Capital Requirement Regulation (CRR)

Nucleus Financial Platforms 2022 Pillar 3 disclosure

Contents

1. Introduction

1.1 Background

Nucleus Financial Platforms Limited (NFP) is supervised by the Financial Conduct Authority (FCA) and is subject to the Capital Requirements Directive IV (CRD).

The Nucleus Financial Platforms group (the Group) is a group of companies that includes James Hay Administration Company Ltd (JHAC), James Hay Wrap Managers Ltd (JHWM), IPS Pensions Ltd, The IPS Partnership plc and Nucleus Financial Services Ltd (NFS). These five legal entities are FCA regulated.

This Directive established a framework for regulatory capital management, which consists of three pillars:

- Pillar 1 – specifies the minimum capital requirement for firms subject to CRD IV
- Pillar 2 – requires firms to assess whether the firm needs to hold additional capital against the firm's specific risks not covered or not sufficiently covered under Pillar 1
- Pillar 3 – requires firms to disclose information regarding their risk management policies, own funds and capital requirement. These disclosures represent the annual public Pillar 3 qualitative and quantitative disclosures requires under Part Eight of the CRR.

NFP is subject to the Pillar 3 requirements and as such must publicly disclose certain information relating to risk and risk management.

1.2 Reporting period

The financial information within these disclosures is as at 31 December 2021 and calculated in accordance with the rules set out in the Capital Requirements Regulation (CRR), Prudential Sourcebook for Investment Firms (IFPRU) and General Prudential Sourcebook (GENPRU).

1.3 Frequency

The disclosures in this document are required to be published at least annually and if appropriate, more frequently. This document has been updated following the 2021 audit and production of financial statements.

1.4 Disclaimer

This information has been prepared for the purpose of explaining the basis on which the Group has developed and disclosed certain capital requirements and information about the management of risks relating to those requirements and for no other purpose. This document does not constitute any form of financial statement on the Group, nor does it constitute any current or future record or opinion of any business within the Group.

2. Overview of the Nucleus Financial Platforms Group

2.1 Background

The Nucleus Financial Platforms group (the Group) is a group of companies that consists of Nucleus Financial Platforms Limited and all of its direct and indirect subsidiaries. This includes James Hay Administration Company Ltd (JHAC), James Hay Wrap Managers Ltd (JHWM), IPS Pensions Ltd, The IPS Partnership plc and Nucleus Financial Services Ltd (NFS). These five legal entities are FCA regulated.

