

ROYAL LONDON ASSET MANAGEMENT LIMITED

SECTION 172 FOR THE YEAR ENDED 31 DECEMBER 2024

Section 172 statement

The Directors are mindful of their duties under Section 172 of the Companies Act 2006 to run the Company for the benefit of its members as a whole, and in doing so, to have regard (amongst other matters) to the interests of key stakeholders, which they take into consideration as part of Board discussions and decision making.

While discharging their duties and making decisions, Section 172 requires Directors to have regard, amongst other matters, to:

- The likely consequences of any decision in the long term;
- The interests of the Company's employees;
- The need to foster the Company's business relationships with suppliers, customers and others;
- The impact of the Company's operations on the community and environment;
- The desirability of the Company maintaining a reputation for high standards and business conduct; and
- The need to act fairly between members of the Company.

As a subsidiary in a large Group, the Company does not have any employees. All employee's engaged in the Company's business are employed by the ultimate parent undertaking, RLMIS, and seconded to Royal London Management Services Limited ("RLMS"). Further information regarding the Group's approach to its workforce and current year initiatives are disclosed in the Group's annual report and accounts. In respect of the need to act fairly between members of the Company, as noted above, the Company is a subsidiary within a large Group, and has a sole ultimate parent – RLMIS.

During 2024, the Board discussed a number of important matters and took a number of key decisions where the Board had regard to the impact on stakeholders with respect to the requirements of Section 172 as follows:

Section 172 factor

Board discussion and stakeholder considerations

The likely consequences of any decision in the long term

Strategy

The Board of Directors of RLAM Ltd is committed to maintaining the Group's culture and achieving its purpose, which ultimately leads to increasing value for RLAM Ltd's ultimate parent undertaking, RLMIS. The Board continually discusses long term strategy, and on at least a yearly basis, approves the Company's strategy which is in line with the Group's purpose and strategy. Whilst considering the strategic direction of the Company, the directors will have regard to the likely consequences of these decisions over the longer term, and the impact on stakeholders.

The impact of the Company's operations on the community and the environment

Task force on climate-related financial disclosures ("TCFD") report

As part of its commitment to the environment, and having regard to the Company's impact on the environment, the Board reviewed the Company's appendices to the Group's TCFD report. The Company has been an official supporter of the Financial Stability Board's TCFD since June 2020, aiming to increase and improve its own disclosures and that of companies that it invests in.

The need to foster the Company's business relationships with suppliers, customers and others
And

The impact of the Company's operations on the community and the environment

Stewardship and responsible investment report

The Company is a signatory to the Stewardship Code, and the Board approved the Stewardship and Responsible Investment Report in Spring 2023. The Company exercises its stewardship responsibilities by voting at annual meetings and through engagement with company Directors and management on strategic as well as environmental, social and governance issues. As outlined in the Report, the Company believes it has a responsibility to act as a responsible steward of the assets it invests in on behalf of its clients.

The desirability of the Company maintaining a reputation for high standards of business conduct

Operational resilience self-assessment

The Royal London Asset Management Holdings ("RLAM HL") Risk and Capital Committee recommended to the Board the approval of the Operational Risk Self-Assessment in early 2024. This self-assessment ensures that clients are properly protected, and is mindful of the desirability of the Company to maintain a reputation for high standards of business conduct.

The desirability of the Company maintaining a reputation for high standards of business conduct

Consumer duty

During the year the Board have been continually engaged in the progress made to enhance and evolve the Company's approach to the Consumer Duty regulation. The Duty introduced enhanced regulatory requirements to deliver good outcomes to customers, and to support their financial objectives. In early 2024, the Board approved the Consumer Duty Annual Report, thereby confirming that the Board had reviewed and approved the report on the outcomes being received by retail customers, including agreeing any actions, that the Board was satisfied that the Company was complying with its obligations under Consumer Duty, and that it had assessed that the Company's future business strategy was consistent with its obligations to deliver good outcomes for retail customers.