

MIFIDPRU 8 DISCLOSURE YEAR ENDED 31 DECEMBER 2025

Introduction

Regulatory Context

In accordance with MIFIDPRU 8, the regulatory aim of the disclosures is to enable stakeholders and market participants an insight into how Seilern Investment Management Limited (“SIM”) is run. They also aim to help stakeholders make more informed decisions about their relationship with SIM.

This disclosure covers the period 1 January 2025 to 31 December 2025.

Frequency

SIM will be making these MIFIDPRU disclosures annually. The disclosures will be as at the Accounting Reference Date (“ARD”) and will be publicly disclosed on the it’s website.

In particular circumstances (e.g. major change to the SIM’s business model), we may make more frequent public disclosures.

Proportionality

The level of detail provided in the qualitative disclosures is proportionate to the size and internal organisation of SIM and also proportionate to the nature, scope, and complexity of its business activities.

This disclosure has been made in line with the requirements which apply to SIM as a UK MiFID Investment Firm, which is classed as a Small and Non-Interconnected firm and subject to basic requirements.

Verification

The information contained in this document has not been audited by SIM’s external auditors, as this is not a requirement, does not constitute any form of financial statement, and must not be relied upon in making any judgment on SIM.

MIFIDPRU 8.6 – Remuneration

Qualitative Disclosures

SIM has in place a remuneration policy which is approved by the Board of Directors.

SIM has voluntarily established a Remuneration Committee (“RC”), composed of Non-Executive Directors, to ensure that its remuneration practices remain independent and that potential risks of conflicts of interest are mitigated. The RC is responsible for the remuneration of all staff and reports directly to the Board of Directors which retains ultimate responsibility. The RC oversees the implementation of SIM’s remuneration policies and practices.

SIM’s remuneration policies and practices are aimed at promoting sound and effective risk management and responsible business practices that do not encourage excessive risk-taking and are in line with the FCA’s Remuneration Code (SYSC 19G), with the main objective of the financial incentives being to attract, motivate and maintain high-calibre staff.

The decisions on setting remuneration are based on risk management supporting business strategy, objectives, values, long-term interests, avoiding conflicts of interest, and maintaining a sound capital base.

Staff receive fixed remuneration in the form of base salary, regular dividends, + non-discretionary pension contributions and various standard employee benefits and are considered for discretionary variable remuneration in the form of a bonus or extraordinary dividends where eligible.

The fixed remuneration is sufficient to enable the operation of a fully flexible policy on variable remuneration, including the possibility of paying no variable remuneration component.

The size of the variable remuneration pool is based on the performance of SIM as a whole and dependent on its overall financial result, taking into account its business strategy and any financial or liquidity needs to implement such strategy while ensuring a sound capital base. Both financial and non-financial criteria are taken into account for individuals including but not limited to:

- performance in line with SIM's strategy or values; and
- adherence to SIM's compliance obligations.

SIM may also impose vesting, retention, and clawback mechanisms.

Quantitative Disclosures

Total Remuneration	Fixed Remuneration	Variable Remuneration
£5,070,282	£4,843,683	£226,599