



CREDITEX BROKERAGE LLP

2023 MIFIDPRU Disclosures

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1. Introduction

1.1 Background

In January 2022 the Financial Conduct Authority (“FCA”) introduced the Investment Firms Prudential Regime (“IFPR”), a new regime for UK firms authorised under the Markets in Financial Instruments Directive (“MiFID”).

The FCA have set out certain regulatory disclosure requirements in Chapter 8 of the Prudential sourcebook for MiFID Investment Firms (“MIFIDPRU”).

The information is known as MIFIDPRU Disclosures and is intended to contain an overview of the following aspects of Creditex Brokerage LLP’s business (“CBL” or the “Firm”) as of 31 December 2023:

- Risk management objectives and policies for the categories of risk address by MIFIDPRU 4 (Own funds requirements), MIFIDPRU 5 (Concentration risk) and MIFIDPRU 6 (Liquidity);
- Internal governance arrangements and a summary of the policy promoting diversity in CBL’s Management Body and its application;
- Own Funds and Own Funds Requirements, including its K-Factor and Fixed Overheads Requirements; and
- The key characteristics of CBL’s remuneration policy and practices and specific qualitative and quantitative information.

1.2 Basis of Disclosure and Scope of Application

The MIFIDPRU disclosures set out in this document are provided solely in respect of CBL, a Non-SNI MIFIDPRU Investment Firm.

The information contained in this document has not been audited by the Firm’s external auditors and does not constitute any form of financial statement.

MIFIDPRU includes further disclosure requirements for Non-SNI MIFIDPRU Investment Firms, should certain criteria set out in SYSC 19G.1.1R and MIFIDPRU 7.1.4R not be met. These disclosure requirements include additional qualitative and quantitative remuneration disclosures as set out within MIFIDPRU 8.6.8R(6) and MIFIDPRU 8.6.6R(4) and investment policy disclosures as set out within MIFIDPRU 8.7. It has been confirmed that for the period covering 01 January 2023 through 31 December 2023 (the “Reporting Period”), CBL meets the criteria set out within SYSC 19G.1.1R and MIFIDPRU 7.1.4R, therefore these additional disclosure requirements are not included as part of the Firm’s MIFIDPRU disclosures.

1.3 Frequency of Disclosure

The Firm is required to make MIFIDPRU 8 disclosures annually concurrently with the publication of the Firm’s Annual Accounts in accordance with regulatory requirements.

Unless otherwise stated, all financial figures are as of 31 December 2023, CBL's financial year end.

1.4 Location

The Firm's MIFIDPRU 8 disclosure document will be published on the Firm's website: <https://www.theice.com/service/creditex>

1.5 Company Background

The Firm is a wholly owned subsidiary of Intercontinental Exchange, Inc. ("ICE"), a US company listed on the New York Stock Exchange.

The Firm provides electronic trade execution services to financial institutions and investment firms operating in the credit derivatives and fixed income markets. The Firm is an operator of a Multilateral Trading Facility ("MTF") and also acts as an Introducing Broker for commodity futures and options products.

2. Risk Management Objectives and Policies

2.1 Risk Management and Identification

The Management Body (which includes both the Governing Body and Senior Management of the Firm) is responsible for the Firm's risk management structure and operations, as well as forming its own opinion on the effectiveness of the process.

The Management Body decides the Firm's risk appetite or tolerance for risk, those risks it will accept and those it will not take in the pursuit of its goals and objectives. In addition, the Management Body ensures that the Firm has implemented an effective, ongoing process to identify risk, to measure its potential impact against a broad set of assumptions and to ensure that such risks are actively managed.

The Firm has adopted a low-risk appetite. The Firm's general risk management objective is to develop governance structures and systems and controls to mitigate risk of potential harm, limiting the requirement to hold additional own funds or liquid assets. The Firm's definition of a material risk of potential harm is an unlikely but not impossible event that might have a material economic impact on the Firm, its clients, or the wider market.

