MIFIDPRU 8 Disclosure
(Based on audited financial statements for the year ending 31st December 2025)

1. Scope and purpose

This disclosure relates to **GGC Securities Ltd** "the Firm", which is classified as a non "small and non-interconnected" (Non-SNI) MIFIDPRU investment firm and is therefore required under MIFIDPRU 8 of the Prudential sourcebook for MiFID Investment Firms to disclose information relating to governance arrangements, risk management, own funds, and remuneration policies and practices.

In accordance with the rules, the disclosures herein are appropriate to the size and internal organisation, and to the nature, scope, and complexity of the Firm's activities.

2. Governance and decision-making procedures

The governing body is ultimately responsible for the definition, oversight, and implementation of the strategic objectives, risk strategy, and internal governance arrangements.

The firm has robust governance arrangements which include:

- A clear organisational structure with well defined, transparent and consistent lines of responsibility,
- Effective processes to identify, manage, monitor and report the risks it is or might be exposed to,
- Internal control mechanisms, including sound administrative and accounting procedures,
- Effective control and safeguard arrangements for information processing systems.

The Firm is not required to establish separate risk, remuneration or nomination committees under MIFIDPRU 7.3, as it meets the conditions in MIFIDPRU 7.1.4R. In particular, the Firm's audited financial statements show total assets materially below the applicable threshold, and the Firm does not operate a trading book. Given the Firm's size, internal organisation and the nature, scale and complexity of its activities, oversight of risk, remuneration and governance matters is retained by the Board. The Board receives management information and reviews relevant policies and arrangements periodically to ensure that risks are identified, managed, monitored and reported appropriately

2.1 Governance Structure

2.2 The Firm has a simple governance structure which reflects its size, internal organisation and business model. The Board of Directors meets quarterly and is attended by the directors, with senior management, Compliance, Finance, Operations or other relevant staff invited where required. The Board is responsible for overall oversight of the Firm, including strategy, financial resources, risk management, regulatory compliance, remuneration matters and key business decisions. The Firm also operates a Product Committee, which meets on an ad hoc basis where product governance review is required, in particular where the Firm acts as distributor. The Product Committee is attended by relevant senior management, Compliance and business representatives, and considers matters such as product approval, target market, distribution strategy, product risks, conflicts and ongoing product review.

2.3 Directorships

In compliance with MIFIDPRU 8.3.1(2) the table below discloses the number of directorships held by the governing body.

Directorships held by each member of the management (governing) body *MIFIDPRU 8.3.2 states that directorships held within the same group or holding, and those held in organisations which do not pursue predominantly commercial objectives are not within scope.*	
Member of the management body	**Number of directorships held** (executive and non-executive) (details of modifications/waivers if applicable)
Domenico Clasadonte	1
Marco Eman	1
Alexandre Vecchio	2
John Calvert	2

2.4 Diversity statement

GGC Securities Ltd is committed to equality of opportunity and to promoting diversity of skills, experience, knowledge, background and perspective within the Firm and, where relevant, on its Board. The Firm's approach is proportionate to its size, internal organisation and simple governance structure. Appointments to the management body are considered on merit, taking into account the skills, experience, independence, conduct, time commitment and knowledge required for the role, while also seeking to support effective challenge and avoid narrow decision-making. Given the Firm's small size and limited number of Board appointments, the Firm has not set fixed numerical diversity targets for the management body during the period. The Board considers that its current composition provides an appropriate range of financial services, governance, regulatory and business experience for the Firm's current activities. The Board will keep this approach under review at least annually and when any new Board appointment is considered. As the Firm grows, the Board will consider whether more specific objectives or targets should be adopted

3. Risk management objectives and policies

The Board of GGC Securities Ltd is responsible for setting the Firm's business strategy, risk appetite and risk management framework. The Firm's objective is not to eliminate risk, but to identify, assess, monitor and manage risks to an acceptable level, while maintaining adequate own funds and liquid assets to remain financially viable and, if required, to wind down in an orderly manner. The Firm's risk profile reflects its wholesale B2B business model: it deals only with Professional Clients and Eligible Counterparties, does not deal with retail clients, does not hold client money or custody assets, and executes matched principal transactions on a back-to-back basis, with settlement normally on a delivery-versus-payment basis through regulated third-party providers. The main potential harms associated with the Firm's business strategy include operational or dealing errors, client categorisation or appropriateness failures, counterparty or settlement disruption, regulatory or financial crime failings, cyber or systems events, reputational harm, liquidity pressure and business or revenue stress.

