

## **MIFIDPRU 8**

Disclosure - Attivo Investments Limited

The Investment Firm Prudential Regime ('IFPR') is the Financial Conduct Authority's ("FCA") prudential regime for MiFID investment firms. Its provisions apply to Attivo Investments Limited ("the Firm") as an FCA authorised and regulated firm.

This disclosure is made in accordance with the requirements of the FCA under MIFIDPRU 8.. Under the IFPR, the Firm is categorised as a Small and Non-Interconnected ("SNI") firm. The information provided reflects the position of the Firm as at its financial year-end and is intended to provide transparency on the firm's capital adequacy, risk management, governance, and remuneration practices.

The Firm believes that its qualitative disclosures are appropriate to its size and internal organisation, and to the nature, scope and complexity of its activities.

### **1. Overview**

Attivo Investments Limited is authorised and regulated by the Financial Conduct Authority as a MIFIDPRU investment firm. We operate under an SNI classification and manage model portfolios on a discretionary basis, serving professional clients only. We do not hold client money or assets.

### **2. Own Funds**

The Firm maintains sufficient own funds to meet its capital requirements. Our capital position is monitored on an ongoing basis and is reviewed as part of the Firm's Internal Capital Adequacy and Risk Assessment (ICARA) process.

As at the end of the financial year, the Firm held own funds in excess of its Fixed Overhead Requirement (FOR).

### **3. Own Funds Requirements**

As an SNI firm, the Firm's capital requirement is equal to its Fixed Overhead Requirement (FOR), calculated in line with MIFIDPRU 4. This is reviewed regularly to ensure the firm maintains adequate financial resources.

### **4. Governance Arrangements**

The Firm is governed by Directors of an Executive Committee which includes executive and non-executive directors. Governance is structured to ensure clear oversight of strategic, financial, investment, operational and compliance matters. The Firm has established a formal committee structure including the Regulatory Oversight Committee, Investment Committee, and Executive Committee.

As the Firm grows, the Executive Committee continues to evolve its governance framework with a focus on independence, transparency, and accountability.

## **5. Risk Management Objectives and Policies**

The Firm maintains a risk management framework that is proportionate to its scale and activities. Key risks identified include operational, compliance, liquidity, and strategic risk. These are assessed and managed through ongoing monitoring, scenario analysis, stress testing, and internal policies. Risk is reviewed quarterly at Executive Committee level and through our ICARA process.

## **6. Remuneration Policy**

The Firm's remuneration policy is designed to attract, retain, and motivate skilled professionals in a manner consistent with the long-term interests of the Firm and its stakeholders. The Executive Committee is responsible for decision-making and governance around the development of remuneration policies and practices.

Remuneration consists of fixed pay, with any variable pay assessed based on individual performance, conduct, and firm-level outcomes.

The Firm applies the proportionality principle and does not operate bonus schemes that create inappropriate risk incentives.

## **7. Remuneration – Financial and Non-Financial Performance Criteria**

The use of both financial and non-financial criteria when assessing remuneration, aims not only to discourage inappropriate behaviours but also to incentivise and reward behaviour that promotes positive non-financial outcomes for the Firm.

The Firm uses its risk adjusted profits based upon the performance of the business as its financial performance criteria.

The Firm uses the following non-financial performance criteria:

- An employee's conduct;
- An employee's individual performance, including learning and development;
- Performance in line with firm strategy or values; and
- Adherence to the Firm's risk management and compliance policies.

## **8. Total Amount of Remuneration Awarded**

Under MIFIDPRU 8.6.8R(2), the Firm must disclose the total amount of remuneration awarded to all staff, split into fixed and variable remuneration. The remuneration figures shown below are for the financial year ending 30<sup>th</sup> September 2025.

<b>Remuneration Type</b>	<b>£</b>
Fixed Remuneration	226,879
Variable Remuneration	24,167
<b>Total Remuneration</b>	<b>251,046</b>

## **7. Frequency of Disclosure**

This disclosure will be updated and published annually in line with the Firm's audited financial statements or more frequently if there is a material change.

## **8. Publication**

This disclosure is available on the Firm's website and can be requested in hard copy by contacting us directly.