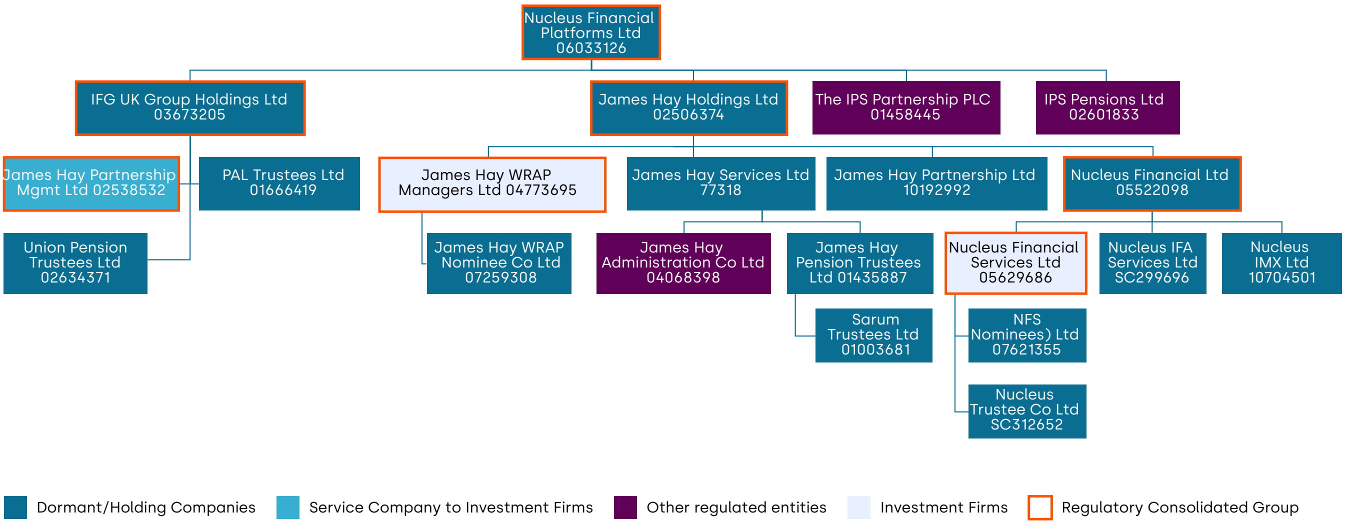
2.2 Regulatory Consolidation Group

This document sets out the disclosures for NFP, for which the following businesses comprise the Regulatory Consolidation Group (RCG):

- Nucleus Financial Platforms Limited – the highest UK parent in the group structure
- James Hay Wrap Managers Limited and Nucleus Financial Services Limited – providers of wrap platform services, which allow customers and their financial advisers to manage investments held across different tax environments. JHWM and NFS are classified as 'investment firms' as defined by the FCA
- James Hay Partnership Management Limited - a company that provides services to the regulated entities in the group and is therefore classified as an 'ancillary services undertaking'
- James Hay Holdings Limited, IFG UK Group Holdings Limited and Nucleus Financial Limited – intermediate holding companies classified as 'financial institutions' by the FCA.

JHAC, IPS Pensions Ltd and The IPS Partnership plc are regulated SIPP administration firms subject to Interim Prudential sourcebook for Investment businesses (IPRU-INV) and are therefore are not members of the regulatory consolidation group which includes Investment Firms and related companies only.

NFP Group company structure showing regulated firms and regulated consolidated group



The regulatory consolidation group is subject to Consolidated Supervision, and the disclosures in this document are therefore made on a consolidated basis and not by the individual firms. The disclosures are made on a going concern basis and incorporate the firms' contingent and prospective liabilities as applicable.

3. Risk management

The Board's objective regarding risk management is to deliver the Group's strategy and business plan supported by a robust, scalable and enterprise wide governance, risk management and control framework.

Our framework is concerned with:

- Demonstrating it's proportionate and effective in the governance and performance of risk management for an authorised and regulated investment firm.
- Evidencing our business strategy and business planning processes are aligned with the risk management framework.
- Supporting the Board set and monitor risk appetite.
- Demonstrating we manage our risk appetite tolerances and limits across agreed risk categories.
- Demonstrating we meet all applicable regulatory principles and requirements on an ongoing basis and do so based on strong and effective risk management culture and structures.
- Embedding a risk aware culture with risk management recognised as a management competence, critical to the delivery of our business strategy and performance targets.
- Demonstrating that we treat our customers fairly at all times.

We use a clearly defined risk framework to effectively identify, assess, manage and report the Group's risks. The framework is set out in our internal policies and process documentation and is subject to annual review and challenge by the Risk Committee.

In assigning risk management responsibilities, the Group operates an approach to risk management that is commonly referred to as the 'three lines of defence' model. The activities within each of the three lines are:

First line of defence

Business lines have responsibility for identifying, assessing and managing their risks through a sound set of policies, processes and controls. Business lines are also responsible for the development and deployment of appropriate mitigating actions and embedding of systems and controls. Activity in the first line of defence extends to the relationships and management of our outsourced partners.

Second line of defence

The roles of the second line risk and compliance functions are to develop and maintain the Group risk and compliance management policies and frameworks. Review of the effectiveness of the risk management practices performed by operational management is evidenced through effective assurance reporting to management and the Board Committees. The second line also provides support and advice to the business risk owners in reporting risk related information within the Group, including management information on risk and assurance matters to the Audit and Risk Committees and the Board. The Risk Committee receives regular reporting from the second line functions on business performance against risk appetites across the risk universe.