To assess the effectiveness of the Firm's risk management process, the Firm undertakes a robust risk identification process to determine any potential material risks of harm and documents these in a Risk Matrix to determine which risks are appropriately mitigated and can be accepted, and which risks require further attention or mitigation. The Risk Management Officer and the other members of the Management Body consult to refine and develop the list of material risks. The matrix is structured to identify and record the inherent risk of potential harm, the probability of their occurrence, the impact if they did occur and the Firm's assessment of the degree of residual risk of harm in the light of the Firm's risk management controls.

2.2 Own Funds Requirements Risk

The Firm's own funds requirements are detailed in Section 5 below. The only K-factors applicable to the Firm are K-COH in respect of the client orders handled in the Firm's capacity as an arranging firm in connection with auctions run in relation to commodities, and K-NPR in respect of the Firm's exposure to foreign exchange rate movements.

The Firm's risk identification process has identified a number of key risks of potential harm with the potential to impact the Firm's own funds, including operational risk, market risk and business risk. Operational risk is the risk of loss arising from inadequate or failed internal processes, from personnel or systems, or from external events. The exposure to market risk arises from the risk of adverse movement in foreign exchange rates. Business risk is the risk arising from exposure to factors or events connected with the business which, if crystallise, could materially reduce revenue or increase expenses.

The Firm uses a number of tools to manage own funds requirements risk, including continuous monitoring and approval of the adequacy of its own funds. 'Key Risk Indicators' have been implemented to act as early warning signs aimed at notifying senior management if own funds cross internally set thresholds and thus misalign with the Firm's risk appetite. The Firm also ring-fences a certain amount of financial resources, calculated using current and forecast data to provide sufficient buffer to ensure the Firm is continually meeting its requirements. As an additional layer of risk management, a recovery plan is in place to replenish capital to avoid a breach of the Firm's requirements if own funds were to fall below a certain threshold, or to restore compliance if the Firm were to breach its requirements.

2.3 Concentration Risk

The Firm's most significant concentration risk is revenue concentration risk, which exists through a lack of diversity in CBL's revenue streams; the Firm earns revenue solely from a limited number of customers. Therefore, a failure or loss of a customer could result in a loss of all revenue.

As part of the Firm's Internal Capital Adequacy and Risk Assessment ("ICARA") process, scenario testing has been performed to ensure that the Firm can withstand a loss of revenue and maintain sufficient own funds and liquid assets without the need for additional capital injection for a 3-year forecast period.

2.4 Liquidity Risk

The Firm's liquid assets requirements are detailed in Section 5 below. The Firm monitors the adequacy of its liquid assets on a continuous basis and documents this monitoring monthly. 'Key Risk Indicators' have been implemented to act as early warning signs aimed at notifying senior management if liquid assets cross internally set thresholds and thus misalign with the Firm's risk appetite.

The key risk to the Firm's liquidity observed from the Firm's risk identification process is counterparty default risk. The Firm's assets primarily relate to cash which

is held at highly rated credit worthy institutions invested in line with an agreed investment policy to mitigate risk of credit loss.

3. Governance Arrangements

3.1 Governing Body and Management Body

The Firm's legal form is that of a Limited Liability Partnership, and it is governed by Creditex UK Limited (Managing Member) and Creditex Brokerage Holdco Limited (together, the "Designated Members"). Under CBL's terms of reference, the Designated Members must ensure that the Firm operates within an established framework of effective systems of internal control, risk management and compliance. The Directors of the Managing Member comprise the Governing Body and undertake the management and oversight responsibilities.

The Management Body of the Firm consists of the Governing Body and individuals who are members of Senior Management. The Management Body decides the Firm's appetite or tolerance for risk: those risks it will accept and those it will not take in the pursuit of its goals and objectives. In addition, the Management Body ensures that the Firm has implemented an effective, on-going process to identify risk, to measure its potential impact against a broad set of assumptions and then to ensure that such risks are actively managed.

