Heartland Group Remuneration Policy

Version History

Version	Date	Amendments
1.0	24 July 2017	Document created.
2.0	August 2018	Annual review, reference pay equity and behavioural considerations for bonuses
3.0	October 2018	Updated to reflect demerger
4.0	April 2024	Updated to reflect the acquisition of Challenger Bank Limited, the establishment of a Heartland Bank Limited People, Remuneration and Nominations Committee and other general amendments.
5.0	September 2024	Updated to reflect the name change of Challenger Bank Limited to Heartland Bank Australia Limited; the name change of the Heartland Bank Limited Remuneration Committee to People & Culture and Remuneration Committee; the establishment of a Heartland Bank Australia Limited People, Remuneration and Nominations Committee; changes in the LTI section to include all three CEO roles; and other non-material changes.
6.0	June 2026	Updated policy for administrative changes to reflect corporate structure and amendments to enhance regulatory compliance.

Approved by: Boards of Directors of Heartland Group Holdings Limited, Heartland Bank Limited and Heartland Bank Australia Limited
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Policy Owner: Chief People & Culture Officer
Policy Author: Chief People & Culture Officer
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1. Introduction

1.1 Heartland Group Holdings Limited (**HGH**) and its wholly owned subsidiaries, including Heartland Bank Limited (**HBL**) and Heartland Bank Australia Limited (**HBAL**), (together, **Heartland**) seek to create a high-performance culture underpinned by our values which attracts and retains quality employees.

1.2 The members of the Heartland recognise that remuneration is an important part of its governance structure and is an important driver in developing and maintaining a robust risk culture.

2. Application of this Policy

2.1 This policy applies to the whole Heartland.

2.2 **Appendices 1 and 2** contain additional provisions which apply **only** to HBAL, and its wholly owned subsidiaries. In the event of any inconsistency between this policy and **Appendices 1 and 2**, the provisions of **Appendices 1 and 2** shall prevail in relation to the remuneration policies and principles of the HBAL Group.

2.3 This policy applies to all directors and employees of Heartland Group. Including:

a) the HGH CEO and his or her direct reports;

b) the HBL CEO and his or her direct reports;

c) the HBAL CEO and his or her direct reports; and

d) all other employees.

3. Remuneration Principles and Objectives

3.1 The key remuneration principles are to:

a) comply with all applicable legal and regulatory requirements to ensure good customer outcomes;

b) review and carefully consider the link between group performance and remuneration and promote conduct which is consistent with the relevant Board's risk appetite and the creation of shareholder value;

c) support the attraction, retention and engagement of quality, diverse employees;

d) not show bias on the basis of gender, ethnicity, sexuality or any other individual factor;

e) further the aspirations to achieve pay equity across the organisation;

f) be consistent and promote adherence to values, policies and procedures;

g) reward our people for performance that exceeds expectations delivered within the guidance of our values; and

h) be flexible in order to meet operational variances.

3.2 The objectives of this policy are to ensure the appropriate oversight of the remuneration arrangements and the alignment of remuneration arrangements with the business plans, strategic objectives and risk management frameworks of Heartland (as applicable) which will support;

a) effective management of both financial and non-financial risks, sustainable performance and long-term soundness;

b) the prevention and mitigation of conduct risk; and

c) alignment of variable remuneration outcomes with performance and risk outcomes.

3.3 All Heartland employees are required to comply with the policies (including this policy) and other risk management and regulatory requirements as they apply to their particular role and business area. Breaches of compliance with these policies and other requirements are taken seriously and may impact variable remuneration as well as result in disciplinary action. All employees are assessed against the Heartland's values, risk and compliance and conduct as part of the annual performance review process and the outcome contributes to the overall performance rating and remuneration outcomes. Assessment against the values, risk and compliance and conduct is treated as the gateways for individual participation in fixed remuneration and variable remuneration plans.

3.4 Calibration across senior leaders forms part of the end of year remuneration process.

4. Responsibility for this Policy

4.1 The HGH Board is ultimately responsible for this policy but does so with the assistance of the HBL People & Culture and Remuneration Committee and the HBAL People, Remuneration and Nominations Committee (together, the **Remuneration Committees**). This policy must also be adopted by the HBL Board and the HBAL Board.

