

MIFIDPRU Disclosure for the Financial Year Ending 30 Sept 2023

Raymond James Investment Services Limited

1. Background

Raymond James Investment Services Limited (“Raymond James” or the “Firm”) is a private client wealth management firm, authorised and regulated in the United Kingdom by the Financial Conduct Authority (“FCA”). The Firm’s principal activity is providing retail customers with investment management and financial planning solutions. The Firm is a wholly owned subsidiary of Raymond James Financial, Inc. (“RJF”), a diversified US-based financial services company.

Under the FCA’s Investment Firms Prudential Regime (“IFPR”), Raymond James is classified as a non-SNI (small non-interconnected) MIFIDPRU Investment Firm and is subject to the rules under the FCA’s Prudential Sourcebook for MIFID Investment Firms (“MIFIDPRU”) (“the Rules”).

Under the Rules, the Firm is required to publicly disclose certain aspects of its approach to governance, own funds and own funds requirement, risk management, financial adequacy, and remuneration. These requirements are set out in MIFIDPRU 8.

The aim of this document is to fulfil Raymond James’s obligations in respect of these public disclosures for the financial year ended 30 September 2023.

2. Disclosure Policy

Raymond James will make disclosures under MIFIDPRU 8 on at least an annual basis, typically this will be as soon as practicable following the end of our Financial Year or alongside the publication of our Statutory Accounts, or more frequently should there be changes deemed material to the business. The disclosures are made available within the “Important Information” section of our corporate public website, found at www.raymondjames.uk.com.

The disclosures are provided to fulfil our regulatory requirements and are not subject to audit. Pursuant to the requirements in MIFIDPRU 8.1.7R, RJIS is required to make disclosures on a solo-entity basis.

Under the Rules, the Firm may omit certain information from the disclosure, in specifically defined circumstances, where it believes that the disclosure contains information that is immaterial, proprietary, or confidential. **We confirm that we have not omitted any disclosures on these grounds.**

All figures in this document relate to the Firm’s financial year ending 30th September 2023, unless stated otherwise.

3. Governance and Risk Management

3.1. Culture

Our corporate culture has always been – and continues to be – grounded in conservative management, high ethical standards, measured growth and a commitment to superior client service.

Our Culture

Our business is grounded in the **Raymond James culture** – one that is instilled in all Raymond James businesses globally. **Our culture is the foundation of our success and what differentiates us from the competition.** Our culture is best articulated through **our Mission, our Vision, and our Values.**

Our Mission (i.e., our Purpose)

Our business is **people and their financial well-being.** We are committed to helping individuals, corporations and institutions achieve their unique goals, whilst also developing and supporting successful professionals, and helping our communities prosper.

Our Vision

Our vision is **to be a financial services firm as unique as the people we serve,** transforming lives, businesses, and communities through the power of personal relationships and professional advice.

Our Values

They are more than the characteristics that define Raymond James as a company or even the shared attitudes of the people who make up the firm. **They are our pledge and our promise to clients, to wealth managers and to each other.**



We put clients first

If we do what's right for our clients, the firm will do well and we'll all benefit.



We act with integrity

We put others above self, and what's right above what's easy. We believe doing well and doing good aren't mutually exclusive.



We think long term

We act responsibly, taking a conservative approach that translates into a strong, stable firm for clients, wealth managers, associates, and shareholders.



We value independence

We respect autonomy, celebrate individuality and welcome diverse perspectives, while encouraging collaboration and innovation.

3.2. Risk Management Objectives

RJIS' Governance structure contains two strata of management – the Board of Directors (the “Board”) and the Operating Committee (the “Committee”), an executive committee made up of senior managers, each of whom is involved in the Firm's day-to-day activities. Raymond James' risk culture and its philosophy regarding risks are established by the Board of Directors. The Firm have adopted our parent company RJF's Corporate Risk Appetite statement, and seek to inculcate its conservative risk culture, consistent with its values of client first, conservatism, independence, and integrity.

Corporate Risk Appetite Statement

Raymond James operates within a highly conservative overall risk range, consistent with its core values of client-first, conservatism, independence and integrity.

