

## **Gramercy Ltd. Public Disclosure under MIFIDPRU**

### **Introduction**

The UK Investment Firms Prudential Regime (“IFPR”) requires all UK MiFID investment firms to make certain qualitative and quantitative public disclosures under Chapter 8 of MIFIDPRU of the Financial Conduct Authority (“FCA”) rules. Under the IFPR, Gramercy Ltd. (the “Firm”) is categorised as a small and non-interconnected (“SNI”) MIFIDPRU investment firm and this disclosure is prepared on this basis.

### **i) SNI Qualitative Disclosures**

#### **Remuneration approach and financial incentive objectives**

The Firm’s approach to remuneration, as set out in its remuneration policy, aims to ensure that the performance assessment and remuneration of the Firm’s staff does not conflict with the Firm’s duty to act in the best interest of its clients and the underlying investors in our clients’ products. This policy is designed to ensure that our remuneration policies and practices are consistent with, and promote sound and effective, risk management and are in line with the business strategy, objectives and long-term interests of the Firm.

The remuneration policy is also designed to ensure that staff are appropriately incentivised and rewarded based on performance, and in a way that supports the Firm’s purpose and values.

#### **Governance and decision-making**

Gramercy Ltd.’s Board of Directors (the “Board”) is responsible for ensuring that a robust remuneration policy is developed to align the Firm’s remuneration practices with its risk tolerance. The Board sets the overall remuneration policy for the Firm and ensures it is reviewed and approved if there are any updates or changes to the remuneration policy. The development and review of the policy is supported by risk management and compliance functions and by business units in the Firm.

#### **Remuneration practices and policies**

The Firm’s remuneration policy makes a clear distinction between criteria for setting fixed and variable remuneration. All remuneration paid to staff members is categorised as either fixed or variable remuneration as follows:

- Basic fixed remuneration primarily reflects an employee’s professional experience and organisational responsibility as set out in the employee’s job description and terms of employment; and
- Variable remuneration reflects performance in excess of that requirement to fulfil the employee’s job description and terms of employment and that is subject to performance adjustment in accordance with the MIFIDPRU Remuneration Code (SYSC 19G).

When the Firm is paying variable remuneration that is performance related, the Firm will consider not only the performance of the individual, but also of their business unit and the Firm itself. This will include looking at long term performance to ensure that the payment of variable remuneration reflects that long term timescale and considers the Firm’s business risks during that time frame. The Firm will also consider non-financial metrics when assessing performance. Conduct is a significant metric within the non-financial considerations influencing variable remuneration. All variable remuneration will be adjusted in line with capital and liquidity requirements.

**ii) SNI Quantitative Disclosures**

In accordance with MIFIDPRU 8.6.8R(2) the Firm confirms that for the period 1 January 2025 to 31 December 2025 the remuneration was:

Total Remuneration for all Staff	Total Fixed Remuneration	Total Variable Remuneration
£2,544,347	£891,173	£1,653,173