



Remuneration Policy

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MAS Markets utilises the FCA Remuneration Policy Statement to formulate our Remuneration policy.

1. Purpose of the template

MiFID investment firms that are prudentially regulated by the FCA in the UK (FCA investment firms) are within scope of the MIFIDPRU Remuneration Code (the Code) in the FCA Handbook at SYSC 19G. As part of the Code, firms are expected to ensure that their remuneration policies and practices (including performance assessment processes and decisions) are clear and documented.¹

This Remuneration Policy Statement (RPS) template is designed as a tool for firms to document their remuneration policies and practices. It sets out the principal questions that we are likely to ask if we carry out a review of your firm's remuneration policies. This template is intended to provide a useful format for recording relevant information and detail about your remuneration policies and practices, required by the Code. It is not compulsory, and you may choose to document your remuneration policies in a different way. However, if you choose not to use this template, you should ensure that you document the information (as indicated by this template by reference to the requirements in the Code) in a clear and structured manner.

The proportionality principle in SYSC 19G.2.4 R requires that a firm's remuneration policies and practices must be appropriate and proportionate to the nature, scale and complexity of the risks inherent in the business model and the activities of the firm. Refer to SYSC 19G.1.7 G for a summary table of the general application of the Code. The template has been designed to cover the full range of FCA investment firms and, as such, not all questions in this template will necessarily apply to your firm. Where relevant, we have included notes to indicate where certain parts of this template may not apply.

¹ See SYSC 19G.2.3 G

While the template refers to certain parts of our rules and guidance in the Code, it is not intended to be a comprehensive summary of those requirements. Filling out the template is not a substitute for independently considering and applying the Code, and reliance on filling out the template alone will not automatically demonstrate compliance with our rules and guidance.

You do not need to send us a copy of your RPS or equivalent documentation unless requested to do so. Nonetheless, firms are reminded that the remuneration policy should be adopted and reviewed periodically by the firm's management body in its supervisory function with responsibility for overseeing the implementation of remuneration policies.² This may be the Remuneration Committee where one exists. Completing the RPS template or equivalent documentation may be a convenient method of documenting compliance with this requirement.

Completing your RPS

Scope of the Code

Where the Code applies on a consolidated basis, the effect of SYSC 19G.1.18R(5) is that the UK parent entity and all the investment firms, financial institutions, ancillary services undertakings and tied agents in the investment firm group are treated, for these purposes, as a single MIFIDPRU investment firm.³ If you decide to use this template to record your remuneration policies and practices, you should include all undertakings which form part of the consolidated group. Where your firm is part of a dual-regulated group,⁴ and where practices in compliance with group policies may apply, you may wish to use the relevant RPS template published on the PRA's website.⁵ Alternatively, you may wish to use this template to record the remuneration policies and practices relevant to the FCA investment firm.

Annex

The RPS Table forms part of your RPS. An Excel spreadsheet template is available to record your Material Risk Takers (MRTs), including the structure of their remuneration. If you decide to use this template, then you may also choose to complete the RPS Table for the current performance year.

² See SYSC 19G.3.1 R

³ See SYSC 19G.1.19G(1)

⁴ including a bank; building society; or PRA designated investment firm including UK branches of non-UK headquartered firms

⁵ <https://www.bankofengland.co.uk/prudential-regulation/key-initiatives/strengthening-accountability>

2. General firm information

2.1	General firm information			
(a)	Where your firm is part of a group, please include the UK parent entity and all the investment firms, financial institutions, ancillary services undertakings and tied agents in the investment firm group.			
	Firm Name	FRN	Business Type	
	Multi Assets Solutions Limited	926482	Regulated	
(b)	Please provide contact details of the key individual(s) who we should contact within your firm regarding this RPS.			
	Name	Job Title	Phone No.	Email
	Glen Ward Chartered MCSI	Head of Compliance	Tel: +44 (0) 208 61 62 303	g.ward@MAS- markets.com
(c)	What performance year is this RPS in respect of?			
	2024			

