



KNG SECURITIES LLP

2022/2023 MIFIDPRU 8 Disclosures

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1. Introduction

1.1 Background

In January 2022 the Financial Conduct Authority (“FCA”) introduced the Investment Firms Prudential Regime (“IFPR”), a new regime for UK firms authorised under the Markets in Financial Instruments Directive (“MiFID”).

The FCA have set out certain regulatory disclosure requirements in Chapter 8 of the Prudential sourcebook for MiFID Investment Firms (“MIFIDPRU”).

The information is known as MIFIDPRU Disclosures and is intended to contain an overview of the following aspects of KNG Securities LLP’s business (“KNG” or the “Firm”) as of 31 December 2022:

- Risk management objectives and policies for the categories of risk address by MIFIDPRU 4 (Own funds requirements), MIFIDPRU 5 (Concentration risk) and MIFIDPRU 6 (Liquidity);
- Internal governance arrangements and a summary of the policy promoting diversity in KNG’s Management Body and its application;
- Own Funds and Own Funds Requirements, including its K-Factor and Fixed Overheads Requirements; and
- The key characteristics of KNG’s remuneration policy and practices and specific qualitative and quantitative information.

1.2 Basis of Disclosure and Scope of Application

The MIFIDPRU disclosures set out in this document are provided solely in respect of KNG, a Non-SNI MIFIDPRU Investment Firm.

The information contained in this document has not been audited by the Firm’s external auditors and does not constitute any form of financial statement.

The Firm is required to publish disclosures in accordance with the provisions outlined in MIFIDPRU 8. The disclosure document covers all aspects of the disclosure requirements within the scope of the MIFIDPRU rules applicable to non-small and non-interconnected (‘Non-SNI’) investment firms.

The Firm is not a member of a UK Consolidation Group and the disclosures have been prepared on an individual basis. The Firm believes that its qualitative disclosures are appropriate to its size and internal organisation, and to the nature, scope and complexity of its activities. This disclosure has been ratified and approved for disclosure by the Executive Committee of KNG Securities LLP. The annual audited accounts of KNG Securities LLP set out further information which

complements the information in this disclosure. The audited accounts are freely available from UK Companies House.

This document does not constitute any form of financial statement on behalf of KNG Securities LLP. The information contained herein has been subject to internal review but has not been audited by the Firm's external auditors.

1.3 Frequency of Disclosure

The Firm is required to publicly disclose the information specified in this Policy on an annual basis on the date it publishes its annual financial statements, which will be by 31st December following the March year end.

The Firm will consider making more frequent public disclosure where particular circumstances demand it, for example, in the event of a major change to its business model or where a merger has taken place.

1.4 Location

The Firm's MIFIDPRU 8 disclosure document will be published on the Firm's website: www.kngsecurities.com

1.5 Company Background

The Firm is a UK LLP regulated by the FCA since November 2004 under firm reference number 402459 as a full-scope IFPRU 750k Investment Firm. There is a Portuguese subsidiary, KNG Securities International Empresa de Investimento, SA, regulated by the CMVM (Comissão do Mercado de Valores Mobiliários which is majority-owned by KNG Securities LLP. The principal activity of the limited liability partnership is that of brokering securities (fixed income securities and convertible bonds).

2. Risk Management Objectives and Policies

2.1 Risk Management and Identification

When assessing the adequacy of the Own Funds Requirement, the Firm has considered the key risks to the Firm's operating model. Due to our prudential classification as a Non-SNI, the Firm's own funds requirement is based on the higher of the Permanent Minimum Requirement ('PMR'), the Fixed Overheads Requirement ('FOR') or the K-Factor Requirement ('KFR'). The Firm's [PMR/FOR/KFR] as at the Firm's year-end 31st March 2023 is £3,000,000

The Risks that were examined and concluded are as follows:

Concentration risk- MIFIDPRU 5

The Firm undertakes trading on own account and has regulatory permissions for dealing as principal. The Firm is therefore subject to concentration risk and the Firm's Principals monitor the concentration risk.

Liquidity risk - MIFIDPRU 6

The Firm maintains sufficient liquidity at all times in compliance with the Basic Liquid Asset Requirement, being at least 1/3rd of its FOR.

The Firm does not provide any client guarantees and therefore its entire liquidity requirement is driven by its expenses, as captured by the FOR.

