

ENTREPRENEUR'S
INVESTMENT OFFICE



The Entrepreneur's Investment Office Limited

MIFIDPRU 8 DISCLOSURE

1 May 2024

(based on figures from the Firm's Audited Accounts for the financial year
end 31 December 2023)



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1. MIFIDPRU 8 DISCLOSURE

The Firm is authorised and regulated by the Financial Conduct Authority (the “FCA”). The Firm is a boutique investment advisory firm that operates with two primary functions, namely advising and arranging debt services and advising and arranging investment services. The Firm’s clients are single and multi-office family offices, corporate funds, financial institutions, and ultra-high net worth individuals, predominantly based in the UK, Europe and North America, who qualify to be classified as Professional Clients and/or Eligible Counterparties. The Firm does not work with or provide any services to Retail Clients.

The Firm is categorised as a “SNI MIFIDPRU investment firm” by the FCA for capital purposes. The Firm reports on a solo basis and has not issued any Additional Tier 1 capital.

This is the Firm’s first disclosure under the public disclosure requirements under MIFIDPRU 8. As such, there have been no significant changes to the information disclosed since the Firm’s last disclosure period.

This disclosure is made annually on the date the Firm publishes its annual financial statements.

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. The Firm is classified as an ‘SNI firm’ and is therefore subject to the ‘Basic’ remuneration requirements only.

This is the first disclosure and covers the remuneration period 1 January 2023 to 31 December 2023. The disclosure sets out qualitative and quantitative information on the Firm’s remuneration processes and practices. The Firm awards remuneration on the same cycle as the Firm’s financial year. This enables the Firm to consider variable remuneration in the context of the Firm’s financial position as set out in the annual audited financial statements.

A. Qualitative Information

The Firm has established, implemented and maintains remuneration policies, procedures and practices that promote effective risk management and do not encourage excessive risk taking.

In accordance with **SYSC 19G 3.1** the Firm’s governing body has reviewed and adopted the Firm’s Remuneration Policy, pursuant to consulting and taking advice from the Firm’s Compliance and Risk Officer. It is the Firm’s policy to review and assess the Firm’s Remuneration Policy and procedures on an annual basis or sooner should the business change or other need arise. It is the Firm’s policy that its Compliance and Risk Officer will review the Firm’s compliance with the Firm’s current Remuneration Policy, as part of a risk-based compliance monitoring programme. Considering the size, nature, scope and complexity of its activities, the Firm has concluded that it is not appropriate for the Firm to establish and maintain a remuneration committee.

Senior Management has the responsibility of developing and overseeing the Firm’s remuneration structure and strategy. In some cases, individuals undertaking key control functions may be involved in the remuneration policy-setting and monitoring process to ensure the integrity and objectivity of the process.

The Firm ensures that the remuneration policy and its practical application are consistent with the Firm’s business strategy, objectives and long-term interests. The remuneration structure and strategies of the Firm are appropriate to the nature, scale and complexity of the business and considers the risks to which the Firm could be exposed as a result of the conduct or behaviour of its staff.

The term staff or staff member covers the Firm’s Board, Senior Management, individuals undertaking key control functions, any major risk-taking individuals (individuals whose actions have a material impact on the risk exposure of the Firm) and any other employees. The Firm ensures that it is compliant with rules on performance assessment and risk adjustment in relation to any given performance period. A discretionary bonus may be determined and distributed annually subject to the performance of the Firm and the individual.

The Firm is aware that all manner of remuneration could have a bearing on effective risk management, including salaries, bonuses, long term incentive plans, options, hiring bonuses, severance packages and pension arrangements and takes this into account when structuring remuneration arrangements.

The Firm's remuneration policy is gender neutral. Pursuant to the Equality Act 2010, discrimination on the basis of an individual's protected characteristics both before and after employment is offered, is prohibited. This applies to pay and all other contractual terms, including variable remuneration.