The Firm manages these risks through its ICARA process, Risk Management Policy, Risk Register, Compliance Monitoring Programme, product governance framework and Board oversight. The Firm applies a proportionate three-lines-of-defence model. The first line consists of the business and operational functions, which identify and manage risks arising from day-to-day activity. The second line consists of Compliance, Financial Crime/MLRO, Finance, Operations and risk oversight, which provide monitoring, challenge, reporting and escalation to senior management and the Board. Independent challenge is provided through external compliance consultants and other professional advisers, while external audit provides assurance in relation to financial reporting. The Firm assesses risks on both a gross and residual basis, records them in its Risk Register, links them where relevant to K-factors and the ICARA, and escalates any material or out-of-appetite risk to senior management and the Board. The Board reviews the ICARA, capital and liquidity adequacy, risk appetite, stress testing and wind-down planning at least annually and whenever there is a material change to the Firm's business model or risk profile.

3.1 Own funds requirements

The Firm is required to maintain own funds of £750,000, being the higher of its permanent minimum capital requirement, fixed overhead requirement and K-factor requirement. For the period covered by this disclosure, the Firm's permanent minimum capital requirement was £750,000, its fixed overhead requirement was £632,370 and its K-factor requirement was £334,412. The Firm's ICARA own funds threshold requirement was also assessed as £750,000. As at 31 December 2025, based on the Firm's audited financial statements, the Firm held regulatory own funds of £3,973,748, consisting entirely of Common Equity Tier 1 capital, made up of £750,000 called-up share capital and £3,223,748 retained earnings. The Firm has not issued Additional Tier 1 or Tier 2 instruments. The Firm operates an ICARA process to ensure that it remains adequately capitalised to cover the risks arising from its ongoing activities and to support an orderly wind-down if required. The Firm monitors its financial performance, capital position and liquid resources on an ongoing basis and reports these matters to the Board. The Board considers whether the Firm's own funds and liquid assets remain adequate in amount and quality, taking into account the Firm's business strategy, risk profile, stress testing and wind-down planning. The Firm will keep its capital assessment under review and will update its capital requirements where additional risks or material changes to the business are identified.

3.2 Concentration risk

The Firm has considered its concentration exposure with regards to the factors in MIFIDPRU 5.2:

Source of concentration risk	Firm statement
Trading book exposures	The Firm does not operate a proprietary trading book and does not intentionally hold positions for its own account. Its matched principal activity is carried out on a back-to-back basis, with transactions pre-agreed and normally settled on a delivery-versus-payment basis through regulated third-party providers. Any temporary exposure arising from matched principal activity is monitored through the Firm's trade, settlement and counterparty controls.
Assets not recorded in a trading book, including trade debtors	The Firm's main balance sheet exposures outside cash are trade debtors and other receivables. As at 31 December 2025, trade debtors were £4,457,025 and total debtors were £4,906,121. These balances are monitored by Finance through normal debtor, settlement and reconciliation processes, with aged or material balances escalated to senior management where required. The Firm also monitors whether exposures become concentrated with any issuer, client, counterparty or group undertaking.
Off-balance sheet items	The Firm has not identified any material off-balance sheet concentration exposure. The Firm does not provide client guarantees and does not use off-balance sheet arrangements as a material part of its business model. Any new arrangement that could create off-balance sheet exposure would be reviewed through the Firm's risk and governance process.
Location of client money	Not applicable. The Firm does not hold client money and has no permission to do so. Controls are in place to ensure client money is not accepted or retained by the Firm.
Location of custody assets	Not applicable. The Firm does not hold or safeguard client assets. Settlement and custody-related services are provided by regulated third-party providers, including Titan Settlement & Custody Ltd. The Firm manages this risk through due diligence, ongoing oversight of outsourced providers, and escalation of settlement or service issues.
Firm's own cash deposits	The Firm recognises that concentration of its own cash deposits with a single banking provider could create liquidity access risk. As at 31 December 2025, cash at bank and in hand was £4,449,607. Finance monitors the Firm's cash and liquidity position, and the Board reviews capital and liquidity adequacy as part of its ongoing oversight. Where appropriate, the Firm may reduce concentration risk by using reputable banking providers and more than one account or banking relationship.
Earnings	The Firm's earnings are linked to financial intermediary services, including the arrangement and distribution of structured products and matched principal execution. The Firm recognises that earnings may be sensitive to market conditions, investor appetite, product demand and transaction volumes. The Board and Finance function monitor revenue, pipeline, client and counterparty concentration, and the Firm seeks to reduce reliance on any single client, issuer, product type or counterparty through business development and counterparty onboarding.

