

# JK Investment Management LLP

## MIFIDPRU Disclosure

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## 1. Introduction

JK Investment Management LLP (JKIM, the “Firm” or “we”) is a MIFID investment firm authorised and regulated by the Financial Conduct Authority (FCA). We are required to comply with the disclosure requirements under the Investment Firms Prudential Regime (IFPR), which is set out in the FCA Handbook MIFIDPRU 8. This supersedes the previous Pillar 3 disclosure.

For the purpose of prudential regulations, we are classified as a small, non-interconnected (SNI) MIFIDPRU investment firm and are subject to the to meet the basic requirements of section 19G of the FCA’s Senior Management Arrangements, Systems and Controls (SYSC) sourcebook, the “MIFIDPRU Remuneration Code” (the ‘Code’). We are required to provide a level of detail in our disclosures that is appropriate to our size and internal organisation, and to the nature, scope, and complexity of our activities.

The following sections of the MIFIDPRU disclosure rules apply to us:

- MIFIDPRU 8.1 – Disclosure
- MIFIDPRU 8.6 – Remuneration policy and practices

## 2. Remuneration

The Firm is required to comply with the MIFIDPRU Remuneration Code under IFPR, which aims to ensure that we have risk-focused remuneration policies that are consistent with and promote sound and effective risk management in the long-term interests of the Firm and our customers and do not expose the Firm or our clients to excessive risk.

### 2.1. Our approach and objectives

We have formulated our approach to remuneration policy and practices with reference to the guidance set out by the FCA. We consider the appropriate balance between fixed and variable remuneration as well as the constraints in place to avoid a conflict of interest between staff incentives and the best interests of our clients and customers.

The objectives of our financial incentives are to:

- promote sound and effective risk management in the long-term interests of the Firm and its customers;
- limit risk-taking and avoid conflicts of interest;
- ensure alignment between risk and individual reward;
- supporting positive behaviours and healthy firm cultures;
- encourage responsible business conduct;
- discourage behaviour that can lead to misconduct and poor customer outcomes;
- align employee’s interests with the firm’s long-term strategy and objectives; and
- be gender neutral, in line with the Equality Act 2010.

### 2.2. Governance and decision-making procedures

JKIM’s Partners are responsible for overseeing the implementation of our remuneration policy and ensuring our compliance with the MIFIDPRU Remuneration Code.

The role of the Partners is to ensure that the extent of the variable remuneration at the Firm cannot affect the Firm’s ability to maintain a sound capital base. The Partners oversee the performance management process, including reviewing and approving the Firm’s remuneration policy, the variable remuneration pool, eligibility of participation in variable remuneration schemes, as well as the approval of variable remuneration awarded to individuals.

We assess our staff members under our performance management process on an ongoing basis with an annual performance assessment outcome being used as a contributing factor in the determination of remuneration.

### **2.3. Key characteristics of remuneration policies and practices**

The Firm's remuneration policy has been created, and is reviewed annually, by the Partners.

The remuneration policy's aims are to promote sound and effective risk management, to encourage responsible business conduct, to limit risk-taking and avoid conflicts of interest, to align employee's interests with the firm's long-term strategy and objectives, and to be gender neutral, in line with the Equality Act 2010.

The policy is designed to align risk and reward, to ensure the capital base of the firm is not put at risk by its remuneration incentives.

### **2.4. Objectives of financial incentives**

JKIM's remuneration Policy provides a framework to ensure all staff are fairly and competitively rewarded in return for a high level of service to the Firm and its clients and customers. In setting remuneration levels, JKIM recognises the importance of attracting and retaining experienced staff. The amount of fixed remuneration paid to an employee will be based on market rates relevant to the employee's role and their knowledge, experience, and competencies. Discretionary bonuses are made to employees to reward them for good performance with a view to increasing and maintaining their productivity. The principal objective in determining variable bonus awards is to reward individual contribution to the firm whilst ensuring that such payments are warranted given business results

The remuneration policy has been developed based on a number of key principles which are:

- Remuneration should align to the Firm's business drivers, corporate vision and strategic priorities.
- Remuneration should adhere to wider people management practices, and only reward results which support a positive employment culture and customer values.
- Remuneration plans communication should be made simple, clear and transparent for employees and shareholders.

At JKIM, remuneration for employees consists of a fixed salary and the statutory pension contribution, which constitutes the fixed payment made to an employee for their services. and the potential for a discretionary bonus, Where the individual is a material risk taker under MIFIDPRU, a portion or all of any discretionary bonuses are usually deferred for two years. The Partners do not draw a salary, but share in the firm's profit and loss at the end of each financial year.

### **2.5. Fixed remuneration**

#### *Base Salary*

We review the base salary our staff members on an annual basis by considering factors such as market information and individual performance.

The base salary component of the fixed remuneration primarily reflects the staff member's professional experience and organisational responsibility as set out in their job description and terms of employment. The fixed remuneration is permanent, pre-determined, non-discretionary, non-revocable and not dependent on performance.

## 2.6. Variable remuneration

### *Bonus*

The Firm's bonus scheme is a discretionary reward scheme based on the performance of the Firm as a whole and individual performance. It can also include employee incentive plans and carried interest. All bonuses are dependent on the Firm's overall financial result to ensure a sound capital base. The bonus pool will take into consideration all types of current and future, financial and non-financial risks and be determined on a sliding scale, using a monthly salary multiplier as a guide.

All employees are entitled to participate in the firm's bonus scheme.

The variable remuneration component of remuneration is based on employee performance. As such it reflects the long-term performance of the staff member as well as performance in excess of the staff member's job description and terms of employment.

The Firm's policy is that the fixed remuneration component will represent 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.

The bonus pool and other individual bonuses will be adjusted as deemed necessary by the Partners of the Firm in consideration of the following:

- Any compliance or regulatory issues that have occurred or are under investigations internally or externally
- Any persistent or significant breaches in either financial or non-financial KPIs
- Any conduct related matters that have occurred or are under investigation internally or externally
- Any matters that adversely impact client outcomes
- Any other factors that may publicly impact the Firm's brand or reputation.

## 2.7. Quantitative disclosures

For the financial year ended 30 November 2025, the amount of remuneration awarded to Partners and staff was as follows:

Total remuneration (£)	Fixed proportion (£)	Variable proportion (£)
374,859	306,425	68,434