To that end, the Firm will:

- put clients’ needs first, ensuring every decision is measured against this tenet;
- uphold a commitment to transparency, clear disclosure and conformity with industry rules;
- maintain a stable and well-diversified source of revenues to limit exposures to cyclical lines of business and market volatility;
- diligently and conservatively manage exposure to volatile assets and business practices, including the amount of leverage the firm employs and the liquidity it maintains;
- focus on long-term and sustainable growth and profitability; and
- maintain low tolerance levels for operating risk, with emphasis on protecting the client, shareholder, and associate interest through efficient, reliable, and cost-effective operational processing and services.

The Board reviews the risk profile of the organization and ensures alignment with RJF’s and Raymond James’ objectives. Additionally, the Board oversees the governance process, established by Senior Management, including a number of committees and working groups to provide the information and analyses necessary to ensure that the firm’s risk profile aligns with the risk culture, philosophy and appetite of RJF.

Capital and liquidity positions are monitored by the Committee to establish adequacy of the firm’s financial resources, and appropriate management information is provided to the Board on a regular basis. The Board has set a prudent target for capital and liquidity coverage to be maintained above the regulatory minimums.

Board Membership and External Directorships

Members of the Board who held office during the financial year ended 30 September 2023 are listed below. In accordance with the requirements of MIFIDPRU 8.3.1R(2), the number of external commercial directorships held by the members of the Board are listed below.

Name	Position	External Directorships (per MIFIDPRU 8.3.1R (2))	
		Executive	Non-Executive
Paul Allison	Chair and Non-Executive Director	0	1
Tash Elwyn	Non-Executive Director	1	0
Peter Moores	Director and CEO	0	0
Cynthia Poole	Executive Director	0	0

3.3. Risk Management Framework

The Board have ultimate responsibility for setting the business strategy and objectives of the Firm and the effective management of risk in pursuit of these objectives, in order to reduce harms to clients, the market and the Firm itself.

The Board have delegated the day-to-day management of risk to the Operating Committee. The Committee accepts primary responsibility for Firm's risk management including systems and controls and the Internal Capital Adequacy and Risk Assessment (ICARA) process.

Three Lines of Defence

The Firm operates a **Three Lines of Defence** model as part of the governance and risk management framework:

First line of defence: Formed by the business, including senior managers, wealth managers and branch supervisors.

- Day-to-day risk management by those 'closest to their respective businesses'.
- Have knowledge of our clients and are best placed to identify unusual client actions and where clients may be vulnerable.
- Liaise with each other and other first line and second line departments to identify issues and assist in remedial actions.

Second line of defence: Formed by Compliance, Branch Audit and Risk, and other control committees.

- Monitors RJIS' adherence to applicable rules and regulations.
- Facilitates the implementation of effective risk management practices.

Third line of defence: formed by Raymond James' group Internal Audit Team carrying out independent periodic audits and reviews.

The Firm does not have a separate risk committee given its size and the scope of its activities and is not required to given it does not meet the criteria within MIFIDPRU 7.3.1R and MIFIDPRU 7.1.4 R during the period. However, the firm has established a number of sub-committees with remits to monitor and escalate key risk issues and events and recommend mitigating actions as appropriate. Other risk management information is collected, reviewed and, where appropriate, acted upon as part of our established internal procedures. These committees regularly establish and review key metrics relating to business performance and management of the Firm's key risks.

The Firm's activities are non-complex, and the Firm does not hold client money or assets or trade on its own account, which limits areas of risk to clients, the Firm and the wider market it operates in.

3.4. Key Risks of Harms and Strategies

People and Conduct: The risk of causing harm to clients, the firm or third parties or the integrity of the wider market because of RJIS' services, products or activities. Branch supervision and audit regimes and compliance monitoring review potential for poor customer outcomes. Key management information is provided to oversight committees to identify and act on any identified trends.

Business Risk: The risks of harm to the Firm arising from changes in its business, including the risk that the firm may not be able to carry out its business plan and its desired strategy and consequences for harm to clients and the wider market. The Operating Committee and Board review progress against strategic objectives, including regular review of performance metrics, and discuss the Firm's strategic priorities on a regular basis as well as reviews of emerging risks. The Firm has internal regulatory and legal resources able to keep it abreast of regulatory developments and recourse to external firms for independent assessments of changes to the firm's operating environment.

Legal & Regulatory: Legal and regulatory risk is defined as the risk of exposure to legal or regulatory penalties, financial forfeiture and material loss due to failure to act in accordance with industry laws and regulations, including suitability and customer outcomes and non-financial misconduct. RJIS monitors client outcomes through a number of oversight committees and collection of management information. RJIS' has internal resources to review and monitor compliance with applicable legal and regulatory requirements including regulatory change projects, which are independently assessed through third line and external third parties. RJIS' implementation of the FCA's Consumer Duty has further enhanced processes and oversight for ensuring our customers are receiving good outcomes.

