Njord Partners

MIFIDPUR 8

Disclosure

Introduction

Njord Partners LLP (the “Firm”, “Njord” or “we”) is a MIFID Investment Manager authorised and regulated by the Financial Conduct Authority (FCA). We are required to comply with the disclosure requirements under the Investment Firms Prudential Regime (IFPR), which is set out in the FCA Handbook MIFIDPRU 8.

For the purpose of prudential regulations, we are classified as a SNI (small and non- interconnected) firm and are subject to the basic requirements. We are required to provide a level of detail in our disclosures that is appropriate to our size and internal organisation, and to the nature, scope, and complexity of our activities.

Remuneration

The Firm is required to comply with the MIFIDPRU Remuneration Code under IFPR, which aims to ensure that we have risk-focused remuneration policies that are consistent with and promote sound and effective risk management in the long-term interests of the Firm and our clients and do not expose the Firm or our clients to excessive risk.

Our approach and objectives

The Firm’s approach to remuneration policy and practices, with reference to the guidance set out by the FCA, considers an appropriate balance between fixed and variable remuneration as well as the constraints in place to avoid a conflict of interest between staff incentives and the best interests of clients.

The objectives of our financial incentives are to:

- promote sound and effective risk management in the long-term interests of the Firm and our clients,
- align employee’s interests with the firm’s long-term strategy and objectives
- limit risk-taking and avoid conflicts of interest,
- supporting positive behaviours and healthy firm cultures, and
- discourage behaviours that can lead to misconduct and poor customer outcomes.

Governance and decision-making procedures

The Executive Board of the Firm is responsible for overseeing the implementation of our remuneration policy and ensuring our compliance with the MIFIDPRU Remuneration Code.

One role of the Executive Board of the Firm is to ensure the extent of the variable remuneration at the Firm cannot affect the Firm’s ability to ensure a sound capital base.

The Executive Board of the Firm is responsible for overseeing the performance management process; reviewing and approving the remuneration policy, variable remuneration pool, participation in variable remuneration schemes, as well as the approval of variable remuneration awarded to individuals.

The Firm is committed to excellence, teamwork, ethical behaviour, and the pursuit of exceptional outcomes for our 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, diligence, and results.

The remuneration of senior staff in risk management and compliance functions is directly overseen by the Executive Board of the Firm.

Key characteristics of remuneration policies and practices

Remuneration at Njord is made up of fixed and variable components. The fixed and variable components of total remuneration are appropriately balanced with the fixed element being sufficiently high to enable the operation of a fully flexible policy on variable remuneration. The fixed component is set in line with market competitiveness at a level to attract and retain skilled staff and is reviewed annually taking into account factors such as market conditions and individual performance.

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 will provide eligible employees with direct and indirect allocations of equity interests from select investment vehicles.

Quantitative remuneration disclosures

For the financial year ended 31 March 2025, the amount of remuneration awarded is £2,737,777 of which fix remuneration was £1,512,777.00 and variable remuneration was £1,225,000.