm.

Specifically, CFIL is required to comply with the following:

- Sustainability-related disclosures in accordance with Article 5, Regulation (EU) 2019/2088 of the SFDR.
- Section 4.16 of the European Banking Authority’s Guidelines on Sound Remuneration Policies (EBA/GL/2015/22) as it relates to remuneration, business and risk strategy including ESG risks factors.
- Remuneration disclosures relating to financial and non-financial criteria under Article 32(1) of the IFD, and gender neutrality and gender pay gap under Article 51 of the IFR¹ for Material Risk Takers of the firm.

2. SUSTAINABILITY REQUIREMENTS (PURSUANT TO ART 5 SFDR)

CFIL is integrating ESG and sustainability factors on a proportionate basis into its business operations and risk governance structures in line with the above principles and relevant EBA guidelines.

The Firm operates a total compensation philosophy and therefore the aggregate of fixed and variable compensation is how overall compensation is measured. Remuneration consists broadly of fixed remuneration and variable remuneration, a portion of which may be deferred over a fixed time period with contingent and deferred vesting and payment over a prolonged period. The use of deferred payments is a positive feature to align variable remuneration to the long-term interests of the Firm and Clients.

The CFIL Board recognizes the importance and consequences of these programs, to support positive client outcomes, encourage good staff conduct, positive staff engagement, to management and various stakeholders.

As such, the Board oversees compensation programmes including the Remuneration policy, income and bonus programmes for CFIL staff. The CFIL Executive Committee is responsible for the day-to-day implementation of the policy and the monitoring of compliance risks, on a first line basis, related to the policy.

The guiding principle of the Remuneration Policy is to align remuneration with risk and with the interests of investors. From an ESG perspective, the Firm is committed to creating an alignment with the objectives of the Firm’s business and risk strategy, including environmental, social and governance (ESG) risk-related objectives, corporate culture and values, risk culture, long-term interests of the Firm, and the measures used to avoid conflicts of interest, encourage prudent risk taking and responsible business conduct.

¹ CFIL avails of the derogations in Article 32(4) of Directive (EU) 2019/2034 and therefore does not apply Art 32(j) and 32(l) as the Company’s on and off-balance sheet assets are less than EUR 100 million.

CFIL is committed to building and maintaining a culture of consumer-focused sales where the right products and services are sold based on their suitability to each individual consumer's needs.

3. Broader Remuneration Requirements

For further information on our Remuneration Policy, please refer to our Pillar 3 Report which is available at disclosures on the CFIL website (<https://cantorfitzgerald.ie>).