

Alder Investment Management MIFIDPRU 8 Disclosure 2026

8.1 Application, Proportionality, Timing and Availability

The MIFIDPRU 8 disclosures apply to AIM except for 8.7 and certain elements of 8.6. AIM will make these disclosures annually and publish them on its website. They will be made to a level of detail that is appropriate to AIM’s size and internal organisation, and to the nature, scope, and complexity of its activities.

8.2 Risk management objectives and policies

Please refer to the ICARA document.

8.3 Governance arrangements

The Board Terms of Reference ensure AIM complies with the requirement in SYSC 4.3A.1R to ensure the management body defines, oversees and is accountable for the implementation of governance arrangements that ensure effective and prudent management of the firm, including the segregation of duties in the organisation and the prevention of conflicts of interest, and in a manner that promotes the integrity of the market and the interests of clients. Statements of Responsibility document the segregation of duties.

The number of directorships (executive and non-executive excluding directorships held in organisations which do not pursue predominantly commercial objectives) held by each member of the management body at parent company level are as follows;

Mark Shapley	2
James Bradford	2
Andrew Sykes	2
Andrea Maxwell	2
Angela Sills	2
Arthur Vestey	4
George Vestey	3
Joanna Vestey	3
Lucy Barnes	1

AIM is not a Significant SYSC firm and as such does not require modification or waiver from the FCA in order to allow a member of the management body to hold additional directorships.

AIM’s diversity policy in relation to the management body is to ensure a proportionate representation of its client base. There are no barriers in place beyond this requirement except that the individual possesses the relevant skills and experience to carry out the role effectively, and we do not seek to establish religion, belief, sexual-orientation or any other protected characteristic. There are no outstanding targets attached to this policy having moved to a 50/50 NED gender ratio over the past 48 months. There is an age-span of nearly 30 years between the youngest and oldest member.

In accordance with MIFIDPRU 7.1.4 AIM is not required to establish a risk committee.

8.4 Own funds

We are required to disclose the following information from the audited accounts in the below format.

Composition of regulatory own funds			
	Item	Amount (GBP thousands)	Source based on the balance sheet in the audited financial statements
1	OWN FUNDS	6117	Shareholder's funds
2	TIER 1 CAPITAL	6117	Shareholder's funds
3	COMMON EQUITY TIER 1 CAPITAL	6117	Net Assets including pension liability and provision
4	Fully paid up capital instruments	865	Called up share capital
5	Share premium	154	Share Premium Account
6	Retained earnings	5088	Profit and loss account
7	Accumulated other comprehensive income	0	
8	Other reserves	10	Share Capital Redemption reserve
9	Adjustments to CET1 due to prudential filters	0	
10	Other funds	0	
11	(-)TOTAL DEDUCTIONS FROM COMMON EQUITY TIER 1	0	
19	CET1: Other capital elements, deductions and adjustments	0	
20	ADDITIONAL TIER 1 CAPITAL	0	
21	Fully paid up, directly issued capital instruments	0	
22	Share premium	0	
23	(-) TOTAL DEDUCTIONS FROM ADDITIONAL TIER 1	0	
24	Additional Tier 1: Other capital elements, deductions and adjustments	0	
25	TIER 2 CAPITAL	0	
26	Fully paid up, directly issued capital instruments	0	
27	Share premium	0	
28	(-) TOTAL DEDUCTIONS FROM TIER 2	0	
29	Tier 2: Other capital elements, deductions and adjustments	0	

Own funds: reconciliation of regulatory own funds to balance sheet in the audited financial statements				
Columns should be kept fixed, unless the investment firm has the same accounting and regulatory scope of consolidation, in which case the volumes should be entered in column (a) only.				
Figures are given in GBP thousands unless noted otherwise.				
		a	b	c
		Balance sheet as in published/audited financial statements	Under regulatory scope of consolidation	Cross-reference to template OF1
		As at period end	As at period end	
Assets - Breakdown by asset classes according to the balance sheet in the audited financial statements				
1	Fixed Assets	447		
2	Current Assets	7941		
3	Total Assets	8388		
Liabilities - Breakdown by liability classes according to the balance sheet in the audited financial statements				
1	Creditors	1143		
2	Long-term Liability Provisions	1128		
3	Total Liabilities	2271		
Shareholders' Equity				
1	Called up Share Capital	865		4
2	Share Premium Account	154		5
3	Share Capital Redemption Reserve	10		8
4	Profit and Loss Account	5088		6
5	Total Shareholders' equity	6117		1

8.5 Own funds requirements

Please refer to the ICARA document.

8.6 Remuneration policy and practices

The firm does not pay any form of variable remuneration and its remuneration policy is designed to engender good behaviours.

In accordance with the FCA handbook Alder defines material risk takers (MRTs) as a staff member whose professional activities have a material impact on the risk profile of the firm or of the assets that the firm manages. Alder has three MRTs. For the purposes of this disclosure and in accordance with MiFIDPRU 8.6.8R7 Alder is able to aggregate the salaries of the senior managers and other material risk takers which total £1,168,844 for the last financial year, as splitting the information between those

two categories would lead to the disclosure of information about one or two people. The combined salary for all other staff was £2,191,112 for the same period.

The Remuneration Committee is constituted by the Board of Directors to assist the Board in meeting its responsibilities regarding the determination, implementation and operation of the overall remuneration policy for the Group, including the remuneration of the Chairman and Executive Directors, as well as overseeing the remuneration arrangements of all other staff.

The Committee is authorised to:

- Review and approve the Alder Investment Management Limited Remuneration Policy Statement on behalf of the Board.
- Review recommendations from Senior Management in respect of proposed remuneration levels and agree and approve remuneration for all Group staff on behalf of the Board.
- If appropriate, and after due consultation with the Board, recommend and establish the terms of reference for the appointment of any consultants necessary to advise the Committee on issues within its terms of reference.

The Chairman and the members of the Committee shall be appointed by the Board. The membership of the Committee is restricted to the Chairman of the Board and the independent non-executive Directors with a minimum of two members. The CEO is invited to provide context following discussions with department heads.

8.7 Investment policy

Alder is exempt from this disclosure requirement in accordance with MiFIDPRU 8.1.1R4.