FitzWalter Capital Limited ("FitzWalter" / the "Firm")

MIFIDPRU 8 Disclosure

31 July 2026

Introduction

The Financial Conduct Authority ("FCA" or "regulator") in its Prudential sourcebook for MiFID Investment Firms ("MIFIDPRU") sets out the detailed prudential requirements that apply to FitzWalter. 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.

FitzWalter is classified under MIFIDPRU as a small and non-interconnected investment firm ("SNI MIFIDPRU investment firm"). As such, MIFIDPRU 8 requires FitzWalter 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 FitzWalter in accordance with the requirements of MIFPRU 8 and is verified by the Board of FitzWalter. Unless otherwise stated, all figures are for year ended 31 March 2026.

Remuneration Policy and Practices

Overview

As an SNI MIFIDPRU investment firm, FitzWalter is subject to the basic requirements of the MIFIDPRU Remuneration code. FitzWalter, 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 FitzWalter's remuneration policy 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, FitzWalter 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.

FitzWalter 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 FitzWalter 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 is paid on a discretionary basis and takes into consideration the Firm's financial performance 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 below table summarises the financial and non-financial criteria of performance used across the Firm in assessing the level of variable remuneration to be paid:

	Financial Performance Criteria	**Non-Financial Performance Criteria**
Firm	Overall variable bonus pool is determined by reference to adjusted earnings of FitzWalter.	
Individual	Individual share of variable bonus pool	Investment Staff Investment generation, personal performance, ESG risk management, role and experience and adherence to compliance and risk management policies (including ESG). Non-Investment Staff Fundraising and marketing, effectiveness of control environment, personal performance, ESG risk management role and experience and adherence to compliance and risk management policies (including ESG).

The fixed and variable components of remuneration are appropriately balanced: the fixed component is set a sufficient level to provide staff with comfortable living standards 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.

Governance and Oversight

The Board of FitzWalter is responsible for setting and overseeing the implementation of FitzWalter's remuneration policy and practices. In order to fulfil its responsibilities, the Board of FitzWalter:

- 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.

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

Quantitative Remuneration Disclosures

For the financial year 1 April 2025 to 31 March 2026, the total amount of remuneration awarded to all staff was £4,305,680, of which £3,218,867 comprised the fixed component of remuneration, and £1,086,813 comprised the variable component.