

Annual MIFIDPRU 8 Disclosure

Firm Name:	Vestd Limited
Firm Reference Number:	685992
Period:	Year ended 31 March 2026

1. Executive Summary

This disclosure statement (the 'Statement') has been prepared by Vestd Limited ('Vestd' or 'the Company') to fulfil the regulatory disclosure requirements set out by the Financial Conduct Authority ('FCA') in the Prudential Sourcebook for MiFID Investment Firms ('MIFIDPRU'), Chapter 8.

In January 2022, the FCA introduced the Investment Firms Prudential Regime ('IFPR'), a new prudential regime for UK firms authorised under the Markets in Financial Instruments Directive. MIFIDPRU is the sourcebook that formalises this regime.

Basis of disclosure: this disclosure is prepared on an individual (solo) basis and is not required to be reviewed by the Company's auditor. Information has been omitted where, in the opinion of management, it is proprietary, price-sensitive, could intrude on client privacy, or would not affect the assessment or decisions of market participants or other users of this report.

Frequency of disclosure: unless otherwise stated, all figures are as at 31 March 2026, the Company's financial year end. This disclosure is published annually, alongside the Annual Report, on the firm's website as soon as reasonably practicable after the accounts are audited.

As at 31 March 2026, Vestd held Own Funds of £1,834,780, which is significantly in excess of its Own Funds Threshold Requirement of £420,000 — a coverage ratio of 436.9%. Remuneration for the period is set out in Section 5.

2. Governance Arrangements

a. Overview

Name with title	Name of company with jurisdiction	Type of directorship	Granted a modification or waiver by the FCA (Y/N)
Iftikhar Nasir	Vestd Limited - UK	SMF3	N
Yaroslav Kinebas	Vestd Limited - UK	SMF3	N
Azra Nasir	Vestd Limited - UK	SMF3	N

b. Details of Directorships of Members of the Management Body

Iftikhar Nasir	12
Yaroslav Kinebas	5
Azra Nasir	5

c. Diversity on the Management Body

Two of the firm's Directors are cis gendered male and one is cis gendered female

d. Risk Committee

The firm has a Risk Committee	No
Required by MIFIDPRU 7.3.1R to establish a risk committee	No
If the answer above is Yes, whether the requirement is removed as a result of a waiver or modification granted by the FCA	N/A

The risk management function is the ultimate responsibility of the CEO. In addition, the CFO (who reports directly to the CEO and the Board of Directors), together with the CEO (who is also the Company's SMF16 and SMF17), constitute the Risk Management Team ('RMT').

The RMT is responsible for ensuring that the Company's overall risk taking is consistent with the risk appetite / risk capital allocation, limits, policies, and procedures set from time to time, and commensurate with returns and market rate expectations in all activities.

On an annual basis, the Board reviews and approves its Risk Management Policy and its Harm and Risk Register which considers on an ongoing basis all significant harms that it believes could impact clients, the market, its business and also Liquidity Risk.

3. Own Funds

The tables below set out (i) the composition of Vestd's regulatory own funds, and (ii) the reconciliation of own funds to the balance sheet in the Company's audited financial statements, in accordance with MIFIDPRU 8 Annex 1R.

Composition of regulatory own funds

#	Item	Amount (GBP '000)	Balance sheet reference
1	Own Funds	1,835	
2	Tier 1 Capital	1,835	
3	Common Equity Tier 1 Capital	1,835	
4	Fully Paid-Up Capital Instruments	8	Called up Share Capital
5	Share Premium	3,690	Share Premium Account
6	Retained Earnings	(1,863)	Profit and Loss Account
7	Accumulated Other Comprehensive Income	–	
8	Other Reserves	0	Other Reserves
9	Adjustments to CET1 Due to Prudential Filters	–	
10	Other Funds	–	
11	(–) Total Deductions from Common Equity Tier 1	–	

12	CET1: Other Capital Elements, Deductions and Adjustments	–	
13	Additional Tier 1 Capital	–	
14	Fully Paid Up, Directly Issued Capital Instruments	–	
15	Share Premium	–	
16	(–) Total Deductions from Additional Tier 1	–	
17	Additional Tier 1: Other Capital Elements, Deductions and Adjustments	–	
18	Tier 2 Capital	–	
19	Fully Paid Up, Directly Issued Capital Instruments	–	
20	Share Premium	–	
21	(–) Total Deductions from Tier 2	–	
22	Tier 2: Other Capital Elements, Deductions and Adjustments	–	