As part of the Internal Capital Adequacy and Risk Assessment ('ICARA'), the Firm also maintains liquidity to satisfy its net wind-down costs and any additional liquidity requirements which the ICARA identified for supporting the ongoing business activities of the Firm.

Harms associated with business strategy

The Firm has conducted a comprehensive risk identification exercise of potential harms in line with MIFIDPRU 7 Annex 1 across all business lines to ensure that all significant risks are identified. The Firm has developed a comprehensive Risk Register containing all relevant details for each risk that has been identified. All business areas of the Firm have input into the development of the risk register to ensure all areas of potential harm are identified. All risks recorded in the register are categorised in terms of potential harms to clients, the firm itself or markets. Credit, Market, Operational, Business and Liquidity are categories of risk mapped to potential harms.

Credit Risk

The Firm's exposure to credit risk is the risk that the Firm will suffer financial loss should any of the Firm's clients or counterparties fail to fulfil their contractual obligations.

Our appetite for credit risk is medium.

Market Risk

Our potential exposures are trading book exposures to instruments held on our trading book, instruments held on our balance sheet, and foreign currency assets or liabilities held on our balance sheet.

The majority of our principal trading is as riskless principal – where trades will only be executed on the Firm's trading book where there is a buyer/seller already in place. Occasionally some of these trades may be warehoused.

Our appetite for market risk is low

Operational Risk

The Firm has undertaken a robust risk identification and scoring exercise across the Firm. This Risk Appetite statement translates into the acceptance of risks that fall within our calibrated Operational Risk Appetite. Any risk rated above our Operational Risk Appetite is deemed to be unacceptable to the Firm and will be addressed as a priority to ensure that it is, through mitigation, able to fall within our Operational Risk Appetite or that additional Capital is assigned.

This position has been communicated to all members of staff and is to be reinforced on an annual basis.

Senior Management has determined that any risk emerging and/or rated as above our Operational Risk Appetite must have a plan for treatment developed within ten working days of identification and implemented within thirty days.

Business Risk

We have assessed our business risks and set out appropriate actions to manage them.

Our appetite for business risk is medium.

Liquidity Risk

The Firm seeks to ensure that it has constant access to an appropriate level of cash and/or liquid securities in order to finance its on-going operations and reasonable unexpected events on cost-effective terms.

The management of risk within KNG Securities LLP is formalised and set out in the Firm's risk management and risk appetite framework, and in associated policies. The risk management framework comprises the following components:

- Risk governance including policies and procedure
- Risk culture and strategy
- Board-defined overall risk appetite, risk statements and risk tolerances
- Capital and liquidity adequacy
- Stress testing
- Monitoring, reporting and management information
- ICARA process review document

The Firm assigns clear roles and responsibilities for managing its identified risks. These are confined and controlled by the members of the Executive Committee who monitor and control the Firm's appetite or tolerance for risk – those risks it will accept and those it will not take in the pursuit of its goals and objectives. In addition, the Executive Committee ensures that the Firm has implemented an effective, ongoing process to identify risk, to measure its potential impact against a broad set of assumptions and then to ensure that such risks are actively managed. The Firm conducts a compliance and risk review process on an annual basis.

2.2 Own Funds Requirements Risk

The Firm's own funds requirements are detailed in section 5 below. The only K- factors currently applicable to the Firm are K-COH in respect of the client orders handled in the Firm's capacity as an arranging firm.

The Firm's risk identification process has identified a number of key risks of potential harm with the potential to impact the Firm's own funds, including operational risk, market risk and business risk. Operational risk is the risk of loss arising from inadequate or failed internal processes, from personnel or systems, or from external events. The exposure to market risk arises from the risk of adverse movement in foreign exchange rates. Business risk is the risk arising from exposure to factors or events connected with the business which,

if they should crystallise, could materially reduce revenue or increase expenses.

The Firm uses a number of tools to manage own funds requirements risk, including continuous monitoring and approval of the adequacy of its own funds. 'Key Risk Indicators' have been implemented to act as early warning signs aimed at notifying Senior Management if own funds cross internally set thresholds and thus misalign with the Firm's risk appetite. The Firm also ring-fences a certain amount of financial resources, calculated using current and forecast data to provide sufficient buffer to ensure the Firm is continually meeting its requirements. As an additional layer of risk management, a recovery plan is in place to replenish capital to avoid a breach of the Firm's requirements if own funds were to fall below a certain threshold, or to restore compliance if the Firm were to breach its requirements.