Senior Management is accountable to the Governing Body for designing, implementing and monitoring the process of risk management and incorporating it into the day-to-day business activities of the Firm. The Management Body is responsible for effectively communicating the Firm's approach and commitment to establishing and maintaining an effective risk management framework and approach.

3.2 Directorships

Below is a table listing the number of directorships (executive and non-executive) held by each member of the Firm's Management Body:

Name	Directorships (as of 31/12/2023)	
	Executive	Non-Executive
Peter Borstelmann	2	0
Duncan Moyle ¹	3	0
Kat Bell ²	1	0
Robert Laorno	2	0
Laurence Turpin	1	0
Jeffrey Eilen	1	0

We have counted directorships held within the same group as a single directorship in accordance with MIFIDPRU 8.3.2R.

¹ Mr. Moyle ceased to be involved with the Firm effective 25 April 2023. The appointment to three (3) external directorships occurred after Mr. Moyle's association with the Firm terminated.

² Ms. Bell was approved as a director of the Designated Members and SMF27 of the Firm on 16 February 2023.

3.3 Policy Promoting Diversity on the Management Body

The CBL diversity policy sets out its purpose in relation to diversity and provides a high-level overview of the Firm's approach to diversity in relation to the Firm's Management Body which is further supported by the Firm's parent company's diversity strategy which focuses on increasing and supporting diversity across the Group Company by focusing on three pillars:

- Our broader employee population
- Our board of directors
- Across companies

3.4 Risk Committee

CBL does not have a Risk Committee and it is not required by MIFIDPRU 7.3.1R to establish a Risk Committee. In accordance with MIFIDPRU 7.1.4R, MIFIDPRU 7.3 does not apply to the Firm.

4. Own Funds

Composition of regulatory own funds as at 31 December 2023			
	Item	Amount (GBP thousands)	Source based on reference numbers/letters of the balance sheet in the audited financial statements
1	OWN FUNDS	3,309	N/A
2	TIER 1 CAPITAL	3,309	N/A
3	COMMON EQUITY TIER 1 CAPITAL	3,309	N/A
4	Fully paid up capital instruments	-	N/A
5	Share premium	-	N/A
6	Retained earnings	-	N/A
7	Accumulated other comprehensive income	-	N/A
8	Other reserves	540	Other reserves classified as equity
9	Adjustments to CET1 due to prudential filters	-	N/A
10	Other funds	-	N/A
11	(-)TOTAL DEDUCTIONS FROM COMMON EQUITY TIER	-	N/A
12	Members' capital	2,769	Members' capital classified as a liability
19	CET1.: Other capital elements, deductions and adjustments	-	N/A
20	ADDITIONAL TIER 1 CAPITAL	-	N/A
21	Fully paid up, directly issued capital instruments	-	N/A
22	Share premium	-	N/A
23	(-) TOTAL DEDUCTIONS FROM ADDITIONAL TIER 1	-	N/A
24	Additional Tier 1: Other capital elements, deductions and adjustments	-	N/A
25	TIER 2 CAPITAL	-	N/A
26	Fully paid up, directly issued capital instruments	-	N/A
27	Share premium	-	N/A
28	(-) TOTAL DEDUCTIONS FROM TIER 2	-	N/A
29	Tier 2: Other capital elements, deductions and adjustments	-	N/A

Own funds: reconciliation of regulatory own funds to balance sheet in the audited financial statements				
Flexible template - rows to be reported in line with the balance sheet included in the audited financial statements of the investment firm.				
Columns should be kept fixed, unless the investment firm has the same accounting and regulatory scope of consolidation, in which case the volumes should be entered in column (a) only.				
Figures should be given in GBP thousands unless noted otherwise.				
		a	b	c
		Balance sheet as in published/audited financial statements	Under regulatory scope of consolidation	Cross-reference to template OF1
		As at period end	As at period end	
Assets - Breakdown by asset classes according to the balance sheet in the audited financial statements				
1	Debtors: amounts falling due within one year	32		N/A
2	Cash and bank and in hand	3,460		N/A
	Total Assets	3,492		
Liabilities - Breakdown by liability classes according to the balance sheet in the audited financial statements				
1	Creditors and other payables: amounts falling due within one	183		N/A
2	Members' capital classified as a liability	2,769		Item 12
	Total Liabilities	2,952		
Shareholders' Equity				
1	Other reserves	540		Item 8
	Total Shareholders' equity	540		

