



Brompton Asset Management Limited MIFIDPRU 8 Disclosures

FRN:942254

1. Introduction

Brompton Asset Management Limited ('Brompton') is authorised and regulated by the Financial Conduct Authority ('FCA').

Brompton is a discretionary investment manager, predominantly providing asset management services to fund management groups, financial advisers, investment companies and private clients, including family trusts and pensions plans, and charities.

The activities Brompton is authorised to carry out include those within scope of the Markets in Financial Instruments Directive ('MiFID'). Brompton's activities bring the firm within the scope of the FCA's Investment Firms Prudential Regime ('IFPR') and must therefore comply with the prudential requirements of the IFPR as set out in the FCA's Prudential Sourcebook for MiFID Investment Firms ('MIFIDPRU').

The IFPR introduced new rules concerning remuneration for UK investment firms, including the requirement for investment firms to publish a summary of their remuneration policies and practices. The requirements of the IFPR, and around remuneration disclosure, are applied proportionately depending on a firm's size and complexity. Brompton is classified as a Small Non-Interconnected ('SNI') firm. As such Brompton has produced this public disclosure in line with the rules and requirements of MIFIDPRU 8.6, as applicable to SNI firms without additional tier 1 instruments in issue.

On 31 March 2024, Brompton formed part of a corporate reorganisation where the book value of all of the asset management related entities were distributed by its former ultimate parent entity, Brompton Asset Management Group LLP to the underlying partners. At year end the partners held these shares, before a share-for-share occurred with the new ultimate parent on 5 April 2024 called Brompton Asset Management Group Limited. The previous ultimate parent entity, Brompton Asset Management Group LLP was renamed to Brompton Property Management Group LLP and is now an entirely separate group, albeit under common control. There is no longer any FCA regulated activity undertaken by what is now the Brompton Property Management Group.

This public disclosure has been prepared based on the audited financial statements for the year ended 31 March 2024. Further details on the corporate reorganisation can be sought from these accounts which are publicly available.

2. Remuneration Policy

Given the size and nature of Brompton's operations, Brompton has not established a separate remuneration committee. Brompton's management committee has responsibility for the overall remuneration philosophy and for determining the remuneration of directors and employees.

The majority of Brompton employees are also shareholders of Brompton Asset Management Group Limited, the ultimate parent entity of Brompton. Staff therefore benefit from Brompton's long-term, sustainable growth and profitability. Employees receive a salary and a set share of partnership profits and may benefit from additional rewards that recognise their individual performances in a particular period. Such rewards take into account a number of different factors including the promotion of sound and effective risk management, the level of risk taking, compliance, performance and building a long-term business.

For the financial year ended 31 March 2024, the total amount of remuneration (inclusive of employers National Insurance) awarded to all staff was £2.93m, of which £2.64m comprised of fixed remuneration and £0.29m was the variable component.

'Staff' has been defined broadly to include all employee members working directly on the asset management side of the business as well as the Company directors and designated partners of the Group. All employees are contracted to other companies within the wider Group and recharged to the Company.



3. Remuneration of Directors

Four of the five Directors are remunerated solely by Brompton Property Management Group LLP by way of a recharge to Brompton's service company, Brompton Asset Management Holdings Limited, before a share of which is charged to Brompton by way of a management fee. Only their priority profit share is included in fixed staff costs.

4. Variable Remuneration

Brompton operates variable remuneration based on primarily company success as well as individual performance.

5. Conclusion

Brompton's remuneration policy and appropriate internal procedures are designed with a view to ensuring that clients are treated fairly and their interests are not impaired by the remuneration practices adopted by the firm in the short, medium or long term.