CONTROLLED REMUNERATION POLICY COMMODITY DISCOVERY MANAGEMENT BV
(ART. 14BIS, 14TER AND 69 PARAGRAPH 3 UCITS V, ART. 1:111-1:129 WFT, ART. 66A PARAGRAPH 1 AND 121 PARAGRAPH 2 BGFO, ART. 6.7 PARAGRAPH 2 NRGFO, ESMA GUIDELINES REGARDING REMUNERATION POLICY AIFM AND UCITS)

Adopted by the Managing Directors on December 11, 2023.

Objective of remuneration policy

Commodity Discovery Management BV is a small company. Apart from the Managing Directors, there are just a handful of employees. The employees do not hold a senior managerial or risk-taking position, receive total remuneration at the same level as or a higher level than the Managing Directors only in exceptional cases, and have no material influence on the risk profile of the Fund. The control functions within Commodity Discovery Fund are performed by one employee (Risk Manager) and one external resource (External Compliance Officer).

Commodity Discovery Management BV (the "**Manager**"), the Manager of the Commodity Discovery Fund (the "**Fund**"), subscribes to Articles 14bis and 14ter of the Directive on institutions for collective investment in securities, the Financial Institutions Remuneration Policy Act as included in the Wft, the Sound Remuneration Policy Regulations Wft 2014, the ESMA Guidelines on sound remuneration policies and the Sustainable Finance Disclosure Regulation (SFDR) underlying principles:

- the remuneration policy is consistent with and promotes sound and effective risk management and does not encourage risk taking which is inconsistent with the accepted risks (including operational risks, investment risks and sustainability risks) of the Manager and the Fund;
- the remuneration policy is in line with the business strategy, objectives, values and long-term interests of the Manager and the Fund and includes measures to avoid conflicts of interest;
- it does not contain any incentives that detract from the Manager's obligation to promote the interests of the Participants or other due care obligations incumbent on the Manager;
- the remuneration policy is transparent, simple and feasible;
- the remuneration policy is in line with market practice in order to retain and attract well-qualified employees and is in reasonable proportion to the responsibility assumed, the requirements for the position and the time commitment.

Given the small size, the Manager does not distinguish between identified employees and other employees. As such, all employees are classified as identified employees. The remuneration policy, therefore, applies to all its employees, the Managing Directors and freelancers (including self-employed persons) who have a contractual relationship with the Manager.

The Manager has appointed an External Compliance Officer for the control function, who reports to the management. The control function is independent of the business activities that are supervised, and the remuneration is independent of the results of the business activities. The remuneration policy is determined by the Managing Directors. The Managing Directors evaluate the general principles of the remuneration policy at least annually in consultation with the External Compliance Officer ("**ECO**").

The annual evaluation determines whether:
- the remuneration policy functions as intended (in particular, whether all stated principles are complied with, whether the remuneration-related variable payments are correct, and whether the risk profile and long-term objectives of the Manager are sufficiently reflected); and
- it is in accordance with national and international legal regulations, principles and standards.

Company reward model
The Fund is a mutual fund that invests in accordance with the investment objectives and investment restrictions as set out in the Prospectus. The value of the Fund is determined by the value of the investments.

The Manager's revenue model is simple, clear, and transparent. The Manager receives a "management fee" and possibly a "performance fee". No income is received from commissions on securities transactions. Upon termination of their participation, participants pay redemption costs that are credited to the Fund. Further information about the management fee, the performance fee and the exit costs can be found in the Offering Memorandum. The company's profit consists of the sum of performance fee, management fee and subscription and redemption costs, minus all other costs. The Manager's annual accounts are audited by the external accountant and are available on the Manager's website.

The typology and activities of the Manager have a relatively low inherent risk with regard to the remuneration policy. The Manager does not conduct (risky) trading for its own account, is not listed on a stock exchange and has a simple governance and shareholder structure.

The Fund qualifies as a so-called 'Article 6 fund' within the meaning of the SFDR. This means, among other things, that the Manager has not integrated sustainability risks into the investment decisions. The Manager also does not take into account the so-called "main adverse effects on sustainability factors", as defined in the SFDR. For the above reasons, there is no relationship whatsoever between the remuneration of employees and any sustainability risks that are incurred (in addition to the other investment risks) within the implementation of the investment policy.

No severance payment will be paid if an employee with a fixed-term contract terminates the employment contract prematurely. No severance pay will be paid to an employee if there has been serious culpable conduct or omission in his position.