2.3 Concentration Risk

The Firm's most significant concentration risk is revenue concentration risk, which exists through a lack of diversity in KNG's revenue streams; the Firm earns revenue from a limited number of customers. Therefore, a failure or loss of a customer could result in a loss of all revenue.

As part of the Firm's Internal Capital Adequacy and Risk Assessment ("ICARA") process, scenario testing has been performed to ensure that the Firm can withstand a loss of all revenue and maintain sufficient own funds and liquid assets without the need for additional capital injection for a 3-year forecast period.

2.4 *Liquidity Risk*

The Firm's liquid assets requirements are detailed in section 5 below. The Firm monitors the adequacy of its liquid assets on a continuous basis and documents this monitoring monthly. 'Key Risk indicators' have been implemented to act as early warning signs aimed at notifying Senior Management if liquid assets cross internally set thresholds and thus misalign with the Firm's risk appetite.

The key risk to the Firm's liquidity observed from the Firm's risk identification process is counterparty default risk. The Firm's assets primarily relate to cash which is held at highly rated credit worthy institutions invested in line with an agreed investment policy to mitigate risk of credit loss.

3. Governance Arrangements

3.1 *Overview and governance*

The Firm prepares public disclosure and other required external publications to increase confidence and transparency and provide stakeholders and market participants an insight into how the Firm is run. We understand that public disclosures are a core part of market discipline, providing important information and transparency to participants to enable markets to work well.

An established internal controls framework is in place to ensure that the disclosure, including other external publications, meet the relevant regulatory requirements and standards. As such, prior to external publication, the documents are subject to internal verification and approval.

The COO is responsible for the production of public disclosures. The draft Disclosure document will be reviewed by the Executive Committee before its submission for approval to the Executive Committee.

The role of the Executive Committee is to provide oversight and takes responsibility for the strategic leadership of the Firm within a framework of good corporate governance and prudent and effective controls which enables risk to be assessed and managed, including appropriate segregation of duties of the Senior Management Functions in accordance with the Senior Management and Certification Regime ('SM&CR') and management of conflicts of interest. The Board sets the structure in

place for the Firm

to meet its objectives and reviews management performance. The Executive Committee sets and oversees the Firm's values and standards and ensures that its obligations to its members, its clients and others are understood.

A review of the performance of the Executive Committee takes place annually and all staff are reviewed annually in respect of competence and fitness and propriety. This review process feeds into the individuals' remuneration which in turn is governed by the Firm's remuneration policy.

The Executive Committee of the Firm has the daily management and oversight responsibility for the business supported by other key members of the senior management team within the Firm.

The Firm seeks regulatory approval prior to appointments to the Executive Committee under the SMCR. All Executive Committee members are registered and listed on the FCA Register.

Responsibilities are allocated to Senior Managers under the SM&CR regime, and these are reviewed annually to ensure consistency with the business of the Firm. As detailed in the Statement of Responsibilities Senior Managers have been allocated the following responsibilities:

Nick Nugent: CEO

Andrea Podesta: Compliance Officer

Giorgio Simioni: AML Officer

3.2 Directorships and Responsibilities

Below is a table listing the number of directorships held by each member of the Firm's Management Body:

Directorships		
	Executive	Non Executive
Nick Nugent	1	0
Andrea Podesta	3	0
Giorgio Simioni	2	0

3.3 Material Risk Takers (MRTs)

Below is a table listing the Persons involved as Material Risk Takers:

Individuals	Position	Material Risk Taker	Responsibility
Andrea Podesta	Compliance Officer	Yes	Overall: Joint with Nugent
Nick Nugent	CEO	Yes	Overall: Joint with Podesta
Giorgio Simioni	AML	Yes	AML

4. Own Funds

Composition of regulatory own funds			
	Item	Amount (GBP thousands)	Source based on reference numbers/let ters of the balance sheet in the audited financial statements
1	OWN FUNDS	51,363	N/A
2	TIER 1 CAPITAL	13,007	N/A
3	COMMON EQUITY TIER 1 CAPITAL	13,007	N/A
4	Fully paid up capital instruments	-	Members' capital classified as a liability
5	Share premium	-	N/A
6	Retained earnings	-	N/A
7	Accumulated other comprehensive income	-	N/A
8	Other reserves	3,272	Other reserves classified as equity
9	Adjustments to CET1 due to prudential filters	-	N/A
10	Other funds	-	N/A
11	(-)TOTAL DEDUCTIONS FROM COMMON EQUITY TIER 1	-	N/A
19	CET1.: Other capital elements, deductions and adjustments	-	N/A
20	ADDITIONAL TIER 1 CAPITAL	-	N/A
21	Fully paid up, directly issued capital instruments	-	N/A
22	Share premium	-	N/A

