Redmayne Bentley

REDMAYNE BENTLEY

PUBLIC DISCLOSURE

FOR THE FINANCIAL YEAR ENDED 31 MARCH 2023

CONTENTS

OVERVIEW

This disclosure is in relation to Redmayne Bentley LLP ("RBLLP", "the Firm"). RBLLP is a Limited Liability Partnership company incorporated in the United Kingdom ("UK"), authorised and regulated by the Financial Conduct Authority ("FCA") under a Firm reference number 499510. RBLLP is an investment management and execution-only stockbroking firm. Its clients are predominantly private retail, and its main source of revenue is derived from the provision of services, either through commission charged for the placing of trades or through fees levied for the ongoing advisory, discretionary or dealing with advice services.

This document sets out the public disclosures for RBLLP as at 31 March 2023, which represents the end of the financial accounting period.

BASIS AND FREQUENCY OF DISCLOSURE

As a UK investment firm undertaking activities within the scope of the UK Markets in Financial Instruments Directive ("MIFID"), RBLLP is subject to the prudential requirements of the Investment Firms Prudential Regime ("IFPR") contained in the MIFIDPRU Prudential sourcebook for MIFID Investment Firms of the FCA Handbook.

RBLLP is required to publish disclosures in accordance with the provisions outlined in MIFIDPRU 8 of the IFPR. These requirements are supplemented by the guidance set out in MIFIDPRU 8 published by the FCA.

Under the IFPR's firm categorisation, RBLLP is categorised as a non-small non-interconnected ("non-SNI") MIFIDPRU investment firm.

The disclosure for RBLLP is prepared annually as a solo entity (i.e. individual) basis. The disclosed information is proportionate to RBLLP's size and organisation, and to the nature, scope and complexity of RBLLP's activities.

POLICY, VALIDATION AND SIGN-OFF

RBLLP is committed to following a robust internal control framework to ensure the completeness, accuracy and compliance with the relevant standards and regulatory requirements of any external reports and disclosures. As an external publication, this document has been subject to internal challenge and approval by the Firm's Risk Oversight Committee and Main Board.

The governance in place allows for appropriate challenge and oversight prior to publication. The disclosure is not required to be subject to independent external audit.

BUSINESS MODEL AND STRATEGY

LEGAL AND ORGANISATIONAL STRUCTURE

The Redmayne Bentley Group consists of three legal entities; however, RBLLP represents the vast majority of the trading activity, balance sheet and client base. As a result, RBLLP calculates the appropriate group requirements; however, for the purpose of understanding the risks of harm the Group is exposed to, RBLLP is the only areas where such risks may materialise.

RBLLP has 100% shareholding of Minnie Business Systems Limited ('MBS') and a 33% shareholding of Redmayne Perth LLP. MBS has very limited trading activity, limited to less than 10 purchases per annum which are then recharged to RBLLP. Redmayne Perth LLP is a branch of RB LLP. The income generated by Redmayne Perth LLP first flows through RB LLP, where the client assets are administered.

Neither MBS nor Redmayne Perth LLP is separately regulated by the FCA.

BUSINESS OVERVIEW

The Firm's business model is largely focused on execution-only stockbroker and investment management services. Its clients are predominantly private retail, and its main sources of revenue are derived from the provision of services, either through commission charged for the placing of trades with the stock market or through fees levied for ongoing portfolio management or other services.

The Firm offers additional services including Dealing with Advice and Financial Planning, but these are not material to the Firm's sources of revenue, although the Financial Planning service was only introduced in 2022 and is intended to grow over the medium term.

Finally, the Firm generates revenue returns from client money deposits. In recent years, with the base rate of interest having increased sharply, the value of interest receipts is currently a material part of the LLP's revenue.

The Firm aims to be the most trusted independent provider of personal investment services and to provide excellent personal investment services that enhance clients' wealth.

In order to achieve its aim, the Firm has set out six strategic themes, each with an underlying key business focus and goals which contain measurable metrics to determine success. The strategic themes are as follows:

- Strategic Theme 1 – Business Growth
- Strategic Theme 2 – Revenue Growth
- Strategic Theme 3 – Streamline Processes
- Strategic Theme 4 – Developing People
- Strategic Theme 5 – Excellent Client Services
- Strategic Theme 6 – Environment, Social & Governance

GOVERNANCE ARRANGEMENTS

The Firm has adopted a comprehensive approach to governance to ensure the right information is discussed by the right individuals to enhance decision making. In doing so, this enables the Firm to increase the possibility of achieving its strategic priorities whilst ensuring harms to clients and the Firm are monitored and managed where appropriate.

Set out below is the latest Risk Governance Structure which provides a summary of the key management committees and their respective reporting lines:

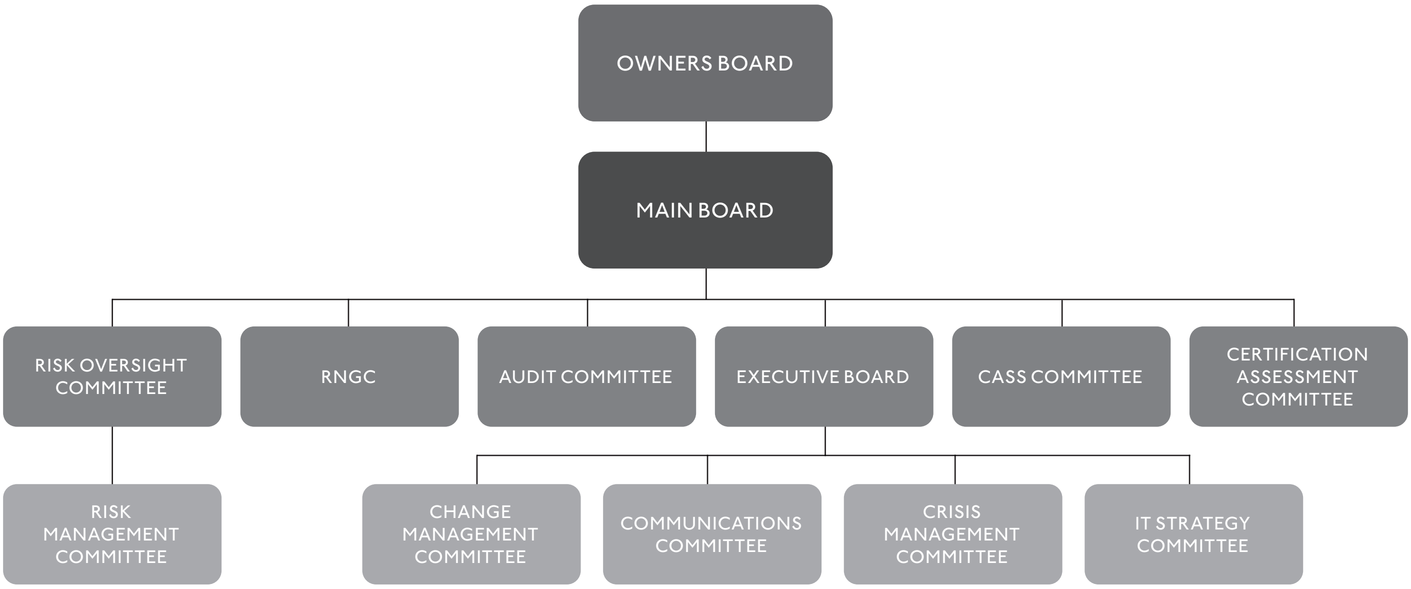

Figure 1 - Risk Governance Structure

Main Board ("MB")
The MB is the ultimate decision maker and setter of strategy throughout the Firm. The MB has six members which is composed of four equity members and two Non-Executive Directors including the chair who is also an equity member. The MB meets formally every quarter and has oversight over the direction of the Firm and its financial performance. The MB also has ultimate responsibility for the management of risk and is required to approve the Firm's Risk Appetite with support / input from the Risk Oversight Committee ("ROC"). Furthermore, the MB receives regular reports from the Executive Board and the main Control Committees – ROC, Audit, CASS, Certification Assessment and Remunerations, Nominations & Governance.

Executive Board ("EB")
The EB has responsibility for the formulation and delivery of the Firm's Business Plan. The EB meets monthly, and reports to the MB.

The EB consists of seven Directors and the Chief Executive Officer. The members of the EB work closely with the business and have Executive accountability for the ongoing monitoring, and management of the Firm's risks, and are supported by the Risk Management Committee ("RMC").

The EB are involved in the preparation of the ICARA, including the risk assessment, risk appetite of the additional provisions and construction of the stress tests used in the sensitivity analysis. Subsequently these are submitted to the ROC and then the MB for approval.

Risk Oversight Committee ("ROC")
The ROC is responsible for the management of the Firm's risk framework and systems of internal control. The ROC is chaired by one of the Firm's Non-Executive Directors and other members of the committee include, the Firm's Chair, another Non-Executive Director, the Chief Executive Officer, Director of Operations, Head of Regulation, Director of Finance, Director of Business and Branch Development and the Risk Manager. Other personnel may be

co-opted if required, including other directors who are rotated and attend meetings periodically.

Throughout 2022/2023 financial year, the Firm had 4 underlying Risk Management Committees ('RMC's) which formed the governance structure of the ROC – they were:

- Operational RMC;
- Market, Credit & Liquidity RMC;
- Conduct & Regulatory RMC; and
- IT & IT Security RMC.

These committees were responsible for managing aspects of risks experienced within the daily operations of the Firm and escalated any issues of materiality to the ROC for review and discussion.

In January 2023, it was agreed that the four RMCs would be consolidated into the one Risk Management Committee which held its first meeting in March 2023.

The ROC has had oversight of the preparation of the 2023 ICARA and has approved and signed off the Risk Assessment, statement of Risk Appetite, overarching Risk Framework and stress tests undertaken prior to submission to the MB.

Audit Committee ("AC")
The AC is chaired by a Non-Executive Director. The Committee has delegated authority from the MB and is responsible for ensuring the effectiveness of the Firm's risk management processes. The AC also oversees the audit framework, including compliance departmental reviews, branch assessments and the work performed by the third-party internal auditors. The Committee's responsibility also covers the Firm's principal accounting and management processes. All meetings are minuted and minutes are circulated to members of both the EB and MB.

CASS Committee
The CASS Committee is a control committee of the MB, from which it obtains its authority and to which it regularly reports. The committee is chaired by the Chair of the Firm, its members include the Chief Executive, Director of Operations, Director of Finance, Head of Asset Services & Settlements, the CASS Manager, Director of Stockbroking, Head of Investment Management and Head of Regulation. The CASS Committee is responsible for the Firm's ongoing compliance with the FCA's CASS rules by overseeing the systems and processes employed, any CASS breaches and their resolution.

Remuneration, Nominations and Governance Committee ("RNGC")
The Firm has a remuneration policy which ensures that the Firm is fully compliant with the FCA remuneration code for the Firm's level 3 category and corporate governance. This has no implications for the Firm's capital resources. The Remuneration, Nominations and Governance Committee meets to review the implementation of the policy and makes recommendations to the MB for changes to the policy and other remuneration decisions. The Committee is chaired by one of the Non-Executive Directors and includes the Chair, the other Non-Executive Director and the Chief Executive who are all voting members. The Director of Human Resources attends meetings as a non-voting member.

Owners Board ("OB")
Towards the end of 2022, the RBLLP created the "Owners Board" which is solely comprised of members of the LLP, to include representation from the corporate equity member as well. The purpose of this board is to provide a mechanism for the MB to communicate with the owners of the business and to make decisions specifically required by the LLPs Membership Agreement. This OB will ratify the Firm's risk appetite statements and review the capital plans of the Firm.

In addition, there is an IT Strategy Committee and Communications committee responsible for overseeing the Firm wide approach to IT infrastructure and development, and internal and external communications respectively.

CHANGES TO THE MAIN BOARD DURING 2022

On 1st April 2023, the constitution of the Main Board changed.

- David Loudon was appointed Chair of the Firm (and the Main Board)
- Stuart Davis became the sole Chief Executive of the Firm. This was a function previously shared with David Loudon
- Keith Loudon and Michael Wheeler are no longer members of the Main Board. They are both Partners at the Firm but do not have any operational oversight and/or input.

DIRECTORSHIPS

The following information relates to the appointments of directors held in both, executive and/or non-executive functions, including any directorships held at external commercial organisations as at 31 March 2023 as required by MIFIDPRU 8.3.1R:

SMF FUNCTION / ROLE	NAME	BACKGROUND	NUMBER OF OTHER EXTERNAL DIRECTORSHIPS
SMF9 – Chair SMF27 – Partner Chair	David Loudon	David joined the Firm in 1993 and has represented the Firm and the industry as a member of various groups and was an active board member of the Personal Investment Management and Financial Advice Association (PIMFA) for 10 years until late 2021 when his term expired.	10
SMF27 – Partner Chief Executive	Stuart Davis	Stuart's career in the financial services industry began in 1983, firstly in accountancy before moving to stockbroking in 1986. He joined Redmayne Bentley in 1991 and became an equity partner of the Firm in April 2003 and in 2005 a Fellow of the Securities and Investment Institute.	11
SMF16 – Compliance Oversight SMF27 – Partner Director of Business and Branch Development	Nick Bettison	Nick's career in financial services began in 1990, joining Redmayne Bentley in 1991 as a stockbroker. In 2008 he joined the Firm's senior management team as Head of Trading. Based in the London office, Nick sits on several of the Firm's key Control Committees and is involved in Redmayne Bentley's ongoing growth and expansion strategy forming part of his responsibility for business and branch development. Externally Nick is a Board member of the Personal Investment Management and Financial Advice Association (PIMFA). During 2020 Nick became an Equity Partner of the Firm and is a member of both the Main and Executive Boards.	3

