

## **MIFIDPRU 8.6 – Remuneration**

Signal Capital is subject to both the 'AIFM Remuneration Code' and 'MIFIDPRU Remuneration Code'. The Firm considers that the MIFIDPRU Remuneration requirements, for SNI MIFIDPRU Investment Firms, are in general less demanding than the requirements under the AIFM Remuneration Code.

Under SYSC 19G.1.20 R, a firm such as Signal Capital, which is subject to multiple remuneration codes, with provisions imposing different remuneration requirements, only one of which can be complied with, must comply with the most stringent of the relevant provisions.

The Firm therefore complies with the most stringent provisions, which it considers are found in the AIFM Remuneration Code, with respect to all of its personnel, all of whom are considered to be involved with the AIFs to whom the Firm are the AIFM to.

The primary reason for this conclusion, is the requirements to identify Material Risk Takers as AIFMD Remuneration Code staff and consider the application of the payout process rules, unless the Firm considers that it is appropriate to disapply the payout process rules.

### **Distributions to Senior Management and Owners**

In accordance with the guidance in SYSC 19G.4.4, at the end of each year, the residual profits of the Firm, which is a private limited company, are distributed among the owners (shareholders).

The level of ownership of each shareholder is reflected in the proportion of shares they have. As residual profits are distributed according to the shares and are not linked to work or performance, this is not considered to be remuneration for the purpose of the Firm's Remuneration Policy.

All other distributions received by Senior Managers (who may also be owners) are classed as fixed or variable, depending on whether they are discretionary and based on performance of the individual or their business unit.

### **Qualitative Disclosures**

The Firm has in place a Remuneration Policy which is approved by the Governing Body (the Board of Directors) at least annually. The Remuneration Policy's overarching aim is the promotion of sound and effective risk management, whilst reducing conflicts of interests and encouraging good conduct amongst personnel.

The purpose of the Remuneration Policy is to set out how the Firm will provide remuneration in a manner that is consistent with the relevant remuneration codes as outlined above, with the main objective of the financial incentives being to attract, motivate and maintain high-calibre personnel.

The remuneration strategy has been designed to ensure consistency with the risk profiles, rules and instruments of incorporation of the funds managed, managed accounts, capital introduction accounts and with the objectives set out in the Firms' business plan and to

ensure no conflict of interest between personnel and investors, and compliance with conduct of business rules.

As noted above, while the Firm is not required to identify Material Risk Takers as an SNI MIFIDPRU Investment Firm, it is required to do so under the AIFM Remuneration Code. The Firm has identified its AIFMD Remuneration Code personnel accordingly.

The Firm's approach to remuneration for all personnel includes:

- Signal Capital's regulatory capital and liquidity position and the maintenance of an appropriate surplus of capital and liquidity.
- The performance of individual personnel with respect to quantitative financial metrics.
- Assessment of the performance of personnel against non-financial metrics, such as good conduct.
- The performance of the Firm.

In line with the Equality Act 2010, the Firm have developed the following remuneration policies and practices to promote gender neutrality and eliminate any form of discrimination based on protected characteristics, including gender:

### **1) Pay Equity**

- a) **Objective Evaluation:** Compensation decisions are based on objective criteria such as job responsibilities, skills, qualifications, experience, and performance, irrespective of an individual's gender or any other protected characteristic.
- b) **Salary Evaluation:** Salaries are established for each job role, considering factors that are relevant to the position, ensuring consistency and fairness in pay structures.
- c) **Market Research:** Market research is conducted to compare our compensation levels with industry standards to ensure that our pay remains competitive, equitable, and unbiased.
- d) **Job Descriptions:** Job descriptions are established for each position, outlining the required skills, responsibilities, and qualifications. This ensures clarity and transparency in determining compensation.

### **2) Performance Based Pay:**

- a) **Objective Performance Evaluation:** Performance assessments are conducted that are directly related to job responsibilities and individual contributions. Evaluations are conducted consistently and objectively, free from bias or discrimination.
- b) **Merit-Based Increases:** Salary increases and bonuses are tied to individual performance, recognising, and rewarding personnel based on their contributions and achievements, regardless of their gender.

### **3) Career Development and Advancement:**

- a) **Equal Opportunities:** Signal Capital provides equal opportunities for career development and advancement to all personnel, irrespective of gender or any other protected characteristic. Internal promotion decisions are based on merit, skills, qualifications, and performance.

#### 4) Transparent Communication:

- a) Policy Awareness: Signal Capital ensures that all personnel are aware of our remuneration policies, practices, and their rights to a fair and non-discriminatory workplace. This information is communicated clearly through our Remuneration Policy, Compliance Manual, Personnel Manual, periodic training and periodic personnel attestations.

Signal Capital are dedicated to upholding the principles of equality and non-discrimination in our remuneration policies and practices.

#### Quantitative Disclosures

The total remuneration paid to personnel as required under MIFIDPRU 8.6.8R (4) can be found below.

The variable remuneration reflects such remuneration paid with respect to performance over the financial year (even if paid following the end of the year).

Fixed Remuneration	Variable Remuneration	Total Remuneration
£4,458,342	£2,302,167	£6,760,509