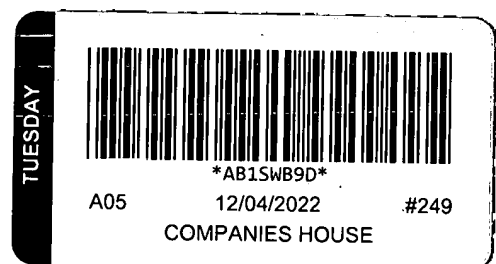


**CFE (UK) LTD**  
**Strategic Report, Directors' Report and**  
**Financial Statements**  
**for the Year Ended 31 December 2021**



**CFE (UK) LTD (REGISTERED NUMBER: 08322531)**

**Contents of the Financial Statements  
for the year ended 31 December 2021**

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**CFE (UK) LTD**

**Company Information  
for the year ended 31 December 2021**

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**Directors:** M Cordoni  
M D M Eleuteri

**Secretary:** Forgate Secretaries Limited

**Registered office:** 43/44 Albemarle Street  
London  
W1S 4JJ

**Registered number:** 08322531 (England and Wales)

**Auditors:** Haines Watts (City) LLP  
Statutory Auditor  
New Derwent House  
69-73 Theobalds Road  
London  
WC1X 8TA

**CFE (UK) LTD (REGISTERED NUMBER: 08322531)**

**Strategic Report  
for the year ended 31 December 2021**

The directors present the Strategic Report and financial statements for the year ended 31 December 2021. The purpose of the Strategic Report is to inform shareholders and help them to assess how the directors have performed their duties to promote the success of the Company. The report, together with the further information in the Directors' report, provides:

- A fair and balanced review of the Company's business including:
  - i) The development and performance of the business during the year;
  - ii) The position of the Company at the end of the year; and
  - iii) A description of the principal risks and uncertainties facing the Company.

**Review of business**

The principal activity of the Company continued to be that of an investment management firm and broker. The Company is authorised and regulated by the Financial Conduct Authority.

The Company is required by its regulator, The Financial Conduct Authority, to make its disclosure risk policy available in accordance with Pillar 3 of the capital requirement directive. The disclosure is attached as an appendix to these Financial Statements and the disclosure is un-audited.

**Development and financial performance during the year**

As reported in the Company's Income Statement, the Company generated a trading revenue of £2,045k in the year. Turnover has decreased due to a number of securitisation projects drawing to an end. There was a profit after tax of £112k.

**The financial position of the company at the year end**

At the year end there was an increase in shareholders funds from £1,846k to £2,812k. The movement is explained by retained profits of £112k and an issue of share capital for £855k.

The results for the year and the financial position at the year end were considered satisfactory by the directors.

**Key Performance Indicators (KPI's)**

Management use a range of performance measures to monitor and manage the business. As set out below the following financial key performance measures are considered by management to be the key performance indicators for the Company:

	2021 £'000	2020 £'000
Turnover	2,045	3,732
Profit before tax	144	646

Given the straight forward nature of the business the directors are of the opinion that further analysis using non-financial KPI's is not necessary for the understanding of the development, performance or position of the business.

**Future developments**

In the coming financial year the Company expects to expand brokerage commission and is examining other business opportunities.

**Post balance sheet events**

Other than COVID-19 explained below, no events have occurred pre and post year end to the financial year that may be deemed relevant to the accuracy of the financial statements.

**Strategic Report  
for the year ended 31 December 2021**

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**Coronavirus and the COVID-19 pandemic**

The directors acknowledge the current outbreak of COVID-19, which is causing economic disruption in most countries, and its potentially adverse economic impact on the Company. In response, the Company has taken proactive steps in mitigating these potential impacts. Nonetheless, this remains an additional risk factor which could further impact the operations of the Company after year end which the Company continues to monitor.

As such, the full impact of COVID-19 on the Company remains unclear and at the date of this report it is not possible to evaluate all potential implications for the Company's trade, customers, and suppliers. The directors are actively analysing possible consequences whilst directing the Company's response to mitigate these risks. Their principal objectives are to protect the health and safety of personnel in the performance of their duties, ensure the continuity of operations, and to fully cooperate with public authorities on all matters within their scope. To that end, the directors have provided information to employees regarding COVID-19 awareness, prevention, management and hygiene practices. A business continuity plan is in place to ensure future events do not impact on business activities, which includes continuing support from the parent company. A work from home policy has been successfully trialled and fully implemented, with the option to work from the office should it be deemed necessary.

Further assessment regarding COVID-19 is in note 2 of these financial statements.