23	(-) TOTAL DEDUCTIONS FROM ADDITIONAL TIER 1	-	N/A
24	Additional Tier 1: Other capital elements, deductions and adjustments	-	N/A
25	TIER 2 CAPITAL	-	N/A
26	Fully paid up, directly issued capital instruments	-	N/A
27	Share premium	-	N/A
28	(-) TOTAL DEDUCTIONS FROM TIER 2	-	N/A
29	Tier 2: Other capital elements, deductions and adjustments	-	N/A

Own funds: reconciliation of regulatory own funds to balance sheet in the audited financial statements				
<p>Flexible template - rows to be reported in line with the balance sheet included in the audited financial statements of the investment firm.</p> <p>Columns should be kept fixed, unless the investment firm has the same accounting and regulatory scope of consolidation, in which case the volumes should be entered in column (a) only.</p> <p>Figures should be given in GBP thousands unless noted otherwise.</p>				
		a	b	c
		Balance sheet as in published/audited financial statements	Under regulatory scope of consolidation	Cross-reference to template OF1

		As at period end	As at period end	
Assets - Breakdown by asset classes according to the balance sheet in the audited financial statements				
1	Debtors: amounts falling due within one year	488		N/A
2	Cash and bank and in hand	63,919		N/A
	Total Assets	64,420		
Liabilities - Breakdown by liability classes according to the balance sheet in the audited financial statements				
1	Creditors and other payables: amounts falling due within one	13,057		N/A
2	Members' capital classified as a liability	9,693		
	Total Liabilities	51,363		
Shareholders' Equity				
1	Other reserves	26,372		
	Total Shareholders' equity	49,071		

Own funds: main features of own instruments issued by the firm
<i>Free text. A non-exhaustive list of example features is included below.</i>
<p>CET1 instruments comprise members' capital and other reserves.</p> <p>Members' capital classified as a liability is repayable only upon wind-up of the Firm or on retirement of a member, only to the extent that an equal amount is contributed by another member.</p>

5. Own Funds Requirements

5.1 Calculation of RequirementMarket risk takers (MRTs)

As a Non-SNI MIFIDPRU Investment Firm, KNG's own funds requirement is calculated as the highest of:

	£'000
1. Permanent minimum capital requirement ("PMR")	3,000
2. Fixed overhead requirement ("FOR")*	3,000
3. K-factor requirement ("KFR")	60

K-factors split as prescribed in MIFIDPRU 8.5.1:

Sum of K-AUM, K-CMH, K-ASA	-
Sum of K-COH, K-DTF	1
Sum of K-NPR, K-CMG, K-TCD, K-CON	2

* The FOR is equal to one quarter of KNG's fixed expenditure from the previous year after the deduction of certain variable items. KNG's FOR as at 31 March 2023 is based on the most recently available audited annual accounts, being those for the year ended 31 March 2023. The basic liquid assets requirement is one third of the FOR: i.e. £1,000,000

5.2 *Assessing the adequacy of own funds and liquid assets in accordance with the overall financial adequacy rule*

The Firm must, at all times, hold financial resources (own funds and liquid assets) that are adequate for the business it undertakes, both in respect of remaining financially viable throughout the economic cycle, with the ability to address any potential material harms that may result from its ongoing activities, and also to ensure it can conduct an orderly wind-down while minimising harm to consumers or to other market participants.

The Firm has conducted and documented its annual ICARA process, the purpose of which is to quantify own funds or liquid assets required to fund the ongoing operation of its business or to fund a wind-down of the business. To meet this requirement, the Firm must, at all times, maintain own funds and liquid assets that are in excess of the Overall Financial Adequacy Rule ('OFAR'), which includes additional own funds or additional liquid assets above the firm's own funds requirement or basic liquid assets requirement to address material risks of potential harm. To comply with the OFAR, the Firm needs to meet both the Own Funds Threshold Requirement ('OFTR') and the Liquid Assets Threshold Requirement ('LATR'). As at 31 March 2023 these are calculated as follows:

- The OFTR is equal to its PMR of £750,000
- The LATR is equal to £1,000,000 (being the basic liquid assets requirement plus additional amounts required to mitigate the risks of harm from disorderly wind-down).

