

**ELARA CAPITAL PLC ('ELARA')**  
**REMUNERATION DISCLOSURE**  
**(for the year ended March 31, 2022)**

**GOVERNANCE:**

The purpose of the Remuneration Code is to ensure firms establish, implement and maintain remuneration policies, procedures and practices that are consistent with, and promote, sound and effective risk management.

The Remuneration Code applies to 'Remuneration Code Staff' ('Code Staff'). This includes senior management, risk takers, staff engaged in control functions and any employee receiving total remuneration that takes them into the same remuneration bracket as senior management and risk takers, whose professional activities have a material impact on the firm's risk profile.

Elara has considered the contribution that can be made by a remuneration committee. In order to take a proportionate approach given the size and non-complex nature of both the activities undertaken and the organisation, Elara has decided that the governing body will undertake the role which would otherwise be undertaken by a remuneration committee. In accordance with SYSC 19A.3.3R (2) the firm has applied proportionality Level 2 to the application of the rules relating to remuneration. The governing body will be responsible for setting Elara's policy on remuneration.

Elara's Remuneration Policy will be reviewed, at least, annually by the governing body to ensure that it remains consistent with the Remuneration Code Principles and Elara's objectives. The governing body will use all information available to it in order to carry out its responsibilities under the code, for example, information on risk and financial performance.

**LINK BETWEEN PAY AND PERFORMANCE:**

Remuneration at Elara is made up of fixed ('salary') and variable ('bonus') components. Salary for employees is set in line with the market at a level to retain, and when necessary attract, skilled staff.

Any bonus paid is designed to both reflect the performance of a person in contributing to the success of the firm and their success in meeting, or exceeding, targets that have been set by the firm on an individual basis.

Where remuneration is performance-related then in addition to the performance of the individual Elara will also take into account the performance of the business unit concerned and the overall results of the firm. Performance assessment will not relate solely to financial criteria but will also include compliance with regulatory obligations and adherence to effective risk management. In keeping with Elara's long term objectives, the assessment of performance will take into account longer-term performance and payment of any such performance related bonuses may need to be spread over more than one year to take account of the firm's business cycle.

The measurement of financial performance will be based principally on profits and not on revenue or turnover.

Awards will reflect the financial performance of Elara and as such variable remuneration may be contracted where subdued or negative financial performance occurs. Elara will not ordinarily make any variable remuneration awards should the firm's performance be weak. In exceptional circumstances such payments may need to be considered. In such cases the governing body will consider and document whether such an award would be in keeping with the Remuneration policy.

#### **MiFID Requirements (SYSC 19F)**

Elara will ensure that its employees are not remunerated or assessed in a way that conflicts with the firm's duty to act in the best interest of its clients. Elara won't make any arrangements by way of remuneration, sales targets or otherwise that could provide an incentive to its staff to recommend a particular financial instrument when the firm could offer a different one which would better meet that client's needs.

Elara's remuneration and incentives will not be solely based on quantitative commercial criteria. Elara will consider appropriate qualitative criteria based on:

A balance between fixed and variable components of remuneration will always be maintained, so Elara will ensure that its remuneration structure does not favour the interests of the firm or its relevant persons against the interests of the firm's clients

**QUANTITATIVE REMUNERATION INFORMATION:**

Elara is required to disclose aggregate information on remuneration in respect of its Code Staff, broken down by business area and by senior management and other 'material impact' Code Staff.

**BREAKDOWN OF REMUNERATION OF STAFF BY BUSINESS AREA:**

<b>Business Area</b>	<b>Total Remuneration (£)</b>
Asset Management	377,520
Capital Market	1,390,369
Merger and Acquisition	-
Broking	3,600,531
Others	1,155,286
Total	6,523,707

**AGGREGATE REMUNERATION:**

<b>Particulars</b>	<b>Senior Management £</b>	<b>Others £</b>	<b>Total £</b>
Fixed Remuneration	1,318,166	3,071,617	4,389,783
Variable Remuneration	936,104	1,197,820	2,133,923
Number of Staff	14	117	131

This remuneration disclosure is made under the Basel Pillar 3 framework. Our non-remuneration Pillar 3 disclosures can be found on our website.