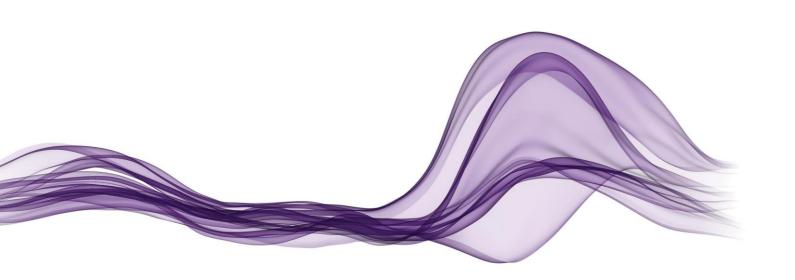
# MIFIDPRU Disclosures

Royal London Asset Management Limited

13 March 2025





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# 1 Introduction

#### **Background**

The Investment Firms Prudential Regime (IFPR) sets out requirements for investment firms to disclose additional information relating to their risk management approach, capital adequacy, remuneration approaches and board diversity. This is intended to help enable stakeholders, including investors, potential investors and counterparties to make informed decisions about their relationship with Royal London Asset Management Ltd. ("RLAM Ltd") on the basis of the harm that RLAM Ltd. may pose to customers and markets. This supports effective market discipline and facilitates constructive engagement by all stakeholders.

This information is known as our "MIFIDPRU Disclosures" and is intended to contain an overview of the following aspects of the Royal London Asset Management Group's non-SNI MIFIDPRU investment firm, RLAM Ltd. As at 31 December 2024:

- Risk management objectives, policies and processes for managing material risks identified through the course of assessing RLAM Ltd.'s own fund requirements (MIFIDPRU 4), concentration risk (MIFIDPRU 5) and Liquidity (MIFIDPRU 6);
- Internal governance arrangements and a summary of the policy promoting diversity in RLAM Ltd.'s management body and its application;
- Own Funds and Own Funds Requirements, including its K-Factor and Fixed Overheads Requirements;
- The key characteristics of RLAM Ltd.'s remuneration policy and practices and specific quantitative information in support of this.

#### Scope of application

The MIFIDPRU disclosures set out in this document are provided solely in respect of the RLAM Group's Non-SNI MIFIDPRU investment firm, RLAM Ltd. The RLAM Group, which also consists of one other subsidiary, Royal London Unit Trust Managers ("RLUTM") Limited, and a connected undertaking, RLUM Limited, both of which are Collective Portfolio Management firms and are not Non-SNI MIFIDPRU firms. Any references to RLUTM or RLUM within this document are within the context of its position within the RLAM Group and is not to be taken as disclosure of RLUTM or RLUM for the purposes of MIFIDPRU.

MIFIDPRU includes further disclosure requirements for Non-SNI MIFIDPRU firms, should certain criteria set out in SYSC 19G.1.1(R) and MIFIDPRU 7.1.4(R) not be met. These disclosure requirements include additional qualitative and quantitative remuneration disclosures as set out within MIFIDPRU 8.6.8(6) and MIFIDPRU 8.6.6(4) and investment policy disclosures as set out within MIFIDPRU 8.7. It has been confirmed that across the year ending 31 December 2024, RLAM Ltd. meets the criteria set out within SYSC 19G.1.1(R) and MIFIDPRU 7.1.4(R), therefore these additional disclosure requirements are not included within this document.

#### Frequency of disclosure

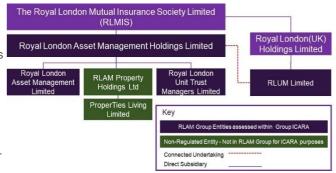
This disclosure is subject to review and update at least annually. Regulatory capital requirements and firm-level own funds set out within this disclosure reflect RLAM Ltd.'s position as at 31 December 2024. Other disclosures covering RLAM Ltd.'s approach to assessing the adequacy of its own funds are based on the RLAM Group's Internal Capital Adequacy and Risk Assessment (ICARA) review dated 25 June 2024. RLAM Ltd. will reassess the need to publish some or all disclosures more frequently than annually in light of any significant change to the relevant characteristics of its business including disclosure about capital resources and adequacy, and information about risk exposure and other items prone to rapid change. This Disclosure is published on RLAM's website.

