

# **MIFIDPRU Annual Disclosures**

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**Aldgate Advisers Limited**

**For the Financial Year Ended 31/12/2022**

## 1. Remuneration Policy and Practices

This Disclosure document sets out the remuneration policies and practices of Aldgate Advisors Limited (“Aldgate”, “the Firm”), as required by MIFIDPRU 8. Aldgate Advisors Limited (Aldgate) is subject to the FCA Rules on remuneration as they apply to a small and non-interconnected (SNI) MIFIDPRU investment firm. These are contained in the MIFIDPRU Remuneration Code located in SYSC19G of the FCA’s Handbook.

As an SNI firm Aldgate is required to provide a qualitative disclosure on its approach to remuneration and incentives and key characteristics of its remuneration policy and practices. In addition, a basic quantitative disclosure is required detailing the total amount of remuneration awarded to all staff split between fixed and variable remuneration. This document provides such disclosures.

### Approach to Remuneration

The Ocorian Group has established a Global Remuneration Policy (“**the Policy**”) which regulates the area of remuneration to ensure alignment with business objectives and that the remuneration that is paid is aligned to the business risk profile. This is considered alongside the additional requirements applicable to the Aldgate, as outlined below.

### Governance

Ocorian has established a Remuneration Committee (a committee of the board of Stanford HoldCo Limited) (“**REMCO**”), which oversees the design and implementation of the Remuneration Policy for Ocorian globally, including the entities in the group. The REMCO is provided with input from Risk & Compliance, Human Resources and Finance to support decision making and oversight.

The Policy and the specific requirements for Aldgate will be reviewed on an annual basis alongside the Ocorian Group Remuneration Policy by REMCO. The Chief Executive Officer represents the Service Lines during the review.

REMCO is supported in the review by the relevant internal Control Functions (i.e. Risk and Compliance, Finance, HR and Legal).

### Characteristics of Remuneration Policy and Practices

#### Balance of fixed and variable remuneration

The REMCO will ensure it always maintains a balance between fixed and variable components of remuneration, to mitigate any conflicts of interest between the firm, its staff and its clients.

There are restrictions on use of the below types of remuneration:

- **Guaranteed variable remuneration** (minimum performance bonus / sign on bonus) are restricted to 1st year of employment and only used in exceptional circumstances.
- In case of **equity buy-outs** for new joiners, these need to be replaced with deferred equity rather than cash.
- **Retention awards** must be used in exceptional circumstances only and linked to performance.
- **Severance payments** are only used in exceptional circumstances only and must be considered in relation to performance of beneficiary during employment period. The Entities do not reward poor performance.

**Remuneration for year ending 31/12/2022**

<b>Staff remuneration (GBP)</b>	
Fixed remuneration	£1,103,105
Variable Remuneration	£147,403
Total Remuneration	£1,250,508

There were no guaranteed variable remuneration awards or severance payments made in 2022.