The remuneration structure takes into consideration business objectives and strategies and the identified risk parameters within which the Firm business. It also recognizes the need for effective alignment of risk outcomes and the roles and functions of the Staff, taking account of whether their actions may expose the Firm to unacceptable financial, reputational and any other risks.

The Firm's Board and Senior Management promote a culture of responsible business conduct, aligned with the standards of conduct expected under the Senior Managers and Certification Regime. The Firm's remuneration arrangements are compatible with this philosophy. Senior Management ensures that staff members have an awareness of the Firm's risk profile and risk tolerance. The Firm's remuneration arrangements are aligned to this.

In accordance with **SYSC 19G.2.8** Senior Management ensures that remuneration is consistent with and promotes sound and effective risk management and does not encourage risk-taking that exceeds the level of tolerated risk of the Firm.

In accordance with **SYSC 19G 2.9** Senior Management ensures that the Firm's remuneration policy is in line with the business strategy, objectives, values and long-term interests of the Firm with consideration to the Firm's risk appetite and strategy, including environmental, social and governance risk factors and the Firm's culture and values.

In accordance with **SYSC 19G.2.11** Senior Management ensures that the Firm's remuneration policy contains measures to avoid conflicts of interest, encourages responsible business conduct and promotes risk awareness and prudent risk taking. The Firm has a documented Conflicts of Interest Policy and Inventory in order to identify, manage and monitor the Firm's conflicts. This includes a consideration of any conflicts that may arise in relation to the Firm's remuneration arrangements.

In accordance with **SYSC 19G 2.12** the Firm is aware that it must not pay variable remuneration to members of the management body who do not perform any executive function in the Firm. The Firm's non-executive directors are remunerated with a fixed fee only.

In accordance with **SYSC 19G 3.6** the Firm's governing body, the members of which collectively have a significant amount of experience in the industry, is responsible for ensuring that the remuneration of those persons in control functions is linked to their performance and achievements of the business areas they control.

In accordance with **SYSC 19G 4** remuneration comprises an annual salary and a discretionary bonus. Staff remuneration can be categorized as either fixed or variable remuneration. There is no third or hybrid category. The fixed remuneration is determined by market value, responsibilities and experience.

The Firm has a flexible approach to the variable remuneration component. Variable remuneration ranges from zero to an amount that ensures that the individual's total remuneration is sufficient to reward overall performance; financial and non-financial.

The Firm has the flexibility to direct resources towards capital building if this is deemed appropriate. The Firm ensures that it does not award variable remuneration if this were to erode the Firm's capital base, to the degree that it would be in breach of its requirements under the Overall Financial Adequacy Rule.

The impact of exceptional Government Intervention as outlined in **SYSC 19G.6.2** does not apply to the Firm.

In accordance with **SYSC 19G.6.4** assessment of performance takes into consideration non-financial criteria and this is a significant element of the performance assessment process. Non-financial criteria may override financial criteria where appropriate and will include metrics on conduct and the individual's adherence to effective risk management and the individual's compliance with relevant regulatory requirements.

Other examples of non-financial criteria that will be assessed include metrics relating to building and maintaining positive customer relationships and outcomes, such as positive customer feedback, performance in line with the Firm's strategy or values, for example by displaying leadership, teamwork or creativity. Critically, non-financial performance will take into account the individual's adherence to the firm's risk management and compliance policies and their compliance with achieving targets relating to environmental, social and governance factors; and the individual's adherence with the Firm's diversity and inclusion statements.

The Firm's performance related remuneration is based on the assessment of the individual's performance and competence in his/her role within the business during a defined period and the aforementioned criteria for determining variable remuneration is embedded into the appraisal process of each relevant staff member. This includes documenting the rationale for the form and amount of variable remuneration.

B. Quantitative Information

With respect to the financial year ending 31 December 2023, the total amount of remuneration awarded to all staff, including the split of fixed and variable remuneration, was as follows:

	Amount
Fixed remuneration	£17,484
Variable remuneration	£0
Total	£17,484