

# COMAC CAPITAL LLP

(FCA firm reference number 794872)

MIFIDPRU 8 Disclosure July 2023

## 1. 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 COMAC Capital LLP (“COMAC” 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.

COMAC 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 the following:

- Governance arrangements.
- 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 COMAC in accordance with the requirements of MIFIDPRU 8 and is verified by the Firm’s executive committee (the “ExCo”). Unless otherwise stated, all figures are as at the Firm’s most recent 31st March financial year-end.

## 2. Remuneration Policy and Practices

### Overview

As an SNI MIFIDPRU Investment Firm, COMAC 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 of the FCA Handbook (“SYSC”). The purpose of the remuneration requirements is to:

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

The objective of COMAC’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, COMAC recognises that remuneration is a key component in how the Firm attracts, motivates, and retains high quality staff.

### **Characteristics of the Firm's Remuneration Policy and Practices**

Remuneration at Aperture UK is made up of fixed and variable components. The fixed component is set in line with market competitiveness at a level to attract and retain skilled staff. Variable remuneration is paid on a discretionary basis and takes into consideration the Firm's overall financial performance and the financial and non-financial performance of the individual in contributing to the Firm's success. All staff members are eligible to receive variable remuneration.

The Firm has a single business unit, that of Investment Management. Overall financial performance of the Firm, as well as both financial (to the extent directly applicable) and non-financial criteria related to the performance of each staff member is used in assessing the level of variable remuneration to be awarded to individuals in all roles across the Firm.

- The non-financial criteria considered includes but is not limited to:
- Adherence to the FCA's Conduct Rules;
- Upholding company values;
- Work ethic and level of diligence applied to the role;
- Compliance with the Firm's and the Aperture group's policies and procedures;
- Where applicable, adherence to risk limits and the appropriate control of risk within the agreed framework for the relevant investment strategies.

The fixed and variable components of remuneration are appropriately balanced: the fixed component represents a sufficiently high proportion of the total remuneration to enable the operation of a fully flexible policy on variable remuneration. This allows for the possibility of paying no variable remuneration component, which the Firm may do should a need arise, such as where there is a risk that the Firm may not be able to meet its regulatory capital or liquidity requirements.

### **Governance and Oversight**

The ExCo is responsible for setting and overseeing the implementation of COMAC's remuneration policy and practices. In order to fulfil its responsibilities, the ExCo:

- 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 consider the public interest and the long-term interests of partners, 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.

COMAC's remuneration policy and practices are reviewed annually by the ExCo.

### **Quantitative Remuneration Disclosure**

For the financial year 1st April 2022 to 31st March 2023, the total amount of remuneration awarded to all staff was £2,174,363 of which £906,363 comprised the fixed component of remuneration, and £1,268,000 comprised the variable component. The firm chose For these purposes, 'staff' is defined broadly, and includes, for example, employees of the Firm itself, partners, employees of other entities in the group, employees of joint service companies, and secondees.