



Annual disclosure for Astute Investment Management Ltd for year
ending 31/03/2026

Introduction

The Investment Firms Prudential Regime (IFPR) came into effect on the 1 January 2022 as a new regime for UK firms authorised under the Markets in Financial Instruments Directive (MiFID).

The IFPR was implemented by the FCA as prudential regulation within the MIFIDPRU section of the FCA Handbook.

These disclosures set out Astute Investment Management Ltd's annual public disclosures as required under MIFIDPRU 8 for the year ending 31/03/2026.

Scope and application of disclosure

These disclosures relate to Astute Investment Management Ltd which is an SNI MIFIDPRU Investment firm, authorised and regulated by the FCA.

Astute Investment Management Ltd is required to disclose on an individual firm basis and these disclosures have been prepared in line with the requirements of MIFIDPRU 8.

As an SNI MIFIDPRU firm under IFPR we are required to disclose the following remuneration information regarding our remuneration policy and practices under MIFIDPRU 8:

Remuneration policy and practices

1. Qualitative disclosures

- Our approach to remuneration for all staff
- The objectives of our financial incentives
- The decision-making procedures and governance surrounding the development of the remuneration policies and practices our firm is required to adopt in accordance with the MIFIDPRU Remuneration Code, to include, where applicable:
 - The composition of and mandate given to the remuneration committee, and
 - Details of any external consultants used in the development of the remuneration policies and practices
- The key characteristics of our remuneration policies and practices to enable
 - An understanding of the risk profile of our firm and/or the assets it manages, and
 - An overview of the incentives created by our remuneration policies and practices
- The different components of our remuneration, together with the categorisation of those remuneration components as fixed or variable
- A summary of the financial and non-financial performance criteria used across the firm, broken down into the criteria for the assessment of the performance of
 - The firm,
 - Business units, and
 - Individuals

2. Quantitative disclosures

- The total amount of remuneration awarded to all staff, split into fixed v variable remuneration.

1. Qualitative Disclosures

Our approach to remuneration for all staff and the objectives of our financial incentives in respect of staff remuneration.

Astute Investment Management Ltd exists to manage the core investment proposition for the retail clients of Astute Private Wealth Ltd. This is done through the management of three UK-authorised collective investment schemes, all of which have a mandate to target risk-adjusted returns with a set level of volatility. These targets are set in line with Astute private Wealth's assumptions which are used in clients' cashflow plans.

There are no performance related pay incentives that promote behaviours that result in incentive to deliver a short-term outcome. Remuneration is set at a level that is deemed to encourage retention in the role, in order to encourage stability and consistency. Where staff have objectives, these include delivery of quality measures in order to encourage working within an effective, structured, compliant framework.

The firm's Board agree that remuneration should not be linked to specific revenue targets, but instead linked to competence within the role, and risk measures form part of this assessment of competence. The award of any variable remuneration to staff is entirely discretionary. In awarding it, the Directors will take into account, where appropriate, the performance of the individual, the firm's overall results, benchmarking of fund performance against internal targets and industry-wide fund performance, and non-financial aspects of performance, such as team management and strategic planning.

Our decision-making procedures and governance surrounding the development of the firm's remuneration policies and practices.

Astute Investment Management Ltd does not have a Remuneration Committee. The firm's governing body are responsible for our remuneration policy including:

- Determining the framework and policy for remuneration and ensuring it does not encourage undue risk taking
- Agreeing any major changes in remuneration structures
- Reviewing the terms and conditions of any new incentive schemes and in particular, considering the appropriate targets for any performance related remuneration schemes
- Considering and recommending the remuneration policy for the senior employees taking into account the appropriate mix of salary, discretionary bonus and share based remuneration
- In determining remuneration arrangements, the Directors will give due regard to best practice and any relevant legal or regulatory requirements including the MIFIDPRU requirements

The key characteristics of our remuneration policies and practices including the different components of our remuneration, together with the categorisation of those remuneration components as fixed or variable.

- Our staff are remunerated primarily via a fixed salaries and benefits.
- At the discretion of the firm's governing body, select senior staff may be awarded long-term incentive payments (share options) which can be exercised at a date in the future. It is expected that these payments will be sufficient to reward good performance but be at a level that does not represent a significant proportion of an individual's overall remuneration.
- Performance of senior staff is linked to risk-based measures such as volatility and inflation adjusted returns in line with clients' risk profiles. This aligns staff with client outcomes and seeks to avoid a culture of excessive risk-taking.

2. Quantitative Disclosures

As an SNI MIFIDPRU investment firm, we are required to disclose the total remuneration of all our staff split between fixed and variable remuneration for our performance year end which is also our financial year end.

For our year ending 31/03/2025, our total remuneration is split as follows:

Type of Remuneration	Amount £000s
Fixed Remuneration	£220
Variable Remuneration	£0
Total Remuneration	£220