

Introduction

The following disclosure is made by Omni Advisory Limited (“**OAL**”) pursuant to the FCA’s Prudential Sourcebook for MiFID Investment Firms (“**MIFIDPRU**”) in respect of the financial year ended 31st December 2023.

OAL is authorised and regulated by the FCA in the UK as a Collective Portfolio Management Investment (“**CPMI**”) firm and is therefore subject to the FCA’s Prudential Sourcebook for MiFID Investment Firms (“**MIFIDPRU**”). It meets the criteria for small and non-interconnected (“**SNI**”) investment firm, detailed in MIFIDPRU 1.2, and, so, is categorised as ‘SNI investment firm’.

OAL is required, under Chapter 8 of MIFIDPRU, to publish key information to assist users of their accounts and to encourage market discipline. In accordance with MIFIDPRU 8.1, as an ‘SNI investment firm’ the information which it is required to publish is limited to information relating to their respective remuneration policies and practices (per MIFIDPRU 8.6).

This disclosure has been prepared by OAL in accordance with the requirements of MIFIDPRU 8 and has been approved by the directors of OAL. Unless otherwise stated, all disclosures pertain to the financial year ended 31st December 2023 and are seen as complimentary to OAL’s published financial statements for that period, its implementation of other MIFIDPRU rules, and internal capital adequacy and risk assessment (“**ICARA**”) process. The MIFIDPRU disclosure is published alongside the audited annual accounts.

Remuneration Policy and Practices

As an ‘SNI investment firm’, OAL is subject to the “basic” requirements of the MIFIDPRU Remuneration Code set out in SYSC 19.G of the FCA’s Handbook. MIFIDPRU 8.6 of the FCA’s Handbook requires OAL to disclose certain information on at least an annual basis regarding its Remuneration Policy and related practices for all staff.

Approach to Remuneration

The directors of OAL are responsible for its Remuneration Policy.

The Remuneration Policy is designed to ensure that the entity’s compensation arrangements:

- are consistent with and promote sound and effective risk management;
- does not encourage risk-taking which is inconsistent with the risk profiles of the funds which it manages;
- seek to avoid creating conflicts of interest; and
- are in line with its business strategy, objectives, values and long-term interests.

Compensation is based upon consideration of qualitative and quantitative factors, including the performance of the relevant individual and of the business. Variable remuneration is adjusted in line with relevant capital and liquidity requirements.

Objectives of Financial Incentives

Individuals are rewarded based on their contribution to the relevant entity's overall strategy. Other factors, such as performance, reliability, effectiveness of controls, business development and contribution to the relevant entity generally are also taken into account when assessing the performance of staff.

Development of Remuneration Policy and Related Practices

The governance relating to the development of the Remuneration Policy and related practices has risk management, equality, and conflicts of interest at its core:

- Risk management:
 - setting a clear policy and procedure for setting variable remuneration including individual, team and firm performance;
 - alignment with the relevant entity's business strategy, values and long term-goals;
 - alignment with the protection of the relevant entity clients, customers and investors;
 - ensuring variable remuneration does not undermine the relevant entity viability, sustainability and its ability to meet its Overall Financial Adequacy Rule and Threshold Conditions; and
 - ensuring that financial and non-financial incentives do not promote excessive risk taking;
- Equality:
 - ensuring that remuneration is not biased by gender, race, ethnic origin, political views, sexual orientation, age, disability or any other discriminatory factors;
- Conflicts of interest:
 - adopting policies and procedures aimed at mitigating any potential conflicts that may arise between the relevant entity, and its staff members, clients, customers, investors or investment strategies; and
 - maintaining a Conflict of Interests Register which includes potential conflicts relating to remuneration as well as any procedures implemented to mitigate such conflicts.

Components of Remuneration

OAL's remuneration components are described below:

Category	Component
Fixed	Base salary

	Pension
	Benefits
Variable	Discretionary annual bonus
	Carried interest
	Sign-on bonus (extraordinary)
	Retention bonus (extraordinary)

Performance criteria

Remuneration decisions are made based on a combination of:

- the relevant entity's long-term sustainability and viability including looking through the business and economic cycles;
- the impact on the entity's Overall Financial Adequacy Rule and Threshold Conditions; and
- the entity's business performance and results against its strategic objectives.

Remuneration decisions for individuals are made based on a combination of:

- individual performance against the specifications of the role;
- the level of responsibility and seniority;
- overall performance of the relevant business function;
- adherence to the relevant entity's purpose, values and culture;
- adherence to the relevant entity's risk management and compliance framework; and
- compliance with the relevant entity's internal conduct policies and procedures.

Specific criteria are in place for those members of staff performing SM&CR control functions, whereby remuneration for such members of staff is not directly determined by the performance of the business, either positively or negatively. This is to ensure there are no conflicts of interests and that objectivity is not compromised.

Quantitative Disclosure

Aggregated quantitative information on remuneration paid to all staff:

Category	£'000
Omni Advisory Limited	
Fixed remuneration	645

Variable remuneration	206
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Verification

The information contained in this disclosure has not been audited by OAL's external auditors and does not constitute any form of financial statement.