

REMUNERATION POLICY

Annual disclosure for London Wealth Management for year ending 31/01/2023

Introduction

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 London Wealth Management Ltd annual public disclosures as required under MIFIDPRU 8 for the year ending 31/01/2023

Scope and application of disclosure

These disclosures relate to London Wealth Management as an SNI MIFIDPRU Investment firm which is authorised and regulated by the FCA.

London Wealth Management is required to disclose on an individual firm basis and these disclosures have been prepared in line with the requirements of MIFIDPRU 8.

As an SNI MIFIDPRU firm under IFPR we are required to disclose the following remuneration information regarding our remuneration policy and practices under MIFIDPRU 8:

Remuneration policy and practices

1. Qualitative disclosures of the remuneration policy and practice:

Our approach to remuneration for all staff and the objectives of our financial incentives in respect of staff remuneration.

- All LWM employees from all departments fall under the scope of our remuneration policy and practices.
- This policy does not remunerate or assess performance of our staff in any way that conflicts with our duty to act in the best interest of our clients.
- It does not include any arrangement by way of remuneration, sales targets or otherwise, that could provide an incentive to our staff to recommend a particular product to a retail client where a different product could be offered that would better suit their needs.
- The policy does not create a conflict of interest that would encourage individuals to act against the interests of any of our clients.
- It is not solely or predominately based on quantitative commercial criteria.
- The policy acknowledges that all clients are clients of the firm and not under any one individual.
- This policy maintains a balance between fixed and variable remuneration so the structure does not favour the interests of our firm or staff over those of our clients.

Our decision-making procedures and governance surrounding the development of the firm's remuneration policies and practices.

The four directors agree staff remuneration based on responsibility of the role, experience of the individual and performance of the individual based on their training and competence (T&C), appraisal system, adherence to our firms values as well as longevity within London Wealth Management.

Under the T&C scheme LWM agree specific KPI's with each individual commensurate with their role, responsibilities, experience and training requirements which are agreed in advance, fully documented and assessed on at least a 6 monthly basis within T&C review meetings.

The appraisal scheme runs alongside the T&C meetings which reviews each individual on pre-agreed objectives and goals. These reviews are completed on a 6 monthly basis.

The directors only consider increases in fixed remuneration or awarding variable remuneration after cautious consideration of liquidity, the "own funds adequacy rule" (MIFIDPRU/ICARA), as well as profit and loss forecasting which is completed by our independent bookkeeper on a monthly basis and audited by our accountants on an annual basis.

The LWM remuneration policy is in no way implicitly linked to the amount of clients introduced, bought in or retained; which therefore avoids conflicts of interests to our clients. Whilst overall investment performance is monitored for client purposes, this is not used when assessing employee remuneration. Our firm's overall strategy is to retain long term relationships with clients and employees and ensure that no conflicts are in place. Our conflicts of interest are reviewed on a quarterly basis within Board meetings.

LWM does not discriminate on a gender basis as all variable remuneration is determined by overall performance of LWM.

The key characteristics of our remuneration policies and practices including the different components of our remuneration, together with the categorisation of those remuneration components as fixed or variable.

- Workplace Pension scheme: all employees are entered into this pension on the first complete month of their employment. Employer contribution of 3% of total basic salary (included bonuses up to the upper threshold) and employee contribution of up to 5%. Employees can opt to pay the minimum requirement between banded earnings.

All employees are invited to join the various employee benefit schemes after a 6 month probation – these include:

- Death in Service
- Group Private Medical Insurance
- Gym/wellness membership
- Bonus schemes – variable remuneration for all employees not including the three founding directors: The directors at LWM run a variable discretionary bonus scheme for all employees which is based on firm wide profitability and individual adherence to company culture. Whilst most of the variable reward components are awarded to employees across the firm, the structure, balance and amounts may differ. The variable bonuses are expected to be paid every 6 months and will form part of their PAYE payment.

It is expected that all 9 employees (not including the three founding directors) will participate within this scheme in 2023.

There are other minor benefits on a flexible basis such as covering the cost of flu jabs or eye care as well as a cycle scheme which is available to all staff.

Executive incentive schemes

LWM do not have any executive schemes in place:

Appointed representatives

LWM have no appointed representatives

2. Quantitative disclosures

As an SNI MIFIDPRU investment firm, we are required to disclose the total remuneration of all our staff split between fixed and variable remuneration for our performance year end which is also our financial year end.

For our year ending 31/01/2023, our total remuneration is split as follows:

Type of Remuneration	Amount £000s
Fixed Remuneration	£ 607
Variable Remuneration	£ 255
Total Remuneration	£ 862