SMF27 – Partner Director of Investment Management	James S. Andrews	James is based at the Firm's Leeds Head Office and has responsibility for investment management and research. He joined Redmayne Bentley from KPMG, where he was Head of Equity Research in their investment advisory division. James has an MBA with Distinction from the University of Leeds and is a Chartered Fellow of the Chartered Institute for Securities and Investment with over 19 years of institutional and private client investment management experience. During 2021 James became an Equity Partner of the Firm and sits on both the Main and Executive Boards.	2
SMF10 – Chair of the Risk Committee SMF12 – Chair of the Remuneration Committee SMF13 – Chair of the Nominations Committee SMF14 – Senior Independent Director Non-Executive Director	Kim Rebecchi	Kim is a Fellow of the Chartered Institute of Bankers, and she holds a postgraduate diploma in financial services. She worked at Leeds Building Society for 28 years, latterly as the Sales and Marketing Director and as an executive member of the Board. She holds the Financial Times Non-Executive Diploma and is also a Director of Furness Building Society and Cynergy Bank. Kim joined Redmayne Bentley as a non-executive director in April 2016 and was attracted by the Firm's strong business performance, solid values and reputation. Kim also chairs the Remuneration, Nominations & Corporate Governance and Risk Oversight committees.	2
SMF11 – Chair of the Audit Committee Non-Executive Director	Ian Cordwell	Ian joined the Board of Redmayne Bentley in November 2020 following a 30-year career in retail financial services serving on Boards for the past 25 years. A Fellow of the Institute of Chartered Accountants, Ian has held diverse roles ranging from traditional CFO to Group Marketing, Group Operations and Chief Investment Officer in organisations such as M&S Financial Services, LV= and Police Mutual. Ian has also spent time with the Pensions Regulator, developing his own small businesses and as a Non-Executive Director of a Health Trust. Ian is also a Non-Executive Director and Audit Committee Chair for National Pharmacy Association Insurance. In addition, he runs a small employee benefits business and a green waste recycling business.	3

RISK MANAGEMENT

RBLLP APPROACH TO RISK MANAGEMENT

Risk Management at RBLLP is governed by the Main Board with input from the Risk Oversight Committee and the Risk Management Committee. The Risk Management Framework elements described in this section are applied throughout RBLLP which is consistent with the Firm's strategy and business management.

All risks described throughout this section are managed via an established three lines model and are governed by one of more firmwide policies and procedures and are overseen by the Risk Oversight Committee and/or the Risk Management Committee.

The First Line has primary 'ownership' of risks throughout the Firm. The First Line consists of most colleagues, including but not limited to investment management, stockbroking, and IT Teams. These departments provide the framework within which activities for achieving the Firm's objectives are planned, executed, controlled, and monitored. The First Line is accountable for their respective risks, including risk assessments and management, developing controls, adherence to policies, and management of talent and compensation.

The Second Line functions (i.e., Risk Team, CASS Team, Finance, Compliance) provide independent oversight of, and support for, the activities performed within the First Line. These functions coordinate among themselves and actively work with the business, providing expertise and appropriate challenge to help ensure that risks are identified and mitigated in a timely manner across the Firm.

The Third Line is the Internal Audit Function which is outsourced to BDO. It aims to enhance and protect organisational value by providing risk-based and objective assurance, advice, and insight.

RISK MANAGEMENT FRAMEWORK

The Firm follows a comprehensive Enterprise Risk Management Framework. The framework begins with culture, with a consistent tone from the top led by our Main Board. This includes commitment to Excellence, Integrity, Respect, Responsibility and Teamwork as well as a clear ownership of risk, and risk management, and an adherence to a control environment standard.

The Risk Management Framework consists of the following elements:

Risk Identification and Definitions	• Identifying key and emerging risks through tools such as Risk and Control Self-Assessments ("RCSAs"), Risk Workshops, regular meetings with departments, reviewing service offerings, major changes, and internal and external events; and • Assigning Risk Owners and Risk Sponsors.
Risk Appetite	• Setting of risk appetite by the Main Board within input from the Risk Management Committee, Executive Board and the Risk Oversight Committee. • Managing risks within risk appetite; and • Ensuring appropriate escalations should risk appetite be breached.
Risk Management and Control	• Adhering to the Three Lines Model; • Establishing the appropriate processes to measure, manage, and control risk taking; • Utilising RCSAs and Risk Event Reporting; and • Addressing how specific duties related to risks and control are assigned and coordinated.
Risk Monitoring and Reporting	• Establishing and monitoring Risk Indicators in the context of Risk Appetite • Providing information and reports (e.g. Risk Assurance Reports) throughout the Risk Governance Structure; • Monitoring, investigating and if required, escalating Risk Events; and • Overseeing the ICARA, including quantification of internal regulatory capital and liquidity requirements.

Risk Governance	• Establishing policies and procedures; • Establishing risk committees; and • Overseeing the risk management framework.

APPROVAL OF RISKS AND RISK APPETITE

The risk appetite statement is an expression of how much risk the Firm is willing to pursue to achieve the Firm's strategic objectives. As is with all businesses to achieve growth, some risks must be taken, but these should be managed to prevent unnecessary/excessive risk taking such as outsourcing business activities or dealing with counterparties. Other risks must be avoided such as harm to customers or non-compliance with regulation.

The Firm's Risk Appetite is based on qualitative statements which articulate the risk-taking intent for the Firm. The primary driver of the Risk Appetite is to protect the Firm from an unacceptable level of financial performance volatility, conduct and compliance failures and ultimately harm to client, the Firm or the Market.

The Firm's Risk Appetite Framework ensures that Risk Appetite is aligned to the Firm's strategy whilst having an awareness of the Firm's Risk Maturity and Capacity to ensure the Firm can manage risks within the appetite it sets.

The Risk Appetite Statements include:

- Risks the Firm accepts as part of doing business, such as credit and market risks, and risks that the Firm takes to generate income – such as operational risks which are managed to remain within an acceptable tolerance.
- Risks which the Firm has a low or zero appetite such as reputational risk, regulatory risk and conduct risk.

The Firm considers current conditions, identified risks, and the prospect of emerging risks in developing and applying its Risk Appetite. Adherence to overall Risk Appetite is managed and monitored across the Firm, and is informed by the Risk Appetite Statement, Risk Reporting and a broad spectrum of principles, policies, processes, and tools. The Firm's Risk Appetite Statements describe the Firm's risk principles expresses its appetite for risk. The actual risks it faces are monitored through risk reporting.