3.3 Liquidity

The Firm has a liquidity planning process designed to ensure that it holds sufficient core liquid assets to meet its liabilities as they fall due, remain financially viable under normal and stressed conditions, and support an orderly wind-down if required. Liquidity risk is monitored by the Finance function with Board oversight, and forms part of the Firm's ICARA process, stress testing and wind-down planning. The Firm's liquid resources are primarily held as cash with regulated banking institutions. The Firm does not hold client money or custody assets and does not provide guarantees to clients. The Firm monitors its liquid assets against its Basic Liquid Assets Requirement and its internal liquid assets threshold requirement, with escalation to senior management and the Board where liquidity falls towards internal warning levels.

The Firm's latest approved ICARA assessed its Basic Liquid Assets Requirement at £210,790 and its liquid assets threshold requirement at £1,061,868. As at 31 December 2025, the Firm's audited financial statements showed cash at bank and in hand of £4,449,607, which was materially above the Firm's assessed liquidity requirement. The Board will continue to review the Firm's liquidity position, stress testing and wind-down liquidity needs at least annually, and sooner if there is a material change to the Firm's business model, risk profile or financial position.

4. Own Funds

According to MIFIDPRU 8.4, the Firm must disclose the information below regarding its own funds.

1. a reconciliation of common equity tier 1 items, additional tier 1 items, tier 2 items, and the applicable filters and deductions applied in order to calculate the own funds of the firm;
2. a reconciliation of (a) with the capital in the balance sheet in the audited financial statements of the firm; and
3. a description of the main features of the common equity tier 1 instruments, additional tier 1 instruments and tier 2 instruments issued by the firm.

MIFIDPRU 8 Annex 1 template

Composition of regulatory own funds			
	Item	**Amount (GDP thousands)**	**Source based on reference numbers/letters of the balance sheet in the audited financial statements**
1	**OWN FUNDS**	**3,974**	**Sum of CET1 capital**
2	**TIER 1 CAPITAL**	**3,974**	
3	**COMON EQUITY TIER 1 CAPITAL**	**3,974**	
4	Fully paid-up capital instruments	**750**	**Called up share capital**
5	Share premium	**-**	
6	Retained earnings	**3,224**	**Profit and loss account**
7	Accumulated other comprehensive income	**-**	
8	Other reserves	**-**	
9	Adjustments to CET1 due to prudential filters	**-**	
10	Other funds	**-**	
11	(-) TOTAL DEDUCTIONS FROM COMMON EQUITY TIER 1	**-**	
19	CET1: Other capital elements, deductions and adjustments	**-**	
20	**ADDITIONAL TIER 1 CAPITAL**	**-**	
21	Fully paid up, directly issued capital instruments	**-**	
22	Share premium	**-**	
23	(-) TOTAL DEDUCTIONS FROM ADDITIONAL TIER 1	**-**	
24	Additional Tier 1: Other capital elements, deductions and adjustments	**-**	
25	**TIER 2 CAPITAL**	**-**	
26	Fully paid up, directly issued capital instruments	**-**	
27	Share premium	**-**	
28	(-) TOTAL DEDUCTIONS FROM TIER 2	**-**	
29	Tier 2: Other capital elements, deductions and adjustments	**-**	