The Firm monitors the adequacy of its own funds and liquid assets on a continuous basis. Should a situation arise, which would cause a material change in the assumptions and inputs to the calculation of the OFAR, the ICARA process would undergo a review and update outside of the annual cycle. A certain amount of financial resources is ring-fenced to ensure that the Firm continually meets its requirements. This ring-fenced amount is calculated using current and forecast data to provide sufficient buffer over the requirements. 'Key Risk indicators' have been implemented to act as early warning signs aimed at notifying Senior Management if own funds or liquid assets cross internally set thresholds and thus misalign with the Firm's risk appetite.

6. Remuneration Policy and Practice

Governance and Oversight

The Management Body of the Firm in its supervisory function adopts and periodically reviews the Firm's Remuneration Policy and has overall responsibility for overseeing its implementation. Development, review and implementation of the Remuneration Policy/remuneration arrangements, including variable remuneration, is supported by Control Functions of the Firm (including (where they exist) risk management, compliance, internal audit and human resources), with the assistance and advice of its executives.

The remuneration programs of the Firm have been designed in a manner that (i) is in line with the Firm's business strategy (ii) is consistent with its risk profile and promotes sound and effective risk management, (iii) does not impair the long-term objectives and goals of the Firm, and (iv) complies with its legal and compliance obligations.

6.1 Remuneration Structure

The firm does not meet the criteria of an Enhanced Remuneration Code firm and

follows the general principles of remuneration plans and ensuring the balance of pay is in line with the market, therefore rewarding all employees and members fairly, regardless of job function, race, religion, colour, national origin, sex, sexual orientation, marital status, pregnancy, disability, or age.

The Firm has the flexibility to choose remuneration structures which are most appropriate for the Company's strategy and business needs. Remuneration Structures include, but are not limited to, fixed salary, discretionary variable bonuses, deferred bonuses, variable profit sharing, pension payments and early termination payments. The Executive Committee is responsible for the approval of all compensation to all members and employees.

The Firm is also committed to ensuring that its remuneration practices encourage high standards of personal and professional conduct, support sound risk management and do not encourage risk taking that exceeds the level of tolerated risk of the Firm, and are aligned with the Firm's regulatory requirements;

- Rewards for all staff will be aligned to financial and non-financial performance criteria and risk profile, and in all cases will be in line with the business strategy, objectives, values, culture and long-term interests of the Firm.

6.2 *Link Between Pay and Performance*

The Firm's remuneration practices are designed to reward staff for their performance and contribution to the success of the Firm.

The Firm maintains remuneration programs and practices that are consistent with and promote prudent, sound and effective risk management and which take into account the type of risks and the degree of risk that an individual may take on behalf of the Firm. No employee will be encouraged to take, or be rewarded for, taking excessive risk.

As stated above, all staff receive fixed remuneration in the form of a base annual salary. Base salaries are established based on an evaluation of internal comparisons and external market rates for the position. An individual's initial base salary is set relative to this internal/external market rate based on the individual's experience, knowledge, skills and abilities. Base salaries are then reviewed each year during this process and adjusted to reflect merit and market (internal and external) considerations.

All staff are eligible for, but not guaranteed to receive, a cash bonus as part of their variable remuneration. Eligibility for a cash bonus is based on a combination of the assessment of the performance of the relevant individual (financial and non-financial), the business unit concerned and the overall performance results of the Firm.

Senior employees and significant contributors to the Firm's long-term strategy are eligible for, but not guaranteed to receive, Equity Awards as part of their variable remuneration on the basis of the assessment of the performance of the relevant individual. All Equity Awards are awarded after the end of the performance period in which they are earned (to allow for performance adjustments (please refer to Section 6.5 below) as well as changes in the Firm. The vesting periods of such awards mitigates against short-term risk taking.

No employees receive remuneration only comprised of variable remuneration.

6.3 *Performance Assessment*

Variable remuneration is only awarded if it sustainable to the financial situation of the Firm and if justified by the performance of the Firm and the individual concerned.

6.3.1 *Firm Performance*

The discretionary annual bonus is operated on the basis of the Firm's performance. The bonus pool, if any (since the pool comprises a percentage of pre-

tax profits, including the cost of employer's NICs) is determined annually as part of the Firm's budget process and approved by the Executive Committee.