Own funds: main features of own instruments issued by the firm	
<i>Free text. A non-exhaustive list of example features is included below.</i>	
CET1 instruments comprise members' capital and other reserves.	
Members' capital classified as a liability is repayable only upon wind-up of the Firm or on retirement of a member, only to the extent that an equal amount is contributed by another member.	

5. Own Funds Requirements

5.1 Calculation of Requirement

As a Non-SNI MIFIDPRU Investment Firm, CBL's own funds requirement is calculated as the highest of:

	£'000
1. Permanent minimum capital requirement ("PMR")	750
2. Fixed overhead requirement ("FOR")*	86
3. K-factor requirement ("KFR")	3
K-factors split as prescribed in MIFIDPRU 8.5.1:	
Sum of K-AUM, K-CMH, K-ASA	-
Sum of K-COH, K-DTF	1
Sum of K-NPR, K-CMG, K-TCD, K-CON	2

* The FOR is equal to one quarter of CBL's fixed expenditure from the previous year after the deduction of certain variable items. CBL's FOR as at 31 December 2023 is based on the most recently available audited annual accounts at that date, being those for the year ended 31 December 2022. The basic liquid assets requirement is one third of the FOR: £29,000.

5.2 Assessing the adequacy of own funds and liquid assets in accordance with the overall financial adequacy rule

The Firm must, at all times, hold financial resources (own funds and liquid assets) that are adequate for the business it undertakes, both in respect of remaining financially viable throughout the economic cycle, with the ability to address any potential material harms that may result from its ongoing activities, and also to ensure it can conduct an orderly wind-down while minimising harm to consumers or to other market participants.

The Firm has conducted and documented its annual ICARA process, the purpose of which is to quantify own funds or liquid assets required to fund the ongoing operation of its business or to fund a wind-down of the business. To meet this requirement, the Firm must, at all times, maintain own funds and liquid assets that are in excess of the Overall Financial Adequacy Rule ('OFAR'), which includes additional own funds or additional liquid assets above the firm's own funds requirement or basic liquid assets requirement to address material risks of potential harm. To comply with the OFAR, the Firm needs to meet both the Own Funds Threshold Requirement ('OFTR') and the Liquid Assets Threshold Requirement ('LATR'). As at 31 December 2023 these are calculated as follows:

- The OFTR is equal to its PMR of £750,000
- The LATR is equal to £457,000 (being the basic liquid assets requirement plus additional amounts required to mitigate the risks of harm from disorderly wind-down).

The Firm monitors the adequacy of its own funds and liquid assets on a continuous basis and documents this monitoring monthly. Should a situation arise which would

cause a material change in the assumptions and inputs to the calculation of the OFAR, the ICARA process would undergo a review and update outside of the annual cycle. A certain amount of financial resources is ring-fenced to ensure that the Firm continually meets its requirements. This ring-fenced amount is calculated using current and forecast data to provide sufficient buffer over the requirements. ‘Key Risk Indicators’ have been implemented to act as early warning signs aimed at notifying senior management if own funds or liquid assets cross internally set thresholds and thus misalign with the Firm’s risk appetite.

6. Remuneration Policy and Practices

The Firm has a Remuneration Policy which sets out the Firm’s approach to remuneration, articulating the principles and structures that have been adopted in accordance with applicable legal and regulatory guidance, including the MIFIDPRU Remuneration Code and the Equality Act 2010.