Own funds: reconciliation to the balance sheet in the audited financial statements

Assets	Balance sheet (£'000)	Cross-ref to Own Funds
Fixed Assets	13	
Trade Debtors	–	
Debtors	140	
Called Up Share Capital Unpaid	–	
Cash at Bank and in Hand	2,556	
Total Assets	2,709	
Liabilities		
Trade Creditors	874	
Other Taxes and Social Security	–	
Accruals and Deferred Income	–	
Total Liabilities	874	
Shareholders' Equity		
Called Up Share Capital	8	Item 4
Share Premium Account	3,690	Item 5
Other Reserves	0	Item 8
Retained Earnings B/F	(1,864)	Item 6
Profit/(Loss) for the Year	–	
Total Shareholders' Equity	1,835	

Main features of own funds instruments

The Company has one class of Ordinary shares, which carry no right to a fixed income.

4. Own Funds Requirements

a. Own Fund Requirements

Vestd must hold Own Funds in sufficient quantity and quality in accordance with MIFIDPRU. The Own Funds Requirement is the higher of the following three amounts:

- Permanent Minimum Capital Requirement of £150,000, as defined by the regulation;
- Fixed Overheads Requirement (FOR), equal to one quarter of Vestd's relevant fixed overheads — c.£420,000; and
- the K-Factor Requirement, calculated as £135.

Own Funds Requirement component	
Permanent Minimum Capital Requirement	£150,000
Fixed Overheads Requirement (FOR)	£420,000
K-Factor Requirement	£135
Own Funds Requirement (higher of the above)	£420,000

The Own Funds Requirement is therefore £420,000. In accordance with MIFIDPRU 7.4.7R, the Company has identified through its risk assessment (ICARA) process that no additional own funds are required to address potential material harms from its ongoing activities. This results in an overall financial adequacy requirement of £420,000, which represents Vestd's Own Funds Threshold.

The rules also require additional amounts to be held where necessary to support an orderly wind-down. The Own Funds Threshold set out above is more than sufficient to enable an orderly wind-down, so no additional amount is required for this purpose.

Own Funds held versus Own Funds Threshold Requirement

	£'000
Total Tier 1 Capital	1,835
Own Funds Threshold Requirement (OFTR)	420
Surplus capital over OFTR	1,415
Percentage coverage	436.9%

b. Overall Financial Adequacy Rule

Vestd must at all times meet the overall financial adequacy rule. This requires the Company to hold Own Funds and liquid assets that are adequate, in amount and quality, to ensure it remains financially viable throughout the economic cycle and can address any material potential harm arising from its ongoing activities. The Company must also ensure it holds adequate Own Funds and liquid assets to enable an orderly wind-down, minimising harm to consumers and other market participants.

Vestd meets this requirement through regular monitoring of:

- Own Funds held by Vestd against the Own Funds Threshold calculated under MIFIDPRU; and

- liquid assets held by Vestd against the Liquid Assets Threshold calculated under MIFIDPRU.

These assessments are dynamic and reflect the evolution of the K-factors referred to above, as well as the Company's risk assessments. Based on the year-end snapshot, as at 31 March 2026, the Own Funds held of £1,834,780 were significantly in excess of the £420,000 Own Funds Threshold Requirement.

5. Remuneration Policy and Practices

a. Qualitative Disclosures

Vestd applies proportionality provisions relevant to its size, internal organisation, and the nature, scale and complexity of its activities and all staff are subject to the same remuneration approach. The Board of Vestd Limited determines the Remuneration Policy. The Board sets and agrees the Remuneration Policy of Vestd; reviews take place on an annual basis.

Any performance related remuneration is given to reward individuals for their contribution towards the firm's financial and strategic objectives. Any award is subject to the profits of Vestd and is agreed by the Board. The Board may consider amongst other things, the short- and long-term financial position of Vestd along with other appropriate risk assessments before reaching a decision.

All staff are eligible to receive such rewards apart from those under a contract for services subject to contract associated with external third parties.

There are only three components of remuneration – fixed salary per the employment contract, pension payments (where applicable) and a discretionary, risk adjusted bonus, where applicable based upon the financial results of the firm, and the performance of the employee in assisting the firm reach its financial and strategic objectives.

b. Quantitative Disclosures

Period	Number of Staff	Fixed Remuneration (£'000)	V a r i a b l e Remuneration (£'000)
03/2026	7 (MRTs)	637	0
03/2026	55 (Non-MRTs)	2,821	14