The Firm's Main Board has the ultimate responsibility for the development of appropriate strategies, systems, and controls for the management of risks within the business. The risk appetite statement is reviewed at least annually, or more often as deemed appropriate, as part of the ICARA review process and approved by the Main Board.

RISK CATEGORY	RISK APPETITE STATEMENT
Credit Risk	We will only engage with counterparties who are creditworthy and manage exposure by setting appropriate credit limits and monitoring collateral positions. The Firm only transacts with counterparties authorised by the FCA (or equivalent regulatory body) and regular credit and trading checks are carried out.

Market Risk	Market risk provides strategic opportunity for the Firm and the nature of our investment management and stockbroking services mean we need to have exposure to markets. However, the Firm seeks a balanced approach to market risk to maximise profit for both clients and the Firm, while mitigating the extremes of market volatility. Market Risk operates within predefined thresholds that are set in the interests of clients and the Firm. The Firm has zero tolerance to undertake any proprietary trading. Much of the Firm's client money is kept in sterling, with limited foreign currency held to facilitate settlement and dealing activity on behalf of clients and/or to mirror those client deposit accounts held in a foreign currency. Market risk incorporates Interest risk where a similarly balanced approach between maximising returns while ensuring suitable institutions are utilized and adequate client money protections are maintained.
Financial Risk	The Firm will at all times maintain financial strength and business performance to ensure financial stability and sustainability to support its strategic themes. In addition to meeting its regulatory capital requirements the Firm will not undertake activities that would jeopardise this financial stability and will ensure risks taken are proportionate with its risk profile and strategic ambitions. The Firm aims to retain the confidence of its clients, to fulfil regulatory requirements and to maintain a capital surplus to protect against unexpected losses. The Firm holds capital above the minimum regulatory requirement, defined by annually reviewed Risk Appetite metrics, to ensure it is able to meet these obligations under possible liquidity stress scenarios and maintains a Contingency Funding Plan in case such conditions arise.
Liquidity Risk	The Firm accepts that an appetite for liquidity risk is required in order to achieve its business objectives, while having zero appetite for risks that would result in not meeting client money requirements, regulatory financial obligations and/or having insufficient resources to meet current and future financial commitments.
Strategic Risk	We aim to minimise the potential for financial loss or reputational damage arising from ineffective business strategies, improper implementation of business strategies or a lack of responsiveness to changes in the business environment. The Firm will at all times maintain financial strength to ensure stability and sustainability to support its strategic themes that support the Firm's Mission and Vision, while not compromising our core values and behaviours.
Operational Risk	The Firm accepts that operational risk is present in pursuit of its strategic objectives and follows robust processes and controls in accordance with FCA rules in order to mitigate and minimise these risks within set thresholds with zero appetite for poor client outcomes. Identified issues are investigated with the appropriate remedial action taken.
Conduct Risk	The Firm has zero appetite for conduct risks and seeks to minimise the opportunity for them to arise by aligning strategy, process, and operations. The Firm's tolerance to conduct risk is informed by the fact that crystallised conduct risks can result in client, financial, brand reputation or regulatory detriment. The Firm's priority is to deliver excellent client outcomes, as client service is central to our business culture. Our vision prioritises the Firm's reputation above profitability alone in order to be a trusted provider of personal investment services.
Legal & Regulatory Risk	The Firm has a zero appetite for regulatory breaches and legal issues. While it is not possible to eliminate all legal and regulatory risk, the Compliance department works closely with all other departments to ensure that any legal and regulatory risks are identified and reduced to a minimum. This ensures compliance with legal and regulatory requirements and industry best practice to protect our clients, the market, and the Firm's reputation. We strive to maintain an open and transparent relationship with the regulator.

KEY RISKS AND THE ASSOCIATED RISK MANAGEMENT APPROACH

The following section covers the Risk Management objectives and policies for risks relevant the Firm as set out in MIFIDPRU 4, 5 and 6.

Harm to Clients (‘**HtC**’), **Harm to Firm** (‘**HtF**’) **and Harm to Market** (‘**HtM**’)
MIFIDPRU 4 outlines requirements for investment firms to hold a minimum amount of own funds to address potential material harms arising from MiFID activities (through the K-factor requirements) and from a wind-down/ exit from the markets (through the Fixed Overhead Requirements (‘FOR’)). The Firm’s K-Factor requirements are based on the following:

- K-AUM – Assets Under Management
- K-COH – Clients Orders Handled
- K-CMH – Client Money Held; and
- K-ASA – Assets Safeguarded and Administered.

For more information, please see **Own Fund Requirements.** These exposures are managed by assessing the risks and the associated harms.

The Firm’s risks are intrinsically linked to the potential harms that the Firm poses to clients, markets and the Firm itself. The key risks are driven by the business activities undertaken and the potential harm would arise because of issues related to the key risks. Therefore, management of potential harms is fundamental to the Firm’s Risk Management Framework, and it utilises the same elements outlined in **Risk Management Framework**.

The primary source of potential harm is related to operational risks (including processes, technology risks etc.) These are often the result of inadequate internal processes, people and systems or external events. These risks may, but do not always, have an adverse financial impact. Operational risks are actively mitigated wherever possible, through design and implementation of strong processes and controls. This includes a range of policies captured within the Firm’s Branch Manual which are carried out by all Three Lines with the aim of minimising potential harm. The same applies to all other sources of risks.

For each of the Firm’s risks, a Risk Sponsor and Risk Owner is assigned by the Risk Oversight Committee and/or the Risk Management Committee. Risk Sponsors are the Firm’s Directors who are ultimately responsible for all aspects of the risks they are assigned to, to ensure the successful management of the risk. Risk Owners are management who provide support to their respective Risk Sponsor by assessing, monitoring, managing and appropriately reporting on the Firm’s risk exposure to the relevant risks and the associated harms in line with risk appetites set by the Main Board. The Risk Management Committee has oversight of the Risk Owners activity assisting in the prioritisation of resources for risk and potential harm mitigation where needed. First Line functions work with the Second line functions to define and implement Risk Indicators used to monitor risks and to flag changes in the operating environment. Risk Indicators combined with emerging threat analysis and data from Risk Event Reporting along with the Risk Owner’s judgement, are used to assess the risk against appetite.

Completed risk assessments are reported to the Risk Management Committee to review and challenge such assessments and actions where appropriate. The output of such reviews by the Risk Management Committee are shared with the Executive Board, Risk Oversight Committee and the Main Board.

