

Annual Disclosure for Advanta Invest for year ending 31/3/2025

The Investment Firms Prudential Regime (IFPR) came into effect on the 1 January 2022 as a new regime for UK firms authorised under the Markets in Financial Instruments Directive (MiFID).

The IFPR was implemented by the FCA as prudential regulation within the MIFIDPRU section of the FCA Handbook.

These disclosures set out the annual public disclosures for Advanta Invest Limited (the firm) as required under MIFIDPRU 8 for the year ending 31/03/2025.

Scope and application of disclosure

Advanta Invest is an SNI MIFIDPRU Investment firm, authorised and regulated by the FCA. The firm is required to disclose on an individual firm basis and these disclosures have been prepared in line with the requirements of MIFIDPRU 8.

The firm has in place a remuneration policy (the policy) in accordance with the rules of its regulator (the FCA rules), covering the financial year ending March 2025.

The firm's board is responsible for approving and maintaining the policy. The policy is designed to align the firm's remuneration practices with its strategic objectives, growth opportunities, risk tolerance and cultural dynamics.

The firm is authorised by the Financial Conduct Authority (FCA) as a UK investment manager. The firm can arrange deals and manage investments, as well as arranging the safeguarding of assets. At this time the firm offers a range of model portfolios for its clients, and does not offer a range of collective investment schemes.

Remuneration policy is designed to be consistent with, and promote, sound and effective risk management. The policy is also designed to not encourage risk taking which is inconsistent with the risk profile of its offered range of model portfolios.

Remuneration for staff falls into two main components – fixed and variable remuneration. Fixed compensation for all employees includes a fixed salary, healthcare benefits, life insurance and critical illness cover. The firm also offers a discretionary bonus (variable remuneration).

Monetary, fixed remuneration is set relative to commonly used industry benchmarks which are reviewed every two years, or at the point of initiating a recruitment process.

Principles

1. Advanta Invest recognises the importance of retaining high calibre talent across all levels within the organisation. Consequently, we aim to provide a remuneration structure which places us in the top-half of widely recognised industry averages for similar roles, again recognising that within a small company individuals experience less role delineation than in larger entities.
2. With incremental responsibilities, increased levels of remuneration can be achieved, subject to appropriate banding.

3. The greater the seniority within the organisation the greater the variable element of compensation.
4. All remuneration policies are gender neutral and do not discriminate on the basis of protected rights of an individual in accordance with the Equality Act 2010.
5. Remuneration policies are designed to mitigate reputational risks from excessive rewards and behavioural risks that can arise from target-based incentives. Advanta Invest has a requirement to pay due regard to the interests of customers and to treat them fairly; consequently, its policies seek to mitigate and reduce the potential for an identifiable conflict of interest.
6. The policy is gender neutral as defined by the Equality Act 2010.

Objectives Alignment

The Advanta Invest remuneration structure aligns individual reward and recognition through a combination of both tangible and intangible factors.

Intangible factors have a higher degree of subjectivity and are aligned to Consumer Duty key performance indicators as follows:

1. **Personal development:**- achievement of professional qualifications and soft-skills development.
2. **Stakeholder engagement:** - effective engagement with all internal and external stakeholders, including shareholders, employees, clients and third-party service providers.
3. **Consumer Duty:** - successful implementation of annual Consumer Duty review, including fair value assessment and ongoing evidence-based target market review. To include appropriate monitoring of key metrics by the board.
4. **Appropriate management of any complaints.**

Tangible factors are aligned to the wider business key performance indicators; shown below:

1. **Assets under management:** - successful achievement of budget expectations.
2. **Capital adequacy:** - adherence to, regulatory, capital adequacy obligations.
3. **Cost base management:** - management of the underlying cost base within agreed budgetary framework.
4. **Performance and volatility management:** – successful maintenance of portfolios within targeted Dynamic Planner risk categories. Demonstratable evidence of relative strength of investment proposition using appropriate set of peer comparators.
5. **Execution and operational excellence:** - accurate portfolio transaction dealing, completeness and timeliness together with successful management of investment platform engagement.

Variable remuneration payments are calculated and awarded by reference to a series of metrics:

1. The assessment of performance of the individual concerned, including financial as well as non-financial criteria such as adherence to the Firm's policies and procedures and effective risk management.
2. The assessment of the performance of the portfolio range.

3. The overall firm results.

The level of importance of each criterion is adequately balanced to consider the position or responsibilities held by the individual concerned. The assessment of performance is also set in a multi-year framework appropriate to the life cycle of the models managed by the firm and the longer-term performance of the firm. The firm also sets an appropriate ratio of fixed to variable remuneration when awarding bonuses.

The Firm's approach ensures that there is a fully flexible bonus policy enabling it to award no bonus where performance does not justify an award.

This policy is reviewed at least annually, taking into account current and future risks and having regard to the firm's financial forecasts. Any changes are approved by the firm's board.

For the year ending 31 March 2025, total remuneration awarded to all staff was: Fixed £232,000; Variable £12,000.

Matt Webber