For all staff, the Firm’s approach to remuneration is designed to meet the following key objectives:

- To attract, motivate and retain high calibre and diverse employees across the Firm;
- Reward high performance and deliver a sustainable performance;
- Promote the achievement of the Firm’s business strategy and objectives and its longer-term strategic and investment objectives;
- Be sustainably affordable;
- Be gender neutral; and
- Support good risk management procedures and a positive culture.

The Firm is committed to maintaining responsible and effective remuneration practices.

The Firm provides electronic brokerage solutions in relation to credit default swaps and fixed income products (e.g., bonds) to Eligible Counterparties and Professional Clients (as such terms are defined in the FCA Handbook) through the operation of a Multilateral Trading Facility (“MTF”). The Firm also acts as an Introducing Broker for CFTC regulated products.

The Firm’s business does not involve taking principal positions with its own capital, and the Firm does not enter into any transactions in a principal capacity. It does not hold client funds or safeguard client assets. Since it does not lend, it is not subject to material credit risk associated with this type of activity. Since the Firm does not enter into proprietary positions or enter into transactions in a principal capacity (i.e., it is never a counterparty to a transaction), it is not subject to market risk associated with this type of activity. The risk categories that the Firm is exposed to are operational, business, liquidity, reputational, conduct and regulatory, and the approach to remuneration has been designed with these risks in mind.

6.1 Governance and Oversight

The Management Body of the Firm in its supervisory function adopts and periodically reviews the Firm’s Remuneration Policy and has overall responsibility for overseeing

its implementation. Development, review and implementation of the Remuneration Policy/remuneration arrangements, including variable remuneration, is supported by Control Functions of the Firm (including (where they exist) risk management, compliance, internal audit and human resources), with the assistance and advice of ICE executives, including members of the ICE Group Compensation Committee, as required.

The remuneration programs of the Firm have been designed in a manner that (i) is in line with the Firm's business strategy (ii) is consistent with its risk profile and promotes sound and effective risk management, (iii) does not impair the long-term objectives and goals of the Firm, and (iv) complies with its legal and compliance obligations.

Keystone Law Limited has assisted in the development of the Firm's Remuneration Policy.

6.2 Remuneration Structure

The Firm rewards employees with fixed and variable remuneration.

Fixed remuneration is comprised of base annual salary, pension and benefits.

Variable remuneration, which is not guaranteed, may be comprised of: (i) a cash bonus; and/or (ii) an award of equity in the Firm's ultimate parent company, ICE ("Equity Award"). Variable remuneration is awarded to staff only if applicable performance conditions have been satisfied and always in accordance with the Firm's Remuneration Policy. Variable remuneration is based on a combination of the assessment of the performance of the relevant individual (financial and non-financial), the business unit concerned and ICE Group performance relative to Group Company goals.

The Firm ensures that the fixed and variable components of total remuneration are appropriately balanced, such that the fixed component represents a sufficiently high proportion of total remuneration to enable the operation of a fully flexible policy on variable remuneration (that is, a policy resulting in the possibility of nil or negligible variable remuneration in certain circumstances).

The discretionary annual bonus is determined by the ICE Group Company performance relative to Group Company goals and the performance of eligible staff members, taking into account their individual contribution to the success of the Firm and good conduct and compliance with applicable policies and procedures. The bonus pool, if any, is determined annually as part of the ICE Group's budget process and approved by the ICE Board.

Where applicable (as eligibility to receive Equity Awards is typically limited to senior employees) the discretionary Equity Awards comprises EBITDA-based performance share units and restricted share units and have deferred vesting payment periods. All grants are awarded after the end of the performance period in which they are earned (to allow for performance adjustments as well as changes in Firm/ICE Group performance). The vesting periods of such awards mitigates against short-term risk taking and poor performance can trigger the operation of claw-back provisions.