Third line of defence

The Group has an external partner as an appointed internal audit function to serve as its third line of defence on a fully outsourced basis. Through the model the Group obtains independent assurance on the effectiveness of its control environment for material processes. Internal audit, through a risk-based approach, provides assurance to the Risk Committee and the Board on how effectively risks are assessed and managed, and the effectiveness of the risk management framework. Findings arising from these audit processes are reported to the Risk Committee. As at 31 December 2021, BDO were appointed as internal auditors for the Group and were auditors for the James Hay entities throughout 2021.

The Group also engages other third parties to provide independent assurance.

4. Governance

The below summarises the principal activities within the main Boards and Committees.

4.1 Board of Directors

The Board of our regulated entities is made up of an independent Chairman and a number of other non-executive and executive directors who provide a balance of skills, experience and independent knowledge to enable the Board, as a whole, to discharge its duties and responsibilities. The Board meets at least six times a year and has adopted a formal schedule of reserved matters. The Board sets the Group's strategic aims, risk appetite and specifies key management objectives that are to be achieved within an agreed budget.

The Board has delegated responsibility for the day to day management to the Chief Executive Officer (CEO) and, through him, to senior management. The Board has also delegated some additional responsibilities to committees established by it whose powers, obligations and responsibilities are set out in written Terms of Reference.

The CEO and senior management have considerable experience in the financial services sector and are responsible for the operational management of the organisation. This specialist knowledge is backed up by the general business skills of each of these, and by the broad-based skills and knowledge of each of the Non-Executive Directors.

The Boards of Directors across the group as at 31 December 2021 was made up of the following individuals:

Role	Board member	Directorships *	External Directorships**
Chief Executive Officer (CEO)	Richard Rowney	19	4
Chief Financial Officer (CFO, JHP)	Gavin Howard	15	7
Chief Financial Officer (CFO, NFS)	Stuart Geard	6	0
Finance Director	Matthew Taylor	8	5
Chairman and Non-Executive Director	Mark Dearsley	6	3
Non-Executive Director	Kathryn Purves	6	5
Non-Executive Director	David Paige	6	2
Non-Executive Director	Bill Priestley	6	8
Non-Executive Director	Owen Wilson	6	7

* Individual directorship of NFP Group companies

** Directorship of companies external to NFP Group

4.2 Board committees

The Board has established four principle committees:

Risk committee – is responsible for assisting the Board in fulfilling its oversight responsibilities and obligations in relation to the Group's risk management framework, including the Group risk appetite and policy frameworks. The committee oversees the internal audit plan, and oversees the effectiveness of controls across the Group (including its compliance, financial crime and Cass management frameworks and functions).

Audit committee – is responsible for assisting the Board in fulfilling its oversight responsibilities and obligations in relation to the Group's external audit and financial reporting arrangements.

Nomination committee - is responsible for leading the Board appointment process, considering the requirements of the Group and making recommendations to the Board. This responsibility covers both executive and non-executive directors and other senior leadership positions.

Remuneration committee – is responsible for considering and recommending to the Board overall remuneration practice and policy for the Group that is aligned with its long-term strategic objectives, its risk appetite, values and long term interests.

All Board committees meet as required during the year. Our nomination and remuneration committees meet not less than twice a year and our audit and risk committees meet not less than three and four times a year respectively.

4.3 Executive committee

The Executive Committee is responsible for managing the NFP businesses in line with the business's strategic aims and objectives and ensuring alignment with corporate policies and practices. It also aims to ensure that regulatory requirements are met, and that time is focused on business performance and improvement initiatives against conduct framework and investor outcomes. The committee is also responsible for managing financial performance and budgets, the risk framework and the adequacy of systems and controls, provides oversight of regulatory related matters and provides oversight to all sub committees to ensure there is appropriate escalation of issues in place. The CEO and executive committee has formed a supporting Executive Risk and Compliance Committee.

5. Capital requirements

The Group has complied with the capital requirements set out by the FCA throughout the year under review.

5.1 Capital resources

The table below shows the breakdown of the total available capital for the regulatory consolidation group as at 31 December 2021.

