



DISCLOSURE STATEMENT - MIFIDPRU 8

Investra Capital Limited is authorized and regulated by the Financial Conduct Authority (FCA) under reference number 927694. As part of our compliance with the Markets in Financial Instruments Directive (MiFID), we are required to provide certain disclosures to our clients. This disclosure statement outlines important information about our business and the services we provide.

1. Regulatory Status:

Investra Capital Limited is a real estate investment advisory firm authorised and regulated by the FCA. We are registered as an Exempt CAD Firm and provide investment advice to our clients.

2. Client Categorization:

We categorize our clients as Professional and Eligible Counterparty in accordance with the FCA rules on client categorization.

3. Services Provided:

We provide the following services to our clients:

- advising on real estate investments

4. Scope of Services:

Please note that our investment advisory services are deemed to be advising on investments [except pension transfers and pension opt outs].

5. Conflicts of Interest:

As a regulated firm, we have implemented policies and procedures to identify and manage conflicts of interest. We will take all reasonable steps to ensure that any conflicts of interest are appropriately managed.

6. Compensation and Remuneration:

We are remunerated for our services through subscription fees.

7. Client Assets:

Investra Capital Limited does not hold client money or assets.

8. Complaints Handling:

We have a formal complaint handling procedure in place to ensure that any client complaints are addressed promptly and fairly. If you have any complaints or concerns, please contact our Compliance Officer at ismail@investra.co.uk.

9. Regulatory Disclosures:

As part of our regulatory obligations, we are required to make certain disclosures to the FCA and other regulatory authorities. These disclosures may include information about our business, financials, and compliance with regulatory requirements.

10. Governing Law and Jurisdiction:

This disclosure statement is governed by the laws of England and Wales. Any disputes arising from or in connection with this disclosure statement shall be subject to the exclusive jurisdiction of the courts of England.

11. Risk Management:

All Investra Capital Limited employees are required, at on-boarding and annually thereafter, to complete compliance training, including without limitation, on topics such as material non-public information, insider trading, confidential information, and harassment.

Investra Capital Limited's General Counsel & Chief Compliance Officer and Directors attend to all required regulatory filings and corporate maintenance activities, with the assistance of local experts when and as needed.

Investra Capital Limited's Directors, in conjunction with local accounting experts, oversee the financial stability of the Firm to ensure its resilience as an ongoing concern.

Investra Capital Limited at least annually undertakes a risk assessment. This identifies all potential risks and the systems and controls in place to mitigate those risks.

Investra Capital Limited has established adequate systems and controls to ensure that operations continue, to the extent feasible, in the event of a system outage or loss of operations. The Firm uses internal systems and other resources for offsite backup of essential records.

Investra Capital Limited certifies that the communications and operational systems to be employed to conduct business, and the plans and procedures to be employed in relation thereto are adequate and provide reasonable assurance of business continuity with respect to the Firm's systems capacity; providing reasonable means of communicating with the Firm; disaster recovery; and systems security.

Investra Capital Limited undertakes a financial crime risk assessment at least annually to identify and assess the money laundering risk. All staff must undertake AML training at least once every two years.

Investra Capital Limited has clear segregation of duties and reporting lines to ensure that there are no conflicts of interest.

The Board is satisfied that the current approach to managing the Firm's risks is operating as intended and provides sufficient real time granularity of the Firm's exposures compared to its appetites. However, the Board and Senior Management will continue to assess the appropriateness of the risk management framework as the business continues to grow and develop, in line with regulatory expectations and wider market practice.

12. Own Funds:

	Dec 2024
Common Equity Tier 1 Capital	1,344,615
Total capital	1,344,615
Permanent minimum capital requirement under MIFIDPRU 4.4	75,000
Transitional Provisions PMR	60,000
Fixed Overhead requirement	707,946
Transitional Provisions FOR	176,986
Additional Wind down Costs	119,307
Ongoing Assessment	85,894
Own funds threshold requirement	296,294
Surplus of Own Funds	1,048,321
Percentage Above Requirement	454%

Following its analysis and assessment of the risks faced by the firm, its risk to the market and to clients, the Board has concluded that the business is and will remain adequately capitalized across the three-year forecast period – including under stressed conditions. Alongside the firm’s demonstrated own funds and liquidity adequacy, the conclusion of the ICARA is that the business will remain profitable across the forecast period. The ICARA assessment was reviewed and approved by the Board on 31 January 2025.

13. Remuneration Policy:

Given the nature and size of the Firm the Remuneration Policy is determined and administered by the Board of Directors. The remuneration policy of the Firm is intended to ensure that the Firm will attract and retain the most talented staff whilst considering the Firm’s strategic objectives and the long-term interests of the shareholders and other stakeholders.

The Remuneration policy, and the practices supporting the policy, are gender neutral. The policy seeks to ensure all employees and job applicants are treated fairly and on merit, regardless of their race, gender, marital status, age, disability, religious belief, gender identity or sexual orientation.

The Firm’s policy is reviewed at least annually or following any material change to the policies, practices and procedures of the business.

The Firm remunerates its employees through the payment of fixed and variable remuneration. The levels of fixed remuneration are determined by the Board and are comprised of a basic salary plus proportionate contributions to a defined contribution pension scheme. Levels of fixed remuneration are determined with the intention that the amount paid should appropriately reflect the complexity and responsibility of the role performed whilst being consistent with the rates of pay of firms within its peer group for similar positions.

The Firm determines remuneration levels using quantitative and qualitative criteria. The quantitative remuneration criteria primarily rely on financial data relating to the performance of the individual as well as the performance of the Firm. In addition to the quantitative criteria, the Firm has put in place qualitative criteria

which include compliance with regulatory requirements and internal procedures as well as the sustainable growth of the business and the fair treatment of clients.

All salaried employees are eligible to receive variable remuneration subject to acceptable performance. The levels of discretionary variable remuneration paid to staff are determined by the Board. In addition to fixed salaried staff the Firm employs individuals in certain roles which are not salaried. The variable remuneration paid consists of a pre-determined share of the monthly commissions generated. When determining the level of variable remuneration, and the ratio of fixed to variable remuneration, the Firm's aims are to discourage excessive risk taking in the management of the business and

- promote sustainable growth in the business,
- protect client interests and treat clients fairly, and
- protect shareholder value and the reputation of the Firm.