## **Board approval**

These disclosures were approved for publication by the RLAM Holdings Ltd. Board on 13 March 2025. The Board has verified that the disclosures are consistent with formal policies and are satisfied with the adequacy and effectiveness of the risk management arrangements.

#### Company description

RLAM Ltd. is a non-SNI MIFIDPRU investment firm authorised and regulated by the FCA. RLAM Ltd. acts as discretionary portfolio manager, providing investment management solutions to other entities in the Royal London Group as well as a wide range of third party institutional and wholesale clients. RLAM Ltd. provides asset management services across fixed income, equity, multi-asset and property. It also undertakes discretionary portfolio management delegated from other financial entities, however, RLAM Ltd. does not delegate this activity to other firms. Alongside RLUTM Ltd., RLAM Ltd. is a wholly owned subsidiary of Royal London Management Holdings

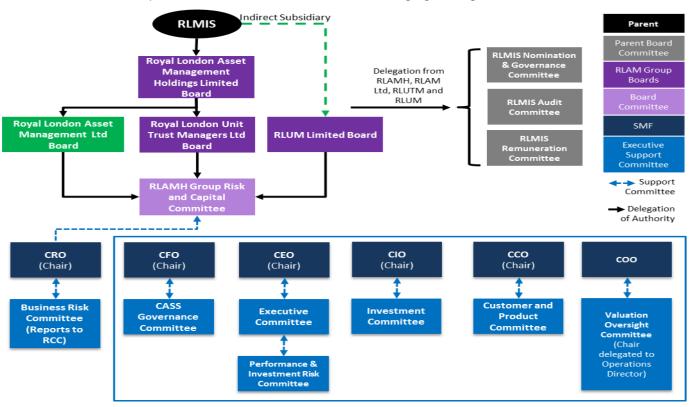


Ltd. (RLAMHL). Together with RLUM Limited, and certain non-regulated property management entities, these collectively comprise the RLAM Group. RLAMHL in turn is a wholly owned subsidiary of the Royal London Mutual Insurance Society Ltd. ("RLMIS") and forms part of the 'Royal London Group' (RLG)). The RLAM Group is the asset management division of RLG.

# 2 Internal governance arrangements

The RLAMHL Board provides leadership and oversight of RLAMHL and its subsidiaries, RLAM Ltd. and RLUTM, as well as its connected undertaking, RLUM. RLAMHL was set up to provide a consolidation point for capital management of the RLAM Group; its Board of Directors are responsible for the Group ICARA. The governance and business oversight of RLAM Ltd. is conducted through regular meetings of its respective Board of Directors, who, along with the relevant FCA Approved persons, have responsibility for risk management, compliance and regulatory matters and have oversight of the effective implementation of the Risk Management System for RLAM Ltd.

The day-to-day management of the business activities of the RLAM Group (including RLAM Ltd) has been delegated to Hans Georgeson, Chief Executive Officer. Whilst the RLAM Group's strategy is set annually by the Boards of the RLAM Group, the strategic and business risks arising from the plan are reviewed by the RLAMHL Risk and Capital Committee on at least a quarterly basis. Additionally, various executive management committees are in place to assist the Chief Executive Officer, FCA Approved persons and other responsible persons in the proper performance of their duties. Individuals identified as Chairs of committees report on their areas of accountability supported by those management committees to the RLAM Group Executive Committee, with the exception of the Business Risk Committee, which reports to the RLAMH Group Risk and Capital Committee. The governance structure of the RLAM Group is outlined below, with the RLAM Ltd. Board highlighted in green:



#### **RLAM Ltd. Board**

The RLAM Ltd. Board meets formally at least four times a year and is responsible for promoting the long-term success of RLAM Ltd. In a manner that seeks to generate value for RLMIS whilst taking account of interests and relationships with its other stakeholders and the impact on the environment. As part of this responsibility, it considers reports and escalated items and discusses business, financial, regulatory, risk and operational issues impacting the firm. The Board is chaired by a non-executive Director, Parwinder Purewal. At the time of reporting the Board is comprised of the following directors:

Director	Role in RLAM Ltd	Number of Non-RLG Directorships
Parwinder Purewal	Chair	3
Hans Georgeson	Executive Director (Chief Executive Officer)	0
Piers Adrian Carlyle Hillier	Executive Director (Chief Investment Officer)	1
Andrew Lawrence Hunt	Executive Director (Chief Financial Officer)	0
Ewan Farquharson Smith	RLG Employed Non-Executive Director	0
Dagmar Kent Kershaw	Independent Non-Executive Director	4
Christopher Morson	Independent Non-Executive Director	1
Nicholas Ring	Independent Non-Executive Director	0

#### RLAMHL Risk and Capital Committee (RCC)<sup>1</sup>

The Committee supports the boards of Royal London Asset Management Holdings Limited ("RLAMH"), its subsidiaries and RLUM Limited (the "RLAMH Group") in managing risk and capital; and complying with prudential and conduct regulations. The Committee is responsible for monitoring and reviewing the effectiveness of risk and capital management, and internal control systems on behalf of the Boards of the RLAMH Group. The RLAMHL RCC meets formally at least four times a year and is also chaired by Parwinder Purewal. In support of its responsibilities, the RLAMHL RCC receives regular reporting from the RLAM Group Chief Risk Officer and considers related issues escalated by executive management committees.

#### Recruitment and selection of members of the RLAM Ltd. Board of Directors

RLAM Ltd. values and promotes diversity and inclusion. We recognise that having a range of backgrounds and experience in senior positions is the right thing to do and provides RLAM Ltd. with strategic advantage. RLAM Ltd. values the benefits that diversity brings in terms of Board effectiveness and understands the importance of taking an inclusive approach. RLAM Ltd.'s specific targets and objectives in relation to the composition of its Board of Directors are set out within the RLMIS Board Diversity and Inclusion Policy, which the RLAM Ltd. Board adopted on June 2024. The Policy includes a commitment to ensuring continued focus on the diversity of the RLMIS Board<sup>2</sup>, taking account of the demographics of the Group's customers, members and communities including:

- Having at least 40% female representation
- Having at least one Board member from a Black, Asian and Minority Ethnic (BAME) background

We are working towards these targets and currently meet the requirements for having at least one Board member from a wider ethnicity background. The appointment of Dagmar Kershaw as a board member on 27 February 2024 represents a positive step towards meeting female representation targets. Board diversity will remain a significant factor in determining future Board appointments.

In line with the UK Corporate Governance Code, the selection and recruitment of directors is based on merit against objective criteria and candidates must meet the regulatory requirements for a Board director of a financial services firm. Role profiles set out the skills, experience, competencies and knowledge required for the role (and regulatory and firm specific responsibilities for regulated roles). Directors are appointed having taken the advice of the Royal London Nominations and Governance Committee. Prior to appointment, background checks are conducted to ensure individuals are fit and proper; with follow up assessments conducted on an annual basis and at any role changes.

All employees and members of the management body are subject to the Royal London Diversity and Inclusion Policy, the aim of which is to promote equality of opportunity for everyone, and to prevent discrimination at work. It also aims to create an inclusive environment where everyone is valued and respected for the difference they bring. It promotes equality of opportunity for everyone, irrespective of protected or personal characteristics, such as age, gender, gender identity, sexual orientation, race or ethnicity, religious beliefs and educational and social background. This also includes creating a culture where employees are able to share issues and concerns and feel confident that this is received in a positive manner.

