

# Explanation of compliance with the Remuneration Code

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Link Market Services Trustees Limited (“LMSTL”) is a firm subject to regulation by the Financial Conduct Authority (“FCA”). The Transitional Provisions set out in the FCA “Prudential sourcebook for MiFID Investment Firms” require a firm to publish remuneration disclosures that would have been required in the performance period beginning before 1 January 2022 and ending after 1 January 2022. In the case of LMSTL the requirements applicable in said performance period are the obligations of the EU’s Capital Requirements Directive and associated Regulation (“CRD/CRR”).

Article 96 of the CRD, as previously transposed into Chapter 19.3A of the FCA “Senior management, systems and controls” (“SYSC”) sourcebook, required a firm that maintains a website to explain on the website how it complies with the Remuneration Code:

<https://www.handbook.fca.org.uk/handbook/SYSC/19A/?view=chapter>

The purpose of this material is therefore to satisfy that obligation.

The Remuneration Code is designed to ensure that firms have risk-focused remuneration policies, which are consistent with and promote effective risk management and do not expose them to excessive risk.

It requires firms to maintain formal policies and procedures implementing the Code’s provisions which amplify the over-arching objective above.

LMSTL has implemented a formal remuneration policy that addresses all the Code’s requirements and applies to all remuneration and employees subject to the Code. The policy is subject to oversight and periodic (at least annual) review by the LMSTL Board and Risk Committee. A list of the staff subject to the provisions of the Code applying to certain, more senior, categories of employee, is also maintained and is also subject to periodic review.

Because the Code applies to all CRD/CRR firms, it covers a wide range of institutions, from smaller, simpler organisations (such as LMSTL) to the largest banks. The Code therefore allows for the disapplication or proportionate implementation of certain obligations.

The LMSTL Board, having regard to the nature, scale and complexity of its activities - while also taking account of its ownership by the MUFG Pension and Market Services - has concluded that it is appropriate and in the Company’s interests to make use of such flexibility. Where disapplication or proportionate implementation has occurred, then this is reflected in the formal policy.