INFORMATION FLOW ON RISK TO THE MAIN BOARD

Information provided to the Main Board is typically first reviewed and challenged by the Risk Oversight Committee and by the Risk Management Committee. The Risk Management Committee meets monthly, and members include the Chief Executive, Director of Investment Management, Director of Stockbroking, Head of Client Services, HR Manager, Financial Controller, Compliance Policy Manager, IT Services and Information Security Manager, Marketing & Communications Manager and Risk Manager. The Risk Oversight Committee meets quarterly.

At each meeting, these committees:

- Review reports in respect of the Firm's risk profile. The information is collated by the Firm's Second Line (Risk Team) based on input from across the business; and
- Consider the risk position relative to tolerance and in particular any breaches of risk limits or tolerances.
- The Risk Management Committee also undertake bi-monthly deep dives into specific risks deemed as a priority which is set quarterly.

The Chair of the Risk Oversight Committee then provides an update to the Main Board.

MAIN BOARD DECLARATION – ADEQUACY OF RISK MANAGEMENT ARRANGEMENTS

The Main Board is responsible for the effectiveness of RBLLPs risk management arrangements and has implemented an appropriate governance and risk management structure. This is designed to determine what risks the Firm is willing to take and to manage those risks appropriately.

The Main Board considers that it has in place adequate risk management arrangements and that the Firm's risk profile is in line with its risk appetite and strategy.

OWN FUNDS

Own funds (also referred to as 'capital resources') is the aggregate of common equity tier 1 ('CET1') capital, additional tier 1 capital and tier 2 capital that is held by a firm, net of any required deductions. Regular monitoring is undertaken to ensure that own funds always remain equal to or greater than the Firm's own funds requirement (as required per MIFIDPRU 3.2.2 (3)).

COMPOSITION OF REGULATORY OWN FUNDS

RBLLP's own funds (i.e., capital resources) comprise the Firm's fixed capital, retained earnings and a subordinated loan.

As at the FY end on 31 March 2023, the Firm complied with the relevant capital regulatory obligations as outlined in the IFPR.

Table 1 - Composition of Regulatory Own Funds as at 31st March 2023

	ITEM	£000'S	SOURCE BASED ON REFERENCE NUMBERS / LETTERS OF THE BALANCE SHEET IN THE AUDITED FINANCIAL STATEMENTS
1	**Own Funds**	**10,798**	n/a – sum of items 21 to 24
2	**Tier 1 Capital**	**9,401**	n/a – sum of items 21 to 24
3	**Common Equity Tier 1 Capital**	**9,401**	n/a – sum of items 21 to 24
4	Fully paid-up capital instruments	10,686	Members' capital classified as equity, page 12
6	Retained earnings	-	-
7	Accumulated other comprehensive income	-	-
8	Other reserves	1,272	Revaluation Reserve, page 12
9	Adjustments to CET1 due to prudential filters	-	-
10	Other funds	-	-
11	(-) TOTAL DEDUCTIONS FROM COMMON EQUITY TIER 1	(2,557)	Various
19	CET1: Other capital elements, deductions and adjustments	-	-
20	**ADDITIONAL TIER 2 CAPITAL**	-	n/a – sum of items 21 to 24
21	Fully paid up, directly issued capital instruments	-	-
22	Share Premium	-	-
23	(-) TOTAL DEDUCTIONS FROM ADDITIONAL TIER 1	-	-
24	Additional Tier 1: Other capital elements, deductions and adjustments	-	-
25	**TIER 2 CAPITAL**	**1,397**	n/a – sum of items 26 to 29
26	Fully paid up, directly issued capital instruments	-	
27	Share premium	-	
28	(-) Total Deductions from Tier 2	-	
29	Tier 2: Other capital elements, deductions and adjustments	1,397	

RECONCILIATION OF REGULATORY OWN FUNDS TO AUDITED FINANCIAL STATEMENTS

The table below describes the reconciliation with own funds in the balance sheet as at 31 March 2023, where assets and liabilities have been identified by their respective classes. The information in the table below reflects the balance sheets in the audited financial statements as required by MIFIDPRU 8.4.1R.

Table 2 - Own Funds: Reconciliation of Regulatory own funds to statement of financial position in the audited financial statements as at 31st March 2023.

		a	b	c
Amount in GBP (thousands)		**Balance sheet as is published/ audited financial statements**	**Under regulatory scope of consolidation**	**Cross-reference to template OF1 (table 1)**
As at period end		**31st March 2023**	**31st March 2023**	
Assets – Breakdown by asset classes according to the balance sheet in the audited financial statements				
1	Goodwill	90	-	Box 11
2	Intangible Assets	685	-	Box 11
3	Tangible Assets	1,174	-	-
4	Investments	1,520	-	-
5	Debtors	55,575	-	-
6	Cash at Bank and in Hand	43,014	-	-
	Total Assets	102,058	-	-
Liabilities – Breakdown by liability classes according to the balance sheet in the audited financial statements				
1	Creditors due within 1 year	81,029	-	-
2	Provisions	559	-	-
3	Creditors due after 1 year	2,000	-	-
	Total Liabilities	83,587	-	-
Shareholders' Equity				
1	Members capital classified as Equity	10,686	-	Box 4
2	Members capital classified as a liability	6,513	-	-
3	Revaluation Reserve	1,272	-	Box 8
	Total Members Equity	18,471	-	-

OWN FUNDS REQUIREMENTS

A MIFIDPRU investment firm is required to maintain a minimum level of owner funds as specified in MIFIDPRU 4.3 of the FCA's Handbook. As a non-small and non-interconnected ('non-SNI') firm, the Firm is required to hold own funds to cover the highest of:

- Permanent minimum capital requirement ('PMR') under MIFIDPRU4.4;
- Fixed overhead requirement ('FOR') under MIFIDPRU 4.5;
- K-Factor requirement under MIFIDPRU 4.6.
- Any additional capital based on risk assessments.

The table below sets out the Firm's own funds requirement as of 31 March 2023.

	£ MILLION
A - Permanent minimum capital requirement (PMR)	**0.75**
Fixed Overhead Requirement (FOR)	5.59
Additional own funds necessary for wind down	-
B - Wind down requirement	**5.59**
K-AUM	0.46
K-COH	0.01
K-CMH	1.86
K-ASA	2.52
K-NPR	-
K-CMG	-
K-TCD	-
K-DTF	-
K-CON	-
Additional capital for risks identified in ICARA risk assessment	0.49
Stressed Buffer requirement	-
C - Ongoing operations	**5.34**
Overall capital requirement (the greater of Subtotal A, B or C)	**5.59**
110% of the overall capital requirement	6.149

PERMANENT MINIMUM CAPITAL REQUIREMENT

The Firm's PMR is £750K, which is based upon the regulatory permission criteria detailed in MIFIDPRU 4.4

FIXED OVERHEADS REQUIREMENT

RBLLP is required to hold an amount of liquid assets equal to one third of our Fixed Overhead Requirement (FOR). This is the basic liquid asset requirement and is made up of approved liquid assets, which for RBLLP is simply cash and cash equivalents.

