

MIFIDPRU Remuneration Disclosures

Introduction

INDOS Financial Limited (the “Firm”) is authorised and regulated by the Financial Conduct Authority.

The Firm is a MiFIDPRU investment firm and the following disclosures have been made in accordance with the FCA’s MiFIDPRU remuneration requirements. This Remuneration Disclosure (the “Disclosure”) has been produced to satisfy the requirements of the MIFIDPRU 8 Disclosure requirements and provides a summary of the Firm’s qualitative and quantitative disclosures.

Remuneration Philosophy

Our remuneration philosophy and the objectives of our remuneration practices are consistent with and promote sound and effective risk management aligned with the business strategy, objectives and long-term interests of the Firm. The Firm’s remuneration arrangements are designed to:

- promote risk awareness and encourage responsible business conduct;
- reinforce positive cultures and the values of the Firm;
- encourage responsible business conduct;
- align the interests of staff with the long-term interests of the clients and the Firm commensurate with the Firm’s risk appetite;
- avoid conflicts of interests; and
- offer reasonable and competitive remuneration to attract and retain high calibre employees.

Governance and reporting

The Firm’s parent undertaking designs and implements remuneration policies which are overseen by the Group Remuneration Committee to ensure that what is paid to its staff is aligned to the group’s business performance and strategy.

The Firm believes that its parent undertaking’s remuneration policy and process is appropriate for the Firm. The Firm inputs into the remuneration process through the rating of staff performance in appraisals to ensure appropriate alignment of compensation to performance.

Components of Remuneration

The Firm categorises all remuneration as either fixed or variable remuneration based on the ‘quality’ and ‘purpose’ of the remuneration.

The Firm pays fixed and variable remuneration in a balanced way with the fixed component representing a sufficiently high proportion of the total remuneration that enables the Firm’s Policy to work flexibly and includes the possibility of the Firm paying no variable remuneration.

Fixed remuneration is remuneration that primarily reflects a staff member’s professional experience and organisational responsibility as defined in their job description and terms of employment; and is permanent, pre-determined, non-discretionary, non-revocable and not dependent on performance.

Variable remuneration is remuneration that is based on performance or, in exceptional cases, other conditions that reflects the long-term performance of the staff member as well as performance in excess of the staff member's job description and terms of.

Fixed and variable remuneration components

Under the remuneration framework, remuneration decisions are made based on a combination of:

- Business results, including performance against strategic objectives.
- Performance against Group's strategic objectives set out in performance scorecards.
- Adherence to the Group's values, business principles and Group risk-related policies. Risk objectives are included into the performance scorecard of senior management and there is a mandatory global risk objective applied for all employees in order to highlight the importance of managing risk and ensure its consistent reinforcement;
- Individual performance; and
- Local market position and practice.

Financial and non-financial assessment criteria

The Firm considers both financial and non-financial criteria when assessing individuals for the purposes of determining the amount of variable remuneration to pay.

Non-financial criteria forms a significant part of the performance assessment process, overrides financial criteria, where appropriate, include metrics on conduct, which make up a substantial portion of the non-financial criteria and include how far the individual adheres to effective risk management and complies with relevant regulatory requirements.

Total remuneration awarded to all staff

For the period 1st January – 31st December 2022, the total amount of remuneration awarded to all staff comprised:

- (a) £2,737,489 of fixed remuneration; and
- (b) £123,301 of variable remuneration.

Summary of significant changes

This is the Firm's first Remuneration disclosure under MIFIDPRU8. There have been no significant changes to the Firm's Remuneration practices compared to the disclosures made in the previous period under FCA IFPRU rules.

Timing of disclosure

This disclosure is published annually shortly after we publish our annual financial statements and is made available on the Firm's website under the regulatory notice section.

21st April 2023