<sup>&</sup>lt;sup>1</sup> It has been confirmed that across the year ending 31 December 2024, RLAM Ltd. meets the criteria set out within MIFIDPRU 7.1.4(R), therefore RLAM Ltd. is presently not subject to the requirements of MIFIDPRU 7.3.1 to establish a risk committee. Nonetheless, the RLAMHL RCC has been established as the principal risk committee of the RLAM Group and includes RLAM Ltd. and its fellow subsidiary RLUTM Ltd. within its scope.
<sup>2</sup> As at year-end 2024, Royal London investment management division entities comprise RLAM Holdings Ltd., RLAM Ltd., RLUTM, RLUM and RLAM Property Holdings Ltd.

# 3 Risk management objectives and policies

The RLAM Group, of which RLAM Ltd. is a key component, adheres to the risk management objectives and policies set out for companies within the Royal London Group. The RLAM Group maintains a risk management framework, referred to as the Risk Management System ("RMS"). This is anchored by the Royal London Group Risk Management Policy, which provides standards to the business on how it identifies, manages, monitors and reports on risks it faces. These are supported by a range of process documents that sets out approaches to be taken for each aspect of the RMS. This framework supports the RLAM Group in delivering its business plan through managing risks and controls, protecting its employees and clients from adverse events and losses.

The RLAM Ltd. Board carries responsibility for risk management. As reflected in Section 2 above, there are also management committees chaired by, and consisting of, Senior Managers that have responsibility for specific areas of risk. The framework is structured through a variety of mechanisms that assist in ensuring employees are aware of and understand their responsibilities.

#### Three lines of defence

The RLAM Group's governance structure for risk management is based on the 'three lines of defence' model. Primary responsibility

for risk management lies with the business. A second line of defence is provided by a Risk and Compliance function that reports to the RLAMHL RCC and acts independently from the executive management of the RLAM Group to oversee the effectiveness of the Company's risk management and internal control systems. It also reports on these matters to the subsidiary Boards, including RLAM Ltd.

Royal London Group Internal Audit Comprises the third line of defence. It provides independent assurance that the Royal London Group's (including the RLAM Group) risk management, governance and internal control processes are operating

**RLAM Business** 3rd Line Risk & Control Independent Committee Internal (BRC) Assurance Reviews risk and control issues and 2<sup>nd</sup> Line ensures that Risk & adequaterisk management Compliance processes are in place. Reports to A ExCo and RCC on any significant operational business and strategic risks. enabling strong oversight and engagement on risk topics.

Responsible for implementing the strategy and objectives set by the Board. Also ensures the assessment and implementation of a sound system of internal governance, control and risk management, as well as the RLAM Group's culture, values and

standards.

RLAM

Executive

Committee

RLAM Group Risk & Capital Committee (RCC)

Undertakes capital and risk oversight of the RLAMH Groupto ensure that the interests of shareholders and stakeholders are properly protected through the application of effective risk and capital management frameworks.

# **Risk Management System**

The key elements of the RMS are:

#### Risk appetite framework ("RAF")

The RLAM Group RAF defines the amount of risk the RLAM Group is prepared to accept in order to achieve strategic and business objectives, based on the activities and the environment the business operates in. The Framework consists of four components:

effectively. The RLAMHL RCC and RLG Audit Committee receives reports from Group Internal Audit on these matters.

- Risk strategy statements define the types of risks we aim to take or not take in the pursuit of our business objectives and sets the boundaries within which our risk appetite will operate;
- Risk preferences articulate the extent to which certain risks are viewed as being desirable or undesirable to take on and manage.
- Risk appetite statements explain how much risk the RLAM Group is prepared to be exposed to in relation to each risk category; and:
- Risk metrics and tolerances which help to measure the amount of risk exposure against risk appetite. Each metric has limits designed to provide an early warning of when the RLAM Group is approaching risk appetite limits.

