

AXM Alternative Investments Limited

MIFIDPRU 8 DISCLOSURE

Financial Year Ended 31/12/2024

1. INTRODUCTION

1.1. Background

AXM Alternative Investments Limited (“the Firm”) is prudentially regulated as a “small and non-interconnected” (“SNI”) MIFIDPRU investment firm. The Firm is Authorised as a MiFID Investment Firm and acts as a wholesale investment management firm. It is permitted to act only for professional clients and eligible counterparties. The Firm is authorised and regulated by the Financial Conduct Authority (“FCA”).

1.2 Scope of Application

Due to its ownership structure, the Firm is not a member of an investment firm group and therefore is required to issue disclosures on an individual basis for prudential purposes.

1.3 Disclosure Policy

This Disclosure is in line with the most recent published financial statements for the Firm as at 21/03/2025.

The MIFIDPRU Disclosure obligations, under MIFIDPRU chapter 8, require publication on an annual basis. The FCA expects this to be published on the Firm’s website. This Disclosure will be assessed and amended if there are any material changes within the period of Disclosure.

This Disclosure has been approved by the governing body of the Firm and are not subject to audit, except where they are prepared under accounting requirements for publication.

2. REMUNERATION

2.1 Approach to Remuneration

The Firm does not link remuneration directly to the performance of the Firm, or that of the Group, rather, the Firm’s performance may be a factor in determining variable remuneration. The Firm also considers its non-financial criteria when assessing remuneration.

Any discretionary bonus scheme pools are calculated by reference to the Firm’s net operating profit, where the underlying revenue is not subject to recovery or downward adjustment. Employees are not encouraged, and the Firm’s remuneration schemes do not reward, the taking of market or trading risks.

When determining the variable remuneration paid to any employee, the Firm considers a number of factors covering the firm as a whole, individual business units, and the individual employees as appropriate. The Firm’s overall profitability, the absolute and relative performance of an employee and (as applicable) their business unit, the employee’s conduct and adherence to the Firm’s values, any disciplinary action taken against the employee and the results of the employee’s performance review will be taken into account.

The discretion held by the Board of the Firm ensures that the Firm is able to retain employees in executive positions who are vital to the Firm’s strategic development. The Firm has no obligation to pay variable remuneration other than out of realised profits which are not subject to later reduction (after subtracting all expenses relating to running the business) to allow for a fully flexible policy. Accordingly, the Firm’s total variable remuneration does not limit its ability to strengthen its capital base.

2.4 Remuneration Objectives

The Firm’s financial incentives are designed to attract and retain employees with the appropriate skills, knowledge and expertise to enable the Firm to deliver its long-term strategic goals, widen its client base and expand into similar areas of business as and when the appropriate opportunities arise, in each case in a manner which is consistent with and which promotes effective risk management and does not expose the Firm to excessive risk.

2.5 Remuneration Governance

The Firm has in place a Remuneration Policy which is approved by the Board at least annually.

The Firm does not meet the criteria to form a remuneration committee under SYSC 19G. In view of the nature and size of the Firm, the Board does not believe it is proportionate to have a Remuneration Committee but will periodically monitor the remuneration practices of the Firm to determine if the implementation of such a committee would enhance its practices. The Board has oversight of the Firm's remuneration policies and refers to its remuneration Terms of Reference and the MIFIDPRU remuneration code. Furthermore, the Firm ensures that the Firm's standards, fairness, compliance objectives, corporate governance and maintaining a sound capital base are not compromised by its remuneration incentives. The Firm has used external consultants to assist in the development of its remuneration policies and practices.

2.6 Total Remuneration for the period ending 31 December 2024

Remuneration	Total for Firm (£)
Total Remuneration	3,111,812
Of which:	
Fixed Remuneration	791,762
Variable Remuneration	2,320,050