SEI Investments (Europe) Limited Pillar 3 Disclosure

June 2018
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1. Overview

1.1 Introduction

SEI Investments (Europe) Limited, (“SIEL”), is regulated in the United Kingdom (“UK”) by the Financial Conduct Authority (“FCA”). Under the requirements of the Prudential Sourcebook for Investment Firms (“IFPRU”), SIEL is a significant €125k Limited License, and CRR Article 95 firm. SIEL is therefore required to calculate its Pillar 1 capital requirement as the higher of its Fixed Overhead Requirement (“FOR”) and the sum of credit and market risk capital requirements as set out under the Capital Requirements Regulation (“CRR”).

The FCA sets out certain capital adequacy standards and disclosure requirements to be implemented by regulated firms. These rules are built on three pillars:

1. Pillar 1 sets minimum capital requirements to meet credit, and market risk.

2. Pillar 2 requires firms to assess capital adequacy in relation to the actual risk profile and determining whether additional capital is required to cover these risks by the firm’s Board of Directors through the Internal Capital Adequacy Assessment Process (‘ICAAP’) and the subsequent regulator’s Supervisory Review and Evaluation Process (‘SREP’); and

3. Pillar 3 seeks to improve market discipline by requiring firms to disclose certain information on their risks, capital and risk management.

The Pillar 3 requirements have been implemented in the UK by way of the Prudential Sourcebook for Investment Firms (“IFPRU”) in the FCA Handbook. This document contains the Pillar 3 disclosures required by IFPRU in respect of SIEL.

1.2 Purpose of Pillar 3

The purpose of Pillar 3 is to encourage market discipline by developing a set of disclosure requirements which will allow market participants to assess key pieces of information on a firm’s capital, risk exposures and risk assessment process. The disclosures are to be made public for the benefit of the market.

These disclosures therefore allow market participants to assess the scope of application by regulated firms of the Basel framework and the rules in their jurisdiction, their capital condition, risk exposures and risk assessment processes, and hence their capital adequacy. Pillar 3 requires all material risks to be disclosed, enabling a comprehensive view of the company’s risk profile.

This document comprises SIEL’s pillar 3 disclosures on capital and risk management as at June 2018. It has two principal objectives:

1. To meet the regulatory disclosure requirements under the rules of the United Kingdom (‘UK’) Financial Conduct Authority (‘FCA’);
II. To provide further information, useful to readers, of these disclosures on SIEL’s capital and risk profile.

1.3 Frequency of Disclosure

The disclosures in this document are required to be updated annually, and if appropriate, more frequently.

2. Structure of SEI

SIEL is a wholly owned subsidiary of SEI Global Investments Corporation ("SGIC"), a company incorporated in the United States of America, which is wholly owned by SEI Investments Company ("SEI"). SEI is the ultimate Parent Company of SIEL. SEI has its common stock traded on The Nasdaq Global Select Market® (NASDAQ) under the symbol "SEIC." And its common stock is registered with the U.S. Securities and Exchange Commission ("SEC"). SEI is required by the SEC to file public disclosures, including Annual Reports on Form 10-K, Quarterly Reports on Form 10-Q and Current Reports on Form 8-K. These disclosures can be found at http://www.seic.com/enUS/about/425.htm. SEI Global Investments Corp is not a regulated entity.

SIEL is an asset management and wealth investment processing services firm with its primary office located in London with further branch offices in the Netherlands, established under the MiFID I Directive. SIEL also has relationships with affiliate offices located in South Africa and is regulated by the FSB as a Foreign Financial Services Provider. SIEL offers three core business services to its clients. These are Institutional Asset Management services ("IAM"), Asset Management/Distribution services ("AMD") and SEI Wealth Platform ("SWP"). SIEL is regulated in the United Kingdom ("UK") by the Financial Conduct Authority ("FCA") as a significant €125K Limited License, and CRR Article 95 firm.

SIEL’s Asset Management (AM) services primarily include investment management programmes delivered to defined benefit plans sponsored by corporations and to independent financial advisors and private banks for individual investors. AM is SIEL's original business solution offering in the United Kingdom and Europe. SIEL’s AM programmes are offered in the form of Undertakings for Collective Investment in Transferable Securities ("UCITS") registered in the Republic of Ireland. These are public limited companies with the objective of collective investment in transferable securities and other liquid financial assets of capital raised from the public and operating on the principle of risk spreading in accordance with the European Community’s UCITS regulations. SIEL is a named distributor of the UCITS but is not the investment manager or administrator. SIEL provides Sub-Distribution of the UCITS through a number of different channels, including SEI Wealth Platform clients, Third Party Platforms and Advisers (IFAs and Wrapper Providers).

