



## Remuneration Disclosure 2025 – MIFIDPRU 8.6

### **Introduction**

ELIDI Advisers Ltd (‘ELIDI’) is subject to the FCA Rules on remuneration as they apply to non-interconnected MIFIDPRU investment firms. These are contained in the FCA’s MIFIDPRU Remuneration Code located in SYSC19G of the FCA’s Handbook.

### **Remuneration Policy**

The Remuneration policy applies to employees or other relevant persons who can have a material impact on the services provided and/or the corporate behaviours of the firm.

Employees have the opportunity to share in the success of the Company in years of good performance and also accept reduced levels of variable compensation (such as bonuses) in times of poor performance or losses.

ELIDI does not remunerate or assess the performance of its employees in a way that conflicts with its duty to act in the best interests of its clients.

ELIDI does not make any arrangement by way of remuneration, sales targets or otherwise that could provide an incentive to its employees to recommend a particular financial instrument to a client when the firm could offer an alternative financial instrument which would better suit the client’s needs.

ELIDI is mindful of ensuring that its remuneration policy and practices do not lead to a conflict of interest or incentivise employees to act in a manner that favours their own interests or the firm’s interests to the potential detriment of any client or potential client.

ELIDI will ensure that remuneration and similar incentives will not be solely or primarily based on quantitative commercial criteria. Consequently, ELIDI will consider appropriate qualitative criteria (i.e., behavioural measures such as customer feedback) which shall encompass adherence with relevant regulations, fair treatment of clients and the quality of services provided to clients.

Senior management are responsible for the implementation of this policy as well as the monitoring of compliance risks associated with it. This policy will be reviewed and approved by the management body at least annually to ensure it continues to remain fit for purpose with input from the firm’s Compliance Officer.

ELIDI ensures it always maintains a balance between fixed and variable components of remuneration, so as to mitigate any conflicts of interest between the firm, its employees and its clients.



Remuneration is typically made up of a base salary and a variable discretionary bonus. All variable remuneration is delivered in cash, whilst fixed remuneration is delivered as allowances, benefits including defined contribution pension, private medical insurance and life assurance.

### **Performance Criteria**

ELIDI uses a mix of performance criteria to assess the performance of the firm, business units and individuals. Non-financial performance could include adhering to the firm's corporate values, complying with regulatory compliance and ensuring training is up to date etc.

### **Guaranteed Variable Remuneration**

Guaranteed variable remuneration would only be awarded in exceptional cases when new employees are guaranteed a joining bonus when they join the firm. The Firm ensures that such awards of guaranteed variable remuneration are discussed and approved by the Firm's management Board.

### **Severance Pay**

ELIDI's policy and criteria for the application of severance pay covers permanent employees. Severance pay would be assessed on a case by case basis taking into consideration the employees' length of service, conduct, remuneration and other benefits received during the course of employment.

### **Ex-ante and ex-post risk adjustment of remuneration**

Ex-ante and ex-post risk adjustment of remuneration covers the potential adjustment of variable remuneration to take account of specific crystallised risks or any adverse performance outcome that had occurred at ELIDI. Potential future risks identified mainly relate to securities trading where the risk assessment potential is currently classified as Low. Front office risks are considered when adjusting remuneration and they are based on the overall annual performance of employees. Malus and clawback (the reduction or recovery of remuneration) would be applied in extreme situations where acts of misconduct or gross misconduct were discovered as part of a disciplinary investigation and in breach of company policy and the FCA regime

### **Material Risk Takers**

ELIDI has identified Material Risk Takers (MRTs) in accordance with the criteria set out in SYSC 19G.5.3 for the definition of material risk takers for remuneration purposes. ELIDI has developed and applied internal qualitative and quantitative assessments against the defined criteria to identify those individuals that have a material impact upon the Company's risk profile.



For the performance year to 31.03.2025 there were 2 MRTs identified.

#### **Base salary**

Base salary is the fixed payment made to an employee for their services. It does not include allowances or benefits and is the basis for salary-related benefits such as pension contributions.

The amount of salary paid to an employee will depend on the market rate for the employee's role, and the knowledge, experience, and competencies of the employee.

#### **Variable pay**

ELIDI has defined variable pay as annual discretionary bonus, which is awarded based on company performance, departmental performance and individual performance. The total bonus pool amount is determined by reference to the Company's risk-adjusted criteria, which include both quantitative and qualitative measures.

Individual discretionary bonuses are based on performance and non-performance-based criteria. Adherence to applicable risk and control frameworks is part of the performance assessment.

#### **Remuneration for year ending 31.03.2025**

##### **Senior Management Remuneration (GBP)**

Fixed Remuneration	£ 11,909.41
Variable Remuneration	£ 0.00
Total Remuneration for Senior Management	<b>£ 11,909.41</b>

##### **Other MRTs Remuneration (GBP)**

Fixed Remuneration	£ 0.00
Variable Remuneration	£ 60,770.57
Total Remuneration for other MRTs	<b>£ 60,770.57</b>

##### **Other Staff Remuneration (GBP)**

Fixed Remuneration	£ 33,882.48
Variable Remuneration	£ 0.00
Total Remuneration for Other Staff	<b>£ 33,882.48</b>



The total amount of guaranteed variable remuneration awards made to senior managers during the financial year was **zero**.

The total amount of severance payments awarded during the financial year was **zero** and the number of material risk takers who received those payments was **zero**. No severance payment was made during the year in question.