3. General information on variable remuneration schemes

<p>3.1</p>	<p><i>Please provide information on the variable remuneration schemes in operation within your firm. Please note, small and non-interconnected (SNI) firms are only required to comply with some remuneration rules and as such some information requested as part of this question may not be relevant for your firm. However, where your firm has remuneration policies that are consistent with the information requested, it would be helpful to include such information.</i></p> <p><i>If the information requested in this section is clearly set out elsewhere in this template, you may wish to refer to the relevant section/s. Alternatively, if the information is already set out in your firm's remuneration scheme documentation, you may wish to supply that as an annex instead.</i></p>
<p>(a)</p>	<p>Please provide detail on all variable remuneration schemes, and long-term incentive plans (LTIPs) that are in place to reward material risk takers (MRTs) for performance during the current performance period. Please also include co-investment schemes or carried interest schemes to the extent they are in scope of the Code.</p> <p>If your firm is not required to identify MRTs, then please provide information on any variable remuneration arrangements for staff in senior management and oversight roles and senior staff within revenue generating parts of the business.</p> <p>Please include where relevant:</p> <ul style="list-style-type: none"> • the scheme's purpose; • eligible participants; • number of expected participants for the performance period; • the structure of each scheme's awards, including: <ul style="list-style-type: none"> ○ the deferred proportion; ○ the length of the deferral period; ○ the vesting schedule including the frequency of the vesting i.e. annually or more frequently, whether vesting is on a pro-rata basis; or if there is cliff vesting at the end of the deferral period; or any other combination; ○ award composition i.e. proportion in shares or instruments /cash etc; ○ retention policies applied to any part of the awards; and ○ the length of the retention policy.

	<ul style="list-style-type: none"> the ratio of the maximum pay-out of the variable remuneration when compared to fixed remuneration; the performance criteria including both financial and non-financial criteria and the weight applied to each; the risk adjustment techniques and measures considered, including both financial and non-financial risks, when calculating the variable remuneration pool; whether variable remuneration is subject to performance adjustment; and any other information related to the scheme that you believe is relevant.
i)	<ul style="list-style-type: none"> Scheme 1 <u>the scheme's purpose</u>; The firm does not reward staff for risk-taking, we set the culture to one of risk-management. Therefore we reward staff with a fixed and a variable remuneration. The fixed being a set salary, and the variable being a discretionary bonus based on the performance of the firm overall. eligible participants; [All staff] number of expected participants for the performance period; [15] the structure of each scheme's awards, including: the deferred proportion; [n/a] the length of the deferral period; [n/a] the vesting schedule including the frequency of the vesting i.e. annually or more frequently, whether vesting is on a pro-rata basis; or if there is cliff vesting at the end of the deferral period; or any other combination; [n/a] award composition i.e. proportion in shares or instruments /cash etc; [100% cash] retention policies applied to any part of the awards; and [n/a] the length of the retention policy. [n/a] the ratio of the maximum pay-out of the variable remuneration when compared to fixed remuneration; [variable remuneration will be limited to 100% of fixed remuneration] the performance criteria including both financial and non-financial criteria and the weight applied to each; [the bonus pool will be calculated on any excess of capital requirement for the forthcoming 12 month period] the risk adjustment techniques and measures considered, including both financial and non-financial risks, when calculating the variable remuneration pool; [The Firm's variable remuneration will mainly be based on profits generated from increased order volume. If the volume is low or below expectations, the variable remuneration pool will be considerably smaller.] whether variable remuneration is subject to performance adjustment; and [n/a] any other information related to the scheme that you believe is relevant. [The Firm's Remuneration Policy is consistent with the Firm's risk management objectives and does not encourage risk taking and promotes a risk averse culture. The Firm's current business is reception and transmission of orders from professional clients.]
ii)	Scheme 2 [n/a]

4. Basic remuneration requirements

The basic remuneration requirements are applicable to all firms in scope of the Code.