Principle of proportionality
The Manager only manages the Fund; there are no other activities. As explained above, this is a simple structure with fewer than 15 employees (including freelancers). Given the typology, absence of stock exchange listing, absence of (risky) trading for own account, the simple governance structure, the limited size and unambiguous (1 fund, only offered in the Netherlands) activities, the Manager appeals to the principle of proportionality.

The application of the principle of proportionality explicitly relates to the payment of variable remuneration in the form of participations in the Fund, no deferred period during which variable remuneration components are withheld after the expiry of an allocation period and the requirement to set up a remuneration committee. The substantiation has been determined by the Manager.

Description of reward components
Fixed remuneration
Both employees and the Managing Directors receive a fixed salary that is in line with the market. In addition, everyone receives a holiday allowance of 8%, calculated on the fixed annual salary. No fixed bonuses or a fixed 13th month are awarded. There is also no pension scheme in force.

The following principles are applied when determining the fixed salary:
1. Fixed and variable components of total remuneration are appropriately balanced, and the fixed component represents a sufficiently high proportion of the total remuneration to allow the operation of a fully flexible policy on variable remuneration components, including the possibility to pay no variable remuneration component;
2. The fixed component is sufficient to reimburse the professional services provided by the employee in accordance with:
   (a) level of education;
   (b) degree of seniority;
   (c) the level of expertise and skills required;
   (d) the limitations and work experiences;
   (e) fixed remuneration of comparable positions in the business world (market conformity).

The personnel files describe any additional employment conditions and personnel regulations, such as expense reimbursements. Freelancers are paid based on the number of hours spent and the contractually agreed rate per period.

Variable remuneration
Under certain circumstances, employees may be eligible for variable remuneration. Any variable remuneration is intended to reward and encourage good performance, taking into account the nature and level of responsibility of the position. The first priority is that the variable component represents a sufficiently low proportion of the total remuneration to enable a fully flexible policy with regard to that component, including the option not to pay variable remuneration if the individual performance or financial developments of the Manager and/or the Fund would give reason to do so.

The Managing Directors, with a casting vote from the chairman, determine whether variable remuneration will be paid and, if applicable, the amount thereof. A maximum of ten per cent of the Manager's profit before corporate tax will be made available by the Managing Directors for an annual variable remuneration for the entire staff (including directors).

The annual percentage variable remuneration will be determined based on the net profit of the Manager (once the draft annual figures are known) and the general financial situation of the Manager and the Fund, taking into account the legal prudential requirements that apply to the Manager. The assessment of individual performance and the financial situation and performance of the Fund will take place in a multi-year framework so that longer-term effects and developments can be taken into account.

Variable remuneration awarded to employees and Managing Directors will be paid out entirely in cash after determination. The Manager does not apply the requirement that 50% of the variable remuneration is paid out in participations of the Fund and spread over at least 3 years based on the proportionality principle.

Criteria for variable remuneration
Depending on the employee's performance and the realization of previously made agreements and objectives, an employee may be eligible for variable remuneration. When determining the employee's variable remuneration, predetermined and internally announced financial and non-financial criteria (in the ratio 50/50) are used. For the Risk Manager (control function), the assessment is made solely based on non-financial criteria. The ECO (employee on a self-employed basis) is not eligible for any form of variable remuneration.

Both Managing Directors are shareholders of the Manager. Through their shareholding in the Manager, they, therefore, benefit from any increase in the intrinsic value of the Fund (regardless of whether and to what extent this increase in value is paid out to them in the form of a dividend) because an increase in the intrinsic value of the Fund leads to an increase in the management fee to be received by the Manager and, under certain circumstances, the performance fee. However, any decrease in the intrinsic value of the Fund also translates into a decrease in the fee or fees to be received by the Manager and, therefore a decrease in the value of the shareholding of the relevant Managing Director. Under certain circumstances, the Managing Directors may be eligible for variable remuneration, as further described above.

Risk management
In the opinion of the Managing Directors, the remuneration policy is fully in accordance with the principles described above. The remuneration policy is in accordance with and contributes to sound and effective risk management and does not encourage taking more risks than are acceptable for the Fund or the Manager.

Transparency remuneration policy
A copy of this policy is provided to every employee and Managing Director. The relevant parts of the text are also included in the Prospectus, and a summary is included on the Fund's website.