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	**Tangible fixed assets (Note 9)**	**£74**		
2	**Trade debtors (Note 10)**	**£4,457**		
3	**Amounts owed by group undertakings (Note 10)**	**£137**		
4	**Other debtors (Note 10)**	**£125**		
5	**Prepayments and accrued income (Note 10)**	**£186**		
	Cash at bank and in hand	**£4,450**		
xxx	**Total Assets**	**£9,430**		
Liabilities - Breakdown by liability classes according to the balance sheet in the audited financial statements				
1	**Trade creditors (Note 11)**	**£81,273**		
2	**Amounts owed to group undertakings (Note 11)**	**£103**		
3	**Corporation tax (Note 11)**	**£351**		
4	**Other taxes and social security (Note 11)**	**£206**		
	Other creditors (Note 11)	**£71**		
	Accruals and deferred income (Note 11)	**£4,642**		
xxx	**Total Liabilities**	**£5,456**		

Shareholders' Equity				
1	**Called-up share capital (Note 12)**	**£750**		**OF1 row 4**
2	**Profit and loss account (Note 13)**	**£3,224**		**OF1 row 6**
3				
xxx	**Total Shareholder's equity**	**£3,974**		

Own funds: main features of own instruments issued by the firm
Free text. A non-exhaustive list of example features is included below.
Examples
Public or private placement
Instrument type
Amount recognised in regulatory capital (GBP thousands, as of most recent reporting date)
Nominal amount of instrument
Issue price
Redemption price
Accounting classification
Original date of issuance
Perpetual or dated
Maturity date
Issuer call subject to prior supervisory approval
Optional call date, contingent call dates and redemption amount
Subsequent call dates, if applicable
Coupons/dividends
Fixed or floating dividend/coupon
Coupon rate and any related index
Existence of a dividend stopper
Convertible or non-convertible
Write-down features
Link to the terms and conditions of the instrument

5. Own Funds Requirements

To comply with its ‘own funds requirement’, the firm is required to hold, as a minimum, the highest figure from the table below. The figures adhere to the overall financial adequacy rule in MIFIDPRU 7.4.7, which states the own funds and liquid assets must be adequate in amount and quality to ensure the firm is able to address potential material harm from ongoing activities and can wind down in an orderly manner if necessary.

Own Funds Requirement	
Category of requirement	**Amount**
Permanent minimum capital requirement	**£750,000**
Fixed overhead requirement	**£632,370**
K-Factor requirement	**£334,412**

5.1 Overall K-factor requirement

As required by MIFIDPRU 8.5, the K-factor requirement has been broken down into three categories.

Assets for which the firm is responsible		
K-Factor	**Requirement**	**The sum of (if applicable)**
K-AUM (assets under management)	0.02% of the AUM	**£9,995 (K-AUM £9,995; K-CMH & K-ASA: N/A)**
K-CMH (client money held)	0.4% and 0.5% of the average CMH held in segregated and non-segregated account respectively	
K-ASA (assets safeguarded and administered)	0.04% of the average ASA	
Execution activity undertaken by the firm		
K-Factor	**Requirement**	**The sum of (if applicable)**
K-COH (client orders handled)	0.1% and 0.01% of the average COH to cash trades and derivatives trades respectively	**£222,500 (K-COH £172,500 + K-DTF £50,000)**
K-DTF (daily trade flow)	0.1% and 0.01% of the average COH to cash trades and derivatives trades respectively	
Exposure-based risks		
K-Factor	**Requirement**	**The sum of (if applicable)**
K-NPR (net position risk)	Every position which does not form part of a portfolio for which K-CMG permission has been granted	**£101,917 (K-NPR £101,917; K-CMG/K-TCD/K-CON: N/A)**
K-CMG (clearing margin given)	Is not applicable because the Firm has not been granted a K-CMG (clearing margin given) permission	
K-TCD (trading counterparty default risk)	Is assessed as NIL for the period, on the basis that the Firm has not undertaken derivatives, repos, securities financing transactions, margin lending, credit/loan transactions or other in-scope K-TCD transactions	
K-CON (concentration risk)	Is assessed as NIL, as the Firm does not operate a proprietary trading book and does not intentionally hold long or short trading book positions. Broader concentration risk is monitored separately as part of the Firm's risk management framework	

