

Regulatory Disclosure

Introduction

The Investment Firms Prudential Regime (IFPR) came into effect on the 1 January 2022 as a new regime for UK firms authorised under the Markets in Financial Instruments Directive (MiFID).

The IFPR was implemented by the FCA as prudential regulation within the MIFIDPRU section of the FCA Handbook.

These disclosures set out Birchwood Investment Management Limited (BIML) annual public disclosures as required under MIFIDPRU 8 for the year ending 31/12/2023.

Scope and application of disclosure

These disclosures relate to BIML and the Stonewood group of companies which BIML is a part, BIML is an SNI MIFIDPRU Investment firm, authorised and regulated by the FCA. Each of the investment firms within the group will make their own disclosures. The other investment firms within this group are as follows:-

- NLP Financial Management Limited
- Stonewood Wealth Management LLP

The other firms within this group are:-

- Stonewood Financial Planning Limited
- Tawny Eagle Capital Limited
- Tawny Eagle Limited

BIML is required to disclose on an individual firm basis and these disclosures have been prepared in line with the requirements of MIFIDPRU 8.

As an SNI MIFIDPRU firm under IFPR we are required to disclose the following remuneration information regarding our remuneration policy and practices under MIFIDPRU 8:

Remuneration policy and practices

1. Qualitative disclosures
 - Our approach to remuneration for all staff
 - The objectives of our financial incentives
 - The decision-making procedures and governance surrounding the development of the remuneration policies and practices our firm is required to adopt in accordance with the MIFIDPRU Remuneration Code, to include, where applicable:
 - The composition of and mandate given to the remuneration committee, and

- Details of any external consultants used in the development of the remuneration policies and practices
- The key characteristics of our remuneration policies and practices to enable
 - An understanding of the risk profile of our firm and/or the assets it manages, and
 - An overview of the incentives created by our remuneration policies and practices
- The different components of our remuneration, together with the categorisation of those remuneration components as fixed or variable
- A summary of the financial and non-financial performance criteria used across the firm, broken down into the criteria for the assessment of the performance of
 - The firm,
 - Business units, and
 - Individuals
- 2. Quantitative disclosures
- The total amount of remuneration awarded to all staff, split into fixed v variable remuneration.

Summary of Significant Changes from Previous Disclosure

There have not been any significant changes to the information disclosed, when compared with previous disclosure period.

1. Qualitative Disclosures

Our approach to remuneration for all staff and the objectives of our financial incentives in respect of staff remuneration.

The remuneration policy of the group has the aim of keeping the client's at the centre of everything at each of the firms. The policy has been designed to drive the business strategy, objectives, values and culture of the business.

The Remuneration Committee are responsible for the remuneration policy the remuneration policy provides guidance for the remuneration of individuals across the group. The remuneration of staff is made up of basic fixed remuneration (salary plus allowances) and variable remuneration (bonus). The fixed remuneration is determined by the role and experience that the individual holds. The variable remuneration is directly determined by the performance of the individual.

The remuneration policy documents the qualitative measures of advisers that advisers are measured against on a quarterly basis and bonuses are paid on a quarterly basis accordingly. The qualitative measures assessed are areas such as carrying out annual reviews and their standard of client files. The policy is that the performance of advisers are paid on a quarterly basis, based on the results of reviews on a quarterly basis an adviser's bonus can be paid, deferred or withheld.

The advisory staff within the group follow the same remuneration policy.

Non advisory staff are paid bonuses on an annual basis which is linked to their performance, their adherence to the firm's systems and controls and the performance of the firm. All staff within the firm are incentivised to make sure clients are serviced according to our agreements and in a compliant manner. Staff that consistently meet the expectations of the firm are rewarded accordingly and those that do not meet these expectations are disincentivised accordingly.

Our decision-making procedures and governance surrounding the development of the firm's remuneration policies and practices.

The remuneration policy is reviewed on an annual basis by the individual boards of the firms within the group and the group Executive Committee and has overall responsibility of the decisions of the group, this includes the group's compliance with the Remuneration Code subject to any applicable exemptions.

We have set up a Remuneration Committee who are responsible for agreeing levels of remuneration awarded to all staff.

The committee is specifically not made up of any advisory staff to manage any kind of conflict of interest.

The key characteristics of our remuneration policies and practices including the different components of our remuneration, together with the categorisation of those remuneration components as fixed or variable.

The remuneration strategy of the group is set to enable our objectives of being able to attract people with a commitment to excellence and a passion for helping individuals achieve their financial goals. The remuneration of the directors of the firms are linked to the profitability and meeting the SYSC requirements of the firm which they are a director and is agreed on an individual basis.

The remuneration of all employees is made of salary and other benefits which are reviewed on an annual basis. The fixed proportion of salaries are set in a way that this is sufficiently high that it

remains the largest proportion of the remuneration of each employee. These pay levels are reviewed on at least an annual basis to ensure that this remains the case and is in line with SYSC 19G.4.

There are different bonus schemes across the different firms within the group to reflect the different businesses and roles held within the group.

Most non advisory staff are on a discretionary bonus which is divided amongst staff. This amount is set through the annual budgetary process and is based on their contribution to the strategic aims of the business which is determined by them meeting their agreed goals. The contribution of staff is assessed by the line managers against set criteria based on their role such as personal development and performance, this is then reviewed by the managing directors of the businesses and then ultimately by the Remuneration committee.

The advisory staff across the group are on a separate bonus scheme which is based on the income that they bring into the business and certain qualitative measures. The bonus payment can be deferred, adjusted or completely removed if the qualitative measures are not met. The qualitative measures are reviewed on an annual basis by the compliance team compliance and the head of financial planning to ensure that these measures drives behaviours in line with the group's values.

2. Quantitative Disclosures

As an SNI MIFIDPRU investment firm, we are required to disclose the total remuneration of all our staff split between fixed and variable remuneration for our performance year end which is also our financial year end.

For our year ending 31/12/2023, our total remuneration is split as follows:

Type of Remuneration	Amount £000s
Fixed Remuneration	£ 1,087
Variable Remuneration	£ 192
Total Remuneration	£ 1,279