



**Odyssean Capital LLP**  
**MIFIDPRU 8 Disclosure**

(Based on the audited financial statements as at 31<sup>st</sup> March 2024)

**Introduction**

The Financial Conduct Authority (“FCA”) sets out the detailed prudential requirements that apply to Odyssean Capital LLP (“Odyssean” or the “Firm”) in the Prudential sourcebook for MiFID Investment Firms in the FCA Handbook (“MIFIDPRU”). Chapter 8 of MIFIDPRU (“MIFIDPRU 8”) sets out public disclosure rules and guidance with which the Firm must comply, further to those prudential requirements.

Odyssean is classified under MIFIDPRU as a small and non-interconnected MIFIDPRU investment firm (“SNI MIFIDPRU Investment Firm”). As such, the Firm is required by MIFIDPRU 8 to disclose information on its remuneration policy and practices.

This document has been prepared by Odyssean in accordance with the requirements of MIFIDPRU 8. Unless otherwise stated, all figures are as at the Firm’s 31<sup>st</sup> March financial year-end.

**Remuneration Policy and Practices**

**Overview**

As a SNI MIFIDPRU Investment Firm, Odyssean is subject to the basic-requirements of the MIFIDPRU Remuneration Code (as laid down in Chapter 19G of the Senior management arrangements, Systems and Controls sourcebook in the FCA Handbook (“SYSC”)).

Odyssean, as an Alternative Investment Fund Manager, is also classified as a Collective Portfolio Management Investment Firm (“CPMI”), and as such, is also subject to the AIFM Remuneration Code (SYSC 19B).

The purpose of the remuneration requirements is to:

- Promote effective risk management in the long-term interests of the Firm and its clients;
- Ensure alignment between risk and individual reward;
- Support positive behaviours and healthy firm cultures; and
- Discourage behaviours that can lead to misconduct and poor customer outcomes.

The objective of Odyssean’s remuneration policy and practices is to establish, implement and maintain a culture that is consistent with, and promotes, sound and effective risk management and does not encourage risk-taking which is inconsistent with the risk profile of the Firm and the services that it provides to its clients.

In addition, Odyssean recognises that remuneration is a key component in how the Firm attracts, motivates, and retains quality staff and sustains consistently high levels of performance, productivity, and results. As such, the Firm’s remuneration philosophy is also grounded in the belief that its people are the most important asset and provide its greatest competitive advantage.

The Firm is structured as a Limited Liability Partnership. Key remuneration aspects of the members of Odyssean are governed by the limited liability partnership agreement (“LPA”). Guaranteed and additional drawings taken by individual members are considered fixed remuneration. Discretionary profit share will be considered variable remuneration.



### **Governance and oversight**

In order to take a proportionate approach given the Firm's size and non-complex nature of both the activities undertaken and the organisation, the Firm has decided that its Management Committee will undertake the role which would otherwise be undertaken by a remuneration committee.

The Firm's Remuneration Policy will be reviewed at least annually by the Firm's Management Committee to ensure that it remains consistent with the Remuneration Code Principles and the Firm's objectives.

### **Characteristics of the Firm's Remuneration Policy and Practices**

Remuneration at Odyssean is made up of fixed and variable ("bonus") components. The fixed component is set in line with the market at a level to retain and, when necessary, attract skilled staff. Variable remuneration is paid on a discretionary basis and is designed to reflect both the performance of a person in contributing to the success of the Firm and their success in meeting, or exceeding, targets that have been set by the Firm on an individual basis.

Where remuneration is performance-related then in addition to the performance of the individual, the Firm will also take into account the performance of the business unit concerned and the Firm's overall results. Performance assessment will not relate solely to financial criteria but will also include non-financial criteria such as compliance with regulatory obligations.

The measurement of financial performance will be based principally on the Firm's profits and not on revenue or turnover. Awards will reflect the Firm's financial performance and, as such, variable remuneration may be reduced where subdued or negative financial performance occurs. The Firm will not ordinarily make any variable remuneration awards should it make a loss. In exceptional circumstances such payments may need to be considered. In such cases the Management Committee will consider and document whether such an award would be in keeping with the Firm's Remuneration Policy.

All staff members are eligible to receive variable remuneration. However, bonus pools and individual awards are subject to the discretion of the Management Committee and it is possible that in any year no variable bonus will be awarded, either at all, or to particular individuals.

### **Aggregate quantitative remuneration disclosure**

The Firm considers that it has a single business area (investment management).

According to MIFIDPRU 8.6.8(2)R, the Firm is required to disclose the total amount of remuneration awarded to all staff, split into fixed and variable.

The total aggregate remuneration attributable to all staff for the year ended 31<sup>st</sup> March 2024 was £986k. Their total fixed pay was £739k and their total variable pay was £247k. There was no guaranteed variable remuneration during the financial year ending 31<sup>st</sup> March 2024.