

MIFIDPRU 8.6 Remuneration Disclosure

Heptagon Capital LLP (the 'Firm') is authorised and regulated by the Financial Conduct Authority ("FCA") as a Markets in Financial Instruments ("MiFID") firm and subject to the rules and requirements of the FCA's Prudential Sourcebook for MiFID Investment Firms ("MIFIDPRU") handbook.

The Firm is classified under MIFIDPRU as a **small and non-interconnected firm** ('SNI'). As such, MIFIDPRU 8 requires the firm to disclose information regarding its remuneration policy and practices.

This document has been prepared by Heptagon Capital LLP for the **financial year ended 30th April 2026**. It is made in accordance with MIFIDPRU 8.6 and reflects the Firm's position as an SNI MIFIDPRU investment firm. The disclosure is proportionate to the Firm's size, internal organisation and the nature, scope and complexity of its activities.

The Firm has reviewed the application of the MIFIDPRU 8 disclosure requirements and, on the basis that it remains an SNI MIFIDPRU investment firm and has not issued Additional Tier 1 instruments, this disclosure is limited to the Firm's remuneration policy and practices. The Firm does not therefore include own funds, own funds requirements or risk management disclosures in this public disclosure.

This disclosure was reviewed on 15 September 2026. It is based on the Firm's remuneration arrangements and financial information for the financial year ended 30th April 2026.

Remuneration Policy and Practices

As an SNI MIFIDPRU investment firm, the Firm is required to make public disclosure of its remuneration policy and practices in accordance with MIFIDPRU 8.6 of the FCA Handbook. The purpose of the remuneration requirements is to:

- Promote effective risk management in the long-term interests of the Firm and its clients.
- Ensure alignment between risk and individual reward.
- Support positive behaviours and healthy firm cultures; and
- Discourage behaviours that can lead to misconduct and poor customer outcomes.

The objective of the Firm's remuneration policy and practices is to establish, implement and maintain a framework that is consistent with sound and effective risk management. The policy is designed not to encourage excessive risk-taking, misconduct or behaviour that is inconsistent with the Firm's risk profile, regulatory obligations or the interests of its clients.

The Firm recognises that remuneration is an important component of how it attracts, motivates and retains high-quality staff. The Firm's remuneration philosophy is therefore intended to support sustainable performance, prudent risk management, good conduct, fair client outcomes and a healthy culture. The policy is designed to be gender neutral and to avoid conflicts of interest.

The Firm's remuneration decisions take account of financial and non-financial performance, including conduct, compliance with internal policies and procedures, risk awareness, teamwork, client service, ethical behaviour and contribution to the Firm's long-term objectives. Remuneration outcomes are not based solely on financial performance or short-term revenue generation.

Characteristics of the Firm's Remuneration Policy and Practices

Remuneration at the Firm consists of fixed and variable components. The fixed component is set in line with market competitiveness at a level that attracts and retains skilled staff. Variable remuneration is paid on a discretionary basis and considers the Firm's financial performance as well as the financial performance of each business unit 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.

Company Performance - the allocation of the variable bonus pool shall be contingent upon the financial performance and profitability of both the Group and the Firm.

Individual Performance - the annual assessment of an individual's performance includes, where applicable, both financial and non-financial criteria. All assessments consider compliance with the Firm's policies, procedures and relevant regulations, as well as conduct, risk management, teamwork, client outcomes and contribution to the Firm's long-term objectives. For staff in revenue-generating roles, financial contribution may be considered, but it is not assessed in isolation. For staff in non-revenue-generating roles, the annual review focuses on the individual's overall contribution to the Firm, including internal collaboration, control discipline and engagement with external parties where relevant.

The fixed and variable remuneration components are appropriately balanced: the fixed component represents a sufficiently high proportion of the total remuneration to enable the operation of a fully flexible policy on variable remuneration. This allows for the possibility of paying no variable remuneration component, which the Firm would do in certain situations, such as where the Firm's profitability performance is constrained or where there is a risk that the Firm may not meet its capital or liquidity regulatory requirements.

Governance and Oversight

The Managing Partners are responsible for setting and overseeing the implementation of the Firms remuneration policy and practices. To fulfil its responsibilities, the management body:

- Is able to exercise competent and independent judgment on remuneration policies and practices and the incentives created for managing risk, capital, and liquidity.
- Prepares decisions regarding remuneration, including decisions that impact the firm's risk and risk management.
- Ensures that the Firm's remuneration policy and practices consider the public interest and the long-term interests of shareholders, investors, and other stakeholders.
- Ensures that the overall remuneration policy is consistent with the business strategy, objectives, values, and interests of the Firm and of its clients.

The Firm's remuneration policy and practices are reviewed at least annually and when there is a material change to the Firm's business, risk profile, governance arrangements or applicable regulatory requirements.

Quantitative Remuneration Disclosure

For the financial year ended 30th April 2026, the total amount of remuneration awarded to all partners, split between fixed and variable remuneration, is set out below:

Total fixed remuneration	£0
Total variable remuneration	£785,693
Total remuneration	£785,693