

Delin Advisors Ltd

30th April 2026

Introduction

Regulatory Context

In accordance with MIFIDPRU 8 the regulatory aim of the disclosures is to enable stakeholders and market participants to have an insight into how Delin Advisors Ltd (“Delin” or “Firm”) is run. They should also aim to help stakeholders make more informed decisions about their relationship with the Firm.

Frequency

The Firm will be making these MIFIDPRU disclosures at least annually. The disclosures will be as at the Accounting Reference Date (“ARD”) and will be published on its website on the date on which it publishes its annual financial statements.

In particular circumstances (e.g. major change to the Firm’s business model), we will make more frequent public disclosures.

Proportionality

The level of detail provided in the qualitative disclosures is proportionate to the size and internal organisation of the Firm and also proportionate to the nature, scope and complexity of the Firm’s business activities.

This disclosure has been made in line with the requirements which apply to Delin as a MIFIDPRU investment firm, which is classed as Small and Non-Interconnected (“SNI”) with no Additional Tier 1 Capital in issue.

Media and Location

The disclosure will be published on the Firm’s website and will be free to obtain.

Changes to Information disclosed

The Firm confirms that there are no significant changes to the information disclosed.

Verification

The information contained in this document has not been audited by the Firm’s external auditors, as this is not a requirement, and does not constitute any form of financial statement and must not be relied upon in making any judgement on the Firm.

Background

Delin is incorporated in the UK and is authorised and regulated by the FCA. The Firm is a MIFIDPRU Advisor. As a SNI MIFIDPRU investment firm, that has no additional tier 1 instruments in issue, the Firm is only required to disclose its remuneration policies and practices, as per MIFIDPRU 8.1.

These disclosures are made by the Firm on solo basis as required by MIFIDPRU 8.1.7R.

MIFIDPRU 8.6 – Remuneration

Delin is subject only to the 'MIFIDPRU Remuneration Code'.

Distributions to Senior Management and Owners

In accordance with the guidance in SYSC 19G.4.4, at the end of each year, the residual profits of the Company are available to be distributed to the shareholders. The level of ownership of each member is reflected in the proportion of ownership shares they have. As residual profits are distributed according to the ownership shares and are not linked to work or performance, this is not considered to be remuneration for the purpose of the Firm's Remuneration Policy.

All other distributions received by Senior Managers and owners are classed as fixed or variable, depending on whether they are discretionary and based on performance of the individual or their business unit.

Qualitative Disclosures

The Firm has in place a Remuneration Policy which is approved by the Governing Body at least annually. The remuneration policy overarching aim is the promotion of sound and effective risk management, whilst reducing conflicts of interest and encouraging good conduct amongst employees. The purpose of the remuneration policy is to set out how the Firm will provide remuneration in a manner that is consistent with the relevant remuneration codes as outlined above, with the main objective of the financial incentives being to attract, motivate and maintain high-calibre employees. The remuneration strategy has been designed to ensure consistency with the risk profiles, rules and instruments of incorporation of the funds managed and with the objectives set out in the Firms' business plan and to ensure no conflict of interest between Staff and investors, and compliance with conduct of business rules.

The Firm does not believe it is proportionate to have a Remuneration Committee. However, all remuneration decisions are overseen by a Senior Manager who is not responsible for portfolio management and/or business development activities, where appropriate.

The Firm's approach to remuneration for all staff includes:

The Firm's board of directors considers remuneration in the context of a wider agenda including retention, recruitment, motivation and talent development and the external market environment. It also receives updates on regulatory developments and general remuneration issues, as well as market and benchmarking data.

The various components of total remuneration (which comprise base salary and variable bonus) are considered and are balanced appropriately having regard to the overall Firm performance and fund performance and is less focused on individual profit and loss. No remuneration is made by payments directly by a fund itself or by any transfer of units or shares of a fund made for the benefit of staff members.

Firm performance and the input of the individual are significant contributors to the determination of variable bonus awards. The principal objective in determining variable bonus awards is to reward individual contribution to the Firm whilst ensuring that such payments are warranted given business results. In this context performance can include financial and non-financial measures, risk measures, compliance with regulatory obligations and other relevant factors. There

is a focus on differentiation so that any rewards are determined according to the contribution of individuals. All staff are subject to variable remuneration. However, bonus pools and individual awards are subject to the discretion of the Board, and it is possible that in any year no variable bonus will be awarded, either at all, or to particular individuals. The Firm may also impose vesting, retention, and clawback mechanisms to take into account the Firm's business cycle.

Quantitative Disclosures

The Firm considers that it has a single business area (investment advisory services), and the total remuneration paid to Staff as required under MIFIDPRU 8.6.8R (4) can be found below. The variable remuneration reflects such remuneration paid with respect to performance over the financial year (even if paid following the end of the year).

Year ending 31st December 2025

GBP

Fixed Remuneration	Variable Remuneration	Total Remuneration
2,007,000	582,500	2,589,500

EUR

Fixed Remuneration	Variable Remuneration	Total Remuneration
1,017,000	261,000	1,278,000

The above does not include contractors on fixed terms contracts.