SIEL’s investment processing business is offered via the SEI Wealth Platform ("SWP"), which provides financial intermediaries with certain customer account and portfolio management services.
administration services. SWP is a web-driven multi-currency investment reporting, accounting and global securities processing system designed around the client portfolio management process. SWP is primarily offered to independent wealth advisers and investment managers alongside Custody and cash management services.

3. Capital Resources and Adequacy

3.1 Approach

SIEL determines its capital adequacy using the following process:

- Pillar 1 calculation: assumes the higher of:
  a) SIEL’s fixed overhead requirements (FOR), or
  b) the assessment of its Credit and Market risks, added to the firms €125K base requirement, and;
- Pillar 2 calculation, based on a risk assessment and stress testing quantification of high impact, (severe but plausible) scenarios, including reverse stress tests on material macro-economic events, against SIEL’s complete Risk Appetite thresholds (see below), including its Operations risks and;
- A cash flow analysis for winding down SIEL, in the event a strategic decision is made to do so, or it is triggered by extreme events beyond the firm’s stated Risk Appetite, (the “Wind-down Analysis”).
- A Comparison of a) the Wind-down Analysis,
  b) The Pillar 2 capital requirement, and
  c) Pillar 1 calculation as further multiplied by FCA’s individual capital guidance (at 245%), to determine the overall capital requirement of the Firm by adopting the highest number of the three; and
- Final Risk validation and challenge from the Board.
3.2 Summary of the Firms Capital Position

SIEL’s overall capital requirement has been assessed at £23m based on the Fixed Overhead Requirement (“FOR”) and the FCA’s Individual Capital Guidance (“ICG”) of 245% of Pillar 1

<table>
<thead>
<tr>
<th>Regulatory Capital Resources and Requirement – 2018</th>
<th>£,000</th>
</tr>
</thead>
<tbody>
<tr>
<td>Regulatory Capital Resources</td>
<td>87,699</td>
</tr>
<tr>
<td>Pillar 1 capital requirement (FOR)</td>
<td>9,378</td>
</tr>
<tr>
<td>Additional capital requirement (ICG 245%)</td>
<td></td>
</tr>
<tr>
<td>Credit risk</td>
<td>5,170</td>
</tr>
<tr>
<td>Market risk</td>
<td>1,576</td>
</tr>
<tr>
<td>Operational risk</td>
<td>12,053</td>
</tr>
<tr>
<td><strong>Total Pillar 2 requirement</strong></td>
<td>18,799</td>
</tr>
<tr>
<td>Wind-down requirement</td>
<td>19,100</td>
</tr>
<tr>
<td><strong>Total capital requirement identified</strong></td>
<td>22,976</td>
</tr>
<tr>
<td>Regulatory capital surplus</td>
<td>64,723</td>
</tr>
</tbody>
</table>

The Firm is required, by the FCA, to hold additional capital at no less than 245% of its Pillar 1 capital requirement (FOR). The Firm’s internal capital assessment is the higher of the ICG capital requirement, Pillar 2 capital requirement and the wind-down requirement in 2018. SIEL has assessed its Pillar 1 capital requirement based on FOR as the highest value. SIEL therefore deems its total regulatory capital requirement to be £23m, which is therefore the minimum regulatory capital requirement of the Firm.

The table above illustrates that the firm is capable of meeting its regulatory capital resource requirement. It had a regulatory surplus of £64.7m, based on the information contained in its ICAAP submission; the Board can confirm that SIEL has adequate capital for its size and for the complexity of the business as of the date of this report.

3.3 Capital Adequacy - Risk Profile

SIEL is a Significant IFPRU €125k Limited License Firm and a CRR (Capital Requirements Regulation) Article 95 Firm. SIEL’s Board has established a risk appetite for the Firm with regard to the business, its control and management of operational activities. As part of this, the Firm has an experienced management team and a governance structure which provides an enhanced control environment commensurate with its size and complexity. All individuals in senior control functions have at least ten years of relevant market experience. Particular risk strategies for SIEL are defined in the following specific risk appetite statements:

SIEL’s risk appetite is an expression of the maximum level of risk that SIEL is prepared to accept in order to achieve its business objectives. Expectations and limitations
surrounding SIEL’s risk appetite are set at the SEI Group Board level, therefore SIEL’s risk appetite statement translates group level strategy into measurable short to medium term targets and thresholds across material risk categories to enable intra-year performance monitoring and management, which aims to identify optimal growth opportunities whilst considering the risk involved and the allocation of available capital resources to drive sustainable long term performance.