Operational Risk: The risk that a material failure of business processes or IT infrastructure may result in unanticipated financial loss, harm to customers or reputational damage. Raymond James seeks to monitor potential sources of errors arising from its operations and continually strengthen our internal systems and processes, supervisory and oversight functions and internal controls to reduce exposure. The Firm maintains resilient infrastructure and regularly tests its business continuity and disaster recovery arrangements to limit the impact of potential external events and risk of harm to our clients through operational disruptions. A robust supplier risk assessment process regularly reviews current and intended vendors. The Firm also maintains comprehensive Professional Indemnity Insurance cover to cap our exposure to potential large claims or operational losses.

IT and Cyber Security: The risk that RJIS' system infrastructure is breached by external counterparties with or without malicious intention with harm to our clients and the firm. Possible breaches could involve data theft, ransomware or a shutdown of systems. Raymond James' robust, best of breed Information Technology Security Standards – incorporating hardware, software and resources – are mandated by the Raymond James Financial global business and include 24/7 global cyber threat monitoring and mitigation, regular vulnerability testing of systems and advanced threat and intrusion detection systems.

Credit and Counterparty: The risk that clients or counterparties fail to fulfil their contractual obligations. Key business partners, including banking and custodian relationships and trading counterparties are monitored on a regular basis through RJIS oversight committees. RJIS does not offer any lines of credit to clients.

Market Risk: The risk of losses to the Firm arising as a result of exposure to market movements, including foreign exchange and interest rates. The Firm does not hold any proprietary positions or trade on own account. Adverse movements in securities markets may negatively affect commissions and fees derived from assets under management. This is mitigated by the retention of appropriate capital resources, which are determined on the basis of rigorous stress testing and scenario analysis. The firm has limited exposure to foreign currency risk.

Concentration Risk (MIFIDPRU 5): Concentration risk is defined as the risk arising from the strength or extent of a firm's relationships with, or direct exposure to, a single or group of connected clients or counterparties. The firm's client base is spread across a number of direct relationships with private clients who are serviced by Raymond James Wealth Managers, and relationships through a number of firms utilising RJIS' investment management platform which limits concentrations in the Firm's earnings. Additionally, RJIS monitors and manages potential sources of concentration risk by diversifying firm money across a number of banks.

Liquidity (MIFIDPRU 6): The risk that the Firm has insufficient funds to meet its liabilities as they fall due. This is mitigated by the daily monitoring of cash flow and forecasting, and stress testing and scenario analysis. The Firm does not undertake trading on its own account, or face market counterparties directly for the purposes of execution of trades on behalf of clients, which limits its liquidity exposures. Cashflow forecasting

and stress testing is undertaken on a regular basis as part of the ICARA process. The Firm maintains a liquidity risk management framework and contingency funding plan.

3.5. Our Approach to Diversity and Inclusion

Our core beliefs

Our firm’s mission, values and vision – the core beliefs that define who we are – are entwined in diversity, equity and inclusion.

Our DEI mission

Building and maintaining a diverse workforce and creating an inclusive work environment – a place where everyone feels a sense of belonging – is a natural part of our people-first culture, unleashing the power of perspectives and unique talents.

Our DEI vision

To intentionally nurture an environment where everyone feels welcomed, respected, valued, heard and free to bring their best selves to work in support of our firm's vision: to be a financial services firm as unique as the people we serve.

In collaboration with our colleagues at Charles Stanley (CSC), Raymond James Investment Services and CSC created a joint Diversity, Equity and Inclusion Strategy Committee in 2023. Francesca Hampton, Group CFO, has now been named as DEI Executive Sponsor for our wealth management businesses in the UK, and will drive forward our Raymond James Wealth Management (RJWM) DEI strategy, continuing to align with and leverage RJF resources, tailored to our UK needs.

4. Own Funds

4.1. Composition of Own Funds

The Firm’s regulatory capital resources as of Financial Year End, 30 September 2023, and a reconciliation to the balance sheet as per audited financial statements are laid out in the table below in accordance with MIDPRU 8.4.