However, the basic liquid asset threshold requirement may not be sufficient in times of financial stress, so RBLLP has also considered the higher requirement needed to meet:

- The liquid assets needed at any given point in time to fund ongoing operations as well as to mitigate any adverse trends throughout the economic cycle, or
- The Firm's assessment of liquid assets required in the event of an orderly wind down.

	£ MILLION
1/3 of Fixed Overhead Requirement (FOR)	1.87
1.6% of total guarantees provided to clients	-
A – Basic liquid assets requirement	**1.87**
Estimate of wind-down needs above Basic Liquid assets requirements	3.85
B – Additional Wind Down Requirements	**3.85**
Estimate of additional liquidity needs identified in ICARA risk assessment (above Basic Liquid assets requirement)	-
Estimate of stressed liquidity needs above Basic Liquid assets requirement	-
C – Additional ongoing operational requirement	**-**
Overall liquidity requirement (the greater of Subtotal A + B or A + C)	5.75
110% of the overall liquidity requirement	6.29

K-FACTOR REQUIREMENT

IFPR introduced a new approach to calculating capital requirements, the 'K-factor'. This is a capital calculation based on the business activities that a MIFIDPRU investment firm undertakes and the harm that could be posed as a result. The three categories of harm for the purpose of calculating the own funds requirement based on K-factors are HtC, HtM and HtF.

The table below outlines the range of K-factor metrics within each category and their applicability to RBLLP. The applicability of each K-factor is dependent upon the MiFID investment services and/or activities which a firm has permission to undertake.

HARM CATEGORY	K-FACTOR	APPLICABILITY	£ MILLION
HtC	K-ASA: Assets Safeguarded and Administered	✓	2.52
	K-AUM: Assets Under Management	✓	0.46
	K-CMH: Client Money Held	✓	1.86
	K-COH: Client Orders Handled	✓	0.01
HtM	K-CMG: Clearing Margin Given	×	-
	K-NPR: Net Position Risk	×	-
HtF	K-CON: Concentration Risk	×	-
	K-DTF: Daily Trading Flow	×	-
	K-TCD: Trading Counterparty Default.	×	-

RBLLP's K-factor requirements are based on K-ASA, K-AUM, K-CMH and K-COH. All K-factors within the HtM and HtF categories are applicable exclusively to firms that deal on their own account and/or underwrite or place financial instruments on a firm commitment basis, and as such are out of scope for RBLLP. These are not material sources of harm for the Firm, and therefore there are no associated risk management objectives and policies.

A summary of applicable metrics is provided below:

K-AUM
K-AUM is designed to capture the potential for harm when a MIFIDPRU investment firm manages assets for its clients in connection with MiFID business and is calculated in line with MIFIDPRI 4.7. This includes:

- Assets managed on a discretionary portfolio management basis; and
- Assets managed under non-discretionary advisor arrangements of an ongoing nature.

K-CMH
The client money held K-factor requirement, K-CMH, is designed to capture the potential for harm caused by MIFIDPRU investment firm holding client money in connection with MiFID business and is calculated in line with MIFIDPRU 4.8.

The Firm's K-CMH is based on client money held in accordance with Chapter 7 of the FCA CASS rules (Client Money). This provides clarity that the K-CMH calculation excludes any client money held by someone else on behalf of the client, but which RBLLP has the authority to control under Chapter 7 of the FCA CASS rules (mandates).

K-ASA
Assets Safeguarded and Administered K-Factor, K-ASA, is equal to 0.04% of the Firm's average Assets Safeguarded and Administered. This is required to be calculated on the first business day of each month as required by MIFIDPRU4.9.

K-COH
K-COH is designed to capture the potential harm from a MIFIDPRU investment firm handling client orders. This includes the execution of orders on behalf of clients and the reception and transmission of client orders and is calculated in line with MIFIDPRU 4.10.

APPROACH TO ASSESSING THE ADEQUACY OF OWN FUNDS

RBLLP is further required to disclose its approach to assessing the adequacy of its own funds in accordance with the overall financial adequacy rule ("OFAR") as outlined in MIFIDPRU 7.4.7R.

ICARA Process
The ICARA is a formal process through which the Firm assess the risks it faces from the ongoing operation of the Firm's business, and the winding-down of the Firm's business. It required the Firm to assess the capital and liquidity requirements needed to support such risks and brings together a bottom up and top-down senior management view given its business model, strategy, risk appetite and available financial resources.

The Internal Capital Adequacy and Risk Assessment ("ICARA") process serves as the means of assessing key risks to which the Firm is exposed to. Further, it assists the Firm with identifying and managing material harms that the Firm may cause through its regulated and unregulated activities. The ICARA process further seeks to determine the level of own funds and liquid assets the Firm needs to hold.

	ACTIONS	ASSESSMENT	DELIVERABLES
Identify risk of harm	Implement systems and controls to identify and monitor material risk of harm	Risk to Customer Risk to Market Risk to Firm	• Business model analysis • Initial risk assessment via RCSA • Systems and controls to identify and monitor all material potential harm
Mitigate risk of harm	Implement financial and non-financial mitigants to minimise probability and impact	Risk assessment to understand residual risks	• Financial and non-financial mitigants in place • Residual risk assessment (post-mitigation)
Mitigate residual risk	Determine how much financial resources to hold to mitigate residual risks currently and also in the future	1. Forecast capital and liquidity requirements for BAU and stress scenario 2. Calculate additional capital and liquidity needed to recover to OFAR and for wind down	• Capital and liquidity planning • K-factor modelling • Scenario analysis and stress testing
Recovery from stress	Identify credible recovery actions to recover from a plausible stress	Recovery assessment: If recovery actions are not fully effective, calculate further capital or liquidity needed to recover to OFAR	• Identification of early warning indicators • Recovery actions providing capital and liquidity • Recovery action credibility assessment
Wind down	Identify wind down steps and resources	Wind down assessment: • Steps, timelines and wind down costs • Evaluation of harm from wind down	• Wind down plan including: • Calculation of capital and liquidity needed to cover wind down

Targets are set based on the risk appetite, growth in the levels of risk implied by the business plan, current and projected change in the available and capital requirements of the plan. Risks are identified, classified, and measured in the risk register and the controls associated to those risks to mitigate risk exposure. Each risk is then measured against the likelihood and financial and reputational harm to the Firm, clients, and the market. The impact of risks is used in the stress testing process to identify if capital adjustments need to be made. In addition to stress testing, reverse stress testing and wind down costs are performed to reach a final adequacy adjustment. Early warning indictors, appetite limits and trigger points are monitored and reviewed to ensure the Firm's capital and liquidity are sustainable. Assumptions and conclusions reviewed by senior management and endorsed by the Board.