**Principal risks and uncertainties facing the business**

Management continually monitor the key risks facing the Company, together with assessing the controls used for managing these risks. The board of directors formally reviews and documents the principal risks facing the business at least annually.

The principle risks and uncertainties facing the Company are as follows:

**Brexit**

A substantial amount of the business originates from the European Union (EU) area. Following the UK's exit from the EU, more bureaucracy has arisen on cross border services. As a result management are increasing their focus on the UK market.

**Foreign exchange risk**

Foreign exchange risk is the risk that the Company will sustain losses through adverse movements in currency exchange rates. The Company manages its foreign exchange rate risk by possessing cash holdings in various currencies and entering into currency swaps.

**Financial Instruments**

The Company's principal financial instruments comprise debtors, cash at bank, and creditors. The main purpose of the financial instruments at present is to finance the Company's normal expenditure. The main risk arising from the Company's financial instruments is maintaining sufficient working capital.

**Section 172(1) statement**

Statement by the directors in performance of their statutory duties in accordance with s172 (1) Companies Act 2006.

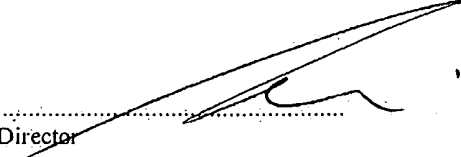
The board of directors of CFE (UK) Limited consider, both individually and together, that they have acted in the way they consider, in good faith, would be most likely to promote the success of the Company for the benefit of its members as a whole (having regard to the stakeholders and matters set out in s172 (1)(a-f) of the Act) in the decisions taken during the year ended 31 December 2021. In particular, by performance of the following:

CFE (UK) LTD (REGISTERED NUMBER: 08322531)

**Strategic Report**  
**for the year ended 31 December 2021**

- 
- Our business aims are designed to have a long-term beneficial impact on the Company and to contribute to its success;
  - Our employees are fundamental to our business aims. We aim to be a responsible employer in our approach to the pay and benefits our employees receive;
  - Our business requires strong relationships with suppliers and others and we continually strive to maintain and improve these relationships;
  - The impact of the Company's operations on the community and environment are considered by the directors and reviewed regularly;
  - As the Board of Directors, our intention is to behave responsibly and ensure that management operate the business in a responsible manner, operating within the high standards of business conduct and good governance; and
  - As the Board of Directors, our intention is to behave responsibly toward our shareholders and treat them fairly and equally, so they too may benefit from the success of our company.

**On behalf of the board:**

  
.....  
M Cordoni - Director

Date: .....

06/04/2022

**CFE (UK) LTD (REGISTERED NUMBER: 08322531)**

**Directors' Report  
for the year ended 31 December 2021**

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The directors present their report with the financial statements of the Company for the year ended 31 December 2021.

**Dividends**

No dividends have been distributed for the year ended 31 December 2021.

**Directors**

The directors shown below have held office during the whole of the period from 1 January 2021 to the date of this report.

M Cordoni  
D Duranti  
M D M Eleuteri

Other changes in directors holding office are as follows:

J Dominice - resigned 30 June 2021  
G Zoïs - resigned 22 January 2021

D Duranti resigned on 15th March 2022.

**Strategic report**

As permitted by paragraph 1A of Schedule 7 to the Large and Medium-sized Companies and Groups (Accounts and Reports) Regulations 2008 certain matters which are required to be disclosed in the directors' report have been omitted as they are included in the Strategic Report on pages 2 and 3. These matters relate to financial instruments and future developments, which otherwise would be required to be shown in the directors' report.

**Statement of directors' responsibilities**

The directors are responsible for preparing the Strategic Report, the Directors' Report and the financial statements in accordance with applicable law and regulations.

Company law requires the directors to prepare financial statements for each financial year. Under that law the directors have elected to prepare the financial statements in accordance with United Kingdom Generally Accepted Accounting Practice (United Kingdom Accounting Standards and applicable law), including Financial Reporting Standard 102 'The Financial Reporting Standard applicable in the UK and Republic of Ireland'. Under company law the directors must not approve the financial statements unless they are satisfied that they give a true and fair view of the state of affairs of the Company and of the profit or loss of the Company for that period. In preparing these financial statements, the directors are required to:

- select suitable accounting policies and then apply them consistently;
- make judgements and accounting estimates that are reasonable and prudent;
- state whether applicable accounting standards have been followed, subject to any material departures disclosed and explained in the financial statements;
- prepare the financial statements on the going concern basis unless it is inappropriate to presume that the Company will continue in business.

