

Remuneration code disclosure

June 2016

global investment management

Introduction

Momentum GIM is an investment management and investment advisory firm. Momentum GIM earns fees by providing investment management services to institutional firms, IFA's, Wealth Managers and by managing the assets of other financial entities and collective investment schemes.

Momentum GIM does not trade as principal and is not permitted to do so in the UK. Investment employees of Momentum GIM are provided with investment discretion on client assets and its staff act as fiduciaries in managing client investments within pre-determined mandates.

Momentum GIM trades as an agent on behalf of clients in managing their assets. The firm's risk profile is much lower and more static than that of a firm which trades as principal, such as a sell-side bank, and it cannot be altered to the same extent by an individual managing client investments.

Momentum GIM's employees are only able to alter the firm's risk profile via strategic planning and product development. These areas are dealt with by committees which include control and oversight staff. It is not possible for any one member of staff to launch a product, or enter into a contract, without the agreement of the new business and / or approval of the executive committee.

Remuneration Arrangements

All Momentum GIM employees are paid fixed basic salaries, with the prospect of an annual management bonus payment, which is at the full discretion of the firm. Additionally, staff involved in sales related activities and roles may participate in a discretionary sales bonus scheme, related to the amount of assets that are brought into products as a result of their activities.

The management bonus pool for Momentum GIM is derived from the performance of the holding company as a whole, as well as the contribution of the firm to such performance, rather than individual business units or employees. Any bonus payments to employees are entirely discretionary. As a result of this Policy, and approach to variable remuneration (the discretionary management bonus and sales related incentives), Momentum GIM will not ever be in a position where the firm making a loss, but remains contractually obliged to pay large bonuses to employees in any of its business units. This remains the case, even if a business unit makes a profitable contribution to the firm as a loss making



entity. Under these circumstances, the holding company and Momentum GIM reserves the right to award no variable remuneration to employees.

As a wholly owned subsidiary of the Momentum Group, all remuneration policies, practices and annual adjustments, including any short and long term variable remuneration proposals, are reviewed and ratified by the Momentum Remuneration Committee (REMCO). Awards of variable remuneration are proposed by Momentum GIM's CEO, for consideration and final approval by the REMCO. This process ensures that a strong degree of oversight and independence exists in the awarding of all variable remuneration payments.

Momentum GIM's investment managers who have investment discretion over client assets are not paid bonuses directly linked to the performance of their investment activities. Consequently, there is no personal incentive for investment managers to take undue levels of risk with the assets on which they provide investment management services.

The avoidance of formulaic bonuses for employees involved in asset management, compliance and risk, operations and control and oversight is entirely in keeping with the principles of the FCA's Remuneration Code.

Disclosure Table

Aggregate quantitative information on remuneration, for staff whose actions have a material impact on the risk profile of Momentum GIM, for the financial year ended 30 June 2015, and the financial year ended 30 June 2016.

All remuneration relates to Momentum GIM's business area of Investment Manager and Advice:

	Senior Management		Other members of Staff		Total
30 June 2015	£1,855,601.30		0		£1,855,601.30
	No of Beneficiaries:	6	No of Beneficiaries:	0	
	Senior Management		Other members of Staff		Total
30 June 2016	£1,886,513.29		0		£1,886,513.29
	No of Beneficiaries:	6	No of Beneficiaries:	0	

Note: The aggregate information about remuneration shown above relates to Momentum GIM Remuneration Code staff only.