All risk metrics are logged on the Company's risk system and reported to the relevant governance bodies on a regular basis. Any individual metrics that are approaching or exceeding set limits require an action plan to ensure that they move back to within appetite. Such plans normally include identification and remediation of gaps or weaknesses in the control environment. The RLAM Group Business Risk Committee reviews metric outputs in conjunction with the other elements of the RMS to assess whether they reflect an environment that is within, approaching or out of risk appetite. The assessment is conducted for each risk appetite category as well as on an overall basis for the business. Any risk appetite categories assessed as either having a control environment approaching or out of appetite requires an action plan to ensure that the risk and control exposure is addressed and moves back within appetite.

The RLAM Group RAF is subject to a periodic review performed at least annually to reassess the tolerance for material risks inherent in the RLAM Group's business. As part of this review, the RLAMHL Group RCC evaluates whether all risk appetite statements and risk metrics are commensurate to the risk the RLAM Group is willing to assume in achieving its strategic objectives. The RLAMHL Board then considers the recommendation of the RLAMHL RCC and if appropriate approves the RLAM RAF for

application as part of RLAM Group's RMS.

#### **Risk registers**

Each function within the RLAM Group owns a risk register within which risk and control assessments ("RCSAs") are conducted. The risk register owner identifies all key risks inherent in the important business services operated by that function, including those that impact the achievement of key objectives. Each risk identified is logged on the risk system and assessed on its inherent impact and likelihood, as well as its residual impact taking into account the effectiveness of relevant controls. Action plans are put in place to address controls identified as not being fully effective or risks that are not mitigated to within risk appetite. All action plans are tracked and monitored via the risk system to ensure timely completion. All identified risk events are logged on the risk system with the impact established and documented. All risk events are reviewed by functional business support teams to ensure their accuracy and completeness, that action plans are robust, and each event is closed in a timely manner. Data from risk events logged is used to inform other elements of the RMS, including RCSAs and the RLAM Group Internal Capital Adequacy and Risk Assessment ("ICARA").

#### **ICARA**

The RLAM Group ICARA process is conducted on a groupwide basis comprising RLAM Ltd., RLUTM and their immediate holding company, RLAMHL. It is a process of ongoing identification, monitoring and mitigation of the harms that a firm may pose to itself, its clients and the markets it operates in from both its ongoing business operations and those that may arise from winding down its business. It is also intended to identify the amounts and spread of types of capital and liquid assets considered adequate to cover unmitigated harms that the RLAM Group may cause itself, its clients, and the markets it operates in. The RLAM Group is required to complete an ICARA at least on an annual basis. Further details on the ICARA process is set out within Section 5 RLAM Ltd. own funds and own funds requirement.

Outputs from these activities not only support the RLAM Group's assessment of the adequacy of its capital and liquidity but also informs other elements of the RMS, for example the RLAM Group's RCSAs and risk appetite. The ICARA is used within the business to support decision-making processes, identify potential risk exposures and implement appropriate mitigants. Should business plans or significant re-positioning of the RLAM Group's business model or activities require it, interim reviews will be undertaken.

#### **Effectiveness of Risk Management Processes**

RLAM Ltd. draws on outputs from the RLG Risk Management System (RMS) in order to determine the effectiveness of its risk management processes, with matters of significance reported to the RLAM Business Risk and Control Committee, the RLAMHL RCC and the RLAMHL Board. The RLAM Group ICARA (which includes RLAM Ltd. In its scope) is also subject to a number of levels of review and validation. Should any points of challenge arise that gives RLAM Ltd. management cause to doubt the appropriateness and veracity of outputs of the ICARA, then this would give RLAM Ltd. cause to consider and reassess the appropriateness of its RMS and its outputs. In addition, RLMIS conducts periodical reviews over the RMS in its totality, including assessing and reporting over risk and control attestations performed by the business. In conclusion, the RLAM Group and its subsidiary entities (including RLAM Ltd) considers the application and design of the RMS it operates to be sufficiently adequate to identify, quantify, manage and mitigate risks across the RLAM Group.