The SIEL Board reviews and approves the risk appetite statement on an annual basis to ensure that it is consistent with SEI’s Group strategy, business environment, stakeholder requirements and UK regulatory requirements. By explicitly setting its risk appetite, the Board seeks to ensure that risk is proactively managed to the desired and approved level. Risk tolerance levels are set at different trigger points, with escalation requirements which enable appropriate actions to be defined and implemented as required. In cases where the tolerance levels are breached, it is the responsibility of the Head of Risk to bring it to the attention of the SIEL Board through its Board Risk Committee (“BRC”). Any material amendments to the risk and capital strategy must be approved by the Head of Risk, BRC, and/or the Board, depending on the significance.

SIEL’s specific risk appetite within each of the risk areas relevant to it, is set out below.

**Credit and Counterparty Risk**

SIEL has a low risk appetite in relation to its own cash balances. It is SIEL’s policy to only deposit cash balances with industry leading banks. SIEL currently deposits its cash with Wells Fargo and HSBC, and client money is diversified across a wider selection of industry leading banks which have successfully completed SIEL’s due diligence and credit assessment process. It is SIEL’s policy to carry out due diligence on these institutions on at least an annual basis and to monitor their credit ratings and other reference metrics such as CDS and bond spreads, (where available) on a regular basis. SIEL has a UK Vendor Management lead who is responsible for conducting due diligence and who works closely with affiliate credit teams, to conduct detailed analysis on financial, market and other credit indicators.

SIEL has a low risk appetite in relation to the failure of its custodians and its policy is to make use only of established, industry-leading custodians. Consequently, SIEL uses a diversified group of five leading custodians for its activities. SIEL conducts detailed financial and operational due diligence and assesses its custodians on at least an annual basis.

It is SIEL’s policy to invoice all of its clients at least quarterly. SIEL’s risk appetite in relation to client fees is limited to 3 months’ exposure. SIEL invoices clients on a quarterly basis, with collection monitored and receivables actively managed. Receivables are substantially collateralized by right of lien over the advisory fee payments that SIEL facilitates for and to client Firms.

SIEL has a low credit risk appetite in relation to its Asset Management clients and normally only carries out transactions once it has received the funds from its clients.

SIEL has a low risk appetite for counterparty default risk. SIEL predominantly deals with counterparties that are regulated entities.
**Market Risk**

SIEL has no appetite for direct market risk, with the exception of FX risk and does not conduct any proprietary trading activities. SIEL accepts a small amount of indirect residual market risk which derives from short-term order execution obligations, arising in the unlikely event of any trade processing disruption. SIEL also retains some indirect market risk through its basis-point pricing model which could result in material revenue reduction in line with AUM reductions resulting from market declines. SIEL is willing to accept some FX risk as a consequence of being part of an international group with a US parent Company. SIEL conducts business with clients in other regions and therefore has receivables and payables in other currencies, which are all recognised currencies (i.e. US Dollar and Euro) and not subject to any hyper-inflation. It has minimal exposure to other currencies relevant to its business.

**Operational Risk**

SIEL has a medium appetite for operational risk. All operational errors are systematically logged by first line Operations staff within an incident management database. The Incident Management database and management information derived from it is directly accessible to Risk Management and Compliance. There are monthly reviews and sample testing by the Operational Quality Control team (OQC) of all errors, breaches and material “near misses” which are attended by a representative of the Risk Management team. Risk Management, and Compliance receive weekly MI reflecting incidents, trends, causal categories and remediation status.

SIEL has an error gain/loss policy which recognises inevitable operational risks associated with manual processes. All SWP client contracts contain explicit consent clauses enabling SIEL to recover gains and incur losses associated with the correction of any operational errors, largely mitigating any directional impact of operational error correction.

SIEL maintains a risk register and breach log which must be updated within a normal business day or no later than the following business day, after the identification and escalation of a new operational risk or suspected regulatory breach respectively. Operational control breaches are automatically escalated to the Operations Director level; where mitigation actions are agreed, documented and tracked via the Incident Management database to closure within a maximum of 26 business days after identification. This reflects SIEL’s commitment to mitigating risk through operational and technology enhancements.