The directors are responsible for keeping adequate accounting records that are sufficient to show and explain the Company's transactions and disclose with reasonable accuracy at any time the financial position of the Company and enable them to ensure that the financial statements comply with the Companies Act 2006. They are also responsible for safeguarding the assets of the Company and hence for taking reasonable steps for the prevention and detection of fraud and other irregularities.

**CFE (UK) LTD (REGISTERED NUMBER: 08322531)**

**Directors' Report  
for the year ended 31 December 2021**

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**Statement as to disclosure of information to auditors**

So far as the directors are aware, there is no relevant audit information (as defined by Section 418 of the Companies Act 2006) of which the Company's auditors are unaware, and each director has taken all the steps that he or she ought to have taken as a director in order to make himself or herself aware of any relevant audit information and to establish that the Company's auditors are aware of that information.

**On behalf of the board:**

.....  
M Cordoni - Director

Date: 06/04/2022



## Independent Auditors' Report to the Members of CFE (UK) Ltd

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### Opinion

We have audited the financial statements of CFE (UK) Ltd (the 'Company') for the year ended 31 December 2021 which comprise the Income Statement, Other Comprehensive Income, Statement of Financial Position, Statement of Changes in Equity, Statement of Cash Flows and Notes to the Statement of Cash Flows, Notes to the Financial Statements, including a summary of significant accounting policies. The financial reporting framework that has been applied in their preparation is applicable law and United Kingdom Accounting Standards, including Financial Reporting Standard 102 'The Financial Reporting Standard applicable in the UK and Republic of Ireland' (United Kingdom Generally Accepted Accounting Practice).

In our opinion the financial statements:

- give a true and fair view of the state of the Company's affairs as at 31 December 2021 and of its profit for the year then ended;
- have been properly prepared in accordance with United Kingdom Generally Accepted Accounting Practice; and
- have been prepared in accordance with the requirements of the Companies Act 2006.

### Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (UK) (ISAs (UK)) and applicable law. Our responsibilities under those standards are further described in the Auditors' responsibilities for the audit of the financial statements section of our report. We are independent of the Company in accordance with the ethical requirements that are relevant to our audit of the financial statements in the UK, including the FRC's Ethical Standard, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

### Conclusions relating to going concern

In auditing the financial statements, we have concluded that the directors' use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

Based on the work we have performed, we have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the Company's ability to continue as a going concern for a period of at least twelve months from when the financial statements are authorised for issue.

Our responsibilities and the responsibilities of the directors with respect to going concern are described in the relevant sections of this report.

However, not all future events or conditions can be predicted. The current COVID-19 viral pandemic is one of the most significant economic events for the UK with unprecedented levels of uncertainty of outcomes. It is therefore difficult to evaluate all of the potential implications on the Company's trade, customers, suppliers and wider economy. The Directors' view on the impact of COVID-19 is disclosed in the Directors' Report and accounting policies note 3 of the financial statements.

### Other information

The directors are responsible for the other information. The other information comprises the information in the Strategic Report and the Directors' Report, but does not include the financial statements and our Auditors' Report thereon.

Our opinion on the financial statements does not cover the other information and, except to the extent otherwise explicitly stated in our report, we do not express any form of assurance conclusion thereon.

In connection with our audit of the financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the financial statements or our knowledge obtained in the audit or otherwise appears to be materially misstated. If we identify such material inconsistencies or apparent material misstatements, we are required to determine whether this gives rise to a material misstatement in the financial statements themselves. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report in this regard.

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**Independent Auditors' Report to the Members of  
CFE (UK) Ltd**

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**Opinions on other matters prescribed by the Companies Act 2006**

In our opinion, based on the work undertaken in the course of the audit:

- the information given in the Strategic Report and the Directors' Report for the financial year for which the financial statements are prepared is consistent with the financial statements; and
- the Strategic Report and the Directors' Report have been prepared in accordance with applicable legal requirements.

**Matters on which we are required to report by exception**

In the light of the knowledge and understanding of the Company and its environment obtained in the course of the audit, we have not identified material misstatements in the Strategic Report or the Directors' Report.

We have nothing to report in respect of the following matters where the Companies Act 2006 requires us to report to you if, in our opinion:

- adequate accounting records have not been kept, or returns adequate for our audit have not been received from branches not visited by us; or
- the financial statements are not in agreement with the accounting records and returns; or
- certain disclosures of directors' remuneration specified by law are not made; or
- we have not received all the information and explanations we require for our audit.

**Responsibilities of directors**

As explained more fully in the Statement of Directors' Responsibilities, the directors are responsible for the preparation of the financial statements and for being satisfied that they give a true and fair view, and for such internal control as the directors determine necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, the directors are responsible for assessing the Company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless the directors either intend to liquidate the Company or to cease operations, or have no realistic alternative but to do so.