The Firm's approach to Variable Remuneration recognises that the overriding consideration is the strengthening and maintenance of the Firm's capital base. Bonuses are paid out of annual realised profits of the ICE Group with such profits having no market risk and only limited credit risk. In addition, the ICE Group Compensation Committee and the Board of ICE has discretion to reduce the bonus pool or defer bonus decisions if it is concerned about the current or future capital position of the Firm and/or the ICE Group.

The Firm considers that its remuneration practices are appropriate, taking into account the size, internal organisation and the nature, scope and complexity of the activities of the Firm.

To avoid conflicts of interest within the Firm, the implementation of, or amendment to, any remuneration program is reviewed and approved by the ICE Group Compensation Committee. Input will be sought from such other departments as required. The Firm's Remuneration Policy and its implementation encourages responsible business conduct by expressly linking remuneration with risk and the Firm/ICE Group performance. Thus, when evaluating staff performance, the Firm includes factors such as performance in relation to ICE's core and functional competencies.

6.3 *Link Between Pay and Performance*

The Firm's remuneration practices are designed to reward staff for their performance and contribution to the success of the Firm and the ICE Group.

The Firm maintains remuneration programs and practices that are consistent with and promote prudent, sound and effective risk management and which take into account the type of risks and the degree of risk that an individual may take on behalf of the Firm. No employee will be encouraged to take, or be rewarded for, taking excessive risk.

As stated above, all staff receive fixed remuneration in the form of a base annual salary. Base salaries are established based on an evaluation of internal comparisons and external market rates for the position. An individual's initial base salary is set relative to this internal/external market rate based on the individual's experience, knowledge, skills and abilities. Base salaries are then reviewed each year during this process and adjusted to reflect merit and market (internal and external) considerations.

All staff are eligible for, but not guaranteed to receive, a cash bonus as part of their variable remuneration. Eligibility for a cash bonus is based on a combination of the assessment of the performance of the relevant individual (financial and non-financial), the business unit concerned and the overall performance results of the ICE Group relative to Group Company goals.

Senior employees and significant contributors to the Firm/ICE Group's long-term strategy are eligible for, but not guaranteed to receive, Equity Awards as part of their variable remuneration on the basis of the assessment of the performance of the relevant individual. All Equity Awards are awarded after the end of the performance period in which they are earned (to allow for performance adjustments (please refer to

Section 6.5 below) as well as changes in Firm/ICE Group performance). The vesting periods of such awards mitigates against short-term risk taking.

No staff receive remuneration only comprised of variable remuneration.

6.4 Performance Assessment

Variable remuneration is only awarded if it sustainable to the financial situation of the Firm and the ICE Group and if justified by the performance of the Firm, individual concerned and the ICE Group.

6.4.1 Firm and ICE Group Performance

The discretionary annual bonus is operated on the basis of the ICE Group's performance. The bonus pool, if any (since the pool comprises a percentage of pre-tax profits, including the cost of employer's NICs) is determined annually as part of the ICE Group's budget process and approved by the ICE Board.

In addition, the ICE Group Compensation Committee and the Board of Intercontinental Exchange, Inc. has discretion to reduce the bonus pool or defer bonus decisions if it is concerned about the current or future capital position of the Firm and/or the ICE Group.

6.4.2 Individual Performance

When assessing individual performance, the Firm takes into account a number of financial and non-financial criteria, which are considered in the context of the individual's performance based on the role of the staff member.

Non-financial criteria include, but are not limited to:

- Compliance with and adherence to the Firm's and ICE's policies and procedures and the Firm's regulatory requirements;
- Establishing and maintaining client relationships, including the fair treatment of clients and quality of service provided;
- Individual performance in relation to specifications of the role;
- Level of seniority and responsibility associated with the role;
- Performance consistent with the Firm's/ICE's business strategy; and
- Performance consistent with the Firm's core competencies.

Financial criteria include, but are not limited to:

- The financial performance of the Firm, e.g., trading volumes and revenue;
- The financial performance of the ICE Group; and
- The current and projected future capital position of the Firm and/or the ICE Group.