Remuneration policies and practices

4.1.	Gender neutral remuneration policies and practices <i>Please refer to SYSC 19G.2.6 R to SYSC 19G.2.7 G</i>
(a)	<p>Briefly describe how your firm's remuneration policies and practices are gender neutral and do not discriminate on the basis of the protected characteristics of an individual in accordance with the Equality Act 2010.</p> <p>[Although Multi Asset Solutions Limited is a very small firm consisting of 15 employees, we fully support the ethics and principles set out in the Equality Act 2010. The firm actively promotes equality and diversity in the workplace and maintains an Environmental, Social and Governance policy which supports this. We are confident that our Remuneration Policy and practices are gender neutral and protect individuals in accordance with the Equality Act 2010..]</p>
4.2	Risk management <i>Please refer to SYSC 19G.2.8 R</i>
(a)	<p>Briefly describe how your firm's remuneration policies and practices promote sound and effective risk management.</p> <p>[The Firm's Remuneration Policy is consistent with the Firm's risk management objectives and does not encourage risk taking and promotes a risk averse culture. The Firm's current business is reception and transmission of orders from professional clients. The Firm has a documented Conflicts of Interest Policy and Inventory in order to identify, manage and monitor the Firm's conflicts.]</p>
4.3	Business strategy <i>Please refer to SYSC 19G.2.9 R to SYSC 19G.2.10 G</i>
(a)	<p>Briefly describe how your firm's remuneration policies are in line with the business strategy, objectives and long-term interests. You should also include information about how these take into account:</p> <p>(1) your firm's risk appetite and strategy, including environmental, social and governance risk factors;</p> <p>(2) your firm's culture and values</p> <p>and</p> <p>(3) the long-term effects of the investment decisions taken.</p>

	<p>(1) your firm's risk appetite and strategy, including environmental, social and governance risk factors; [The Firm's Remuneration Policy is consistent with the Firm's risk management objectives which do not encourage risk taking and promotes a risk averse culture. The Firm's current business and current strategy is reception and transmission of orders from professional clients.]</p> <p>(2) your firm's culture and values; [The Firm is currently staffed by Senior Managers whom all abide by the Senior Managers Conduct Rules (COCON 2.2):</p> <p>SC1: You must take reasonable steps to ensure that the business of the firm for which you are responsible is controlled effectively.</p> <p>SC2: You must take reasonable steps to ensure that the business of the firm for which you are responsible complies with the relevant requirements and standards of the regulatory system.</p> <p>SC3: You must take reasonable steps to ensure that any delegation of your responsibilities is to an appropriate person and that you oversee the discharge of the delegated responsibility effectively.</p> <p>SC4: You must disclose appropriately any information of which the FCA or PRA would reasonably expect notice.]</p> <p>We also operate under the CISI Code of Conduct 8 Principles:</p> <ul style="list-style-type: none"> • Personal Accountability • Client Focus • Conflict of Interest • Respect for Market Participants • Professional Development • Aware of Capabilities • Respect Others and the Environment • Speak Up & Listen Up and ; <p>(3) the long-term effects of the investment decisions taken. [The bonus pool will be calculated in such a way that it will have a zero effect on the long-term performance of the Firm. Investment decisions support the current low risk growth strategy of the firm. The Remuneration Policy supports the strategy where remuneration is based on sustainable results and profit from increased business volumes.]</p>
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4.4	<p>Avoiding conflicts of interest</p> <p><i>Please refer to 19G.2.11 R</i></p>
(a)	<p>Briefly describe how your firm's remuneration policy:</p> <p>(1) contains measures to avoid conflicts of interest;</p> <p>(2) encourages responsible business conduct; and</p> <p>(3) promotes risk awareness and prudent risk taking.</p> <p>(1) contains measures to avoid conflicts of interest; [The Firm has a documented Conflicts of Interest Policy and Inventory in order to identify, manage and monitor the</p>

	<p>Firm's conflicts. The Firm also conducts Monthly Compliance Meetings where any conflicts, or potential conflicts of interest are recorded and mitigated]</p> <p>(2) encourages responsible business conduct; [The Firm is currently staffed by Senior Managers whom all abide by the Senior Managers Conduct Rules (COCON 2.2) listed above.] and</p> <p>(3) promotes risk awareness and prudent risk taking. [The Firm's Remuneration Policy is consistent with the Firm's risk management objectives and does not encourage risk taking and promotes a risk averse culture. The Firm's current business is reception and transmission of orders from professional clients.]</p>
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Governance and oversight