5. Director Remuneration

Non-Executive Directors

5.1 Heartland's desire is to attract and retain the best possible directors for its Boards.

5.2 Non-executive directors are remunerated for their work having regard to their specific responsibilities (and time commitments), relevant industry benchmarking and market rates. The remuneration should not create a conflict with their obligation to bring independent judgment to matters before the relevant Board.

5.3 External benchmarking is used to determine the level of remuneration. The total remuneration pool available to directors of Heartland must be approved by HGH's shareholders.

5.4 Non-executive directors are currently paid a base fee. No separate fees are payable for committee memberships, as all directors sit on one or more committees and are welcome to attend all committee meetings. Heartland does, however, pay additional fees to chairs of committees, given the extra workload involved in that role.

5.5 Directors' fees are paid in cash. There is no requirement for directors to take a portion of their remuneration in shares and there is no requirement for directors to hold shares in HGH. In order to ensure there is no bias in decision making, there is no performance-based remuneration for non-executive directors.

Executive Directors

5.6 Executive directors do not receive any additional remuneration for their role as a director.

6. Employee Remuneration – Remuneration Components

6.1 Total remuneration includes a mix of fixed and (in certain cases) variable components.

6.2 The approach is to provide total salary packages benchmarked against the 50th percentile of our peers for all roles, other than:

a) roles covered by any collective agreement; and

b) roles which are unique and difficult to benchmark externally (in which case there is flexibility to amend packages in order to attract and retain key staff).

6.3 The general approach is to set remuneration against the relevant market benchmarks, but it is recognised that flexibility may be necessary to adjust for factors including experience, exceptional performance and a competitive market. To remain competitive, remuneration is one factor in retaining and attracting talented people, but other factors of the employee value proposition will be regularly reviewed and considered, such as flexible working arrangements, leave, regional working, remote working and referral payments.

6.4 All employees undertake a mid-year and an annual end of financial year performance review with their people leader.

6.5 A remuneration review is conducted annually, which is informed by an assessment of relative external market data and organisational context, providing context for remuneration reviews. Additional factors may include individual performance and experience, remuneration relativity and market information.

Fixed Remuneration

6.6 Fixed remuneration includes base salary and is intended to compensate for performance of the core requirements of the particular role. Employer contribution to superannuation is paid in addition to base salary.

Short-Term Incentives / Bonuses

6.7 Short term incentives (**STIs**) are at the discretion of the Board of the relevant entity and payment is not guaranteed, even if the individual's key performance indicators (**KPIs**) have been exceeded. Where STIs are approved, these may be paid at the end of a financial year to recognise individuals who have exceeded performance and behavioural or leadership expectations in the relevant financial year.

6.8 STI payments are determined:

a) in the case of Executives, by the Board of the relevant entity (with the assistance of the relevant Remuneration Committee); and

b) in the case of all other employees, by the CEO of the relevant entity (with the assistance of senior management and Executives).

However, the Board of the relevant entity has an overriding discretion in the case of all STI payments, to allow for appropriate adjustments where unanticipated circumstances may impact performance, positively or negatively.

6.9 The proportion of each individual's total remuneration paid as a STI increases in line with the seniority and responsibility of their role. Discretionary STI payment quantum is appropriate to the level of responsibility. The relevant CEO, as leader of the organisation, has the greatest bearing on creating shareholder value over time, and a significant part of his or her remuneration should depend upon the creation of that value. STI payments to the Executives (other than the CEOs) and other Senior Employees may be up to 75% of fixed remuneration, depending upon the role.

6.10 Information about HBAL Executive variable remuneration is set out in **Appendix 1.**

Long-Term Incentives

6.11 HGH (as NZX/ASX listed issuer) is the provider of the Heartland Group Holdings Limited Performance Rights Plan (**Plan**).

6.12 Selected Executives, and a limited number of other selected Senior Employees, may be eligible for long term incentives (**LTIs**) under the Plan. These are at-risk payments designed to align the interests of the people best placed to influence the longer term, with the longer-term interests of shareholders.

6.13 The proportion of each selected Executive's or Senior Employee's total remuneration paid as LTI increases in line with seniority of their role within the Heartland Group.

6.14 The CEO roles have the greatest proportion of total remuneration paid as LTI (and this could be up to 100% of fixed remuneration). This reflects that the CEO roles have the greatest bearing on creating shareholder value over time, and a significant part of his or her remuneration should depend upon the creation of that value.

