

# Lexington Partners UK LLP

## MIFIDPRU 8 Disclosure

July 2025

### *Introduction*

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

Lexington UK 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 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 Lexington UK in accordance with the requirements of MIFIDPRU 8 and is verified by the Governing Body. Unless otherwise stated, all figures are as at the Firm’s 31 December financial year-end.

### *Remuneration Policy and Practices*

#### **Overview**

As an SNI MIFIDPRU Investment Firm, Lexington UK 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”)). 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 Lexington UK’s remuneration policies 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, Lexington UK 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.

Lexington UK is committed to excellence, teamwork, ethical behaviour, and the pursuit of exceptional 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, attitude, and results.

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

Remuneration at Lexington UK 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. Variable remuneration is paid on a discretionary basis and takes into consideration the Firm's financial performance as well as the financial performance of each business unit, and the financial and non-financial performance of the individual in contributing to the Firm's success. All staff members are eligible to receive variable remuneration (as outlined below in the two schemes).

**Scheme 1 – Cash Bonus Awards:** Lexington UK award cash bonuses to all active employees. Such bonuses are fully discretionary and are based on both the overall Firm performance as well as the individual's performance. While there is no exact formula for the ratio of the payment related to Firm performance versus individual performance, the payment is weighted slightly towards the Firm performance.

**Scheme 2 – Carried Interest Awards:** Upon the launch of new funds, the Operating Committee allocates carried interest ownership to senior investment professionals and select senior operations professionals. Such awards are also discretionary and are based in part on tenure of the individual and prior contributions to the Firm.

Individual performance is reviewed on an annual basis and all staff awards are based upon the overall performance of the firm, the relevant business unit, and the group, taking into account financial metrics, function performance and individual contribution and compliance with the firm's core compliance (and where relevant) risk policies. The Firm ensures that non-financial criteria forms a significant part of the appraisal process which informs the allocation of bonus awards and, where necessary will override any abiding financial performance achieved by the business unit.

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 fully 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**

The Governing Body is responsible for setting and overseeing the implementation of Lexington UK's remuneration policy and practices. In order to fulfil its responsibilities, the Governing Body:

- Is appropriately staffed to enable it to exercise competent and independent judgment on remuneration policies and practices and the incentives created for managing risk, capital, and liquidity.
- Prepares decisions regarding remuneration, including decisions that have implications for the risk and risk management of the Firm.
- Ensures that the Firm's remuneration policy and practices take into account the public interest and 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.

Lexington UK's remuneration policy and practices are reviewed annually by the Governing Body.

## **Quantitative Remuneration Disclosure**

For the financial year 1 October 2023 to 30 September 2024, the total amount of remuneration awarded to all staff was £63,846,326, of which £5,966,521 comprised the fixed component of remuneration, and £57,879,805 comprised the variable component. For these purposes, 'staff' is defined broadly, and includes, for example, employees of the Firm itself, directors, and secondees.