6. Remuneration policy and practices

6.1 Qualitative disclosures

Approach to remuneration

The Firm's remuneration approach reflects its size, wholesale B2B business model and low risk appetite. Remuneration is made up mainly of fixed pay, including salary, benefits and pension contributions, which is set by reference to the individual's role, responsibility, experience, seniority and market practice. The Firm may award discretionary variable remuneration, but this is not contractual or guaranteed and may be reduced or not paid where the Firm's performance, the individual's performance, or the Firm's capital, liquidity, conduct, compliance or risk position does not support payment. Variable remuneration is designed to support long-term business performance and prudent risk-taking, rather than short-term revenue generation. In assessing performance, the Firm considers both financial and non-financial factors, including contribution to the Firm's strategy, client and counterparty relationships, conduct, adherence to policies and procedures, risk management, compliance and teamwork. Remuneration is subject to Board oversight and is intended to remain consistent with the Firm's ICARA, risk appetite, capital and liquidity position and regulatory obligations. The Firm does not operate remuneration structures that encourage excessive risk-taking, conflicts of interest or behaviour inconsistent with the interests of clients, counterparties, the Firm or market integrity

Objective of financial incentives

The objective of the Firm's financial incentives is to support behaviours that are aligned with the Firm's long-term interests, strategic objectives, risk appetite and conduct standards. Financial incentives are used to recognise individual contribution and performance, including performance that goes beyond normal role expectations, provided this is consistent with good client outcomes, regulatory obligations and prudent risk management

Governance and decision-making procedures

The Firm maintains remuneration policies and practices that are intended to support sound and effective risk management and to remain consistent with the Firm's business strategy, risk appetite, capital and liquidity position, and regulatory obligations. The policy applies to the Firm's directors, senior managers, certified staff and employees, and has been prepared with reference to the MIFIDPRU Remuneration Code in SYSC 19G.

Given the Firm's size, internal organisation and business model, the Firm has not established a separate remuneration committee. Oversight of remuneration matters is retained by the Board, which considers remuneration as part of its general governance, risk and financial oversight. Remuneration decisions are made taking into account the Firm's financial performance, capital and liquidity position, conduct and compliance standards, and the individual's role, responsibilities, experience and performance.

The Firm's remuneration structure is designed to ensure that fixed remuneration represents an appropriate and stable part of total remuneration. Any variable remuneration is discretionary, not guaranteed, and may be reduced or not paid where the Firm's performance, risk profile, capital position, liquidity position, conduct standards or individual performance do not support payment. The Firm does not operate remuneration arrangements that are intended to encourage excessive risk-taking or behaviour inconsistent with the Firm's risk appetite.

The Firm's remuneration practices are intended to promote sound risk management; discourage risk-taking that is inconsistent with the Firm's risk appetite or policies; support compliance with regulatory and conduct obligations; align remuneration with the Firm's long-term interests and values; and recognise individual contribution without creating inappropriate incentives.

In assessing individual performance, the Firm considers both financial and non-financial factors. Non-financial factors include adherence to the Firm's policies and procedures, compliance with regulatory obligations, appropriate management of client and counterparty relationships, contribution to teamwork and the Firm's culture, escalation of risks or issues where required, and behaviour consistent with the Firm's conduct, financial crime, market abuse, product governance and risk management standards.

The Firm may take into account market practice and comparable roles when setting remuneration, but remuneration remains proportionate to the individual's role and the Firm's size, nature and complexity. The Board will review the remuneration approach periodically and will make changes where required to ensure that it remains aligned with the Firm's business strategy, risk appetite and prudential resources.

Material risk takers

The table below is to disclose the types of staff identified as material risk takers. These roles are defined as a staff member whose professional activities have a material impact on the risk profile of the firm, or the assets the firm manages.

Type of staff identified as material risk takers	**Number of material risk takers identified**	**Criteria other than in SYSC 19G.5.3 used to identify material risk takers**
Executive Directors / Senior Management	3	No additional criteria have been applied beyond SYSC 19G.5.3. These individuals have been identified because they are members of the Firm's management body in its management function and/or senior management, and have responsibility for the Firm's strategy, governance, regulated activities, risk appetite, ICARA, capital and liquidity oversight, compliance and control framework.
Non-Executive Director	1	No additional criteria have been applied beyond SYSC 19G.5.3. The non-executive statutory director has been identified because he is a member of the Firm's management body in its supervisory function. He does not perform an executive function and is not approved as SMF3.

