EQUITILE INVESTMENTS LTD

MIFIDPRU 8 Pillar 3 Disclosure Statement

Statement of Non-Applicability — SNI MIFIDPRU Investment Firm

For the financial year ended 28th February 2026

1. Purpose of this Statement

This statement explains the basis on which Equitile Investments Ltd ("the Firm", "Equitile") (FRN 695481) approaches its disclosure obligations under MIFIDPRU 8 of the FCA Handbook, which sets out the Pillar 3 disclosure requirements of the Investment Firms Prudential Regime (IFPR).

The Firm has assessed its classification under MIFIDPRU 1.2 and has determined that it currently qualifies as a Small and Non-Interconnected (SNI) MIFIDPRU investment firm. On this basis, the Firm is not required to make the disclosures set out in MIFIDPRU 8.2 to 8.7, by operation of MIFIDPRU 8.1.1R, which limits the application of this chapter to Non-SNI MIFIDPRU investment firms.

2. Basis for SNI Classification

A firm qualifies as an SNI MIFIDPRU investment firm where it meets all of the conditions set out in MIFIDPRU 1.2.1R, assessed on a rolling basis in accordance with MIFIDPRU 1.2.7R to 1.2.9R. The Firm's position against each condition, as at 28th February 2026.

Equitile confirms that it meets all of the applicable SNI conditions and is accordingly classified as an SNI MIFIDPRU investment firm as at the date of this statement.

At this time the firm is undertaking a permissions application to the FCA for holding Client Monies (CASS). On approval of the application and when the first Client Monies pass over the CASS account this permission will be activated and the firm will become a Non SNI and the Pillar 3disclosure requirements will change. At this point the firm will update this disclosure.

3. Scope of Continuing Disclosure Obligations

Notwithstanding its SNI status, the Firm confirms the following in respect of MIFIDPRU 8.4 (Own Funds):

The Firm has not issued any Additional Tier 1 (AT1) or Tier 2 (T2) capital instruments. Its own funds consist entirely of Common Equity Tier 1 (CET1) capital (ordinary share capital and audited retained earnings). Accordingly, the limited own funds disclosure obligation that applies to SNI firms which have issued AT1 instruments (MIFIDPRU 8.1.4R) does not arise.

Remuneration Disclosure (MIFIDPRU 8.6)

As an SNI MIFIDPRU investment firm, the Firm remains subject to the disclosure requirements in MIFIDPRU 8.6, which apply to both SNI and non-SNI firms, albeit on a more limited basis for SNI firms. In accordance with MIFIDPRU 8.6.8R, the Firm discloses the total amount of remuneration awarded to all staff for the financial year ended 28.02.2026, split into fixed and variable components, as follows:

Remuneration Component	Amount (GBP)
Total remuneration awarded to all staff	2,285,837
of which: fixed remuneration	965,837
of which: variable remuneration	1,320,000

For these purposes, "staff" is defined broadly in accordance with SYSC 19G.1.24 and includes all Directors and employees. The Firm has adopted a Remuneration Policy that complies with the requirements of Chapter 19G (MIFIDPRU Remuneration Code) of the Senior Management Arrangements, Systems and Controls sourcebook (SYSC), applied proportionately given the Firm's size, internal organisation, and the nature, scope and complexity of its activities.

This disclosure is published on the Firm's website at equitile.com, and is updated at least annually, concurrently with the date on which the Firm publishes its annual financial statements.

No other disclosure obligations under MIFIDPRU 8 apply to the Firm while it retains SNI status.

4. Monitoring and Trigger for Reclassification

The Firm monitors its SNI status on an ongoing basis as part of its ICARA process and regulatory reporting cycle (including FIN067 submissions), in accordance with the rolling assessment mechanics in MIFIDPRU 1.2.7R–1.2.9R (a breach of a threshold must generally persist for three months before reclassification takes effect, save for the on/off-balance sheet and revenue conditions which are assessed annually).

Should the Firm cease to meet any of the SNI conditions — for example, as a result of AUM growth, the introduction of new CASS permissions, or a change in business model — it will be reclassified as a Non-SNI MIFIDPRU investment firm and will be required to publish full Pillar 3 disclosures under MIFIDPRU 8.2 to 8.7 from the relevant effective date.

A full MIFIDPRU 8 Pillar 3 disclosure template has been prepared in draft and held on file, to allow the Firm to publish complete disclosures promptly following any reclassification.

5. Publication

As the Firm is not required to publish Pillar 3 disclosures while it remains SNI, this statement is retained for internal governance and audit trail purposes and is published on the Firm's website.

6. Statement of Approval

This statement was reviewed and approved by the Board of Equitile Investments Ltd on 28.07.2026, and will be reassessed at each reporting period, or immediately upon any change in circumstances that could affect the Firm's SNI classification.

Signed for and on behalf of the Board of Equitile Investments Ltd

W N Hellewell
Director
28.06.2026