6.15 LTI payments to selected Executives (other than the HGH CEO), HBL Executives and other Senior Employees may be up to 75% of fixed remuneration, depending upon the role. All recipients of LTIs have the potential to receive additional LTI payments if aspirational targets are met.

6.16 Whereas STI payments are made in cash, LTI payments are made in accordance with the LTI Plan rules, being performance rights which may vest as shares (subject to certain conditions being met). This further aligns the interests of participants with those of shareholders.

6.17 The HGH Board retains discretion over the outcome of LTI payments, to allow appropriate adjustments where unanticipated circumstances may impact metrics, positively or negatively, over the measurement period. The HGH Board sets the measures and targets for the LTI offer, following engagement with the Remuneration Committees, and participants are invited to participate (noting that participation is optional).

7. Monitoring and Reporting

7.1 Compliance with this policy is monitored through:

(a) HGH, HBL and HBAL Board review of the recommendations of the relevant Committee;

(b) annual review of this policy, by the relevant Committee; and

(c) HBAL will periodically assess the effectiveness of the Remuneration Framework at **Appendix 2** including whether remuneration outcomes are aligned with risk and conduct outcomes

8. Effective Date

8.1 This Policy takes effect from the date of approval/adoption by the HGH Board, HBL Board and HBAL Board.

9. Policy Review Date

9.1 This policy will be reviewed annually in line with the timings of the Policy register but review may occur more frequently if material changes are required.

9.2 Notwithstanding planned policy review dates, this policy remains effective and applies until a revised version is distributed.

10. Related Documents

This policy should be read in conjunction with the following policies as relevant to each entity:

Overarching	Dependent
FAR Policy Risk Management Framework Procurement Policy Performance Management Policy	Heartland Group LTI Plan Remuneration Committees' Charters HGH Board Charter HBL Board Charter HBAL Board Charter HBAL Conduct Risk and Consequence Management Framework

Appendix 1 - HBAL Specific Remuneration Provisions

1. Introduction

1.1 This Appendix 1 applies **only** to the **HBAL** and gives effect to the HBAL remuneration framework as contained in **Appendix 2** (**Remuneration Framework**).

1.2 This policy is an essential component in ensuring HBAL meets its statutory obligations under APRA Prudential Standard CPS 511 (**CPS 511**) and the Financial Accountability Regime (**FAR**).

1.3 The following table details the relevant regulatory standards which underpin this Policy as it applied to the ADI Group.

Regulation	Version
Prudential Standard CPS 511	November 2021
Prudential Standard CPS 510	January 2023
Financial Accountability Regime	Financial Accountability Regime Act 2023

2. Scope

2.1 This Appendix 1 applies to persons who are:

(a) directly employed by HBAL;

(b) retained directly by HBAL under contract; or

(c) employed by, or as a contractor of, a body corporate (including a service company) that is a related body corporate or connected entity of HBAL.

2.2 This Appendix 1 also applies to third party service providers in respect of the process to manage remuneration arrangements and material conflicts with the objectives of the Remuneration Framework.

3. Definitions and Interpretation

3.1 For the purposes of this Appendix 1:

Accountable Person is defined under FAR.

Board means the HBAL Board.

Committee means the HBAL People, Remuneration and Nominations Committee

Conduct Risk is the risk associated with misconduct.

FAR means Financial Accountability Regime.

FAR Regulator means Australian Prudential Regulation Authority and the Australian Securities and Investments Commission.

Financial Measures are measures that are based on revenue, profit or other measures that directly affect these.

HBAL means Heartland Bank Australia Limited and all body corporates (including a service company) that are a related body corporate or connected entity of Heartland Bank Australia Limited.

Heartland means HGH and its wholly owned subsidiaries.

HGH means Heartland Group Holdings Limited.

Highly Paid Material Risk Taker is a material risk taker whose total fixed remuneration (which includes salary, superannuation, allowances and benefits) plus actual variable remuneration is equal to or greater than one (1) million dollars in a financial year.

In Period Adjustment is an adjustment made to Variable Remuneration during the period set for measuring the performance under a variable remuneration arrangement.

Malus is an adjustment to reduce the value of all or part of deferred Variable Remuneration before it has vested.

Material Risk Taker is an employee whose activities have a material potential impact on Company's risk profile, performance and long-term soundness.

