

## 1. MIFIDPRU 8 DISCLOSURE

The Firm is authorised and regulated by the Financial Conduct Authority (the “FCA”). The Firm is a UK domiciled discretionary investment manager to Alternative Investment Funds (AIFM business activities) and professional segregated account clients (MiFID business activities).

The Firm is categorised as a “SNI MIFIDPRU investment firm” by the FCA for capital purposes. The Firm reports on a solo basis. The Firm’s MIFIDPRU 8 disclosure fulfils the Firm’s obligation to disclose to market participants’ key information on a firm’s remuneration policies and practices related to MiFID business activities.

In making the qualitative elements of this disclosure, the Firm is required to provide a level of detail that is appropriate to the Firm’s size and internal organisation, and to the nature, scope and complexity of its activities.

This disclosure is made annually on the date the Firm publishes its annual financial statements. As appropriate, this disclosure is made more frequently, for example if there is a major change to the Firm’s business model.

## 2. REMUNERATION POLICIES AND PRACTICES

The Firm is subject to the Remuneration Code (the “Code”) for MIFIDPRU Firms as codified in Section 19G of the SYSC sourcebook of the Financial Conduct Authority handbook.

This disclosure sets out qualitative and quantitative information on the Firm’s remuneration processes and practices.

The disclosure requirements are set out in the FCA Handbook at MIFIDPRU 8.6.

### A. Qualitative Information

The Firm must establish, implement and maintain remuneration policies, procedures and practices that are consistent with and promote effective risk management and do not encourage excessive risk taking.

The Firm ensures that the remuneration policy and its practical application are consistent with the Firm’s business strategy, objectives and long-term interests.

Given the nature and small size of our business, remuneration for all staff is set by the Firm’s Management Board. The Firm’s Management Board is responsible for the review and updating of the Firm’s remuneration policy, agreeing the framework for variable remuneration plans and approving remuneration packages, including variable remuneration, for staff.

Staff receive a salary which reflects their market value, responsibilities and experience.

All staff may also receive variable remuneration, such as an annual bonus, where the individual operates within the risk appetite of the company and has demonstrated appropriate behaviour.

Variable remuneration is intended to reflect contribution to the Firm’s overall success. Staff are assessed throughout the year based on Firm and individual performance. The performance assessment considers both financial measures and non-financial measures.

The Firm’s linkage between variable remuneration and performance is based upon the following tenets:

- Attraction and retention of staff members
- Discourage excessive risk-taking
- Ensure client interests are not negatively impacted

### B. Quantitative Information

With respect to the financial year ended 31st March 2025, the most recently completed financial year, the total amount of remuneration awarded to all staff in respect of MiFID business activities is negligible.

---