
MIFIDPRU 8 Disclosure

AlphaGrep UK Limited

September 2025

Introduction

The Financial Conduct Authority (“[FCA](#)”) in the Prudential sourcebook for MiFID Investment Firms in the FCA Handbook (“[MIFIDPRU](#)”) sets out the detailed prudential requirements that apply to AlphaGrep UK Limited (“[AlphaGrep](#)” or the “[Firm](#)”). Chapter 8 of MIFIDPRU (“[MIFIDPRU 8](#)”) sets out public disclosure rules and guidance with which the Firm must comply, further to those prudential requirements.

AlphaGrep is classified under MIFIDPRU as a small and non-interconnected MIFIDPRU investment firm (“[SNI MIFIDPRU Investment Firm](#)”). As such, the Firm is required by MIFIDPRU 8 to disclose information regarding its remuneration policy and practices.

The purpose of these disclosures is to give stakeholders and market participants an insight into the Firm’s culture and to assist stakeholders in making more informed decisions about their relationship with the Firm.

This document has been prepared by AlphaGrep in accordance with the requirements of MIFIDPRU 8 and is approved by its board of directors (the “[Board of Directors](#)”). Unless otherwise stated, all figures are as at the Firm’s 31 March financial year-end.

Remuneration Policy and Practices

Overview

As an SNI MIFIDPRU Investment Firm, AlphaGrep is subject to the basic requirements of the MIFIDPRU Remuneration Code (as laid down in Chapter 19G of the Senior Management Arrangements, Systems and Controls sourcebook in the FCA Handbook (“[SYSC](#)”). AlphaGrep, as an alternative investment fund manager, is also classified as a collective portfolio management investment firm, and as such, is also subject to the AIFM Remuneration Code (SYSC 19B). The purpose of the remuneration requirements is to:

- Promote effective risk management in the long-term interests of the Firm and its clients;
- Ensure alignment between risk and individual reward;
- Support positive behaviours and a healthy firm culture; and
- Discourage behaviours that can lead to misconduct and poor customer outcomes.

The objective of AlphaGrep’s remuneration policies and practices is to establish, implement and maintain a culture that is consistent with, and promotes, sound and effective risk management and does not encourage risk-taking which is inconsistent with the risk profile of the Firm and the services that it provides to its clients.

In addition, AlphaGrep recognises that remuneration is a key component in how the Firm attracts, motivates, and retains quality staff and sustains consistently high levels of performance, productivity, and results. As such, the Firm’s remuneration philosophy is also grounded in the belief that its people are the most important asset and represents its greatest competitive advantage.

AlphaGrep is committed to excellence, teamwork, ethical behaviour, and the pursuit of exceptional outcomes for its clients. From a remuneration perspective, this means that performance is determined through the assessment of various factors that relate to these values, and by making considered and informed decisions that reward effort, attitude, and results.

Characteristics of the Firm's Remuneration Policy and Practices

Remuneration at AlphaGrep comprises fixed and variable components. The fixed element is set at a level that is competitive within the market and sufficient to attract and retain skilled staff.

The award of variable remuneration is based on both financial and non-financial factors:

- *Financial factors* include an assessment of AlphaGrep's overall results, the performance of the wider AlphaGrep Group (including the Firm's contribution to the Group's performance), and each individual's performance within their business unit, together with their overall contribution to the Firm's objectives.
- *Non-financial factors* include, among other matters, the individual's adherence to internal standards and expectations, as well as full compliance with the Firm's policies and procedures. All staff members are eligible to be considered for variable remuneration.

The Firm does not operate a deferred remuneration plan, as it falls outside the scope of the "extended" remuneration requirements. However, the Firm continues to monitor relevant regulatory developments and would amend its remuneration framework if such requirements were to become applicable in the future.

The fixed and variable components of remuneration are appropriately balanced. The fixed component represents a sufficiently high proportion of total remuneration to allow for a fully flexible approach to variable awards, including the option of paying no variable remuneration. This may occur in circumstances such as constrained profitability or where there is a risk that the Firm may not meet its regulatory capital or liquidity requirements.

Governance and Oversight

The Firm's remuneration committee (the "Remuneration Committee") is responsible for setting and overseeing the implementation of AlphaGrep's remuneration policy and practices. The Remuneration Committee is composed of one or more directors of the Firm, including the CEO of AlphaGrep's asset management division, as well as other senior management of the Firm and the AlphaGrep Group. In order to fulfil its responsibilities, the Remuneration Committee:

- Is appropriately staffed to enable it to exercise competent and independent judgment on remuneration policies and practices and the incentives created for managing risk, capital, and liquidity.
- Prepares decisions regarding remuneration, including decisions that have implications for the risk and risk management of the Firm.
- Ensures that the Firm's remuneration policy and practices take into account the public interest and the long-term interests of shareholders, investors, and other stakeholders in the Firm.
- Ensures that the overall remuneration policy is consistent with the business strategy, objectives, values, and interests of the Firm and of its clients.

AlphaGrep's remuneration policy and practices are reviewed annually by the Remuneration Committee.

Quantitative Remuneration Disclosure

For the financial year 1 April 2024 to 31 March 2025, the total amount of remuneration awarded to all staff was £8,262,618, of which £5,537,795 comprised the fixed component of remuneration, and £2,724,823 comprised the variable component. For these purposes, 'staff' is defined broadly, and includes, for example, employees of the Firm itself, directors, consultants and secondees.