4.5	<p>Oversight of remuneration policies and practices</p> <p><i>Please refer to SYSC 19G.3.1 R to SYSC 19G.3.5 G. Please note SNI firms are only required to comply with SYSC 19G.3.1 R to SYSC 19G.3.3. R.</i></p> <p><i>Non-SNI MIFIDPRU investment firms not falling within SYSC 19G.1.1R (2) should also refer to SYSC 19G.7.1 G.</i></p>
(a)	<p>Describe how remuneration governance and oversight arrangements operate within your firm including who has overall responsibility for adopting, reviewing and overseeing the implementation of your firm's remuneration policy?</p> <p>Please include in your response whether your firm has established a Remuneration Committee (RemCo) and if so, please include:</p> <ul style="list-style-type: none"> • if the RemCo is established in the UK; • in which entity the RemCo is established; • the name of the RemCo if known by any other name; and • whether there are any sub-committees of the RemCo, what they are called and their purpose. <p>[The Firm's governing body has reviewed and adopted this Remuneration Policy, pursuant to consulting and taking advice from the Compliance Officer. It is the Firm's policy to review and assess the Firm's Remuneration Policy and procedures on an annual basis or sooner should the business change or other need arise.</p> <p>It is the Firm's policy that its Compliance Officer will review the Firm's compliance with the Firm's current Remuneration Policy, as part of a risk-based compliance monitoring programme.]</p> <p>Taking into account the size, nature, scope and complexity of its activities, the Firm has concluded that it is not appropriate for the Firm to establish and maintain a remuneration committee.]</p>
(b)	<p>What is the frequency of the periodic review of the remuneration policy?</p> <p>Please also include which control functions and business units develop and support the review.</p>

	<p>[It is the Firm's policy to review and assess the Firm's Remuneration Policy and procedures on an annual basis or sooner should the business change or other need arise.</p> <p>It is the Firm's policy that its Compliance Officer will review the Firm's compliance with the Firm's current Remuneration Policy, as part of a risk-based compliance monitoring programme.]</p>
(c)	<p>When did the last central and independent internal review of your firm's remuneration policies and practices take place?</p> <p>Please also include:</p> <ul style="list-style-type: none"> • what the review assessed; • what the outcomes were; and • any follow up actions.
	<p>[The Firm's Remuneration Policy was assessed by Newgate Compliance Limited in December 2023, where they assessed the policy was appropriate for the size, scale and nature of the firm.]</p>
(d)	<p>Does the RemCo/ management body in its supervisory function have the ability to apply discretion to adjust the bonus pool or individual payments including those paid out in individual incentive schemes?</p> <p>If so, please give an example of when they exercised that discretion and in what circumstances.</p>
	<p>[n/a]</p>

4.6	Control functions <i>Please refer to SYSC 19G.3.6 R to SYSC 19G.3.8 G</i>
(a)	<p>With regard to staff engaged in control functions, briefly explain how your firm ensures that these employees are:</p> <p>(1) are independent from the business units they oversee;</p> <p>(2) have appropriate authority; and</p> <p>(3) are remunerated in accordance with the achievement of the objectives linked to their functions, independent of the performance of the business areas they control.</p>
	<p>[The Compliance Officer is independent from the business areas they control. The Compliance Officer is a senior member of the management team and has authority to monitor and report on all areas of the business. The Firm's governing body, the members of which collectively have a significant amount of experience in the industry, are responsible for ensuring that the remuneration of those persons in</p>

	control functions is linked to their performance and achievements of the business areas they control.]
(b)	If applicable to your firm, describe how risk and compliance functions input into the setting of individual remuneration policies and individual remuneration awards across the firm. Please provide examples as appropriate.
	[n/a]
(c)	Please describe how the RemCo or, if such a committee has not been established, the management body in its supervisory function, oversees the remuneration of senior officers in the risk management and compliance functions.
	[The Firm's performance related remuneration is based on the management body's assessment of the individual's performance and competence in his/her role within the business during a defined period. Due to the small size of the firm, it has been decided that a formal committee or RemCo is not necessary.]