Own funds 31/12/2021			
	RCG £m	NFS £m	JHWM £m
Total equity	219.6	22.0	2.1
Intangibles	-131.6	-0.2	0
Other reserves (non-qualifying)	0	-0.1	0
Deferred tax asset	0	0	0
Article 89/90 deductions	-15.7	0	0
Total own funds	**72.3**	**21.7**	**2.1**

5.2 Capital requirement

Nucleus' minimum capital resources requirement under Pillar 1 is calculated as the higher of:

- the base requirement, which is EUR 125,000 per investment firm
- the sum of credit and market risk requirements
- the fixed overhead requirement

The IFPRU 2.2 overall financial adequacy rule requires that a firm must, at all times, maintain financial resources and internal capital, including own funds and liquidity resources, that are adequate both as to amount and quality to ensure there is no significant risk that its liabilities cannot be met as they fall due.

As part of meeting this requirement, the Group calculates its internal minimum capital requirement as the higher of:

- Pillar 1: Nucleus uses the fixed overhead requirement (FOR) basis as set out in Article 95 of the CRR
- Pillar 2: The Pillar 2 calculation is our own assessment of the capital we need to hold against any risks not adequately covered by Pillar 1. The assessment of these risks is performed on a regular basis for Board consideration and approval. The assessment includes consideration of mitigating actions for identified exposures.
- Net cost of wind-down: This is a theoretical exercise to confirm that the group and firm hold sufficient capital to perform an orderly and responsible wind-down of the firm, in line with the FCA statutory objectives of market integrity and protection of customers. We use reverse stress tests to identify the entry point for our wind-down analysis.

5.3 Pillar 1 minimum capital requirement

Total Pillar 1 requirement 31/12/2021			
	RCG £m	NFS £m	JHWM £m
Credit and market risk requirement	6.9	1.0	0.2
Fixed overhead requirement	16.1	10.9	0.8
Pillar 1 requirement (higher of items above)	**16.1**	**10.9**	**0.8**

5.4 Pillar 2 and net cost of wind down

The Group has assessed its Pillar 2 capital and net cost of wind down resource requirements, and confirms that it has sufficient capital resources to meet these requirements for the foreseeable future.

The individual members of the Regulatory Capital Consolidation Group have their own individual capital requirements, all of which have been met.

5.4.1 Approach to the Internal Capital Adequacy Assessment Process (ICAAP)

We perform the regulatory capital assessment through our ongoing ICAAP programme. The ICAAP is closely aligned with our business strategy and risk management framework.

NFP's ICAAP report is updated and reviewed at least annually (last reviewed in June 2022) as part of the business planning cycle, or more frequently should changes in the business, strategy, nature or scale of the company's activities or operational environment suggest that the level of financial resources are inadequate.

The Board retain ultimate responsibility for the ICAAP and the report is subject to robust challenge and approval with engagement by senior management and the Board through the structured governance process.

6. Material risk exposures

The key risks of the Group are set out below and these are managed within the risk appetites set by the Board on an annual basis.

6.1 Culture risk

Conduct risk is an intrinsic risk to our business as our behaviour and organisational structures have the ability to impact customer outcomes, market integrity and competition in our chosen markets. Our values are embedded in our business strategy and to mitigate our conduct risks, our internal systems and controls are focused on delivering our business plan while meeting our culture, behaviour and customer expectations. The business has established management information to oversee conduct risk and act where required.

Culture risk extends to our role in society and over the last 12 months we have developed our thinking on climate, ESG and sustainability risks. In 2022, this will be incorporated more formally into our risk universe with the introduction of a sustainability risk which will drive increased measurement and assessment of this important area.

Similarly, governance risk is intrinsic to our business model. We believe good governance provides assurance to our stakeholders that we are focused on what matters most, our conduct and customer outcomes. These areas are of particular importance and prominence currently as our business goes through a significant period of integration and change. We have implemented formal governance arrangements and established ownership for decisions.