Misconduct means an action, or inaction, that does not meet applicable:

a) legal (including FAR accountability obligations) and prudential standards; or

b) requirements or standards of a recognised professional body; or

c) policies and procedures (including those covering conduct and ethical standards such as the Code of Conduct) set by HBAL.

Non-Financial Measures are measures that are not financial.

Remuneration Arrangement means an arrangement that includes:

a) measures of performance;

b) the mix of forms of remuneration (such as fixed and variable components, cash, and benefits); and

c) the timing of eligibility to receive payments,

regardless of where, or from whom, the remuneration is sourced.

Remuneration Framework means the totality of systems, structures, policies, processes and roles that identify, measure, evaluate, monitor, report and control or mitigate all internal and external sources of risks relating to remuneration.

Responsible Person as defined in Prudential Standard CPS 520.

Risk, Compliance and Financial Control Personnel are employees whose primary role is in risk management, compliance, internal audit, financial control or actuarial control.

Senior Manager is a person (other than a director) who has, or exercises, senior management responsibilities, as defined in paragraph 25 of Prudential Standard CPS 520 Fit

and Proper. For the purposes of this policy, Accountable Persons (excluding non-executive directors) under FAR also comprise Senior Managers in relation to remuneration.

Specific Exceptions are circumstances that enable vesting of deferred variable remuneration sooner than specified in the appropriate vesting schedule. The circumstances that comprise specific exceptions are:

(a) death; or

(b) serious incapacity or disability; or

(c) serious illness.

Partial vesting may also occur, but only of the amount required to cover taxation obligations arising from the deferred variable remuneration at termination.

Specified Role means an employee who is a:

(a) member of Senior Management (Senior Manager);

(b) executive director;

(c) Material Risk Taker (including Highly Paid Material Risk Takers); or

(d) Risk, Compliance and Financial Control Personnel.

Third Party Service Provider means an entity that is not a related body corporate or connected entity of HBAL that provides a service to HBAL under a compensation arrangement.

Total Remuneration refers to the sum of salary, superannuation, variable remuneration outcome, allowances and benefits for a given financial year.

Variable Remuneration is the amount of an employee's total remuneration that is conditional on objectives, which include performance criteria, service requirements or the passage of time.

Vesting is the process by which an employee becomes the legal owner of Variable Remuneration.

4. Policy Statement

Governance and Accountability

4.1 The HBAL Board is ultimately responsible for the Remuneration Framework and its effective application. In accordance with its board charter, the HBAL Board is responsible for:

(a) adopting this policy and principles contained within it;

(b) approving or varying annually, with recommendations from the Committee, remuneration arrangements and Variable Remuneration outcomes for employees in specified roles as follows:

(i) individually for Senior Managers and executive directors;

(ii) on a cohort basis for Material Risk-Takers (including Highly Paid Material Risk Takers) and Risk, Compliance and Financial Control Personnel; and

(iii) individually for the vesting of deferred Variable Remuneration (including variations due to specific exceptions).

(c) Ensuring the FAR Regulator is informed of any downward adjustment in Variable Remuneration outcomes for Senior Managers as a consequence of individuals breaching FAR accountability obligations, in accordance with the Heartland Group Conduct Risk and Consequence Management Framework.

(d) On advice from the Committee approving any severance or redundancy policy of the Group and any severance or redundancy payment exceeding $A5 million

4.2 The Committee supports the relevant Board in fulfilling its remuneration related responsibilities, and oversees the design, operation and monitoring of HBAL's Remuneration Framework.

4.3 In addition to providing recommendations as described above, the relevant - Committee is responsible for acting in accordance with the relevant - Committee charter.

4.4 The Heartland Chief People & Culture Officer will provide the Committee with appropriate and comprehensive performance and remuneration related information to assist it discharge its responsibilities in relation to the Remuneration Framework. The CEO will have accountability for the Australian performance and remuneration related matters.

4.5 The Board and Committee will have access to independent remuneration advice where required to support objective decision-making.

5. Remuneration Arrangements

5.1 The remuneration arrangements operating within HBAL will:

(a) be assessed for conflicts of interest;

(b) clearly differentiate between fixed and variable pay remuneration components;

(c) provide for variable remuneration appropriate for the nature of the work and the seniority of the position. In any mix of fixed and variable remuneration, the fixed remuneration component must be the predominate component; and,

(d) operate within the approved budget.