Fixed and variable components of remuneration

4.7	Categorising fixed and variable remuneration <i>Please refer to SYSC 19G.4.1 R to SYSC 19G.4.4 G.</i>
(a)	<p>Please describe how your firm's remuneration policy makes a clear distinction between the criteria for setting fixed and variable remuneration.</p> <p>Please include some examples of the individual remuneration components that are included in fixed or variable remuneration.</p> <p>[The Firm's fixed remuneration for staff are competitive to ensure that high-quality individuals will be attracted to the firm. The Firm's variable remuneration will mainly be based on the net profits driven by order volume over a period of time. If the volume is low or below expectations, the variable remuneration pool will be considerably smaller.]</p>

4.8	Balance of fixed and variable components of total remuneration <i>Please refer to SYSC 19G.4.5 R to 19G.4.12 G.</i> <i>Note that only SYSC 19G.4.5R and SYSC 19G.4.7G(1) and (2) (Fixed and variable components of remuneration) are relevant for SNI firms</i>
(a)	<p>Please explain how your firm ensures that:</p> <p>(1) the fixed and variable components of the total remuneration are appropriately balanced; and</p> <p>(2) the fixed component represents a sufficiently high proportion of the total remuneration to enable the operation of a fully flexible policy on variable remuneration, including the possibility of paying no variable remuneration component.</p>

	[variable remuneration will be limited to 100% of fixed remuneration. The Firm's variable remuneration will mainly be based on the net profits driven by order volume over a period of time. If the volume is low or below expectations, the variable remuneration pool will be considerably smaller]
(b)	<p>Please provide details on the ratio between the variable and fixed components of total remuneration set by your firm. Please include the following:</p> <ul style="list-style-type: none"> the maximum ratio and to which roles this ratio applies; whether there are different ratios set for different categories of staff, including details of these; and whether the ratio/s differed from this performance period to the last.
	[variable remuneration will be limited to 100% of fixed remuneration. The Firm's current business is reception and transmission of orders from professional clients. The Firm's variable remuneration will mainly be based on the net profits driven by order volume over a period of time. If the volume is low or below expectations, the variable remuneration pool will be considerably smaller]
(c)	<p>Please explain what factors your firm takes into consideration when determining the appropriate balance of fixed and variable remuneration; and (for non SNI firms only) the appropriate ratio.</p>
	[variable remuneration will be limited to 100% of fixed remuneration. The Firm's current business is reception and transmission of orders from professional clients. The Firm's variable remuneration will mainly be based on the order volume over a period of time. Fixed remuneration is high enough to attract and retain high quality staff whilst variable remuneration is based on exceptional performance and the profits generated from increased customer volumes. If the volume is low or below expectations, the variable remuneration pool will be considerably smaller]
(d)	<p>Please advise if there are any staff within your firm who receive only fixed or only variable remuneration and if so, provide further details including which roles this applies to.</p>
	[All staff receive a fixed and variable remuneration.]

Variable remuneration

4.9	Remuneration and capital <i>Please refer to SYSC 19G.6.1 R</i>
(a)	<p>How do you ensure that your firm's variable remuneration does not affect your firm's ability to ensure a sound capital base?</p>
	[The Firm's current business is reception and transmission of orders from professional clients. The Firm's variable remuneration will mainly be based on the

	net profits driven by order volume over a period of time. If the volume is low or below expectations, the variable remuneration pool will be considerably smaller]
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4.10	Assessment of performance <i>Please refer to SYSC 19G.6.4 R to 19G.6.6 G</i> <i>Note that only SYSC 19G.6.5R to SYSC 19G.6.6G are relevant for SNI firms</i>
(a)	<p>Please set out a high-level description of your firm's approach to assessing individual performance. Your summary should include both financial and non-financial criteria and an explanation of how this assessment influences an individual's remuneration.</p> <p>Please also include in your response the non-financial criteria used and the split between financial and non-financial criteria.</p> <p>[The Firm has only 15 staff members at present and they will be individually judged by their performance, and for senior managers, performance of their prescribed responsibilities and adherence to the Firm's 'Code of Conduct'. There will only be financial rewards of the variable payment which will be reviewed on the assessment of the individual; the business unit and the overall performance of the firm. In Q324 the firm introduced private health cover which is available to all staff.]</p>
(b)	<p>Please explain how your firm ensures that when it assesses individual performance, the assessment process and any variable remuneration awarded does not discriminate on the basis of the protected characteristics of an individual in accordance with the Equality Act 2010.</p> <p>[Although MAS Markets Limited is a very small firm consisting of 15 employees, we fully support the ethics and principles set out in the Equality Act 2010 and our Remuneration Policy complies with the Act. The firm will actively promote equality and diversity in the workplace maintains an environmental, social and governance policy.]</p>