**Liquidity Risk**

SIEL has a low appetite for liquidity risk. SIEL has sought to quantify its liquidity risk appetite by deeming it prudent to maintain a minimum of 30 days operating liquidity in immediately accessible cash deposits at all times. SIEL believes this to be a very conservative position, as its SWP business retains the contractual right of lien against its client firm’s fee revenue, which it facilitates. As such, it is SIEL’s policy to hold at least one-twelfth of its operating expenses, equal to £5.9 million as cash in a current deposit account as this can be accessed instantly by SIEL. SIEL’s liquidity is actively monitored on a monthly basis, including a review of up-coming payments. SIEL also actively manages its trade debtors. As a reflection of its low liquidity risk threshold, SIEL actively manages its daily client money
funding obligations through a number of measures including availability of surplus cash and daily monitoring of CASS funding requirements.

SIEL’s liquidity is monitored on a weekly basis, including a review of up- coming payments and its strategic requirements are actively managed and re-assessed on a quarterly basis. SIEL also actively manages its trade debtors.

Concentration Risk

SIEL accepts a medium degree of concentration risk arising from clients that provide a high percentage of revenues. SIEL also accepts a risk of acquisitions amongst its existing client base. SIEL runs scenario testing to analyse the risks associated with the loss of a significant client or clients. The business is diversified by the existence of substantially different client bases for the asset management and SWP businesses. As part of its expansion strategy, SIEL aims to further reduce concentration risk and expects this will occur naturally with the continued development of the business and market acceptance of SWP.

Regulatory Risk

SIEL has a minor appetite for regulatory breaches or errors. SIEL has invested substantially in enhancing its CASS regulatory monitoring, risk governance and control framework in order to minimise its regulatory risk exposures. SIEL has fully integrated regulatory risk within its broader risk management and control framework and provides quarterly Board MI on Conduct Risk, AML, Data Protection, Breaches and Complaints.

Conduct Risk

SIEL has a minor appetite for any form of conduct risk and has implemented and embedded a comprehensive set of guiding principles, policies and procedures to ensure fairness, prevent client detriment, manage conflicts of interest, protect personal data, safeguard client assets and prevent money laundering throughout the firm. SIEL is committed to treating customers fairly and seeks to avoid all actions or activities that might affect customers detrimentally. SIEL seeks to identify, mitigate and manage any conflicts with appropriate control measures and safeguards, wherever possible.

Key tools used to mitigate and monitor conduct risk include:

- Group Anti-fraud controls;
- Anti-Bribery policy; and
- Conflicts of Interest Register
- Remuneration policy ensuring incentives are within CRD IV objectives.
- Oversight of products and services release by the Product and Services Governance Committee
Business and Strategic Risk

SIEL accepts a medium amount of strategic risk as a consequence of its current and future growth plans. SIEL has carried out asset management business from its inception and these services are provided to institutional clients and individuals through intermediaries. Strategic risks are relatively lower within the Institutional Asset Management and Asset Management Distribution business segments, whilst higher in the platform segment due to its early stage of maturity.

Reputational Risk

SIEL has a low appetite for reputational risk and seeks to minimize its exposure to reputational damage through its focus on wholesale and global wealth platform markets. SIEL products are largely “white labelled” and therefore the firm has no direct retail brand or retail marketing. It seeks to act in all markets in an ethical and appropriate manner and continues to enhance its risk control and governance arrangements to help mitigate this risk and ensure that this approach is implemented and embedded into operating practice. In addition, SIEL proactively manages client relationships with dedicated relationship management teams and with oversight from senior management and the relevant governance committees.

Group Risk

SIEL accepts that Group risk is an inevitable consequence of being a fully owned subsidiary within a larger group. SIEL relies on its parent company to provide operating capital, although risk is substantially mitigated until the end of 2020 through a capital subscription agreement guaranteeing capital adequacy. SIEL could also be subject to the subversion of local entity objectives (regulatory requirements or client obligations) to Group objectives. Nonetheless, SIEL’s structure as an authorised and fully capitalised UK entity with its own management and governance arrangements and client base, affords substantial mitigation of this risk.

Systemic Risk

The Board has considered SIEL as a contributor to systemic risk and has concluded that SIEL does not pose a risk to the UK market system. In order to mitigate Systemic Risk, SIEL’s ICAAP includes detailed estimates of the cost of a 15 month wind down of its business under stressed conditions, as the basis of its regulatory capital requirement.