The Firm has identified 4 material risk takers in total: 3 executive directors/senior managers and 1 non-executive statutory director. The Firm has not applied any additional criteria beyond SYSC 19G.5.3. Identification has been based on the authority and responsibility of the individuals, rather than job title alone.

Risk adjustment and variable remuneration

Variable remuneration, where awarded, is discretionary, non-contractual and not guaranteed. The Board retains discretion to reduce, withhold or not award variable remuneration where payment would not be consistent with the Firm's financial performance, capital and liquidity position, risk appetite, conduct standards or regulatory obligations. Variable remuneration is intended to recognise sustainable performance and appropriate conduct, and is not designed to encourage excessive risk-taking or behaviour that is inconsistent with the Firm's policies, values or long-term interests.

The Firm may apply risk adjustment, including malus and clawback where this is provided for under the relevant employment contract, bonus letter or remuneration arrangement. In deciding whether to reduce, cancel or recover variable remuneration, the Firm may consider whether the relevant individual:

a) has received an award based on materially inaccurate financial, performance or risk information;
b) has knowingly provided inaccurate or misleading information in connection with financial results, risk reporting, compliance matters or performance assessment;
c) has breached the Firm's risk limits, policies, procedures or regulatory obligations;
d) has engaged in misconduct, gross misconduct or behaviour inconsistent with the Firm's conduct standards;
e) has exercised materially imprudent judgement which caused, or could have caused, harm to the Firm, clients, counterparties or market integrity;
f) has contributed to a material compliance, financial crime, market abuse, operational or control failure;
g) has failed to supervise, monitor or escalate misconduct, control weaknesses or regulatory issues where this formed part of their role; or
h) has acted in a way which has resulted, or could result, in regulatory sanction, financial loss or reputational damage to the Firm.

The Firm does not currently operate a formal deferral structure for variable remuneration. However, the Board may delay, reduce or withhold payment where further review is required in relation to performance, conduct, risk, compliance, capital or liquidity matters.

Guaranteed variable remuneration

The Firm does not operate a guaranteed variable remuneration scheme and does not offer guaranteed bonuses or sign-on bonus arrangements. Any variable remuneration, where awarded, is discretionary, non-contractual and subject to the Firm's performance, capital and liquidity position, risk appetite, conduct standards and individual performance. No guaranteed variable remuneration was awarded during the reporting period.

Severance pay

The Firm does not operate a separate discretionary severance pay scheme. Any payment made in connection with the termination of employment would be considered on a case-by-case basis and would be limited to contractual, statutory or legally agreed payments, including any payment in lieu of notice, redundancy payment or settlement payment where applicable.

Where any severance payment relates to the early termination of employment, the Firm will ensure that the payment reflects the individual's performance over time and does not reward failure, misconduct, poor conduct, excessive risk-taking or breach of the Firm's policies or regulatory obligations. The Board will consider the reason for termination, the individual's role, length of service, contractual rights, conduct record, performance, and any legal or regulatory risk before approving any payment.

No severance payments were awarded to material risk takers during the reporting period.

Remuneration components

Fixed remuneration	**Variable remuneration**
Salary	Discretionary bonus
Employer pension contributions	Staff commission or sales incentive, where applicable
Contractual benefits / allowances, where applicable	Other discretionary performance-related payments, where applicable

6.2 Quantitative disclosures

Total Remuneration				
Remuneration Type	**Senior management**	**Other material risk takers**	**Other Staff**	**Total**
Fixed remuneration	**£433,750**	**£0**	**£594,301**	**£1,028,051**
Variable remuneration	**£5,682**	**£0**	**£943,455**	**£949,137**
	£439,432	**£0**	**£1,537,755**	**£1,977,188**

Guaranteed Variable Remuneration	
Total amount during the financial year	Number of material risk takers receiving awards;
£0	**0**

Severance Payments	
Total amount made during the financial year	Number of material risk takers receiving awards
£0	**0**

The Firm did not make any severance payments to an individual material risk taker in the financial year. Variable remuneration is discretionary and non-guaranteed. Any staff commission or sales incentive is treated as variable remuneration only where it is paid to an employee or director as part of their remuneration. Payments to external introducers, distributors or other third parties are not treated as staff remuneration for this purpose.