5. Standard remuneration requirements

The standard and extended remuneration requirements do not apply to SNI firms. However, where an SNI firm has remuneration policies that are consistent with relevant sections i.e. deferral or shares, instruments and alternative arrangements, they may choose to include such information.

5.1	Material risk taker (MRT) identification <i>Refer to SYSC 19G.5 - Application of remuneration requirements to material risk takers.</i>
(a)	<p>Please explain the MRT identification process used by your firm to identify staff members whose professional activities have a material impact on the risk profile of your firm, or of the assets that your firm manages.</p> <p>Please include any additional criteria used to identify individuals based on the specific types of activities and risks relevant to your firm.</p> <p>Please include reference to the criteria set out in SYSC 19G.5.3 R and the guidance set out in SYSC 19G.5.4 G to SYSC 19G.5.5 G in your response.</p> <p>[There are currently five members of staff that are MRT's, consisting of the CEO, CFO, CTO, a Director, the Compliance Officer / MLRO and the Head of Strategic Development]</p>
(b)	<p>Briefly describe the measures you have taken to ensure that all MRTs understand the implications of this status in relation to the requirements of the Code, particularly those employees who were not MRTs in previous performance years.</p> <p>[All MRT's have signed-off on this policy at the monthly compliance meeting.]</p>

5.2	Awards of non-standard forms of variable remuneration Guaranteed variable remuneration, retention awards, severance pay; and buy-out awards <i>Please refer to SYSC 19G.6.7 R to SYSC 19G.6.14 G</i>
(a)	<p>Please outline the circumstances in which your firm may offer non-standard forms of variable remuneration, including how they meet the requirements of the Code.</p> <p>Please provide information on the following:</p> <ul style="list-style-type: none"> • guaranteed variable remuneration; • retention awards; • severance pay; and • buy-out awards. <p>[The Firm will not be awarding any non-standard variable remuneration.]</p>

5.3 Risk adjustment <i>Please refer to SYSC 19G.6.15 R to SYSC 19G.6.18 R</i>	
Where there may be a differentiation between variable remuneration schemes, then please provide the information set out below separately for each scheme	
(a)	Please provide a high-level summary of how your firm calculates pools of variable remuneration (i.e. the total value of all pools of variable remuneration), including whether it involves a top-down and/or bottom-up process (if appropriate).
	[The firm calculates the pool of variable remuneration on a top-down basis, taking a percentage of company profits after allowing for cover of capital requirements for the next 12 months. This figure would have been reached after considering all inherent and residual risks effecting the business over his period.]
(b)	Please describe what key financial performance measures are used to calculate pools of variable remuneration (e.g. economic profit or economic capital) and the overall weighting of these measures against each other.
	There will be only one pool of variable remuneration based on economic profit]
(c)	Please describe what non-financial measures are used when calculating pools of variable remuneration (e.g. reputation, conduct; customer outcomes, values and strategy etc) and the overall weighting of these measures against each other.
	[As there is only one bonus pool, and taking into account the small size of the company, there are no non-financial measures used in calculating pools of variable remuneration. At an individual level, senior management will take into account compliance with COCON 2.2.
(d)	What is the overall weighting of the financial measures versus the non-financial measures?
	[n/a]
(e)	Please describe how these performance measures take into account current and future risks and the cost of capital and liquidity required in accordance with MIFIDPRU.
	[The firm calculates the pool of variable remuneration on a top-down basis, taking a percentage of company profits after allowing for cover of capital requirements for the next 12 months. This figure would have been reached after considering all inherent and residual risks effecting the business over his period.]
(f)	Please indicate the levels in the firm at which financial performance is measured (e.g. at business unit, or trading desk level etc.).
	[only at overall firm performance]
(g)	Please provide a high-level summary of how these key financial performance measures are risk-adjusted (e.g. use of a pre-agreed numerical formula or other factors) including the level at which they are adjusted (e.g. at business unit, trading desk level etc.).
	[The Firm will have only one bonus pool for its staff. The pre-agreed numerical formular to calculate the inherent and residual risks will be those disclosed in our ICARA.]