**Auditors' responsibilities for the audit of the financial statements**

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an Auditors' Report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

The extent to which our procedures are capable of detecting irregularities, including fraud is detailed below:

- the engagement partner ensured that the engagement team collectively had the appropriate competence, capabilities and skills to identify or recognised non-compliance with applicable laws and regulations;
- we identified the laws and regulations applicable to the Company through discussions with directors and other management, and from our commercial knowledge;
- we focused on specific laws and regulations which we considered may have a direct material effect on the financial statements or the operations of the Company, including the Companies Act 2006, FCA regulation, taxation legislation, employment, data protection and capital requirements;
- we assessed the extent of compliance with the laws and regulations identified above through making enquires of management and inspecting legal correspondence;
- identified laws and regulations were communicated within the audit team regularly and the team remained alert to instances of non-compliance throughout the audit.

**Independent Auditors' Report to the Members of  
CFE (UK) Ltd**

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We assessed the susceptibility of the Company's material misstatement, including obtaining an understanding of how fraud might occur, by:

- making enquiries of management as to where they considered there was susceptibility to fraud, their knowledge of actual, suspected and alleged fraud;
- considering the internal controls in place to mitigate risks of fraud and non-compliance with laws and regulations

To address the risk of fraud through management bias and override of controls, we:

- performed analytical procedures to identify any unusual or unexpected relationships;
- tested journal entries to identify unusual transactions;
- assess whether judgement and assumptions made in determining the accounting estimates set out in note 2 were indicative of potential bias; and
- investigate the rationale behind significant or unusual transactions.

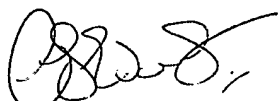
In response to the risk of irregularities and non-compliance with laws and regulations, we designed procedures which included, but were not limited to:

- agreeing financial statement disclosure to underlying supporting documentation;
- reading the minutes of meetings of those charged with governance;
- enquiring of management as to actual potential litigation and claims; and
- reviewing correspondence.

A further description of our responsibilities for the audit of the financial statements is located on the Financial Reporting Council's website at [www.frc.org.uk/auditorsresponsibilities](http://www.frc.org.uk/auditorsresponsibilities). This description forms part of our Auditors' Report.

**Use of our report**

This report is made solely to the Company's members, as a body, in accordance with Chapter 3 of Part 16 of the Companies Act 2006. Our audit work has been undertaken so that we might state to the Company's members those matters we are required to state to them in an Auditors' Report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Company and the Company's members as a body, for our audit work, for this report, or for the opinions we have formed.



Chris Evans BSC FCA (Senior Statutory Auditor)  
for and on behalf of Haines Watts (City) LLP  
Statutory Auditor  
New Derwent House  
69-73 Theobalds Road  
London  
WC1X 8TA

Date: 6 April 2022

**CFE (UK) LTD (REGISTERED NUMBER: 08322531)**

**Income Statement  
for the year ended 31 December 2021**

	Notes	2021 £	2020 £
<b>Turnover</b>	3	2,045,378	3,731,966
Cost of sales		(163,569)	(1,621,881)
<b>Gross profit</b>		1,881,809	2,110,085
Administrative expenses		(1,737,338)	(1,462,273)
<b>Operating profit</b>		144,471	647,812
Interest receivable and similar income		822	-
		145,293	647,812
Interest payable and similar expenses	6	(1,356)	(2,239)
<b>Profit before taxation</b>	7	143,937	645,573
Tax on profit	8	(32,011)	(126,844)
<b>Profit for the financial year</b>		111,926	518,729

The notes form part of these financial statements

**CFE (UK) LTD (REGISTERED NUMBER: 08322531)**

**Other Comprehensive Income  
for the year ended 31 December 2021**

	Notes	2021 £	2020 £
Profit for the year		111,926	518,729
Other comprehensive income		-	-
Total comprehensive income for the year		<u>111,926</u>	<u>518,729</u>

The notes form part of these financial statements

**CFE (UK) LTD (REGISTERED NUMBER: 08322531)**

**Statement of Financial Position  
31 December 2021**

	Notes	£	2021 £	£	2020 £
<b>Fixed assets</b>					
Tangible assets	10		40,706		55,460
Investments	11		853,824		-
			<u>894,530</u>		<u>55,460</u>
<b>Current assets</b>					
Debtors	12	1,054,604		633,673	
Cash at bank and in hand		1,080,095		1,379,518	
		<u>2,134,699</u>		<u>2,013,191</u>	
<b>Creditors</b>					
Amounts falling due within one year	13	216,994		223,043	
		<u>216,994</u>		<u>223,043</u>	
<b>Net current assets</b>			<u>1,917,705</u>		<u>1,790,148</u>
<b>Total assets less current liabilities</b>			<u>2,812,235</u>		<u>1,845,608</u>
<b>Capital and reserves</b>					
Called up share capital	16		1,234,701		380,000
Retained earnings	17		1,577,534		1,465,608
			<u>2,812,235</u>		<u>1,845,608</u>
<b>Shareholders' funds</b>			<u>2,812,235</u>		<u>1,845,608</u>

