

Aranci Advisors Ltd.

MIFIDPRU 8 Disclosure

1. Introduction

The Financial Conduct Authority (“**FCA**” or “**regulator**”) through its Prudential sourcebook for MiFID Investment Firms (“**MIFIDPRU**”) sets out the detailed prudential requirements that apply to Aranci Advisors Ltd. (“**Aranci**” or the “**Firm**”). In particular, Chapter 8 of MIFIDPRU (“**MIFIDPRU 8**” or the “public disclosures requirements”) sets out public disclosure obligations with which the Firm must comply, further to those prudential obligations.

Aranci is classified under MIFIDPRU as a small and non-interconnected investment firm (“**SNI MIFIDPRU investment firm**”). As such, MIFIDPRU 8 requires Aranci to disclose information regarding the Firm’s remuneration policy and practices.

The purpose of these disclosures is to give stakeholders and market participants an insight into the Firm’s culture and to assist stakeholders in making more informed decisions about their relationship with the Firm.

This document has been prepared by Aranci in accordance with the requirements of MIFPRU 8, as applicable to a SNI MIFIDPRU investment firm without additional tier 1 instruments in issue and has been verified by its board. Unless otherwise stated, all figures relate to the 12 months (financial year) ending 31 December 2023.

2. Remuneration Policy and Practices

Overview

As an SNI MIFIDPRU investment firm, Aranci is subject to the basic requirements of the MIFIDPRU Remuneration code. Aranci, as an alternative investment fund manager, is also classified as a collective portfolio management investment firm and, as such, is also subject to the AIFM Remuneration Code. The purpose of the requirements on remuneration are to:

- Promote effective risk management in the long-term interests of the Firm and its clients;
- Ensure alignment between risk and individual reward;
- Support positive behaviours and healthy firm cultures; and
- Discourage behaviours that can lead to misconduct and poor customer outcomes.

The objective of Aranci’s remuneration policies and practices are to establish, implement and maintain a culture that is consistent with, and promotes, sound and effective risk management and does not encourage risk-taking which is inconsistent with the risk profile of the Firm and the services that it provides to its clients.

In addition, Aranci recognises that remuneration is a key component in how the Firm attracts, motivates and retains quality staff and sustains consistently high levels of performance, productivity and results. As

such, the Firm's remuneration philosophy is also grounded in the belief that its people are the most important asset and greatest competitive advantage.

Aranci is committed to excellence, teamwork, ethical behaviour and the pursuit of exceptional outcomes for its clients. From a remuneration perspective, this means that performance is determined through the assessment of various factors that relate to these values, and by making considered and informed decisions that reward effort, attitude and results.

Characteristics of the remuneration policy and practices

Remuneration at Aranci is made up of fixed and variable components. The fixed component is set in line with market competitiveness at a level to attract and retain skilled staff. Variable remuneration are paid on a discretionary basis and take into consideration the Firm's financial performance as well as the financial performance of each business unit, and the financial and non-financial performance of the individual in contributing to the Firm's success. All staff members are eligible to receive variable remuneration.

The fixed and variable components of remuneration are appropriately balanced: the fixed component represents a sufficiently high proportion of the total remuneration to enable the operation of a fully flexible policy on variable remuneration. This allows for the possibility of paying no variable remuneration component, which the Firm would do in certain situations, such as where the Firm's profitability performance is constrained, or where there is a risk that the Firm may not be able to meet its capital or liquidity regulatory requirements.

The variable component of remuneration is assessed through the annual performance review and informal discussions between the individual and his or her manager. This process considers non-financial performance criteria over the assessment period which includes:

- the overall results of the Firm;
- Compliance with regulatory requirements and general conduct;
- Meeting training goals;
- Collaborative and collegiate behaviour;
- keeping risk taking to within Aranci's risk tolerance limits;
- Consideration of the long-term strategic aims of the Firm;
- Placing the client's needs and doing the right thing at the forefront of all decisions;
- Avoiding any activity that would damage the Firm's reputation.

Governance and Oversight

The Governing Body of the Firm (the "**Board**") is responsible for setting and overseeing the implementation of Aranci's remuneration policy and practices. In order to fulfil its responsibilities, the Board:

- Is appropriately staffed to enable it to exercise competent and independent judgment on remuneration policies and practices and the incentives created for managing risk, capital and liquidity;
- Prepares decisions regarding remuneration, including decisions which have implications for the risk and risk management of the Firm;

- Ensures that the remuneration policy and practices take into account the public interest and the long-term interests of shareholders, investors and other stakeholders in the Firm; and
- Ensures that the overall remuneration policy is consistent with the business strategy, objectives, values and interests of the Firm and of its clients.

Aranci's remuneration policy and practices are reviewed annually by the Board.

Quantitative Remuneration Disclosures

For the financial year to 31 December 2023, the total amount of remuneration awarded to all staff was £1,369,200 of which £942,000 comprised the fixed component of remuneration, and £427,200 comprised the variable component. For these purposes, 'staff' is defined broadly, and includes, for example, employees of the Firm itself, employees of other entities in the group, employees of joint service companies, and secondees.