6.3.2 Individual Performance

When assessing individual performance, the Firm takes into account a number of financial and non-financial criteria, which are considered in the context of the individual's performance based on the role of the staff member. Non-financial criteria include, but are not limited to:

- Compliance with and adherence to the Firm's policies and procedures and the Firm's regulatory requirements;
- Establishing and maintaining client relationships, including the fair treatment of clients and quality of service provided;
- Individual performance in relation to specifications of the role;
- Level of seniority and responsibility associated with the role;
- Performance consistent with the Firm's business strategy; and
- Performance consistent with the Firm's core competencies.

Financial criteria include, but are not limited to:

- The financial performance of the Firm, e.g., trading volumes and revenue;
- The financial performance of the Firm; and
- The current and projected future capital position of the Firm.

6.4 Performance Adjustments

Performance adjustment, in the form of malus and clawback, may be applied to all elements of variable remuneration awarded to any individual.

Malus is the adjustment of any portion of variable remuneration which has not been awarded or paid. Any malus adjustment applied under the Firm's Remuneration

Policy will typically be made on an "in year" (or ex ante) basis in the event a performance adjustment matter (see below) occurs or comes to light before the variable remuneration has been awarded or paid.

Clawback is the recovery of variable remuneration which has been awarded and paid. Recovery may be applied in respect of any sums or equity which are held during the relevant deferral period.

Malus and/or clawback may be applied, as determined by the Executive Committee in its absolute discretion, to take account of certain events, crystallised risks or matters of an adverse nature which occur or come to light.

Performance adjustment matters includes, but are not limited to circumstances, where:

- there is evidence of conduct or behaviour falling below the standards expected by the Firm;
- the individual is found to no longer be considered as fit and proper to perform their role;
- there is evidence of a material error or negligence by the individual;
- the Firm suffers, or the individual is responsible for, a material failure of risk management; including Health and Safety; and/or
- the individual is dismissed by the Firm.

6.5 *Guaranteed Variable Remuneration*

The Firm does not award, pay or provide guaranteed variable remuneration except in exceptional circumstances. The Firm's Remuneration Policy includes provisions related to guaranteed variable remuneration, as follows:

- a.) Sign-On Bonuses - The Firm may permit the payment of sign-on bonuses, with any such payments being limited to the first year of service and in circumstances where the Firm has a strong capital base.
- b.) Buy-out awards - The Firm may permit the payment of buyout bonuses where these align with the long-term interests of the Firm and contain provisions on periods of retention, deferral, vesting and ex-post risk adjustment which correspond with the schedule of unvested variable remuneration under the previous contract of employment.
- c.) Retention awards - The Firm may consider retention bonuses, to be paid after a defined event – such as mergers, acquisitions and restructure.

Any guaranteed variable remuneration award will be subject to performance terms applied to the employee in writing.

6.6 *Severance Pay*

In the event that Firm management or employees are entitled to a discretionary pay- out on termination, such payment must:

- be subject to an appropriate limit, or management approval;
- be aligned with the Firm's overall financial condition and performance over an appropriate time horizon;
- not be payable in the case of failure or threatened failure of the Firm, particularly to an individual whose actions may have contributed to the failure or potential failure of the Firm; and accord with the relevant scheme rules.

6.7 Quantitative Remuneration Disclosures

For the Reporting Period, three (3) individuals were identified as Material Risk Takers (“MRT”) for the Firm in accordance with the criteria set out in the FCA’s MiFIDPRU Remuneration Code (SYSC 19G.5).

Total remuneration of £ 480,000 was paid to all employees of the Firm during the Reporting Period. The Firm is relying on the exemption contained in MIFIDPRU 8.6.8R(7)(a) in relation to the information items required in MIFIDPRU 8.6.8R(4). Specifically, the Firm has aggregated the fixed and variable remuneration information to be disclosed for Senior Management and other material risk takers in order to prevent individual identification of a material risk taker.

The total aggregate remuneration split between Senior Management, Other Members and Employees is as follows:

	Senior Management and Other Members	Employees	Total (All Staff)
Fixed Remuneration	N/A	£140,000	£140,000
Variable Remuneration	N/A	£340,000	£340,000
Total Remuneration	N/A	£480,000	£480,000

The Firm is constituted as an LLP. The member’s earnings are of a variable and discretionary nature, linked to profitability, so they are not disclosed in this document.