

ZIM

Zeus Investment Management Limited

MIFIDPRU Disclosures

31 March 2024

Contents

Introduction.....	3
Remuneration policy and practices (MIFIDPRU 8.6).....	4

ZIM

Introduction

Business Background

Zeus Investment Management Limited (“ZIM”) (CHN: 11454651) is a Limited Liability Firm. ZIM was incorporated on 9th July 2018 and authorised on 13th August 2019 (FRN: 816962) and is regulated by the Financial Conduct Authority (“FCA”). ZIM began to trade on 24 January 2024. ZIM’s primary activity is the provision of investment management services. ZIM is an investment manager for a fund vehicle called SVS Zeus Investment Funds ICVC (the “Fund”).

With effect from 1 January 2022, ZIM is categorised as an SNI MIFIDPRU investment firm and falls into scope of the Prudential sourcebook for MiFID Investment Firms (“**MIFIDPRU**”) of the FCA handbook. ZIM is required to comply with the disclosure requirements set out in MIFIDPRU 8.

The information provided here is appropriate for the size and nature of the company.

Basis and Purpose of Disclosure

This disclosure provides market participants with both qualitative and quantitative information of ZIM’s remuneration policies and practices to a level of detail which is appropriate to ZIM’s size, and to the nature, scope and complexity of its activities.

ZIM is 100% owned by Zeus Group Limited. Zeus Group Limited which itself is 97.3% owned by Irwell Investments Limited (formally Zeus Family Office Limited), which is the ‘UK parent financial holding company’ of the resulting ‘UK investment firm group’. The ‘UK investment firm group’ is prudentially supervised on a consolidated basis alongside the standalone supervision of ZIM. As per the requirements of MIFIDPRU 8.1.7, this disclosure has been prepared on a standalone basis.

This disclosure has been prepared as at ZIM’s financial year-end, 31 March 2024, to align with the published annual financial statements.

These disclosures are revised at least annually (with additional updates prepared during periods of material change) and published on the company website.

Remuneration policy and practices (MIFIDPRU 8.6)

Approach to remuneration

The Board of Zeus Group Limited is responsible for appointing a remuneration committee. The Remuneration Committee's role is to develop the Company's remuneration policy and incentive schemes in order to support the delivery of the Company's business strategy, the overall strategy of the group and the long term interests of all stakeholders, taking into account all relevant legal and regulatory obligations. The Committee consists of at least 2 directors from the group and chaired by a non-executive director.

ZIM has ensured that its procedures and practices are appropriate and proportionate to the nature, scale and complexity of the risks inherent in its business model and activities. More generally in complying with the Remuneration Rules, ZIM seeks to do so in a manner that is appropriate to:

- its size and internal organisation; and
- to the nature, scope and complexity of its activities.

Development of remuneration policies and practices

The group's remuneration policy is designed to attract, retain, incentivise and employees properly and to ensure that they are aligned with the financial and strategic goals of the firm and the overall strategy of the group

The Policy is based on the following principles:

- **Fairness and Transparency:** Remuneration decisions will be fair, transparent, and merit based.
- **Performance-based:** Remuneration will be linked to individual, team, and firm-wide performance.
- **Risk Alignment:** Remuneration will be aligned with the level of risk associated with the role and activities performed.
- **Avoidance of Conflicts of Interest:** Remuneration structures shall be designed to prevent conflicts of interest and ensure that the interests of clients are prioritised.
- **Compliance:** Remuneration arrangements will comply with all relevant legal and regulatory requirements.

Objectives of financial incentives

General

ZIM's objectives of financial incentives can be summarised as follows:

- Attract and retain highly motivated, talented and goal-orientated employees,
- Encourage, drive and motivate staff to meet their performance targets, and
- Reward Individuals based on their contribution to ZIM's overall strategy.

ZIM

Components of remuneration

ZIM's remuneration included in this disclosure is made up of the following components:

Fixed remuneration

- Salary
- Pension

Variable remuneration

- Discretionary performance bonus 'Cash Bonus'

Performance criteria used for assessment

ZIM's remuneration policy set by the Remuneration Committee defines the performance criteria used across the group and firm and for individual performance.

The remuneration decisions across the group and firm are made based on a combination of:

- ZIM's long-term sustainability and viability including looking through the business and economic cycles;
- the impact on ZIMs Overall Financial Adequacy Rule and Threshold Conditions; and
- ZIM's business performance and results against its strategic objectives.

Individuals are remunerated based on a combination of factors including individuals' performance during the period, level of responsibility and seniority and contribution to the firm's overall strategy. Employee appraisals are conducted on an annual basis and include financial and non-financial areas of assessment.

Fixed Remuneration

Salaries

Fixed remuneration is determined based on the role being performed. ZIM regularly benchmarks its levels of remuneration with those of other, comparable companies and conducts an annual review of remuneration which is subject to business performance and affordability.

Variable Remuneration

Bonus

ZIM operates a fully discretionary variable cash compensation scheme for employees ("Bonus"). Variable bonuses are completely discretionary and are not guaranteed year on year, amounts may vary from one award period to the next.

Material Risk Takers

ZIM has used the guidance in SYSG 19G.5.3 to identify ZIMs material risk takers (MRTs). ZIM defines MRTs as individuals that perform senior management functions and any individual whose roles have a material impact on the firm's risk profile. At the time of this disclosure the firm held a total of 2 MRTs. The Directors are responsible for reviewing existing MRTs and identifying new MRTs.

Performance adjustment, Malus or Claw Back

ZIM will only pay or award variable remuneration where the Board is satisfied that performance criteria has been met. ZIM will apply in-year adjustment, malus and clawback as the firm feels necessary.

ZIM

Quantitative disclosure

Aggregated quantitative information for all remuneration paid to all staff, split between material risk takers and other staff was as follows:

£	Senior Management	Other MRTs	Other Staff
Fixed Remuneration	0	262,576	0
Variable Remuneration	0	0	0
Total Remuneration	0	262,576	0

As at 31 March 2024 ZIM had a total of 2 number of staff, who are defined as MRTs.
No severance payments were awarded during the year.