# 4 Key Harms and Risks

MIFIDPRU 8.2.1 requires RLAM Ltd. to disclose its risk management objectives and policies for the categories of risk addressed by:

- (1) MIFIDPRU 4 (Own funds requirements);
- (2) MIFIDPRU 5 (Concentration risk); and
- (3) MIFIDPRU 6 (Liquidity).

## Key Harms and Risks identified within MIFIDPRU 4

RLAM Ltd. has identified and assessed the following categories of risk within its assessment of own funds requirements:

#### **Operational Risk**

Operational risk is the risk of loss resulting from inadequate or failed internal processes, people and systems, or from external events, and reflects the risk that inherently arise from RLAM Ltd.'s own business activities and operations. They exist in the normal course of business and are heightened when RLAM Ltd. undertakes changes to its organisation. Where operational risk events occur, they carry the potential for harm to one or a combination of RLAM Ltd.'s own clients, the markets it operates within, as well as to its business performance, operations and standing with stakeholders.

Operational risk may arise from errors in its important business services, including investment management, trading, valuation and pricing, distribution and client servicing and across its internal operations. Operational Risk may also arise from breaches of internal control systems and compliance requirements, internal or external fraud, damage to physical assets, and/or business disruption due to system failures, execution, delivery and process management or other events. Operational risk can also arise from potential legal or regulatory actions, such as non-compliance with regulatory requirements, ethical or market standards or contractual obligations. Sources of operational risk are monitored through the Risk Management System (RMS) implemented in the RLAM Group, which RLAM Ltd. is a part of. Components of the RMS such as the risk strategy, risk appetite and policies set out the objectives, direction, limits and tolerances within which the Directors expect the business to operate. Other components of the RMS also support the management of operational risk across the RLAM Group, with policies, procedures and processes in place to identify, assess, control and remediate, monitor and report on operational risk.

#### **Market Risk**

Market risk is defined as the risk that arises where fluctuations in values of, or income from assets or in interest or exchange rates cause a divergence in the value of RLAM Ltd.'s own assets and liabilities, resulting in harm to the firm. RLAM Ltd. is principally exposed to market risk through price risk, which is the risk that a decline in the value of our investments impacts profits. This risk is mitigated by investments being made in short term rated cash and money market funds held.

#### **Credit Risk**

RLAM Ltd.'s exposure to credit risk principally arises where a counterparty is unable to pay in full amounts when due, resulting in harm to RLAM Ltd.'s own financial position. RLAM Ltd.'s exposure relates to deposits with banks and receivables from clients. This is managed through limiting bank deposits to high quality credit institutions, and also through conducting regular monitoring of counterparty balances, including receivables from clients.

## Strategic Risk

Strategic risk arises from the choice of strategy, business model and decisions about the direction of RLAM Ltd. and is defined as a failure to achieve business objectives in the medium term. Strategic risk may also arise as a result of a failure to identify and address emerging risks. Strategic risk may arise as a result of unexpected changes in the external economic, geopolitical or regulatory environment, from changes in client and market preferences and behaviours or may arise from external events that impact RLAM Ltd. and the markets it operates within. If these risks are not carefully managed, RLAM Ltd.'s AUM and the income it therefore receives may be lowered, thereby causing harm to RLAM Ltd. The component aspects are identified, assessed, monitored and reported through application of the RLAM Group's RMS. RLAM Ltd. also considers scenarios to stress-test its business model and resistance to unexpected shocks and changes.

#### **Concentration Risk**

Concentration risk is any single or group of exposures that may have the potential to produce losses large enough to threaten an institution's health or ability to maintain its core business. This includes large (connected) individual exposures or significant exposures to groups of counterparties, whose likelihood of default is driven by common underlying factors, e.g., sector, economy, geographical location and instrument type. Concentration risk carries the potential to cause harm to RLAM Ltd., and should the exit of key clients occur, it may also cause harm to its remaining clients. The key sources of this risk for RLAM Ltd. are:

• Credit concentration relating to deposits held at bank. This risk is managed through limiting bank deposits to high quality credit institutions. RLAM Ltd. has also assessed that should the single largest counterparty fail, the level of readily available

- core and non-core liquid assets from other sources means that RLAM Ltd. Would retain sufficient liquidity to meet its obligations as they fall due. This risk is monitored as part of RLAM Group's risk appetite framework.
- Receiving a significant portion of its income from its parent entity, RLMIS. RLAM Ltd. manages its earnings volatility
  through continuing to diversity revenue streams by product and client whilst also focusing on long term fund performance.
  RLAM Ltd. has also assessed the risk of withdrawal of most or all of RLG assets from its management as part of its ICARA
  and it is considered that the likelihood of such an event is considered to be remote. This risk is monitored as part of RLAM
  Group's risk appetite framework.

## **Liquidity Risk**

This represents the risk that RLAM Ltd., though solvent does not have sufficient financial resources to settle obligations when they fall due or can secure them only at excessive cost. This may cause harm to RLAM Ltd., its clients and the markets it operates within. RLAM Ltd.'s funding sources are client fees paid in arrears while its main costs are expenses and salaries. We hold assets as readily accessible bank deposits and highly liquid cash and money market funds. We also operate a liquidity management policy which involves reporting liquidity position vs appetite each month to senior management in Finance and to the RLAM Group Executive Committee, and to the RLAM HL Board on a quarterly basis. We also conduct liquidity stress testing on a regular basis to ensure we hold sufficient liquidity under stressed circumstances.

# 5 RLAM Ltd. own funds and own funds requirement

### K-Factor and Fixed Overheads Requirement for RLAM Ltd

RLAM Ltd. is required to disclose the K-Factor requirement and the fixed overhead requirement (FOR) amounts calculated for compliance with the own funds requirement set out in MIFIDPRU 4.3.

(£m)	
Fixed Overhead Requirement	36.7
K-Factor Requirement	27
Split between:	
- Assets for which RLAM Group are responsible	25.4
- Execution Activity undertaken by RLAM Group	1.6
- Exposure based risks	-

# Approach to assessing adequacy of own funds

The RLAM Group ICARA identifies the amounts and spread of types of capital and liquid assets considered adequate to cover unmitigated harms that the RLAM Group may cause itself, its clients, and the markets it operates in. This is achieved through:

- An assessment of the RLAM Group's business strategy and ongoing operating activities. The extent to which this poses harm to
  RLAM Ltd., its clients and the markets it operates within is assessed and quantified through ICARA scenarios, which identifies and
  assesses plausible, yet material manifestations of those harms and quantifies any required capital for harms that are not fully
  mitigated by existing controls and processes. This assessment is conducted using a combination of internal RCSA and internal
  and external risk event risk data and expert judgement.
- Capital and Liquidity Planning and Stress-testing, which identifies an appropriate range of adverse circumstances of varying nature, severity and duration relevant to the RLAM Group's risk profile, business model and strategy. This assesses how the RLAM Group, through application of recovery plans, can recover from such risks on a forward-looking basis and to ascertain whether it holds sufficient capital and liquidity to withstand such shocks. Reverse stress testing is also performed to identify the extent of shocks required for the RLAM Group to become unviable.
- An assessment of the level of capital and liquidity required to support an orderly wind down of the RLAM Group (including RLAM Ltd) that minimises potential harms to itself, its clients, counterparties, and the wider financial services sector. This takes the results of reverse stress testing as a starting point.

Following completion of these assessments, an allocation to RLAM Ltd. is made based on appropriate drivers. This then forms the basis for assessing the adequacy of RLAM Ltd.'s own funds. Working groups comprised of representatives across all functions in the RLAM Group are in place to perform, review and challenge these assessments. Further review and challenge is provided by the RLAM Group's Executive Committee and the RLAMHL RCC before being subject to final review and approval by the RLAMHL Board, which assumes responsibility for formal approval of the RLAM Group ICARA.