5.2 Remuneration arrangements of third-party service providers should not create incentives inconsistent with HBAL's risk management framework and these arrangements are monitored on an ongoing basis

5.3 Remuneration outcomes for Risk, Compliance, Internal Audit and Financial Control personnel must not be determined by the financial performance of the business areas they oversee and must be structured in a manner that preserves their independence.

Performance Measurement

5.4 All employees of HBAL undergo regular formal assessment of their individual performance.

5.5 Performance management operates as follows:

(a) Performance is measured at a number of levels (individual, team, business unit and company) and includes both financial and non-financial measures as appropriate.

(b) HBAL's performance management approach considers both current and potential future risk, including but not exclusively, reputational, market, credit, liquidity and operational risks.

(c) Non-financial measures must form a meaningful component of performance assessment. However, the measures used vary based on an employee's role and responsibilities. Employees are required to comply with their regulatory and risk management responsibilities as they apply to their role and business area. Any breaches of regulatory, risk management and compliance responsibilities are considered in the review of non-financial performance.

(d) HBAL's policy is to analyse business performance against a range of financial, risk and capital allocation performance measures. Formal capital allocation processes are also used to measure the usage of regulatory capital.

Remuneration - Components

5.6 Total remuneration includes a mix of fixed and (in certain cases) variable components.

5.7 The general approach is to provide total salary packages benchmarked against the 50th percentile of our peers for all roles, other than:

(a) roles covered by any collective agreement; and

(b) roles which are unique and difficult to benchmark externally (in which case there is flexibility to increase packages in order to attract and retain key staff).

5.8 While the general policy is to set remuneration against the relevant benchmark, it is recognised that some flexibility will always be necessary in order to adjust for factors such as experience and exceptional performance.

Fixed Remuneration

5.9 Fixed remuneration includes base salary and employer superannuation contributions and is intended to compensate for performance of the core requirements of the particular role.

Variable Remuneration

5.10 HBAL considers that it is essential to construct a balanced set of performance measures, and considers business performance against a range of financial, risk and non-financial indicators of performance. Non-financial performance measures play a key role in the assessment of performance.

5.11 The variable remuneration pool is determined by HBAL Board. All variable remuneration is discretionary and the HBAL Board retains flexibility to approve the pool size (if any) following the end of each financial year. The factors that may be considered by the HBAL Board include overall company result, result against plan (financial and non-financial performance

measures), external pay market movements, capacity to pay, the cost and amount of capital employed, factors beyond management's control, the quality of financial results and the management of risk.

Remuneration Adjustment

5.12 The HBAL Board may apply an In Period Adjustment or Malus to Variable Remuneration where adjustments are necessary in the event of any of the following:

(a) a need to protect the financial soundness of HBAL;

(b) a need to respond to significant unexpected or unintended consequences that were not previously foreseen;

(c) a failure to comply with accountability obligations under the Banking Executive Accountability Regime or FAR;

(d) misconduct leading to significant adverse outcomes;

(e) a significant failure of financial or non-financial risk management;

(f) a significant failure or breach of accountability, fitness and propriety, or compliance obligations;

(g) a significant error or a significant misstatement of criteria on which the Variable remuneration determination was based;

(h) a significant adverse outcome for customers, beneficiaries or counterparties.

If any of the criteria specified above is satisfied, HBAL will take reasonable steps to appropriately adjust variable remuneration downwards. The total adjustment will be proportionate to the severity of the risk and conduct outcome.

HBAL may recover (claw back) vested or paid variable remuneration where subsequent information indicates that adjustment would have been applied had the information been known at the time.

If a person is under investigation for the criteria specified above, no variable remuneration will vest until the investigation is completed.

Deferral

5.13 The Variable Remuneration of the following categories of employees will be subject to deferral:

(a) Accountable Persons; and

(b) Highly Paid Material Risk Takers.

5.14 Variable remuneration will be deferred as follows (to meet the minimum deferred remuneration requirements under FAR for non-significant institutions):

(a) at least 40% of the variable remuneration of each Accountable Person (including the CEO, other executives and directors, where they are Accountable Persons) must be deferred for a minimum period of four years, where the deferred amount exceeds A$50,000 for the relevant financial year.

(b) deferred variable remuneration will generally vest no earlier than the end of the four-year deferral period, with any vesting profile (including pro-rata vesting) to be determined by HBAL in accordance with the Remuneration Framework and applicable law.