4. Corporate Governance Framework

The risk management structure for SIEL has been developed in consideration of the current nature, scale and complexity of SIEL’s operations and is aligned with the governance structure to provide an appropriate, effective and scalable control structure. SIEL operates a Three Lines of Defence Model, whereby, responsibilities for managing risks are allocated to:
First Line - Primary responsibility for managing risks and operating an effective suite of internal controls rests within the business functions;

Second Line – specialist functions (Risk Management, Compliance, Legal and CASS oversight), independent of the First Line, tasked with the ongoing development and delivery of the framework and to provide guidance, oversight, and challenge as appropriate; and

Third Line – SIEL’s Internal Audit function has responsibility for providing the Board with independent assurance that the business operates effectively in managing its risks.

**Board Oversight**

The SIEL Board meets at least quarterly and is responsible, through its oversight obligation, for ensuring that the business affairs of the company are adequately controlled and monitored. To appropriately discharge its function, the Board receives regular MI and reports from business units and individuals. The Board delegates the executive management of the Group’s business to the London Executive Committee (“LEC”), a senior management forum which meets on a regular basis to assist in the day-to-day management and oversight of the firm’s business, with the exception of specific matters reserved for the Board which include:

- Maintenance of a framework of prudent and effective financial, operational and compliance controls and risk management systems;
- Approval of the Group’s Internal Capital Adequacy Assessment process;
- Determination of the Company’s corporate governance arrangements, including the review of risk management and control structures.

The SIEL Board has established a number of oversight committees, to help discharge its specific obligations, including the Audit & Compliance and Board Risk Committees, comprised of non-executive members. The Board receives regular management information reports from its sub-committees, and is therefore in a position to determine the material risks that SIEL faces. The Board reviews these risks as frequently as it considers necessary, based on the management information reports that it receives.

5. **Risk Management**

Risk management and capital planning are established disciplines at SIEL and are part of the Board’s review and consideration in its oversight and management of the business, and the Internal Capital Adequacy Assessment Process (“ICAAP”), as a whole.

The ICAAP is updated, and formally reviewed by the Board at least on an annual basis. The latest ICAAP was reviewed by the Board in April 2018. The assessment draws on the results of existing risk management techniques and reporting. Scenario analysis and stress testing are performed to assess SIEL exposure to extreme events and ensure that appropriate
mitigation factors are in place. Any residual risk is then mitigated by setting aside capital to meet the potential impact calculated. SIEL is exposed to a range of risks; these are managed using a structured and consistent approach across the businesses. The techniques include formal controls, outsourcing, contingency planning, insurance and capital allocation.

5.1 Approach to Risk Management

SIEL’s risk governance framework includes the Board Risk Committee, Management Risk Committee, Remuneration Committee and other relevant oversight Committees and working groups deemed by the Board as being appropriate to the size, nature and complexity of SIEL’s current business and operational model.

SIEL’s Risk and control framework is designed around the following objectives:

- Providing awareness, oversight, management and advice to SIEL in relation to current and potential future risk exposures in the business and future risk strategy;
- Promoting a culture of risk awareness and proactive mitigation across the business;
- Ensuring appropriate risk information is captured and reported to the Board Risk Committee so as to allow effective management of SIEL’s risk profile.

5.2 SIEL Risk Management and Control Framework

SIEL carries out a comprehensive periodic risk review of its policies and procedures and a review of the process resource planning. The Risk Management team carries out periodic risk review meetings with representatives of each business unit and operational teams to discuss the current risks identified within the Risk Register, the significance and impact of each risk and the current controls and mitigation steps that SIEL has in place, and whether these may be enhanced based on this review. The revisions to the Risk Register and the progress of mitigation work streams are reported to the Board.

SIEL has a Management Risk Committee (“MRC”) which is responsible for identifying, assessing and managing the risks relevant to the business with input from other relevant heads of departments and individuals. The Management Risk Committee comprises the UK Head of Risk Management and UK senior managers from each area of the primary business, operations and control functions of SIEL.

The Management Risk Committee reviews the firm’s Risk Register frequently throughout the year both in and outside of formal Committee meetings. The Risk Register and the results of its assessment are provided to the Board Risk Committee (BRC) to review and challenge. The BRC is also updated on any material changes to the Firm’s risk profile at the quarterly Board Meetings.

5.3 The Risk Identification and Assessment Methodologies

Each of the risks identified within the risk register is recorded against a specific risk-bearing business entity and classified within a risk category. These risks are reviewed and assessed as to the likelihood of the occurrence of a risk event and the significance of its potential impact. Risks are assigned a severity rating based on their annualised (plausible but
severe), end-to-end probability weighted impact, across impact categories, defined by the Firm’s Risk Appetite Statement.