6.2 Strategic and business model risks

6.2.1 Fluctuations in capital markets, and economic, political and market factors that are beyond the Group's control

Revenue and performance are directly linked to the value of AUA held on and off platform, which in turn is linked to the level of inflows, outflows and the performance of the assets and asset classes into which customers have invested. A decline in capital market asset values may: (i) reduce the value of the AUA on the platform; (ii) prompt customers (in conjunction with their financial advisers) not to make further investments or to withdraw funds from the platform; and (iii) make it more difficult for financial advisers to attract new customers to advise through the platform. This is partly mitigated through close monitoring of business flows and deviations from plan.

Economic, political and market factors can also affect the level of inflows and outflows and the performance of investment assets. For example, a general deterioration in the global economy, and the UK economy in particular may have a negative impact on customers' disposable income and assets, and the value of savings and investments on the platform. The business is adjusting to a post Brexit operating environment, and during 2021 there continued to be market volatility as the world navigated the Covid-19 pandemic illustrating the significance and importance of this risk. At the current time there is also increased market uncertainty due to Russia's invasion of Ukraine and the 'cost of living crisis'. Whilst these are areas of risk for our business, exposure is reduced following the FNZ outsourcing arrangements where a significant portion of the cost base is also now linked to the value of AUA through a basis points cost model.

The Group is also exposed to movements in interest rates as these impact on the margin on cash retained by the Group. We have experienced a low interest rate environment for a number of years, and are now entering a period of rising interest rates. This will generate some risk within the Group's business plan due to our treasury activity, the uncertainty of future interest rate movements and changing customer expectations.

The above risks are managed through close monitoring of AUA levels, business flows and deviations from plan, with regular reforecasting and business planning taking into account market levels and macro-economic conditions. From time to time, the Group may use hedging to mitigate interest rate and market risk.

6.2.2 Competition

The industry in which we operate is competitive and the Group faces significant competition from a number of sources, including intermediated platform providers, life insurance companies, asset and fund managers and direct to consumer investment platforms. While the Group strives to mitigate this risk and remain competitive by continuing to develop its online and offline offering, the risk exists that it's unable to adapt to changing market pressures or customer demands, keep pace with technological change and platform functionality relative to its competitors or maintain its market share given the intensity of the competition.

Competition may also increase in response to demand dynamics, further consolidation (including vertical integration) in the wider financial services sector, new entrants to the market or the introduction of new regulatory requirements (including those targeted at financial advisers or other market participants). In addition, pricing pressure across the investment lifecycle is prevalent as competitors invest in new technologies and new blends of products and services to deliver value and compelling propositions for their customers and other stakeholders. To mitigate this risk, the Group monitors this competitive environment and takes action where required to maintain a competitive position.

This risk is of key significance currently as our Group scale creates competitive opportunity, as does our proposed future operating model with FNZ. We are however in a period of transition and consequently are in a period of transformation and change which brings competition risk if not managed well.

6.2.3 Relationship with financial advisers

While the Group has been able to maintain strong, longstanding relationships with its customers and adviser users, there can be no assurance that this will continue. The Group could lose or impair relationships as a consequence of, among other things, operational failures, uncompetitive functionality or pricing, reputational damage, consolidation and vertical integration in the financial advice market or the closure of firms of financial advisers. The loss of, or deterioration in, the Group's relationships with its financial adviser base, particularly those responsible for directing significant inflows to the platform, could have a material adverse effect on AUA and revenues. This is part mitigated by our adviser relationship model and also by directly involving advisers in the propositional elements of the platform.

6.2.4 Reliance on key suppliers

The Group operates a business model that outsources significant components of its operations and technology services and enters into agreements with selected product providers to distribute and administer their products as part of our platforms. As a result, the Group has a reliance on its key suppliers and performance issues affecting these products and services may have an adverse impact on the Group's strategy and business performance. To manage these key relationships and mitigate the associated risks, we have outsourcing policies in place and a framework for vendor management and oversight.

The Group's key suppliers are FNZ, who provide IT and operational functions, Bravura Solutions Limited, who provide part of the Group with platform technology services, and Amazon Web Services (AWS), who provide IT infrastructure and cloud hosting services. In addition, we use suppliers for product services and stockbroking services amongst others.