(h)	<p>Are any discretionary factors applied when adjusting for risk?</p> <p>Please include:</p> <ul style="list-style-type: none"> the stages of the process when such discretion can be applied; the items to which discretion can be applied; the bodies or individuals who may exercise that discretion; and the boundaries/parameters used on these discretionary elements.
	[n/a]
(i)	<p>Please explain how often the performance measures are set and who is involved in the process.</p>
	[The senior management set the performance measures on an annual basis.]
(j)	<p>How does your bonus pool determination process take account of situations where your firm's performance is subdued or negative?</p> <p>Please explain who has the discretion to make the adjustments, including through malus and clawback arrangements, and whether they have the flexibility to apply full discretion to reduce the bonus pool to zero.</p>
	[The Firm's current business is reception and transmission of orders from professional clients. The Firm's variable remuneration will mainly be based on the net profits from order volume over a period of time. If the volume is low or below expectations, the variable remuneration pool will be considerably smaller, This is at the total discretion of senior management]

5.4	<p>Performance adjustment</p> <p><i>Please refer to SYSC 19G.6.30 R to SYSC 19G.6.34 G</i></p>
(a)	<p>Please outline your firm's performance adjustment policy. This should include the following:</p> <ul style="list-style-type: none"> whether this is a firm-wide or group-wide policy; who this policy applies to i.e. MRTs only; to all staff; or other groups of staff; how the policy is applied using the appropriate performance adjustment tools (in-year adjustments, malus and/or clawback arrangements); the specific criteria for the application of malus and clawback; and the minimum and maximum malus and clawback periods and what roles these apply to. <p>Please also include any other relevant information concerning implementation and operation of the policy.</p>
	[n/a]
(b)	<p>Please outline your firm's process for deciding how performance adjustment is applied.</p> <p>This should include:</p>

	<ul style="list-style-type: none"> • which roles, departments, functions and committees are responsible for reporting information; • the escalation process; and • the decision-making process. <p>Please also detail how control functions provide information and contribute to discussions, as required.</p>
	<p>[Taking into account the size, nature, scope and complexity of its activities, the Firm will not be applying performance adjustments]</p>

5.5	Discretionary pension benefits <i>Please refer to SYSC 19G.6.35 R</i>	
(a)	Does your firm have a policy for discretionary pension benefits for MRTs?	[No]
(b)	<p>If your answer above is 'Yes', please outline how the policy is in line with the business strategy, objectives, values and long-term interests of your firm. Please also include detail on the instruments used; how malus and clawback are applied; and the retention period.</p>	

5.6	Personal investment strategies <i>Please refer to SYSC 19G.6.36 R to SYSC 19G.6.37 G</i>	
(a)	What arrangements are in place to ensure that MRTs do not use personal hedging strategies or remuneration and liability-related contracts of insurance to undermine the requirements of the Code?	
	<p>[MRT's have to obtain permission from Compliance prior to any personal dealing, as stated in 4.1.2 of the Multi Asset Solutions Limited -Compliance Manual.]</p>	

5.7	Avoidance of the MIFIDPRU Remuneration Code <i>Please refer to SYSC 19G.6.38 R</i>	
(a)	How does your firm ensure that variable remuneration is not paid through financial vehicles or methods that facilitate non-compliance with the Code or MIFIDPRU?	
	<p>[The Firm pays variable remuneration to individuals via their bank accounts, in a manner that does not facilitate avoidance of the Remuneration Code.]</p>	

6. Extended remuneration requirements

The extended remuneration requirements are not applicable to a non-SNI MIFIDPRU investment firm falling within SYSC 19G.1.1R(2). However, where a firm has remuneration policies that are consistent with this section, it may choose to include such information.

