

Asset Value Investors Limited

MIFIDPRU 8 DISCLOSURE: REMUNERATION

December 2025

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1. MIFIDPRU 8 DISCLOSURE

Asset Value Investors Limited (the “Firm”) is authorised and regulated by the Financial Conduct Authority (the “FCA”). The Firm is a UK domiciled discretionary investment manager to a number of collective investment schemes and professional segregated account clients. The Firm conducts agency business and does not operate a trading book or hold client money or assets.

The Firm is categorised as a “SNI MIFIDPRU investment firm” by the FCA for capital purposes. The Firm reports on a solo basis. The Firm’s MIFIDPRU 8 disclosure fulfils the Firm’s obligation to disclose to market participants’ key information on a firm’s remuneration policies and practices.

In making the qualitative elements of this disclosure, the Firm is required to provide a level of detail that is appropriate to the Firm’s size and internal organisation, and to the nature, scope and complexity of its activities.

This disclosure is made annually on the date the Firm publishes its annual financial statements. As appropriate, this disclosure is made more frequently, for example if there is a major change to the Firm’s business model.

2. REMUNERATION POLICIES AND PRACTICES

The Firm is subject to the Remuneration Code (the “Code”) for MIFIDPRU Firms as codified in Section 19G of the SYSC sourcebook of the Financial Conduct Authority handbook.

This disclosure sets out qualitative and quantitative information on the Firm’s remuneration processes and practices.

A. Qualitative Information

The Firm must establish, implement and maintain remuneration policies, procedures and practices that are consistent with and promote effective risk management and do not encourage excessive risk taking.

The Firm ensures that the remuneration policy and its practical application are consistent with the Firm’s business strategy, objectives and long-term interests.

Given the nature and small size of our business, remuneration for all employees is set by a sub-committee of the Firm’s management body. The Remuneration Committee is responsible for the review and updating of the Firm’s remuneration policy, agreeing the framework for variable remuneration plans and approving remuneration packages, including variable remuneration, for staff.

Staff receive a salary which reflects their market value, responsibilities and experience.

All staff are also eligible to receive variable remuneration, such as an annual bonus, where the individual operates within the risk appetite of the company, has demonstrated appropriate behaviour, and met a minimum performance standard. The firm may, from time to time, issue EMI share options to senior/key staff as a longer-term incentivisation tool.

Variable remuneration is intended to reflect contribution to the Firm’s overall success. Staff are assessed throughout the year and rated based on company and individual performance. The performance assessment considers both financial measures such as earnings and profitability, and non-financial measures such as productivity/efficiency, quality, risk management, people and culture, customer focus, and growth/innovation.

The Firm’s linkage between variable remuneration and performance is based upon the following tenets:

- Ensuring an appropriate balance of financial results between staff and shareholders
- Attraction and retention of staff members
- Aligning the interest of key/senior staff members via long-term incentive awards
- Link a proportion of a staff member’s total compensation to the Firm’s performance
- Discourage excessive risk-taking
- Ensure client interests are not negatively impacted

B. Quantitative Information

With respect to the financial year ended 30 September 2025, the total amount of remuneration awarded to all staff, including the split of fixed and variable remuneration, was as follows:

| | GBP |
|-----------------------|------------|
| Fixed remuneration | 3,011,315 |
| Variable remuneration | 1,489,470 |
| Total | 4,500,785 |