

Floww Markets Limited (FRN: 980098)**MIFIDPRU8 Disclosure****Financial Year 2022/2023****Introduction**

The Financial Conduct Authority (“FCA”) in the Prudential sourcebook for MiFID Investment Firms in the FCA Handbook (“MIFIDPRU”) sets out the detailed prudential requirements that apply to Floww Markets Limited (“Floww Markets” or the “Firm”). Chapter 8 of MIFIDPRU (“MIFIDPRU8”) sets out public disclosure rules and guidance with which the Firm must comply, further to any additional applicable prudential requirements.

Floww Markets is classified under MIFIDPRU as a small and non-interconnected MIFIDPRU investment firm (“SNI MIFIDPRU Investment Firm”). As such, the Firm is required under MIFIDPRU 8.6 to disclose information regarding its remuneration policy and practices.

The purpose of these disclosures is to give stakeholders and market participants an insight into the Firm’s culture and to assist stakeholders in making more informed decisions about their relationship with the Firm.

This document has been prepared by Floww Markets in accordance with the requirements of MIFIDPRU 8.

Remuneration Policy and Practices**Overview – approach to remuneration**

As an SNI MIFIDPRU Investment Firm, Floww Markets 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 of the FCA Handbook (“SYSC”)). The purpose of the remuneration requirements is to:

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

The objective of Floww Markets remuneration policies and practices, as set under the Code is to ensure that the way we incentivise our staff does not lead to a conflict of interest with the best interest of our Clients, the Market and itself and to promote an effective harms management control environment.

Floww Markets also recognises that remuneration is a key component in how the Firm attracts, motivates, and retains high quality staff. Floww Markets is committed to excellence, teamwork, ethical behaviour, and the pursuit of good outcomes for its clients. From a remuneration perspective, this means that performance is determined through the assessment of various factors that relate to these values, and by making considered and informed decisions that reward effort, diligence, and results.

Characteristics of the Firm's Remuneration Policy and Practices

Remuneration at Floww Markets is made up of fixed and variable components, The fixed component is set in line with market competitiveness at a level to attract and retain skilled staff. A small number of staff in the firms Sales teams may be eligible to receive variable remuneration by way of commission. Therefore the variable remuneration, where applied, is based solely on their performance for the firm. All other remuneration is fixed.

Remuneration, including pay reviews, will take into consideration the fair and appropriate principle, ensuring decisions are documented, fair, benchmarked and considered in accordance with the Equality Act 2010. It will also take into account the skills required for the role, experience of the individual and the needs of the Firm to ensure it is operating compliantly whilst furthering the interests of the business.

Consequently, remuneration is considered alongside:

- The firm's risk appetite and strategy;
- The firm's culture and values; and
- The long-term effects of the decisions taken in respect of the role required.

Any final remuneration decisions must be able to evidence that the following approach was taken:

- Gender neutral;
- Free from conflict;
- Appropriate for the role (pointing to any benchmarking undertaken); and
- Not discriminatory against protected characteristics of an individual.

The fixed and variable components of remuneration are appropriately balanced. The fixed component represents a sufficiently high proportion of the total remuneration to enable the operation of a flexible policy on variable remuneration. This allows for the possibility of paying no variable remuneration component, which the Firm would do in certain situations, such as where the Firm's profitability performance is constrained, or where there is a risk that the Firm may not be able to meet its capital or liquidity regulatory requirements.

Governance and Oversight

Given the size, internal organisation and the nature, scope, and complexity of the activities of the Firm it does not have a Remuneration Committee. As an SNI firm, Floww Markets is only required to comply with SYSC 19G.3.1 R to SYSC 19G.3.3. R. Therefore, this supervisory function is the direct responsibility of the Floww Markets Board. The Board annually approve the Firms Remuneration policy following review by the Compliance, Finance and People teams. The Firms Executive Committee may review the policy and make any recommendations to the Board prior to approval.

The Firm seeks to ensure that individuals making decisions remain objective by having established a framework for making such decisions This includes:

- clearly documented considerations (minutes of committees);
- consideration of Conflict of Interest;
- input from individuals in Senior Management Functions; and

- documented final decisions regarding risk and/or performance adjustments.

The Board is responsible for setting and overseeing the implementation of Floww Markets remuneration policy and practices. In order to fulfil its responsibilities, the Board:

- Is appropriately staffed to enable it to exercise competent and independent judgement on remuneration policies and practices and the incentives created for managing risk, capital, and liquidity.
- Ensures that the Firm's Remuneration policy and practices take into account the long-term interests of shareholders, investors, and other stakeholders in the Firm.
- Ensures that the overall remuneration policy is consistent with the business strategy, objectives, values, and interests of the Firm and of its clients.

The day to day implementation of the Remuneration Policy is overseen by various functions including Finance & HR.

Contact Details

Should you have any questions regarding this disclosure, please contact the Floww Markets Regulatory Compliance Manager using the details below:

Name	Job Title	Email
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END OF MIFIDPRU8 DISCLOSURE