6.1	Shares, instruments and alternative arrangements <i>Please refer to SYSC 19G.6.19 R to SYSC 19G.6.21 G</i> <i>Note this section is not applicable to a non-SNI MIFIDPRU investment firm falling within SYSC 19G.1.1R(2)</i>
(a)	<p>Briefly describe the shares and/or instruments used to pay out at least 50% of variable remuneration to MRTs. Please include in your response if an instrument relates to an ownership interest in a parent undertaking.</p> <p>If your firm is unable to issue eligible instruments, then please advise if your firm has applied for or has been granted a modification under section 138A of the Financial Services and Markets Act 2000 (the Act), and briefly describe the alternative arrangements used.</p> <p>[n/a]</p>
(b)	<p>Describe the composition of variable remuneration awards between cash and instruments and how this split is applied to both deferred and non-deferred elements of those awards.</p> <p>[n/a]</p>
6.2	Retention policy <i>Please refer to SYSC 19G.6.22 R to SYSC 19G.6.23 G</i> <i>Note this section is not applicable to a non-SNI MIFIDPRU investment firm falling within SYSC 19G.1.1R(2)</i>
(a)	<p>Please describe how your firm's retention policy aligns the interests of the staff member with the longer-term interests of the firm, its creditors and clients.</p> <p>Please include how you have considered the following:</p> <ul style="list-style-type: none"> (a) the length of the deferral period; (b) the length of the firm's business cycle; (c) the types of risks relevant to the role of the staff member; and (d) how long it could take for the risks underlying the staff member's performance to crystallise. <p>Please also include whether there are different retention periods for different MRTs, particularly where the deferral periods may differ.</p> <p>[n/a]</p>

6.3	Deferral <i>Please refer to SYSC 19G.6.24 R to SYSC 19G.6.29 R.</i> <i>Note this section is not applicable to a non-SNI MIFIDPRU investment firm falling within SYSC 19G.1.1R(2)</i>
(a)	Deferral arrangements for MRTs <p>If MRTs participate in different schemes, please answer these questions for each of the schemes they participate in.</p> <p>If deferral arrangements vary for different categories of MRTs then please provide this detail.</p> <p>Please provide the following:</p> <ul style="list-style-type: none"> • the length of the deferral period; • the percentage of variable remuneration deferred; and • how vesting is structured. <p>Please provide detail on the vesting schedule including whether vesting occurs on a cliff vesting; pro-rata basis; a combination of both or whether it varies by different schemes.</p> <p>Please advise how you considered the following factors when deciding how to structure the deferral schedule</p> <p>(a) the firm's business cycle, the nature of its business and its risk profile;</p> <p>(b) the activities and responsibilities of the staff member in question and how these may impact the risk profile of the firm or the assets the firm manages;</p> <p>(c) whether the deferred variable remuneration is paid out in instruments or cash;</p> <p>(d) the amount of the variable remuneration; and</p> <p>(e) the ratio of variable to fixed remuneration.</p> <p>[n/a]</p>
(b)	<p>Please advise if your firm has an interest or dividends policy on any instruments. If so, please provide details of this.</p> <p>[n/a]</p>

7. Remuneration disclosures

7.1	Remuneration disclosures <i>Please refer to MIFIDPRU 8</i>
(a)	<p>When did your firm last disclose the remuneration information required under MIFIDPRU 8?</p> <p>Please provide a link to the most recent remuneration disclosures on your firm's website. If your firm does not maintain a website, please advise where this information is available and provide a copy if requested.</p> <p>If your firm has not yet made your first remuneration disclosures under MIFIDPRU 8, when do you expect to do so?</p> <p>[the firm's remuneration information can be found: https://MAS-markets.com/pdf/MAS-Markets-Ltd-Remuneration-Policy.pdf]</p>

8. Other information

8.1	Other information <i>Refer to SYSC 19G.1.29 G and SYSC 19G.5.13 G</i>
(a)	<p>If not already included in your response above, please provide any further information on how your firm has gone beyond regulatory requirements; and/or has considered whether applying any of the rules applicable to MRTs to other members of staff would contribute to sound risk management or a healthy firm culture.</p>