Factor scores for likelihood and impact are used to derive a total risk factor score, on an Inherent, and Residual basis. Controls which mitigate the risks are documented and assessed, for their design and effectiveness, in conjunction with incident (and near-miss) data. The residual risk is measured against appetite/target in order that appropriate action may be taken to resolve any variances.

Each risk is assigned an owner who is responsible for estimation and validation of the risk, documentation of existing controls, provision of action plans to implement effective risk mitigation and monitoring of internal performance of these controls. The Risk Function is responsible for overseeing the development (for a newly identified risk) or enhancement (for an existing risk) of systems and controls in order to effectively mitigate the risk. The Risk function is primarily responsible for assisting the business in identifying, recording, managing, monitoring and mitigating risks within the SIEL business unit they oversee. This risk structure provides detailed local risk ownership and management.

6. Remuneration Disclosures

6.1 Remuneration Code Applicability

The following groups of employees have been identified as meeting the FCA’s criteria for Code Staff:

- Directors of SIEL;
- Staff performing a Significant Influence Function within the Firm;
- Employees in key control function roles; and
- Employees who have approval authorities such that their decision making could have a material impact on the Firm’s Income Statement.

The categories above include all senior management, those responsible for the management of the main businesses and control function heads.

6.2 Link between Pay and Performance

Remuneration at SIEL is made up of fixed pay and variable performance-related pay.

Fixed pay is principally comprised of salaries but includes appropriate employee benefits. All Code Staff receive either a salary that reflects their talent, skills, responsibilities and contribution to the Group relative to the market for their roles.

Variable performance-related pay is principally comprised of bonus awards or sales commissions.
Members of staff whose role means that they are eligible for sales commissions do not receive annual bonuses. SIEL pays commissions based on sales procured. SIEL makes every effort to pay commissions on a quarterly basis only and on final sales.

All other SIEL Staff who are permanent employees are eligible to be considered for a bonus award annually. Bonuses for all employees take account of the overall group; department and individual performance against agreed objectives and, in this context, performance typically includes financial and non-financial measures including relevant risk and regulatory compliance factors.

The Remuneration Committee (“REMCO”) was established to ensure that the remuneration arrangements for executive management, senior management and other relevant employees of SIEL or its consultants support the strategic aims of SIEL’s business and also the recruitment, motivation and retention of senior executives and management. The Board believes such arrangements are consistent with, and promote, effective risk management. The Committee comprises three Members, all of whom are Non-Executive Directors of the SIEL Board.

The mandate of the Remuneration Committee is to review and set or agree the remuneration policy and strategy for employees. It does so with a view to aligning remuneration with the successful achievement of SIEL’s long term objectives, while taking into account market rates. It will also review the appropriateness and effectiveness of the Remuneration Policy with particular regard to best practice, regulatory and risk management considerations.

The aggregate compensation for senior management and other Code staff, in the financial year ending December 31 2017, was £4,765,722

<table>
<thead>
<tr>
<th>SIEL Senior Management and Code Staff total remuneration</th>
<th>Asset Management (AMD and Inst) &amp; Investment Management Unit</th>
<th>SWP Management</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total remuneration received, SIEL Code Staff <strong>(excludes share options granted or exercised)</strong></td>
<td>£ 4,765,722</td>
<td>£ 2,149,051</td>
</tr>
<tr>
<td>Total fixed payments (salary)</td>
<td>£ 2,583,994</td>
<td>£ 986,764</td>
</tr>
<tr>
<td>Total variable comp paid <strong>(excluding share options granted or exercised)</strong></td>
<td>£ 2,181,728</td>
<td>£ 1,162,287</td>
</tr>
<tr>
<td>Highest Severance Payment award</td>
<td>£8,542</td>
<td></td>
</tr>
</tbody>
</table>
Individuals who received over EUR 1m (total comp including exercised stock options) | 0 |  |  

- Includes Code Staff individuals employed at any time through 2017.  
- Non-executive Directors excluded.  
- All draws (sales and IC) included. Additional taxable benefit payments (pension in lieu) included in base.  
- Stock options not included (grant value or exercised)  
- Variable compensation relates to all sales and incentive compensation accrued for 2017 even if paid in 2018.  
- Some Code Staff, including the CEO, are US based employees, whose costs are not allocated to SIEL.