	Item	Amount (£'000)	Source based on reference numbers/letters of the balance sheet in the audited financial statements
1	OWN FUNDS	25,289	Net Assets/Total equity shareholders’ funds less regulatory deductions in Item 11.
2	TIER 1 CAPITAL	25,289	
3	COMMON EQUITY TIER 1 CAPITAL	25,289	
4	Fully paid-up capital instruments	13,005	Called-up share capital
5	Share premium	7,532	Share premium account
6	Retained earnings	8,008	Profit and loss account
11	(-) TOTAL DEDUCTIONS FROM COMMON EQUITY TIER 1	3,256	Intangible assets and deferred tax assets

4.2. Reconciliation of Own Funds to Balance Sheet from the Audited Financial Statement

A reconciliation of the Own Funds as laid out in 4.1. to the Firm's balance sheet from the audited financial statements is laid out in the table below.

		Balance sheet as in published/audited financial statements (£'000)	Under regulatory scope of Consolidation (£'000)	Cross- reference to template OF1
		As at period end	As at period end	
Assets - Breakdown by asset classes according to the balance sheet in the audited financial statements				
1	Fixed Assets	3,689		OF1 – template item 11
2	Debtors – amounts falling due after one year	3,088		OF1 – template item 11
3	Debtors – amounts falling due within one year	15,769		
4	Financial Assets	116		
5	Cash at bank	26,121		
6	Total Assets	48,783		
Liabilities - Breakdown by liability classes according to the balance sheet in the audited financial statements				
1	Creditors – amounts falling due within one year	20,238		
2	Total Liabilities	20,238		
Shareholders' Equity				
1	Called-up share capital	13,005		OF1 – template item 4
2	Share premium account	7532		OF1 – template item 5
3	Profit and loss account	8,008		OF1 – template item 6
4	Total Shareholders' equity	28,545		

The Firm's Tier 1 capital comprises ordinary shares, retained earnings and the Firm's share premium reserve. Regulatory adjustments refer to deductions of intangible assets relating to internally generated software. The retained earnings figure in the table above includes the audited figure as of 30 September 2023.

5. Own Funds Requirements

5.1. Breakdown of the Own Funds Requirement

The Firm's Own Funds Requirement (OFR) is calculated as the higher of the K-Factor Requirement (KFR), Fixed Overhead Requirement (FOR) and the Permanent Minimum Requirement (PMR). A breakdown of the OFR as of 30 September 2023 is given below in accordance with MIFIDPRU 8.5.

Own Funds Requirement (OFR)	(£'000)
K-Factor Requirement (KFR)	
Sum of the K-AUM, K-CMH and K-ASA requirements	973
Sum of the K-COH and K-DTF requirements	14
Sum of the K-NPR, K-CMG, K-TCD and the K-CON requirements	n/a
Total K-Factor Requirement	987
Fixed Overhead Requirement (FOR)	7,019
Permanent Minimum Requirement (PMR)	75
OFR = higher of KFR, FOR and PMR	7,019

5.2. Approach to assessing the adequacy of own funds

The overall financial adequacy rule (OFAR) in MIDPRU 7.4.7R requires the Firm to assess the adequacy of its capital and liquid assets to ensure that it is able to remain financially viable during the economic cycle and mitigate potential material harms from its ongoing business and be able to wind down in an orderly manner.

The Firm undertakes the ICARA process to determine the amount of capital and liquidity needed to mitigate harms where these may not be adequately captured through the OFR and minimum liquidity requirements. This is done on an ongoing basis through the use of scenario testing, stress testing for severe but plausible events and wind down planning to determine financial resources required to adequately mitigate harms to clients, the market and the Firm itself. Capital and liquid resources are monitored on an ongoing basis against internal thresholds and regulatory requirements to ensure that the Firm remains compliant with the OFAR at all times.

The Firm has been able to maintain regulatory capital and liquidity buffers in excess of its requirements at all times throughout the period.

6. Remuneration Policies and Practices

In accordance with the requirements set out in MIFIDPRU 8.6, this section provides qualitative and quantitative disclosures with respect to the Firm's Remuneration Policy and Practices under the MIFIDPRU Remuneration Code ("The Code") for FCA investment firms which is set out in SYSC 19G of the FCA Handbook.

These disclosures relate to the performance period 1 October 2022 to 30 September 2023.

