

## MIFIDPRU Disclosure as at 31<sup>st</sup> December 2024

Astatine Capital Partners LLP (“the Firm”) is authorised and regulated by the Financial Conduct Authority (the “FCA”). The Firm is an indirect, wholly owned subsidiary of Astatine Investment Partners LLC (the “Parent”). The Firm is regulated by the FCA under the ‘Markets in Financial Instruments Directive’ (“MiFID”) and so it is subject to FCA Rules on remuneration. The Firm is classified as a “Small and Non-Interconnected Investment Firm” (“SNI Firm”) and so makes this disclosure in accordance with the requirements contained within MIFIDPRU 8.6. The relevant rules and guidance for the Firm’s remuneration code are contained within the FCA’s SYSC 19G of the FCA’s Handbook. This remuneration disclosure relates to the remuneration practices of the Firm only. Certain other Firm affiliates employ personnel and provide remuneration to such personnel. However, the Firm’s affiliates are not regulated by the FCA and so are not subject to the FCA rules on remuneration. Accordingly, this Remuneration Disclosure addresses only the remuneration practices of the Firm, and it is not intended to, and does not, describe the remuneration practices of any of the Firm’s affiliates.

The Remuneration Code (the “RemCode”) covers an individual’s total remuneration - fixed and variable. The Firm incentivises staff through a combination of the two.

The Firm’s remuneration policy is designed to ensure that it complies with the RemCode and that its compensation arrangements:

1. Are consistent with and promote sound and effective risk management;
2. Do not encourage excessive risk taking;
3. Includes measures to avoid conflicts of interest;
4. Are in line with the Firm’s business strategy, objectives, values, and long-term interests; and
5. Are on a gender-neutral basis.

### Proportionality

The Firm’s disclosures are prepared in accordance with the relevant requirements in SYSC 19G in a way which is appropriate to its size, internal organisation and the nature, scope and complexity of its business model and activities.

### Application of the Requirements

The Firm completes the remuneration disclosure annually on the date the Firm publishes its annual financial statements. As appropriate, this disclosure will be made more frequently if there is a major change to the Firm’s business model.

#### **1. Summary of the Firm’s approach to remuneration for all staff, including the decision-making procedures and governance in adopting the remuneration code:**

- The Firm’s remuneration policy has been developed internally to align with the Remuneration principles laid down by the FCA. Senior management ensures that the remuneration practises remain effective, competitive, fair and is in line with the Firm’s strategic objectives.
- The Firm complies with the remuneration principles set out in the policy.
- Due to the size, nature and complexity of the Firm, The Firm does not have an independent remuneration committee and the Firm’s senior management are responsible for the governance of the remuneration function.
- The Firm’s remuneration practices are designed to align with the Firm’s long term strategic goals with a key focus on investor objectives.
- The Firm believes in rewarding individual and team performance based on the contributions to the Firm’s success keeping in mind the employee’s function and level of responsibility.
- The Firm’s ability to pay a variable remuneration further takes into account both the capital and liquidity regulatory requirements of the Firm over a rolling three-year period.

- When assessing individual performance to determine the amount of variable remuneration, the Firm will consider both financial and non-financial criteria.

## 2. Qualitative characteristics of the remuneration policies and practices:

- Individuals are rewarded based on their contribution to the overall strategy of the business. Other factors, such as performance, reliability, effectiveness of controls, business development and contribution to the business are taken into account when assessing the performance of the staff.
- Remuneration is split as follows:
  - Fixed remuneration applies to all staff, including salary, pension, and benefits.
    - Primarily reflects a staff member's role, responsibility, experience, and comparative market rates. It is pre-determined, non-discretionary and not dependent on performance.
  - Variable remuneration applies to certain staff, including performance and retention bonuses. Such awards are discretionary in nature.
    - The amount is tied to individual and/or team performance against key performance indicators and achievement of business goals.
    - Retention bonuses are contingent on continued employment and good standing.
    - The payment of bonuses is discretionary and neither the award nor the amount is guaranteed (unless agreed in writing).
  - Certain Firm employees, particularly senior executives and personnel involved principally in sourcing investments, asset management, and capital-raising activities, may be invited to invest their own capital in a given Fund.
    - These opportunities to invest serve as a mechanism to align interests of such personnel with the investment activities of the applicable Fund(s) and motivates employees to make sound investment decisions and actively contribute to the Fund's success.
    - Whether a Firm employee is offered the opportunity to participate in a Fund investment and the size of such participation is completely discretionary and multiple factors are considered including employee role, responsibility, and performance.

## 3. Aggregate quantitative information on remuneration:

With respect to the financial year ended 31 December 2024, the total amount of remuneration awarded to all staff interpreted under SYSC 19G.1.24G was as follows:

	Fixed remuneration	Variable remuneration
All staff	£2,070,997	£1,515,101