6.5 Performance Adjustments

Performance adjustment, in the form of malus and clawback, may be applied to all elements of variable remuneration awarded to any individual.

Malus is the adjustment of any portion of variable remuneration which has not been awarded or paid. Any malus adjustment applied under the Firm's Remuneration Policy will typically be made on an "in year" (or ex ante) basis in the event a performance adjustment matter (see below) occurs or comes to light before the variable remuneration has been awarded or paid.

Clawback is the recovery of variable remuneration which has been awarded and paid. Recovery may be applied in respect of any sums or equity which are held during the relevant deferral period.

Malus and/or clawback may be applied, as determined by the ICE Group Compensation Committee and Board, in its absolute discretion, to take account of certain events, crystallised risks or matters of an adverse nature which occur or come to light.

Performance adjustment matters includes, but are not limited to circumstances, where:

- there is evidence of conduct or behaviour falling below the standards expected by the Firm;
- there is evidence of conduct or behaviour which in the reasonable opinion of the ICE Group Compensation Committee has brought or is capable of bringing the Firm into disrepute;
- the individual is found to no longer be considered as fit and proper to perform their role;
- there is evidence of a material error or negligence by the individual;
- the Firm suffers, or the individual is responsible for, a material failure of risk management; including Health and Safety; and/or
- the individual is dismissed by the Firm.

6.6 Guaranteed Variable Remuneration

The Firm does not award, pay or provide guaranteed variable remuneration except in exceptional circumstances. The Firm's Remuneration Policy includes provisions related to guaranteed variable remuneration, as follows:

- a.) Sign-On Bonuses - The Firm may permit the payment of sign-on bonuses, with any such payments being limited to the first year of service and in circumstances where the Firm has a strong capital base.
- b.) Buy-out awards - The Firm may permit the payment of buyout bonuses where these align with the long-term interests of the Firm and contain provisions on periods of retention, deferral, vesting and ex-post risk adjustment which correspond with the schedule of unvested variable remuneration under the previous contract of employment.
- c.) Retention awards - The Firm may consider retention bonuses, to be paid after a defined event - usually relating to mergers, acquisitions and restructure.

Any guaranteed variable remuneration award will be subject to performance terms applied to the employee in writing.

6.7 Severance Pay

In the event that Firm management or employees are entitled to a discretionary pay-out on termination, such payment must:

- be subject to an appropriate limit, or management approval;
- be aligned with the Firm’s overall financial condition and performance over an appropriate time horizon;
- not be payable in the case of failure or threatened failure of the Firm, particularly to an individual whose actions may have contributed to the failure or potential failure of the Firm; and
- accord with the relevant scheme rules.

6.8 Quantitative Remuneration Disclosures

For the Reporting Period, six (6) individuals were identified as Material Risk Takers (“MRT”) for the Firm in accordance with the criteria set out in the FCA’s MiFIDPRU Remuneration Code (SYSC 19G.5).

Total remuneration of £2,598,241 was paid to all staff of the Firm during the Reporting Period. The Firm is relying on the exemption contained in MIFIDPRU 8.6.8R(7)(b) in relation to the information items required in MIFIDPRU 8.6.8R(5)(b). Specifically, the Firm will not disclose the total amount of severance payments awarded during the financial year and the number of material risk takers receiving those payments in order to prevent individual identification of a material risk taker.

The total aggregate remuneration split between Senior Management, Other MRTs and Other Staff is as follows (the figures below are rounded to the nearest whole number):

	Senior Management	Other MRTs	Other Staff	Total (All Staff)
Fixed Remuneration	£187,745	£539,342	£807,149	£1,534,235
Variable Remuneration	£152,944	£503,478	£407,584	£1,064,006
Total Remuneration	£340,688	£1,042,820	£1,214,733	£2,598,241

There were no guaranteed variable remuneration awards made to Senior Management or other MRTs during the Reporting Period. The highest severance payment awarded to an MRT during the Review Period was £307,905.