6.1. Qualitative Disclosures

Remuneration Policy Approach

RJIS' Remuneration Policy ("the Policy") aims to ensure that the Firm has in place appropriate risk-focused remuneration practices that are consistent with the principles of the IFPR, promote effective risk

management and to align employee's interests with the firm's long-term strategy and objectives. These include management of the key risks as described in section 3.

The Firm's long-term objectives are to enhance our proposition to clients and wealth managers and increase our contribution within the Raymond James Financial Inc. (RJF) Group. These strategic objectives will provide a long-term beneficial impact to the company. In carrying out their duties, the directors consider the impact of key decisions on all stakeholders as well as ensuring they are aligned with the Firm's objectives. In achieving these objectives the Policy and the Firm's incentive structures aim to:

- attract, develop, motivate and retain high-performing individuals in a competitive market
- offer a market aligned remuneration package with fixed salaries being a significant remuneration component; and
- encourage staff to create sustainable results and to operate in a professional and appropriate manner aligned with Raymond James' culture and values;
- ensure alignment of interests of staff, clients and stakeholders

Given the size, nature, and lack of complexity of the Firm, it is not required to establish a remuneration committee. It is the role of the Firm's Board, as the body responsible for the governance of the Firm's business, to incorporate these fundamental principles in its oversight function as well as the responsibilities of establishing and revising as necessary the remuneration policy to ensure compliance with the IFPR regime and with regard to environmental, social and governance (ESG) risk factors. The Board has formally reviewed the Firm's compensation structure and has determined that it promotes effective risk management and conforms to the principles of the IFPR.

In forming the approach to its Remuneration Policy and practices the Firm sought advice from Eversheds Sutherland.

Material Risk Takers (MRTs)

Per SYSC 19G.5.1 R, a material risk taker (MRT) is defined as a staff member at a non-SNI MIFIDPRU investment firm whose professional activities have a material impact on the risk profile of the firm or of the assets that the firm manages.

MRTs at RJIS have been determined by reference to the MIFIDPRU Remuneration Code (SYSC 19G.5), which sets out detailed qualitative and quantitative criteria. In the context of the Firm's activity, the roles assessed to have material impact on the risk profile of the firm include members of the Board of Directors (Executive and Non-Executive Directors) and Operating Committee members holding Senior Management Functions (SMFs) under the FCA's Senior Managers & Certification Regime (SMCR). Other staff are assessed as having a 'material impact' on the Firm's risk profile if they personally directly manage more than a set percentage of the firm's total assets under management or are responsible for generating a set threshold of the Firm's revenues.

Components of Remuneration

Remuneration for the Firm's staff is made up of a combination of fixed and variable remuneration.

(i) Fixed Remuneration

Fixed remuneration principally takes the form of base salaries which provide employees with monthly remuneration irrespective of the Firm's or individual performance. The fixed component of remuneration should represent a sufficiently high proportion of the total remuneration that the Firm can operate a flexible policy on variable remuneration components, including the possibility to pay no variable remuneration

component if necessary or appropriate. Market appropriate benefits (e.g., defined contribution pensions) and other allowances (e.g., relocation costs, travel allowances) are also included within fixed remuneration.

(ii) Variable remuneration

Variable pay takes the form of discretionary cash bonuses and/or the award of Restricted Stock Units (RSU), as applicable. All members of staff are eligible to receive variable remuneration with the exception of members of the management bodies who do not perform any executive function in the Firms.

The award of discretionary compensation takes into account appropriate financial and non-financial factors. The bonuses that are paid are not linked to objectively measured specific personal performance targets and there is no direct link between risk-taking and reward. Rather, a number of factors are considered including overall performance of the firm and individual conduct and behaviour related factors during the appraisal process. Decisions based on performance of the employee will reflect the long-term performance of the individual as well as performance in excess of their job description and terms of employment. As a result of this, excessive risk-taking by any individual or group of MRTs is highly unlikely to be rewarded in monetary terms or in the short term.

Other non-financial considerations include, but are not limited to:

- building and maintaining customer relationships and outcomes;
- performance in line with the Firms strategy or values;
- adherence to the Firm's risk management and compliance policies;
- achieving targets relating to environmental, social and governance factors; and
- diversity and inclusion.

RSUs are subject to both deferral and the compensation recoupment policy, which is line with the standard remuneration code requirements of SYSC19G.

RJIS has a financial forfeiture policy that defines conduct related penalties for all relevant staff, which covers RJIS' wealth manager population. This allows for a full override of financial criteria taking into account conduct-related factors.