6.2.5 Strategic transformation

From time to time the Group undertakes major strategic merger and acquisition activity. There is an inherent risk within these transactions that material matters that may impact the future performance of the Group are not identified as part of the process. In order to mitigate this risk, the Group makes extensive use of specialist external advisers from an early stage.

Transformation risk also exists as a result of the potential failure to integrate services under a common model. Over 2021 this was elevated as NFG's business was integrated and the SSAS business was disposed. Risks in this area are mitigated by establishing strong oversight frameworks and by establishing dedicated project and change teams to deliver. Monitoring of business capacity and delivery is also in place to ensure transformation remains on track for delivery.

6.3 Operational and regulatory risks

6.3.1 Operational

The nature of the activities performed by the Group is such that a degree of operational risk is unavoidable. Operational risk may have a number of consequences, including deficient service delivery, poor customer outcomes, an inability to scale effectively, reputational damage and financial loss. This could occur directly within our retained organisation, or through our outsourced services. As the business outsources more the nature of the operational risk changes, however the accountability for ensuring service delivery and operational stability remains with the retained organisation.

The Group's operational risks can be divided into three main categories (people, operational process and controls, operational resilience and technology) with relevant examples of each below:

6.3.1.1 People

- Failure to attract, train, motivate and retain core skills and knowledge in the retained elements of our business.
- People-related errors in core processes.

6.3.1.2 Operational process and controls

- Failure in core processes and controls (whether preventative or detective), either by the retained business or by third parties.
- Failure in systems and controls in place to meet the requirements of taxation and other regulations in respect of the suitability of certain investments to be held within certain tax wrappers and accounts.
- Failure to implement platform and business change and deliver transformation.
- Failure to maintain adequate controls around fraud and other forms of financial crime, compliance, and client money.
- Failure in processes within FNZ or failure in the oversight of FNZ.

6.3.1.3 Operational resilience and technology

- Failure of, or disruption to, the sophisticated technology and advanced information systems (including those of the Group and its third-party service providers) on which the Group is dependent. This could be from an external threat (cyber-attack) or internal causes (failure to maintain systems or licenses).
- Inability to respond to the need for technological change as a result of the failure to continue to improve new technologies, through lack of appropriate investment in new technologies or through such investment proving unsuccessful.
- Failure to maintain existing technologies or to invest appropriately in continuing improvements to those technologies.
- Vulnerability of the Group's networks and platform (and those of its third-party service providers) to security risks, cyber-attack or other leakage of sensitive or personal data.
- Vulnerability of the Group's networks and platform (and those of its third-party service providers) to security risks or cyber-attack leading to direct theft of monies or assets.

These areas of operational risk are managed and mitigated through a strong risk and control framework, a suite of operational risk policies, and oversight through an embedded governance model.

6.3.2 Regulatory

Regulatory risk includes the risk of non-compliance with existing regulatory requirements as well as the risk relating to changes in government policy and applicable regulations. To mitigate the risks in this area we have a compliance-aware culture with clear risk appetites for regulatory compliance and provide compliance consultancy and advisory services. In addition, compliance monitoring and assurance is carried out as part of our three lines of defence model.

After Nucleus Financial Services Limited became an enhanced firm under SMCR in 2021 (and the wider group subsequently elected to opt up to this level), the business became subject to the associated standards and expectations. If the Group, and/or any of its key suppliers, were to commit a serious breach of any of the regulations that apply to it (not least the applicable regulatory regime relating to the Group's FCA authorisations and its FCA regulated activities), there could be both regulatory and financial consequences (including, without limitation, sanctions, fines, censures, loss of permissions and/or the cost of being required to take remedial action).

In 2022, there have been further material regulatory changes, notably the implementation of the Investment Firms Prudential Regime ("IFPR"), the implementation of Operational Resilience requirements and development work required for Consumer Duty. The Group's readiness for these has been overseen by the Risk Committee and Board.

