SCM Private LLP

MIFIDPRU 8 Disclosures — Financial Year ended 31 March 2026

Background

SCM Private LLP ("SCM", the "Firm") is authorised and regulated by the Financial Conduct Authority (FRN: 497525). The Firm is a MIFIDPRU investment firm and has been classified as a small and non-interconnected ("SNI") investment firm. SCM is an investment manager that manages model portfolios on a discretionary basis; the portfolios invest in Exchange Traded Products.

The Firm is required to make certain disclosures in accordance with the rules and requirements set out in MIFIDPRU 8, as they apply to an SNI firm.

These disclosures are prepared on a solo entity (i.e. individual) basis, using the audited annual accounts approved by the members on 17 July 2026 and signed on 22 July 2026, which cover the financial year from 1 April 2025 to 31 March 2026. They are published annually on the date the Firm publishes its annual financial statements, in accordance with MIFIDPRU 8.1.

Date of publication: November 2026 (www.scmdirect.com)

Risk Management Objectives (MIFIDPRU 8.2)

The Firm does not have any additional tier 1 instruments in issue and is therefore not required to make any disclosures in relation to risk management objectives.

Own Funds (MIFIDPRU 8.4)

The Firm does not have any additional tier 1 instruments in issue and is therefore not required to make any disclosures in relation to own funds.

Own Funds Requirements (MIFIDPRU 8.5)

The Firm does not have any additional tier 1 instruments in issue and is therefore not required to make any disclosures in relation to own funds requirements.

Remuneration Policies and Practices (MIFIDPRU 8.6)

<u>Qualitative Disclosures</u>

The Firm has in place a Remuneration Policy (Version 2, November 2025, reviewed and approved by the Board) which sets out its approach to remuneration and aims to ensure that the performance assessment and remuneration of the Firm's staff do not conflict with the Firm's duty to act in the best interests of its clients. This policy applies to all aspects of staff remuneration and is designed to ensure that our remuneration policies and practices are consistent with, and promote sound and effective risk management, and are in line with the business strategy, objectives and long-term interests of the Firm. The policy also ensures that the Firm does not use staff incentives, performance management or remuneration structures in a way that would conflict with its obligations under Principle 12 (the Consumer Duty) and PRIN 2A, and it is gender-neutral.

Given the nature, scale and complexity of the Firm's business model, the Firm does not believe it is appropriate to have a Remuneration Committee. Therefore, the Board is responsible for ensuring that a robust remuneration policy is developed to align the Firm's remuneration practices with its risk tolerance. The Board will set the overall remuneration policy for the Firm and ensure it is reviewed and

approved at least annually. The Compliance Officer and the Firm's external compliance consultants provide advice and guidance to the Board on the development of the Firm's remuneration policy.

The remuneration policy makes a clear distinction between criteria for setting:

- Basic fixed remuneration (i.e. Base Salary) that primarily reflects an employee's professional experience and organisational responsibility as set out in the employee's job description and terms of employment; and
- Variable remuneration (i.e. Discretionary Bonus) that reflects performance in excess of that required to fulfil the employee's job description and terms of employment and that is subject to performance adjustment in accordance with the Remuneration Code. Variable remuneration is awarded only to employees; the designated members of the LLP receive no bonus or other variable remuneration.

When the Firm pays variable remuneration that is performance-related, it will consider not only the individual's performance but also the Firm's overall performance. This includes reviewing long-term performance to ensure variable remuneration reflects that timescale and considers the Firm's business risks during that period. The Firm will also consider non-financial metrics when assessing performance. As conduct is crucial to the Firm's compliance culture, poor conduct may override performance in financial areas. Conduct is therefore the primary non-financial metric. The Firm will adjust all variable remuneration in line with capital and liquidity requirements. The Firm does not pay variable remuneration to members of the management body who do not perform an executive function.

Quantitative Disclosures

MIFIDPRU 8.6.8R requires the Firm to disclose the total amount of remuneration awarded to all staff during the financial year, split into fixed and variable remuneration. During the financial year 1 April 2025 to 31 March 2026 the Firm employed one member of staff in addition to its two designated members, who received no remuneration or profit allocation from the LLP during the year. Disclosure of the quantitative figures would therefore disclose information about the remuneration of a single individual. In accordance with MIFIDPRU 8.6.8R(7), the Firm has not disclosed the quantitative remuneration information for this reason.