Malus and Clawback Provisions

Variable awards granted to MRTs generally contain provisions relating to malus and clawback. This takes into account all types of current and future risks and ensures total variable pay to MRTs is reduced or cancelled (e.g. by malus and/or clawback provision) where the Firm's capital position falls below regulatory or internal requirements. As such, payments are potentially recoverable by up to 100% for a period of between three years and five years in order to allow sufficient time for any potential risks to crystallise and for adjustments to be made.

- (i) Malus forfeiture provisions** provide for the reduction or cancellation of unpaid amounts of variable remuneration, if it is determined that (A) there is reasonable evidence of employee misbehaviour or material error; or (B) the Firm or a relevant business unit has suffered a material downturn in its financial performance; or (C) the Firm or a relevant business unit has suffered a material failure of risk management.
- (ii) Clawback provisions** provide for the repayment of all, or part of any amount paid to employees in respect of any variable pay if it is determined that (A) there is reasonable evidence of employee

misbehaviour or material error; or (B) the Firm or a relevant business unit has suffered a material failure of risk management.

As a result, the total amount of bonuses paid to its associates does not limit the ability of the Firm to ensure a sound capital base or increase their capital base. The Firm considers that the way it remunerates associates is consistent with sound and effective risk management and is broadly in line with the market.

Guaranteed Variable Remuneration

It is not the normal policy of the Firm to guarantee any element of variable remuneration for any staff. In exceptional circumstances the Firm will only consider guaranteeing an element of an individual's variable remuneration where the guarantee is limited to the variable remuneration to be paid to the individual in respect of their first year of service and the Firm considers that: (i) there are exceptional circumstances which justify the guarantee; (ii) the offer of the guarantee is necessary in order that the individual joins the Firm; and (iii) the Firm has a strong capital base so the offer or payment of the guarantee will not expose the Firm to excessive risk.

Severance Pay

It is the Firm's policy not to enter into contractual arrangements with employees which may have the effect of rewarding either poor performance or conduct which exposes the Firm to excessive risk. Specifically, the Firm reserve the right to dismiss an associate without payment in circumstances where it has reason to believe that there has been gross misconduct, gross negligence or other grounds justifying immediate dismissal. Employees are generally employed on contracts of employment which are terminable on no more than six months' notice and it is not the Firm's policy to make contractual provision for payments on termination other than those which are in lieu of notice. On termination of employment by dismissal other than redundancy, the Firm will generally only make payments to employees which it considers reflect the value of their statutory and contractual rights. It is not the Firm's policy to make ex gratia payments to employees on termination of their employment and such payments will only be made in exceptional circumstances and where they are compatible with effective risk management and do not reward failure.

Deferral

While RJIS is not subject to the requirements for deferral under the standard Remuneration Code requirements, variable pay for MRTs (and other staff as appropriate) will normally be distributed with an element of deferral to accord with the MIFIDPRU Remuneration Code requirements. MRTs' deferral is contingent on long term group performance conditions, appropriate personal conduct and the application of malus and clawback. Together with the use of targets and objectives this ensures that variable pay for MRTs has a strong multi-year performance link.

6.2. Quantitative Disclosures

Quantitative disclosures required under MIFIDPRU 8.6.8 are provided below for the performance year ended 30 September 2023.

During the period, there were a total of **8** material risk takers (MRTs) identified by the firm under SYSC 19G.5.

The table below provides quantitative disclosures for the requirements under MIFIDPRU 8.6.8 (2) and (4):

MIFIDPRU 8.6.8	Remuneration (£'000)	Total	Fixed	Variable
(2)	All Staff	17,206	13,145	4,061
(4)	Senior Management	3,833	1,754	2,078
	Other MRTs	-	-	-
	Other Staff	13,373	11,390	1,983

The table below provides quantitative disclosures for the requirements under MIFIDPRU 8.6.8 (5):

MIFIDPRU 8.6.8 (5)	Remuneration (£'000)	Senior Management	Other Material Risk Takers
(a)	the total amount of guaranteed variable remuneration awards made during the financial year and	0	0
	the number of material risk takers receiving those awards	-	-
(b)	the total amount of the severance payments awarded during the financial year and	0	0
	the number of material risk takers receiving those payments	-	-
(c)	the amount of the highest severance payment awarded to an individual material risk taker.	-	-