Remuneration Disclosure (MIFIDPRU 8.6)

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OptAxe Limited, financial year ended 30 April 2026

Item	Detail	
Issued by	OptAxe Limited	
Registered office	6 Brook Street, Mayfair, London, W1S 1BB	
Company number	13361894	
FCA Firm Reference Number	1002237	
Legal Entity Identifier	984500254D10D9E58C78	
Period covered	1 May 2025 to 30 April 2026	
Next review and republication	1 May 2027, following the financial year ending 30 April 2027	

Introduction

OptAxe Limited ("OptAxe" or "the Firm") is authorised and regulated by the Financial Conduct Authority ("FCA") under firm reference number 1002237 and operates a multilateral trading facility ("MTF"). The Firm provides services exclusively to wholesale market participants, being professional clients and eligible counterparties. It has no retail clients and does not hold client money or client assets.

For UK prudential purposes, OptAxe is classified as a small and non-interconnected ("SNI") MIFIDPRU investment firm under the Investment Firms Prudential Regime.

Basis of publication

OptAxe publishes this disclosure in accordance with MIFIDPRU 8.6 of the FCA Handbook. Under MIFIDPRU 8.1.1R(3), the remuneration disclosure requirements in MIFIDPRU 8.6 apply to every MIFIDPRU investment firm, including a small and non-interconnected firm. As an SNI firm that has not issued additional tier 1 instruments, OptAxe is not subject to the other disclosure requirements of MIFIDPRU 8 (risk management objectives and policies, governance arrangements, own funds, own funds requirements and investment policy), and this remuneration disclosure is accordingly the only disclosure the Firm is required to publish under MIFIDPRU 8. The disclosure covers the financial year ended 30 April 2026 and is republished annually as soon as practicable after each 30 April financial year end, and in any event no later than the date on which the Firm publishes its annual financial statements (MIFIDPRU 8.1.10R).

As an SNI firm, OptAxe is subject to the basic requirements of the MIFIDPRU Remuneration Code (SYSC 19G of the FCA Handbook), and its remuneration policy and practices are designed to be appropriate and proportionate to the nature, scale and complexity of the Firm's business. The Firm is not subject to the additional requirements that apply to non-SNI firms, including the identification of material risk takers, the deferral of variable remuneration, payment in instruments, and the establishment of a remuneration committee.

Approach to remuneration and objectives of financial incentives

OptAxe's remuneration policy applies to all staff employed or engaged by the Firm. It does not extend to the personnel of the Firm's appointed representative, who are remunerated by their own employer, and the figures in this disclosure relate to OptAxe's own staff only.

Remuneration comprises:

- Fixed remuneration: base salary, employer pension contributions and any standard benefits made available to staff generally, reflecting each individual's role, responsibilities, professional experience and market rates; and
- Variable remuneration: a discretionary award, which may take the form of a cash bonus, an award under the Firm's share option arrangements, or both. The Firm is under no obligation to make an award in any year.

The objectives of the Firm's financial incentives are to:

- attract, retain and motivate staff with the skills and experience the Firm needs;
- align staff interests with the long-term interests and business strategy of the Firm, including the fair and orderly operation of its MTF and the integrity of the market;
- promote sound and effective risk management and not encourage risk-taking inconsistent with the Firm's risk appetite; and
- avoid conflicts of interest, including any incentive for staff to favour their own interests, or the Firm's, to the potential detriment of clients or the proper functioning of the venue.

The policy is gender neutral: remuneration is awarded without regard to gender, and the Firm is committed to equal pay for equal work or work of equal value.

Governance and decision making

The Firm's management body (the Board) has adopted, and has overall responsibility for the implementation of, the remuneration policy, and reviews it at least annually. As an SNI firm, OptAxe is not required to establish a remuneration committee. Remuneration decisions are taken by the Board, and a director does not participate in the decision on their own remuneration. The Head of Compliance (SMF16) provides input to the annual review of the policy.

Staff engaged in control functions are remunerated independently of the performance of the business areas they oversee, and their remuneration is determined by reference to the achievement of the objectives of their function.

The Firm's remuneration policy is documented, is approved by the Board, and is reviewed at least annually and on any material change to the Firm's business, risk profile or regulatory obligations. The most recent review was approved by the Board and recorded in the minutes of that meeting.

Key characteristics of the link between pay and performance

The fixed component of remuneration represents a sufficiently high proportion of total remuneration that the Firm can operate a fully flexible policy on variable remuneration, including the possibility of paying no variable remuneration in a given year.

Where variable remuneration is awarded, it is based on a combination of:

- the overall financial performance and affordability position of the Firm;
- the performance of the individual, assessed against both financial and non-financial criteria, including conduct, compliance with the Firm's policies and regulatory obligations, and contribution to the Firm's culture and objectives; and
- the Firm's capital and liquidity position: variable remuneration is awarded only where doing so does not affect the Firm's ability to maintain a sound capital base and to meet its own funds requirement and its liquid assets threshold requirement.

The Firm's own funds and liquid assets threshold requirements, and the early warning indicators applied to them, are set through the Firm's internal capital adequacy and risk assessment ("ICARA") process, which is reviewed and approved by the Management Committee at least annually and on any material change.

The Firm has not received exceptional government intervention or other extraordinary public financial support.

Quantitative disclosure

Total remuneration awarded to all staff for the financial year ended 30 April 2026:

	Amount	
Fixed remuneration	£675,100	
Variable remuneration	£269,909	
Total remuneration	£945,009	

Basis of preparation

- The figures cover all staff employed by the Firm at any point during the financial year, including those who joined or left part way through the year. They are stated on an awarded basis for the year, not on a paid or vested basis.
- Fixed remuneration comprises gross salaries and employer pension contributions as recorded in the Firm's payroll for the year. The pension component is stated on the basis of actual employer contributions made in the year and has been reconciled to the payroll records.
- No cash bonuses were awarded in respect of the financial year. Variable remuneration consists entirely of share option awards granted during the year, valued by reference to the price per share established in the Company's most recent equity funding round as at each award date.
- Awards that lapsed unvested when an individual left the Firm are excluded. The Firm applies this treatment consistently from year to year.
- Each award is counted once, in the financial year in which it is granted. It is not counted again when it vests or is exercised.

Availability, review and contact

This disclosure is published on the Firm's website at https://www.optaxe.com/regulation and is available free of charge. It is published as soon as practicable after the financial year end to which it relates and is reviewed and republished annually. This disclosure was reviewed and approved by the Board prior to publication.

Questions about this disclosure may be directed to compliance@optaxe.com.

Approval History

Version	Date	Conducted by	Approved by	Approved at	Reason	
1.0	2026-08-07	Chris Jackson	Chris Jackson	2026-08-07	Compliance review and approval.	