

# **Lodbrok Capital LLP**

## **(“Lodbrok” or the “Firm”)**

### **MIFIDPRU 8 Disclosure**

December 2025

Lodbrok Capital LLP

#### *Introduction*

The Financial Conduct Authority (“FCA” or “regulator”) in its Prudential sourcebook for MiFID Investment Firms (“MIFIDPRU”) sets out the detailed prudential requirements that apply to Lodbrok. In particular, Chapter 8 of MIFIDPRU (“MIFIDPRU 8” or the “public disclosures requirements”) sets out public disclosure obligations with which the Firm must comply, further to those prudential obligations.

Lodbrok is classified under MIFIDPRU as a small and non-interconnected investment firm (“SNI MIFIDPRU investment firm”). As such, MIFIDPRU 8 requires Lodbrok to disclose information regarding the Firm’s remuneration policy and practices.

The purpose of these disclosures is to give stakeholders and market participants an insight into the Firm’s culture, and to assist stakeholders in making more informed decisions about their relationship with the Firm.

This document has been prepared by Lodbrok in accordance with the requirements of MIFIDPRU 8 and is verified by the Executive Committee of the Firm. Unless otherwise stated, all figures are as at the 31<sup>st</sup> March financial year-end.

#### *Remuneration Policy and Practices*

##### **Overview**

As an SNI MIFIDPRU investment firm, Lodbrok is subject to the basic requirements of the MIFIDPRU Remuneration code. Lodbrok, as an alternatives investment fund manager, is also classified as a collective portfolio management investment firm, and as such, is also subject to the AIFM Remuneration Code. The purpose of the requirements on remuneration are 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 Lodbrok’s remuneration policies and practices are to establish, implement and maintain a culture that is consistent with, and promotes, sound and effective risk management and does not encourage risk-taking which is inconsistent with the risk profile of the Firm and the services that it provides to its clients.

In addition, Lodbrok recognises that remuneration is a key component in how the Firm attracts, motivates and retains quality staff and sustains consistently high levels of performance, productivity and results. As such, the Firm's remuneration philosophy is also grounded in the belief that its people are the most important asset and greatest competitive advantage.

Lodbrok is committed to excellence, teamwork, ethical behaviour and the pursuit of exceptional outcomes for its clients. From a remuneration perspective, this means that performance is determined through the assessment of various factors that relate to these values, and by making considered and informed decisions that reward effort, attitude and results.

### **Characteristics of the remuneration policy and practices**

The Firm's remuneration is comprised of fixed and variable remuneration. The sole component of remuneration that the Firm has categorised as fixed remuneration is base salary paid to employees. The components of remuneration described in the remainder of this paragraph are all categorised by the Firm as variable remuneration. The Firm's sole bonus arrangement is fully discretionary. The Firm has discretion to pay bonuses to all staff (Code and non-Code Staff), based on the performance of the Firm as a whole, and the contribution of the individual to the success of the Firm. Lodbrok's Members receive variable remuneration through an allocation of the Firm's profit share as set out in their Supplementary Agreement, rather than through a separate discretionary bonus scheme (as is the case with employees who are not Members of the Firm). Where the Firm has a distributable profit as defined in the Limited Liability Partnership Agreement, its Members will receive an allocation of such profit in accordance with each Member's Supplementary Agreement for the relevant performance year. The Firm does not operate any executive incentive schemes, or any other remuneration structures outside of the discretionary bonus scheme described above.

The objective of the Firm's Remuneration Policy is to set remuneration at a level that the Firm's staff are fairly and responsibly rewarded in a manner that is appropriately linked to their performance. The size of the bonus pool from which variable remuneration awards are made is assessed in light of the capitalisation and liquidity buffer in place at the Firm, taking into account current and future risks, drawing upon other available resources to make this assessment, such as the Firm's Internal Capital Adequacy and Risk Assessment ("ICARA").

Members' and employee performance is determined using financial and non-financial criteria on a meritocratic basis which is completely gender neutral. This performance assessment is based on a range of criteria on which each Member and employee, when considering their job description, should be assessed. Individuals' performance is not solely based upon investment performance or contribution; it also includes factors such as their adherence to the Firm's compliance policies, risk limits and adherence to behavioural guidelines. Violations of these policies / risk limits, if any, will be taken into account when determining variable remuneration and can have a negative impact on the amount of variable remuneration received.

The fixed and variable components of remuneration are assessed by the Firm to be 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 be able to meet its capital or liquidity regulatory requirements.

### **Governance and Oversight**

The Firm has established an appropriate segregation between its investment and non-investment teams, proportionate to the relatively small size of the business. The Firm has appointed an independent Chief Operation Officer (“COO”) who is not a member of the investment team, but who is a Member, a member of senior management and the Compliance Officer. Therefore, the COO is well informed on all aspects of the Firm’s and the businesses’ fund, managed accounts and co-investment operations and in light of his position within the Firm, has sufficient authority to input and influence the Firm’s remuneration decisions.

Lodbrok’s remuneration policy and practices are reviewed annually.

### **Quantitative Remuneration Disclosures<sup>1</sup>**

For the financial year 1<sup>st</sup> January 2024 to 31<sup>st</sup> March 2025, the total amount of remuneration awarded to all staff was £8,121,990 of which £1,768,645 comprised the fixed component of remuneration, and £6,353,345 comprised the variable component. For these purposes, ‘staff’ includes, employees of the Firm.

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<sup>1</sup> Please note that for the purposes of the figures disclosed in this section, service fees paid by Lodbrok to its corporate member, Lodbrok Limited, are excluded as they do not include remuneration paid to individuals.