6.4 Financial and liquidity risks

6.4.1 Solvency (including access to capital)

We're required to maintain, and have available, a sufficient level of capital and maintain appropriate coverage throughout the year in line with regularly requirements, risk appetite and our policy framework. The Group may require access to additional capital for a number of reasons, including increased regulatory capital requirements, and as a consequence the Group reviews its capital requirements on a quarterly basis, with periodic stress testing of the results to evidence that its regulatory capital requirements can continue to be met in a range of stressed scenarios. In addition, the Group's capital management policy requires setting capital requirements significantly in excess of the minimum regulatory requirement.

We retain a planning assumption that the Group will pay regular dividends, however the ability of the Group to pay dividends is dependent on a number of factors including, among other things, the results of its operations, its financial condition, anticipated cash requirements, regulatory capital requirements, future prospects and its profits available for distribution, and there can be no assurance that the Group will pay dividends or, if a dividend is paid, of the amount that any dividend will be. To mitigate the risk to dividends, profitability, solvency and liquidity are monitored by the Finance team.

6.4.2 Liquidity

Our liquidity position is subject to a number of factors that may generate liquidity strain in the short or medium term. The Group manages its liquidity risk through an ongoing evaluation of its working capital requirements against available cash balances and credit facilities. The Group also has a liquidity management framework that requires management to monitor and report on liquidity positions and potential risks.

6.4.3 Credit

The Group is exposed to credit risk through our outsourced partners, trade and other receivables and our banking relationships. Exposure is mitigated through due diligence processes and by setting minimum policy standards for credit exposure.

7. Remuneration

7.1 Remuneration and Nomination Committees

The Remuneration Committee is the committee of the Board responsible for ensuring that the Group's overall reward philosophy is consistent with achievement of the Group's strategic objectives and with the Group's values and risk appetite. The Remuneration Committee also oversees, challenges and approves the Group's overall remuneration approach ensuring it is in the best interests of the Group and relevant stakeholders (including customers and shareholders).

The principle purposes of the Remuneration Committee are:

- to ensure that our obligations are being met in terms of the setting and implementation of remuneration policy and practice
- to ensure that our directors and executive management are motivated and fairly rewarded for their individual contributions to our overall performance and are encouraged to operate within group risk appetite
- to demonstrate that both remuneration policy and practice is set by a committee which has no personal interest in the outcome of its decisions and who will give due regard to the delivery of sustained growth in shareholder value and to the financial and commercial health of the Group
- to ensure that the Remuneration Committee and Board have sufficient oversight and awareness of our people and reward strategy, culture and associated policies
- to ensure that we can recruit and retain high calibre executive management through fair and attractive, but not excessive, remuneration packages.

The principle purposes of the Nomination Committee are:

- to give additional assurance regarding the approach taken by the Group to identify the knowledge, skills and experience required for the next stage in the Group's development
- to give additional assurance regarding the rigour and transparency of procedures used by the Board for the appointment of new directors to the Board and the appointment of executive management
- to maximise the efficiency and effectiveness of our process for Board and executive appointments and for determining the approach for the removal of any underperforming director or executive from the Board or their executive position.

7.2 Ancillary benefits

Where applicable, the member of staff will also receive ancillary benefits including (but not limited to):

- Group Personal Pension
- Private Health Insurance
- Income Protection Insurance
- Life Assurance

7.3 Code staff

Employees whose professional activities have a material impact on the firm's risk profile are categorised as remuneration code staff and are made aware of the implications of such status, including the potential for remuneration to be rendered void and recoverable by the firm in certain circumstances. Code staff are incorporated in the Senior Management and Certification Regime (SM&CR); identified as Senior Management Functions (SMF) or Certified Individual.

In total 16 employees were categorised as code staff and a summary of their remuneration is set out below:

Code Staff Remuneration	£m
Fixed	3.6
Variable	0.9

7.4 Non-executive directors

Non-executive directors aren't categorised and formally notified as code staff, however their professional activities do have a material impact on the Group's risk profile. The aggregate remuneration awarded to non-executive directors, of which there were three, amounted to £0.2m and was all fixed in nature.

7.5 Other

No individual remuneration exceeded EUR 1 million in the 2021 year. Quantitative information has not been disclosed by business area as this could result in the identification of the remuneration of individual employees.