REMUNERATION POLICY AND PRACTICES

The following disclosure is prepared in accordance with the FCA handbook (MIFIDPRU 8.6). Accordingly, it provides details of the remuneration of Material Risk Takers for the financial year ending March 2023, together with an explanation of the remuneration policies, practices and governance arrangements which apply to the Firm. It also provides quantitative disclosures where appropriate in line with the Firm's status as a non-small, non-interconnected firm and, where doing so would not enable an individual material risk taker to be identified from the information provided.

REMUNERATION PRINCIPLES

Individuals who are identified as Material Risk Takers (referred to as "Coded Staff") are all employees for Redmayne Bentley. As such Coded Staff are remunerated in line with the Firm's Remuneration Framework. The Firm's Remuneration Framework is designed to remunerate employees in line with its business plan, attract, retain, and reward employees in a consistent way as well as ensuring effective risk management. This ensures alignment between risk and individual reward to avoid individuals acting in their own interests to the potential detriment of the Firm or a client.

A consistent approach is applied to the reward of the Firm's employees, aligned to our values of Excellence, Respect, Integrity, Responsibility and Teamwork.

GOVERNANCE FRAMEWORK

Our remuneration governance framework comprises of the Remuneration, Nominations & Governance Committee ("RGNC"). The RGNC is a committee of the Main Board from which it obtains its authority and to which it regularly reports. The remit of the RGNC covers all staff employed by the Firm.

The Members of the RGNC for the financial year ending March 2023 were Kim Rebecchi (chair), Ian Cordwell, David Loudon and Stuart Davis. As per the Terms of Reference of the RGNC, with regards to remuneration, the RGNC is responsible for the following:

- Recommends to the Board the overarching principles of the Firm's Remuneration Policy and packages and to exercise oversight for such issues;
- Consider and approve recommendations for discretionary bonus awards;
- Consider and approve recommendations for extraordinary salary reviews for employees where the increase equates to more than 25% of salary or the individual increase takes them over a basic salary of £75k;
- Review annually any new appointments with salaries above £75K;
- Recommend to the Executive Board where to position the Firm in relation to comparable firms in relation to remuneration levels;
- Be sensitive to market conditions when determining salary increases;
- Oversee the type of variable remuneration allowed under the Remuneration Policy and consider the risk of this being an inappropriate incentive;
- Consider the balance between fixed and variable remuneration and the mitigating controls and arrangements in place to protect the Firm against risk;
- Limit people and remuneration risk to the Firm by:
  - Ensuring the remuneration policy complies with relevant legislation, corporate governance and regulatory requirements;
  - Specifically ensure compliance with the Remuneration Code, MiFID II and SMCR provisions applicable to the Firm;

  - Ensuring the Remuneration Policy is fair and responsible, appropriately competitive to attract and retain quality and competent employees, and provides appropriate incentive and reward to support success and sound behaviours;
  - Obtaining reliable market information and commissioning any reports, surveys or advice as necessary to fulfil its obligations; and
  - Ensuring that the contractual terms on termination for relevant employees are fair to the individual and the Firm, ensuring that failure is not rewarded.
- Agree Core Benefits Strategy to include pension and agree and approve periodic reviews; and
- Agree any retention bonus payments.

During the reporting period, the RGNC engaged the advice and support of Walker Morris as independent remuneration consultants to assist on the development of the Firm's Remuneration Policy and assistance on Coded Staff.

Remuneration at Redmayne Bentley is comprised of salaries, salary increases, bonuses (defined as a discretionary lump sum payment based on either the Firm's performance and or the achievement of an individual's personal objectives as agreed annually through the Firm's Performance Development Review Process), commission payments and pension arrangements.

MATERIAL RISK TAKERS ("CODED STAFF")

Coded Staff are the individuals within the Firm whose professional activities have a material impact on either the risk profile of Redmayne Bentley or the assets it manages through meeting one or more of the following criteria:

- Members of the management body;
- Members of Senior Management Responsible (reporting directly) to members of the management body;
- Individuals with managerial responsibilities for a business unit carrying our investment managements activities;
- Holders of control functions (SMFs);
- Money Laundering Reporting Officer (MLRO);
- Individuals responsible for managing material risks;
- Individual responsible for IT;
- Individuals responsible for material outsourcing arrangements; and
- Individuals responsible for approving new products.

The specific job roles of Coded Staff are as follows:

- Partner
- Chief Executive Officer
- Director of Human Resources
- Director of Operations
- Director of Finance
- Director of Investment Management
- Director of Stockbroking
- Director of IT

- Director of Business and Branch Development
- Head of Asset Services and Settlements
- Head of IT Infrastructure, Service and Safety
- Head of Regulation
- IT Services and Information Security Manager
- Heads of Office – Branches

As per MIFIDPRU 8.6.8 (7)(a), details of the remuneration awarded to senior management and other Coded Staff has been aggregated so as not to lead to the disclosure of information of any specific individual. The total amount of remuneration awarded to senior management and individuals identified as Coded Staff was £6,575,290 of which £2,503,731 was fixed remuneration and £4,071,559 was variable remuneration.

REMUNERATION MODELS AND STRUCTURES

The table below sets out differing remunerations models and the processes which are followed to calculate the level of remuneration.

REMUNERATION	PROCESS
Applied to all employed colleagues	
Salary	• Salary Review annually in October with extraordinary salary increases considered outside of annual review. • New roles and/or salary increases resulting from an organisational restructure considered as part of the activity. • Job evaluation and salary benchmarking carried out periodically. • Performance Development Review process. • RNGC recommend salary increases for Main Board approval if above a specified percentage increase. • Salary information shared via a 1:1 meeting with line manager. • Achievement of professional qualifications are encouraged for specific roles with a small uplift in salary for achievement. • Vacancies are available on the Firm's careers page. • Salary increases of 25% plus or a role change to include management responsibility are approved by RNGC. • Salaries less than 25% can be approved by the Chief Executive along with the function director. • RNGC to review all salary increases made above 20% annually. • Framework for salary award agreed by RNGC.