The Board has concluded that RLAM Ltd. has sufficient financial resources in terms of both capital and liquidity to ensure that there is no significant risk that its liabilities cannot be met as they fall due. The Directors firmly believe that adequate and effective risk management processes represent the most effective means of managing the business activities of RLAM Ltd., and senior management continues to review and oversee the existing business control environment to ensure that risks are managed in a comprehensive and robust manner.

## **Own Funds - Capital resources**

At 31 December 2024 and throughout the year, RLAM Ltd. has complied with its individual capital requirement. The table below summarises the total own funds for RLAM Ltd. as at 31 December 2024.

Composition of regulatory own funds ( <b>OF1</b> )**			
No	Item	Amount (GBP 000's)	Source*
1	OWN FUNDS	217,016	
2	TIER 1 CAPITAL	217,016	
3	COMMON EQUITY TIER 1 CAPITAL	239,495	
4	Fully paid up Capital Instruments	7,000	Note 16 – Called up share capital & Note 17 - Capital reserve
5	Share Premium	-	
6	Retained Earnings	232,495	Statement of Changes in Equity
7	Accumulated Other Comprehensive Income	-	
8	Other funds	-	
9	(-) TOTAL DEDUCTIONS FROM COMMON EQUITY TIER 1	-22,479	
10	Intangible assets	-22,479	Note 9 – Intangible assets
11	Deferred tax assets	-	
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	-	

<sup>\*</sup>Based on reference numbers of the balance sheet in the audited financial statements

The table below presents a reconciliation of RLAM Ltd.'s regulatory own funds presented above to its own balance sheet in the audited financial statements of RLAM Ltd.

		A	С		
		RLAM Ltd.audited balance sheet (as at 31 Dec 2024)	Cross-reference to template OF1		
As	Assets – Breakdown by asset classes according to the RLAM Ltd. balance sheet in the audited financial statements				
1	Investments	137,117			
2	Debtors	52,311			
3	Cash at bank and in hand	47,341			
4	Intangible assets	22,479	Item 10		
	Total Assets	259,248			
Lia	Liabilities - Breakdown by liability classes according to the RLAM Ltd. balance sheet in the audited financial statements				
1	Creditors	14,134			
2	Provision for liabilities	-			
3	Deferred Tax Liability	5,619			
	Total Liabilities	19,753			
Sh	Shareholders Equity				
1	Called up share capital	2,000	Item 4		
2	Capital reserve	5,000	Item 4		
3	Retained earnings	232,495	Item 6		
	Total Shareholders Equity	239,495			

<sup>\*\*</sup> Tier 1 capital comprises of share capital, share premium, profit and loss and other reserves. Tier 2 capital includes revaluation reserves; RLAM Group does not utilise any Tier 2 capital or debt funding.

## Own Funds: Main Features of Own instruments issued by RLAM Ltd.

Issuer	Royal London Asset Management Limited
Public or private placement	Private
Instrument type	Ordinary share
Amount recognised in regulatory capital (GBP thousands, as of most recent reporting date)	£2,000
Nominal amount of instrument	£1
Issue price Redemption price	N/A
Accounting classification	Share capital
Original date of issuance	28 July 1988
Perpetual or dated	Perpetual
Maturity date	N/A
Issuer call subject to prior supervisory approval	N/A
Optional call date, contingent call dates and redemption amount	N/A
Subsequent call dates	N/A
Coupons/dividends	Discretionary dividends
Fixed or floating dividend/coupon	N/A
Coupon rate and any related index	N/A
Existence of a dividend stopper	N/A
Convertible or non-convertible	N/A
Write-down features	N/A
Link to the terms and conditions of the instrument	N/A

# 6 Remuneration disclosure

The remuneration policy of the RLAM Group is under the oversight of the RLG's Remuneration Committee. Information on the remuneration policy, the link between pay and performance, and quantitative information can be found within this section of the Royal London website: <a href="http://www.royallondon.com/about/corporategovernance">http://www.royallondon.com/about/corporategovernance</a>

# **Contact**

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