(c) the deferred amount must not be paid or otherwise transferred to the Accountable Person during the deferral period and must remain subject to reduction in accordance with HBAL's FAR remuneration policy where there is a failure to comply with one or more FAR accountability obligations.

These deferred remuneration requirements apply where the deferred variable remuneration amount exceeds A$50,000 for the relevant financial year.

HBAL may apply deferral arrangements to Highly Paid Material Risk Takers that are consistent with, or aligned to, those applicable to Accountable persons, where this is appropriate having regard to the individual's role and risk impact.

5.15 The performance, risk and conduct outcomes of persons to whom deferral applies will be monitored and assessed during the deferral period, including for the purposes of any in-period adjustment, malus or other downward adjustment under this policy.

5.16 Vesting of deferred variable remuneration must not be accelerated, except to the extent permitted under the Specific Exceptions and in accordance with the applicable remuneration arrangement (including any plan rules) and applicable law.

5.17 An employee to whom deferral has been applied and who ceases to be employed or engaged by HBAL remains subject to the same vesting conditions, vesting schedule and adjustment mechanisms (including in-period adjustment and malus), except as described in this policy and/or the applicable remuneration arrangement (including any plan rules) and applicable law.

6. Specified Roles

6.1 The Board assesses and approves annually the variable remuneration outcomes for persons:

(a) Direct reports of the HBAL CEO;

(b) FAR Accountable Persons;

(c) Head of Internal Audit;

(d) Employees who may affect the financial soundness of HBAL; and

(e) Employees, or a class of employees, determined by APRA and notified in writing to be covered by this policy.

6.2 Specified Roles are assessed annually and approved by the Board.

Material Risk Takers

6.3 Material Risk Takers are those that have senior roles with direct responsibility for decisions.

6.4 Those positions within HBAL which are defined as Senior Managers or Material Risk Taker roles.

Payment of Remuneration

6.5 No remuneration will be paid for the benefit of a person through vehicles or methods that undermine the intention of CPS 511 (unless in circumstances permitted by law).

Prohibition on Hedging

6.6 HBAL will not indemnify or insure a person against the consequences of breaching an obligation of CPS 511.

6.7 HBAL will not permit hedging by any person who receives equity or equity linked deferred variable remuneration of their economic exposure to the resultant equity price risk before the equity-linked remuneration is fully vested and able to be sold for cash by the recipient.

6.8 Employees who receive equity or equity linked deferred Variable Remuneration may be required to confirm they will not use personal hedging strategies. If any employee is found to have breached this requirement, it will be regarded as serious misconduct and may be grounds for dismissal.

Appendix 2 - Remuneration Framework

The Remuneration Framework (**Framework**) serves to align remuneration arrangements with HBAL business plan and strategic objectives and support sustainable business performance, while also mitigating the internal and external sources of risk related to remuneration.

The main components of the Remuneration Framework are shown in the below diagram:

The primary vehicle for implementing the Framework is the Remuneration Policy (**Policy**).

The way the Policy underpins the Framework can be summarised as follows:

Remuneration Framework Objective	**How the Remuneration Policy achieves this:**
Alignment with Business Plan and Strategic Objectives	• Inclusion of non-financial customer orientated KPIs to determine overall performance for all employees • Applying external remuneration benchmarking data to attract and retain talent • Clearly defined variable remuneration plans Relevant regulatory requirements embedded within Policy
Alignment with Risk Management Framework	• HBAL Board approval of remuneration for Specified Roles • Inclusion of relevant risk KPIs to determine overall performance for all employees as a remuneration design feature • Cascading Risk Appetite Statement requirements to all relevant employees through individual KPIs
Management of financial and non-financial risks	• Inclusion of financial (where relevant) and non-financial measures in performance assessment for all employees • Using financial and non-financial risk criteria in identifying Material Risk Takers as Specified Roles • Assessing potential conflicts of interest in variable remuneration plan design • Board review of risk outcomes in determining remuneration for Specified Roles
Management of sustainable performance and long term-soundness	• Regular Board review of Remuneration Framework • Adjustment of variable remuneration outcomes consistent with overall performance and risk outcomes • Deferral of variable remuneration consistent with risk horizons with appropriate monitoring during deferral period
Prevention and mitigation of conduct risk	• Applying minimum performance and risk outcome criteria to regulate access to variable remuneration • Downward adjustment of variable remuneration for misconduct proportional with severity