

## MIFIDPRU 8 DISCLOSURE

### 1. Introduction

Optimum Complexity Limited (the 'Firm') is authorised and regulated in the UK by the Financial Conduct Authority (the 'FCA') under firm reference number 934086, as a MIFIDPRU investment firm with permission to conduct Markets in Financial Instruments Directive ('MiFID') activities. The Firm is classed as a Small Non-Interconnected ('SNI') firm.

Under Chapter 8 of MIFIDPRU the Firm is required to publish key information in order to assist users of its accounts and encourage market discipline. The information which the Firm is required to publish is limited to information relating to its Remuneration Policies and Practices (per MIFIDPRU 8.6). The Firm has not issued additional tier 1 instruments and, as such, it is not required to disclose any information in relation to the below areas:

- Risk management objectives and policies;
- Own funds; and
- Own funds requirements.

This public disclosure has been prepared and approved by the Directors of the Firm and is based on the audited financial statements covering the financial year ending 31.03.23.

### 2. Remuneration Policies and Practices

#### 2.1 Qualitative Disclosures

The Firm is subject to the MIFIDPRU Remuneration Code at SYSC 19G of the FCA Handbook and in accordance with this, has adopted a remuneration framework that:

- is consistent with and promotes sound and effective risk management;
- does not encourage excessive risk taking;
- includes measures to avoid conflicts of interest;
- is in line with the Firm's business strategy, objectives, values and long-term interests; and
- discourages behaviours that can lead to misconduct and poor client outcomes.

The Firm pays its staff a combination of fixed (salary and benefits) and variable (including bonus) remuneration. Fixed remuneration is based on individual performance and market benchmarking. Variable remuneration is discretionary and takes into consideration the Firm's financial performance as well as other non-financial criteria including achievement of personal objectives and risk and compliance behaviour. All staff members are eligible to receive variable remuneration.

The Firm's objective in providing financial incentives is to attract, motivate and retain talent.

The Firm does not consider itself to be significant in terms of the nature, scale or complexity of its business and as such, does not consider it necessary to appoint a remuneration committee. The Firm's governing body, its Board of Directors ("the Board"), has overall responsibility for its remuneration policies and practices. The Board is comprised of two executive directors, all of whom are registered

to perform FCA Senior Management Functions (SMF's). Duties are segregated in a manner that is proportionate to the size of the Firm. The Board is responsible for determining all remuneration packages across the company, with approval for their own remuneration sought from the other member of the Board. Independent review of remuneration decisions is sought from external advisors as required.

The decisions of the Board on setting remuneration are based on risk management, business strategy, long term business interests, managing conflicts of interests, measurement of performance against business and risk objectives and compliance by employees amongst other criteria.

The Board reviews the Firm's remuneration policy and practices on an annual basis.

## **2.2 Quantitative Disclosures**

For the financial year ending 31.03.2023, total remuneration awarded to all staff was £11,0000 of which £11,000 comprised the fixed component of remuneration. No variable remuneration was awarded in the financial year.