## Delft Investments Limited

**MIFIDPRU 8 Disclosure**

May 2025

Delft Investments Limited (‘Delft or ‘the firm’)

### Introduction

The Financial Conduct Authority (“FCA” or “regulator”) in its Prudential sourcebook for MiFID Investment Firms (“MIFIDPRU”) sets out the detailed prudential requirements that apply to Delft. In particular, Chapter 8 of MIFIDPRU (“MIFIDPRU 8” or the “public disclosures requirements”) sets out public disclosure obligations with which the Firm must comply, further to those prudential obligations.

Delft is classified under MIFIDPRU as a small and non-interconnected investment firm (“SNI MIFIDPRU investment firm”). As such, MIFIDPRU 8 requires Delft to disclose information regarding the Firm’s 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 Delft in accordance with the requirements of MIFPRU 8 and is verified by Board. Unless otherwise stated, all figures are as at the 31 Dec 2024 financial year-end.

### Remuneration Policy and Practices

**Overview**

As an SNI MIFIDPRU investment firm, Delft is subject to the basic requirements of the MIFIDPRU Remuneration code. The purpose of the requirements on remuneration are 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 healthy firm cultures; and
* Discourage behaviours that can lead to misconduct and poor customer outcomes.

The objective of Delft’s remuneration policies and practices are 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, Delft 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 greatest competitive advantage.

Delft 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 remuneration policy and practices**

Remuneration at Delft is made up of a fixed remuneration component. The fixed component is set in line with market competitiveness at a level to attract and retain skilled staff. The fixed component represents a sufficiently high proportion of the total remuneration to enable the operation of a fully flexible policy. The bonus pool is determined by the level of success and performance of Delft, not the individual. The amount payable to the individual is determined via their contribution to Delft’s performance over the relevant period. Performance is not assessed by looking solely at their financial performance but will consider whether the individual has breached any internal policies/FCA rules, whether they have stuck to the prescribed risk limits etc. Performance is based on the employee’s contribution to the firm as a whole and is determined by the management committee in its sole discretion.

**Governance and Oversight**

Delft does not have a separate remuneration committee. The responsible for setting and overseeing the implementation of Delft’s remuneration policy and practices rests with the Board. In order to fulfil its responsibilities, the Board,

* Are the controllers of Firm and the Chief Executive Officer. They can exercise competent and independent judgment on remuneration policies and procedures;
* Prepares decisions regarding remuneration, including decisions which have implications for the risk and risk management of the Firm;
* Ensures that the remuneration policy and practices take into account the public interest and the long-term interests of shareholders, investors and other stakeholders in the Firm; and
* Ensures that the overall remuneration policy is consistent with the business strategy, objectives, values and interests of the Firm and of its clients.

Delft’s remuneration policy and practices are reviewed annually by the Board.

**Quantitative Remuneration Disclosures**

For the financial year 31 December 2024, the total amount of remuneration awarded to all staff was £719,472 of which £553,472 comprised the fixed component of remuneration, and £166,000 comprised the variable component. For these purposes, staff’ is defined broadly, and includes, for example, employees of the Firm itself, Directors, employees of other entities in the group (if applicable), employees of joint service companies, and any other relevant associated staff member.