# Bellecapital

# **MIFIDPRU 8 PUBLIC DISCLOSURE**

# **BELLECAPITAL UK LIMITED**

Bellecapital UK Limited ("BCUK" or the "Firm") is authorised and regulated by the Financial Conduct Authority ("FCA") as a MIFIDPRU Investment Firm, as defined in the FCA Handbook.

In accordance with the FCA's Prudential Rules BCUK is defined as a Small-Non-Interconnected Firm ("SNI").

This MIFIDPRU 8 Disclosure has been prepared and published alongside the annual audited financial statements as at 31<sup>st</sup> December 2023.

BCUK also carries out an annual Internal Capital Adequacy Risk Assessment ("ICARA") process and this formally documents how the firm assesses its own funds and liquidity requirements.

## **Remuneration Code, Policy & Practices**

As an 'SNI Firm' BCUK is subject to the basic requirements of the MIFIDPRU Remuneration Code which is set out in SYSC 19.G of the FCA's Handbook.

MIFID 8.6 of the FCA's Handbook requires BCUK to provide a summary of its Remuneration Policy and associated practices.

### BCUK's approach to remuneration

- consistent with, and promotes sound and effective risk management
- in-line with the business strategy, objectives and long-term interests of the firm
- contains measures to avoid conflicts of interest
- encourages responsible business conduct
- considers BCUK's risk appetite and strategy, including environmental, social and governance risk factors
- promotes risk awareness and prudent risk taking
- ensuring gender neutrality and that remuneration is not biased in any way

### **Objectives of incentives**

Employees are rewarded based on their overall contribution to BCUK's business strategy and therefore non-financial criteria is also taken into account when determining financial reward.

These factors include adherence to BCUK's compliance and risk policies, customer relationships, teamwork and reliability.

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#### **Governance Arrangements**

The Governing Body of BCUK is responsible for overseeing the remuneration policy, its implementation and also periodically reviewing the policy.

#### **Components of remuneration**

#### **Fixed Remuneration**

This is based on an employees' professional experience, organisational responsibility and is detailed in their job description and employment contract:

- Base Salary
- Pension
- Benefits

#### Variable Remuneration

This is based on the 'Performance Criteria for variable remuneration' explained in the section below:

- Annual bonus
- Annual discretionary bonus

#### Performance Criteria for variable remuneration

BCUK's Remuneration Policy provides details of the financial and non-financial performance criteria used across the firm performance (including the business units) and individuals.

#### Remuneration criteria on a firm/business unit level

- BCUK's overall business performance
- BCUK's long-term viability looking at the whole business and economy
- BCUK's Threshold Conditions and Financial Adequacy Rules

#### Remuneration criteria on an individual level

- Performance against the specifications of the role
- Level of responsibility and seniority within the firm
- Contribution to business strategy
- Reliability
- Teamwork
- Positive customer relationships
- Adherence to Compliance & Risk framework

## **Categories of staff**

#### **Revenue producers**

- Base Salary
- Pension
- Benefits
- Variable compensation which consists of an annual bonus based on the individual criteria explained above (percentage of revenue and contribution to the business) with a percentage held on retention and paid at the companies' discretion when we satisfied all work has been carried out compliantly

#### Non-revenue producers

- Base Salary
- Pension
- Benefits
- Variable compensation which consists of an annual discretionary bonus based on the individual criteria explained above