<table>
<tr><td>Bonus</td><td>• Discretionary bonus scheme recognises and rewards employees for their contribution to the overall profitability of the Firm as well as their own individual performance.
• Paid annually (July).
• 10% of profit goes into bonus pool.
• Distribution of bonus pool: 30% Related directly to Trading Surplus and individual base salary and 70% to Individual Performance (determined by Managers).
• Qualifying criteria in place.
• Those employed individuals receiving advisory or discretionary revenue shares do not qualify for the discretionary bonus.
• Regular reviews of split between fixed and variable remuneration to manage exposure to risk.</td></tr>
<tr><td>Revenue Share</td><td>• Details provided to individuals receiving revenue share in an addendum to contract.
• Employees are eligible to a 33.3% share of net commission when introducing execution-only business from their personal contacts unless otherwise agreed and confirmed in an addendum to contract.
• Investment Managers may receive a percentage of managed advisory or discretionary revenues.
• Employee performance is remunerated in such a way as not to present a conflict with their duty to act in the best interest of their client or providing an incentive for recommending or selling a particular financial instrument when another product may better meet the client’s needs. However, should a conflict arise, this would be managed within existing systems and procedures.
• The Firm ensures people do not receive incentives which favour their own interests to the potential detriment of any client. Any conflict would be managed within our risk controls and existing systems and procedures.</td></tr>
<tr><th colspan="2">Self-Employed Associates and Franchisees</th></tr>
<tr><td>Fee and Commission</td><td>• Remuneration agreed by the Main Board.
• Fees agreed up to 75% share.
• Commission agreed up to 65%.</td></tr>
<tr><td colspan="2">Profit sharing members (6 Members) receive a share of profits as determined by the ‘Members Agreement’. Fixed Profit Share Member (1) receive a share of profits laid out in individual letters of engagement and under the Members Agreement. This Agreement cannot be changed except by the agreement of all of the designated members.</td></tr>
</table>

Specific Remuneration Structures
Profit Sharing Partners and Fixed Profit Share Members
Profit Sharing Partners receive a share of profits as determined by the 'Members Agreement'. Fixed Profit Share Members (one individual) receive a share of profits laid out in individual letters of engagement and under the Members Agreement. This Agreement cannot be changed except by the agreement of all designated members.

In the case of the Profit-Sharing Partners, a prior profit share (PPS) payable to each Profit-Sharing Partner who is an individual is agreed annually by the Profit-Sharing Partners. While the PPS amount payable to each individual Profit-Sharing Partner may vary between years, it is a fixed amount for each given year. In accordance with SYSC 19G.4.4G(1)(b), the PPS is fixed remuneration.

Each Profit-Sharing Partner is entitled to a share of the LLP's residual profits, such entitlement being determined according to such Profit-Sharing Partner's capital contribution to the LLP. In accordance with SYSC 19G.4.4G(1)(a), such share of residual profits is not remuneration for the purposes of the MIFIDPRU Remuneration Code.

ASSESSMENT OF PERFORMANCE

The Firm ensures that the structure of an employee, associate or franchisee's remuneration is consistent with and promotes effective risk management. All employees have a clear distinction between their basic remuneration as reflecting their professional level, responsibility and accountability and any variable remuneration they may receive. Terms of remuneration are made clear within each employee's contract or as an addendum to the contract. The remuneration arrangements for franchisees and associates can be found in their respective agreements. Line managers and Directors review the remuneration of employed colleagues annually through a formal review of salaries and where appropriate job evaluation.

The Firm has several checks and balances in place to measure performance and recognise where performance falls below the required standard and the risks involved; the Firm regularly monitors its employees through department, individual performance, PDR implementation and review as well as T&C supervision. These measures also ensure that all colleagues understand the performance assessment process. The importance of non-financial assessment factors in the process including the Firm's values and behaviours, Conduct Rules and Compliance standards, are clearly explained to employees.

Assessment of performance is set in a 'multiyear framework' via regular analysis of management information and year-on-year comparisons carried out by Directors of the Executive Board. Trends and risks would be identified during these reviews.

QUANTITATIVE REMUNERATION DISCLOSURES

The following disclosure provides quantitative remuneration information for the Firm's Coded Staff for the financial year ending 31 March 2023.

For ease of reporting, all Coded Staff are deemed as 'Senior Management' except for the IT Services and Information Security Manager; and the Heads of Offices – Branches who are deemed as 'Other Material Risk Takers'.

As required by MIFIDPRU 8.6.2

			SENIOR MANAGEMENT		OTHER MATERIAL RISK TAKERS	ALL OTHER STAFF
			MEMBERS	EMPLOYED		
1	Fixed Remuneration	Number of Identified Staff	7	7	8	256
2		Total Fixed Remuneration	£1,265,000	£663,064	£575,667	£7,918,371
3	Variable Remuneration	Number of Identified Staff	7	7	8	256
4		Total Variable Remuneration	£3,433,021	£97,663.00	£540,873	£1,378,846
5	**Total Remuneration** (2+4)		**£4,698,021**	**£760,728**	**£1,116,541.00**	**£9,297,218**

The table below sets out payments to staff whose professional activities have a material impact on the Firm's risk profile (coded staff).

	SENIOR MANAGEMENT		OTHER MATERIAL RISK TAKERS	ALL OTHER STAFF
	MEMBERS	EMPLOYED		
Guaranteed variable remuneration awards				
Guaranteed variable remuneration awards – No. of identified staff	£0	£0	£0	£0
Guaranteed variable remuneration awards – total amount	£0	£0	£0	£0
Of which guaranteed variable remuneration awards paid during the financial year, that are not taken into account in the bonus cap	£0	£0	£0	£0
Severance payments awarded in previous periods, that have been paid out during the financial year				
Severance payments awarded in previous periods, that have been paid out during the financial year – No. of Identified Staff	0	0	0	1
Severance payments awarded in previous periods, that have been paid out during the financial year – Total amount	£0	£0	£0	£13,872
Severance payments awarded during the financial year ending 31st March 2023				
Severance payments awarded during the financial year ending 31st March 2023 – No. of identified Staff	£0	£0	£0	£0
Severance payments awarded during the financial year ending 31st March 2023 – Total amount	£0	£0	£0	£0
Of which paid during the financial year	£0	£0	£0	£0
Of which deferred	£0	£0	£0	£0
Of which severance payments during the financial year, that are not taken into account in the bonus cap	£0	£0	£0	£0
Of which highest payment that has been awarded to a single person.	£0	£0	£0	£0

APPENDIX

K–FACTORS DEFINITION

Prudential sourcebook for MIFID investment firms (i.e., MIFIDPRU) of the FCA handbook sets out the KFR methodology for calculating own funds requirements, effective from 1 January 2022. The IFPR introduced nine K–Factors. The application of each K–Factor at individual firms is determined by a firm's regulatory permissions.

Table 3 - Summary of individual K-factors used in the KFR methodology.

K-FACTOR	DESCRIPTION
K-AUM	Assets under management
K-COH	Client orders handled
K-ASA	Assets safeguarded and administered
K-CMH	Client money held
K-NPR	Net position risk
K-CMG	Clearing margin given
K-TCD	Trading counterparty default
K-DTF	Daily trading flow
K-CON	Concentration risk