

Horizon3 Investment Management LLP

MIFIDPRU 8 Disclosure Statement

Introduction

Horizon3 Investment Management LLP ("the Firm", "Horizon") is authorised and regulated by the Financial Conduct Authority ("the FCA") and is classified as a Small and Non-Interconnected ("SNI") Investment Firm under MIFIDPRU 1.2. Accordingly, these disclosures have been prepared as per the requirements contained within MIFIDPRU 8.6 to disclose to market participants' key information on a firm's remuneration policies and practices. The relevant rules and guidance for the Firm's remuneration code are contained within the FCA's SYSC 19G of the FCA's Handbook.

Horizon as an alternative investment fund manager, is also classified as a Collective Portfolio Management Investment (CPMI) firm, and as such, is also subject to the AIFM Remuneration Code (SYSC 19B).

The Remuneration Code (the "RemCode") covers an individual's total remuneration - fixed and variable.

The Firm's policy is designed to ensure that it complies with the RemCode and its compensation arrangements:

1. Are consistent with and promote sound and effective risk management;
2. Do not encourage excessive risk taking;
3. Include measures to avoid conflicts of interest;
4. Are in line with the Firm's business strategy, objectives, values and long-term interests; and
5. Are on gender neutral basis.

Proportionality

The FCA has sought to apply proportionality with respects to firm's disclosures. Horizon's disclosure is made in accordance with its size, internal organisation, nature, scope and complexity of its activities.

Application of the Requirements

The Firm completes the remuneration disclosure annually on the date the Firm publishes its annual financial statements. As appropriate, this disclosure will be made more frequently if there is a major change to the Firm's business model.

Remuneration Policies and Practices

- 1. Summary of the Firm's approach to remuneration for all staff, including the decision-making procedures and governance in adopting the remuneration code**
 - The Firm ensures that the remuneration policy and its practical application are consistent with the Firm's business strategy, objectives and long-term interests.
 - The Firm establishes, implements and maintains remuneration policies, procedures and practices that are consistent with and promote effective risk management and do not encourage excessive risk taking.

- The Firm's remuneration policy and practices take into account the public interest and the long-term interests of stakeholders of the Firm.
- All staff are performance evaluated annually and the bonuses and salaries are set accordingly, as determined by the Management Committee. Bonuses are only paid where sufficient profits have been generated throughout the year and the Partners ensure that the payments do not impair the capital base of the firm.
- The Management Committee exercises full discretion in setting the variable remuneration taking into account all the relevant risks and performance factors and reserves the implicit right to set whatever level of variable remuneration they see fit, including not awarding anything.

2. Qualitative characteristics of the remuneration

Horizon3's remuneration structure for employees comprises a base salary and a discretionary bonus. The members of the LLP are entitled to a share of profits according to percentages outlined in the LLP Agreement which are fixed and not subject to any alteration or discretionary element.

Fixed remuneration

- The amount of fixed compensation paid to any member of staff is determined on the basis of the role and position of the individual, taking into account professional experience, responsibility, job complexity and market conditions.
- All staff are remunerated by awards of fixed compensation.

Variable remuneration

- Variable remuneration is intended to motivate and reward high performers who make a contribution to sustainable results and perform according to expectations as set out.
- Any discretionary bonus will be determined by the Firm's overall financial performance, the availability of funds and the performance of the individual staff member.
- When assessing individual performance, both financial and non-financial criteria are taken into account. The non-financial criteria include the individual's quality of work and the individual's compliance with the Firm's policies and procedures. The performance is measured against the delivery of objectives that are in line with the overall aims and interests of the Firm.
- Horizon3 does not provide guaranteed variable remuneration or discretionary pension benefits. Where applicable, carried interest is payable, the amount of which correlates directly to the performance of the funds, aligning the interest of staff with the interest of the investors.

3. Aggregate quantitative information on remuneration

With respect to the financial year ended 31st March 2024, the total amount of remuneration awarded to all staff interpreted under SYSC 19G.1.24G was as follows:

	Fixed remuneration	Variable remuneration
All staff	£357,645	£0