

For the period ending: 31st December 2022

## 1. Overview and summary

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CdR Capital Ltd ("CdR" or "Firm") is authorised and regulated by the Financial Conduct Authority ("FCA") as a Full-scope Alternative Fund Investment Manager ("Full-scope AIFM") and categorized as a Collective Portfolio Management Investment firm ("CPMI firm"). As such, CdR holds Markets in Financial Instruments ("MiFID") Top-up permissions and for this purpose it is subject to the rules and requirements of the FCA's Prudential Sourcebook for MiFID Investments Firms ("MIFIDPRU") Handbook.

For the purposes of MIFIDPRU, CdR has been classified as a Small Non-Interconnected firm ("SNI firm"). It has produced this Public Disclosure Document in line with the rules and requirements of MIFIDPRU 8, as applicable to SNI firms. This Public Disclosure Document has been prepared based on the audited financials as of 31st December 2022, covering the financial period 1st January 2022 to 31st December 2022.

CdR main business activity is investment fund management, and it manages a range of investment products to facilitate business development on behalf of global institutional investors.

## 2. Remuneration arrangements

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CdR has adopted a remuneration policy and procedures that comply with the requirements of chapter 19G of the FCA's Senior Management Arrangements, Systems and Controls Sourcebook ("SYSC").

In accordance with MIFIDPRU 8.6.2, CdR makes the following qualitative remuneration disclosures:

- The Firm's remuneration policies and practices are reviewed annually to ensure they are appropriate and proportionate to the nature, scale and complexity of the risks inherent in the business model and the activities of the Firm.
- CdR's Governing Body, as the Remuneration Committee, is directly responsible for the overall remuneration policy of the Firm.
- The Firm ensures that its remuneration structure promotes effective risk management and balances the fixed and variable remuneration components for all staff members.
- Variable remuneration is adjusted in line with capital and liquidity requirements, as well as the firm's performance.

CdR's Remuneration Policy sets out the criteria for setting fixed and variable remuneration. All remuneration paid to staff members is clearly categorised as either fixed or variable remuneration.

Fixed remuneration is based upon a staff member's professional experience and organisational responsibility. It is permanent, pre-determined, non-discretionary, non-revocable and not dependent on performance.

Variable remuneration is based upon staff members performance or, in exceptional cases, other conditions.

Performance 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, and could also:

- include discretionary pension benefits; and
- include carried interest, as referred to in SYSC 19G.1.27R.

Total remuneration is based on balancing both financial and non-financial indicators together with the performance of the Firm and the staff member's business unit.

The Firm ensures that fixed and variable components of the total remuneration are appropriately balanced; and the fixed component represents a sufficiently high proportion of the total remuneration to enable the operation of a fully flexible policy on variable remuneration.

The Firm monitors fixed to variable compensation to ensure SYSC 19G is adhered to with respect to Total Remuneration.

### **Quantitative Remuneration**

All firms are required to publicly disclose certain quantitative information in relation to the levels of remuneration awarded.

As an SNI firm, and in accordance with MIFIDPRU 8.6.8, CdR is required to disclose the total amount of remuneration awarded to all staff, split into fixed and variable remuneration.

For the performance year ending 31 December 2022:

- Total fixed remuneration awarded: £1,399,473
- Total variable remuneration awarded: £497,000
- Total remuneration awarded: £1,896,473