MIFIDPRU 8.6: SNI Remuneration Disclosure

(Based on audited financial statements for the year ending 2025)

Scope and Purpose

This disclosure relates to Ptarmigan Capital Limited ("Ptarmigan Capital" or "the Firm"), which is classified as a small and non-interconnected (SNI) MIFIDPRU Investment Firm and is therefore required under MIFIDPRU 8.6 to disclose information relating to remuneration policies and practices.

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

Approach to Remuneration

Base salaries provide pre-determined, non-revocable compensation paid to individuals throughout the year, irrespective of Firm or individual performance. Base salaries and benefits constitute the significant proportion of the Firm's total remuneration. This fixed element is based on the professional experience and responsibility within the Firm of an individual.

The Firm may operate a discretionary bonus scheme that is based on individual performance as well as the Firm's underlying profitability. The bonus does not form part of an individual's contractual remuneration. The size of the bonus pool is linked to the overall performance of the Firm and employee incentive payment is linked to the contribution of the individual to such performance. Bonuses are discretionary and will diminish or disappear in the event financial performance is below the Firm's expectations or as a result of an individual's performance. We did not operate a discretionary bonus scheme in 2025.

When considering individual performance, the Firm considers both financial and non-financial metrics. To not incentivise unacceptable risk taking, fixed remuneration comprises most staff compensation.

Objective of Financial Incentives

The objective of providing financial incentives is to promote behaviour that is aligned to the Firm's long-term interests, strategic objectives, and ethical standards. Financial incentives are used to reward individual performance, as well as performance in excess of the staff member's job description and terms of employment.

Governance and Decision-Making Procedures

The Firm is required to implement and maintain remuneration policies, procedures and practices for all directors and employees that are consistent with and promote sound effective risk management.

The policy is intended to cover all aspects of remuneration and has been created in accordance with the MIFIDPRU Remuneration Code (SYSC 19G).

The remuneration practices and policies are intended to:

- promote sound risk management practices in alignment with the Firm's risk management principles;

- discourage risk taking that is inconsistent with the Firm's risk appetite or risk management policies and principles;
- control fixed costs by ensuring that remuneration expense varies according to profitability and does not place undue constraints on the Firm's ability to maintain its capital base;
- link remuneration to the Firm's financial and operational performance as well as individual performance;
- provide competitive, but not excessive, levels of remuneration compared to peer firms of appropriate size, scope, and complexity; and
- promote a positive culture towards risk management and compliance.

The remuneration practices and policies are intended to support the Firm's business strategy, long term interests and values, and to ensure that risk taking does not exceed the Firm's tolerated level of risk.

Periodic benchmarking ensures that remuneration at individual level is not unreasonable or disproportionate to the amount, nature, quality, and scope of the work performed.

The remuneration policy outlines the criteria used to assess the performance of the Firm and of individual staff members. The Firm's performance is assessed against its overall financial performance, as well as other measures such as new business gained, client satisfaction and employee retention rates.

In assessing the performance of individual staff members, the Firm takes into account financial and non-financial criteria. Non-financial criteria includes:

(a) measures relating to building and maintaining positive client relationships and outcomes, such as positive client feedback and client retention;

(b) performance in line with the Firm's strategy or values, for example by displaying leadership, teamwork or creativity;

(c) adherence to the Firm's risk management and compliance policies.

Remuneration Components

All components of remuneration are categorised as either fixed or variable:

Fixed Remuneration	Variable Remuneration
Salary	Discretionary Bonus
Pension	Shareholder Dividends

Quantitative Disclosures

Remuneration to all staff ("Staff has been interpreted broadly in line with SYSC 19G.1.24G)	
Fixed Remuneration	£440,424.00
Variable Remuneration	£0

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