The financial statements were approved by the Board of Directors and authorised for issue on and were signed on its behalf by:

..... April 6<sup>th</sup>, 2022

.....  
M Cordoni - Director

The notes form part of these financial statements

**CFE (UK) LTD (REGISTERED NUMBER: 08322531)**

**Statement of Changes in Equity  
for the year ended 31 December 2021**

	<b>Called up share capital £</b>	<b>Retained earnings £</b>	<b>Total equity £</b>
<b>Balance at 1 January 2020</b>	380,000	1,946,879	2,326,879
<b>Changes in equity</b>			
Dividends	-	(1,000,000)	(1,000,000)
Total comprehensive income	-	518,729	518,729
<b>Balance at 31 December 2020</b>	<u>380,000</u>	<u>1,465,608</u>	<u>1,845,608</u>
<b>Changes in equity</b>			
Issue of share capital	854,701	-	854,701
Total comprehensive income	-	111,926	111,926
<b>Balance at 31 December 2021</b>	<u><u>1,234,701</u></u>	<u><u>1,577,534</u></u>	<u><u>2,812,235</u></u>

The notes form part of these financial statements

**CFE (UK) LTD (REGISTERED NUMBER: 08322531)**

**Statement of Cash Flows  
for the year ended 31 December 2021**

		2021	2020
	Notes	£	£
<b>Cash flows from operating activities</b>			
Cash generated from operations	1	(199,694)	(34,579)
Interest paid		(1,356)	(2,239)
Tax paid		(96,141)	(213,530)
Net cash from operating activities		<u>(297,191)</u>	<u>(250,348)</u>
 <b>Cash flows from investing activities</b>			
Purchase of tangible fixed assets		(3,931)	(7,053)
Purchase of fixed asset investments		(853,824)	-
Interest received		822	-
Net cash from investing activities		<u>(856,933)</u>	<u>(7,053)</u>
 <b>Cash flows from financing activities</b>			
Share issue		854,701	-
Equity dividends paid		-	(1,000,000)
Net cash from financing activities		<u>854,701</u>	<u>(1,000,000)</u>
 <b>Decrease in cash and cash equivalents</b>		<u>(299,423)</u>	<u>(1,257,401)</u>
<b>Cash and cash equivalents at beginning of year</b>	2	1,379,518	2,636,919
 <b>Cash and cash equivalents at end of year</b>	2	<u><u>1,080,095</u></u>	<u><u>1,379,518</u></u>

The notes form part of these financial statements



**CFE (UK) LTD (REGISTERED NUMBER: 08322531)**

**Notes to the Statement of Cash Flows  
for the year ended 31 December 2021**

**1. Reconciliation of profit for the financial year to cash generated from operations**

	<b>2021</b>	<b>2020</b>
	<b>£</b>	<b>£</b>
Profit for the financial year	111,926	518,729
Depreciation charges	18,685	25,030
Finance costs	1,356	2,239
Finance income	(822)	-
Taxation	32,011	126,844
	<u>163,156</u>	<u>672,842</u>
(Increase)/decrease in trade and other debtors	(420,931)	525,496
Increase/(decrease) in trade and other creditors	58,081	(1,232,917)
	<u>(199,694)</u>	<u>(34,579)</u>
<b>Cash generated from operations</b>	<u>(199,694)</u>	<u>(34,579)</u>

**2. Cash and cash equivalents**

The amounts disclosed on the Statement of Cash Flows in respect of cash and cash equivalents are in respect of these Statement of Financial Position amounts:

**Year ended 31 December 2021**

	<b>31/12/21</b>	<b>1/1/21</b>
	<b>£</b>	<b>£</b>
Cash and cash equivalents	<u>1,080,095</u>	<u>1,379,518</u>

**Year ended 31 December 2020**

	<b>31/12/20</b>	<b>1/1/20</b>
	<b>£</b>	<b>£</b>
Cash and cash equivalents	<u>1,379,518</u>	<u>2,636,919</u>

**3. Analysis of changes in net funds**

	<b>At 1/1/21</b>	<b>Cash flow</b>	<b>At 31/12/21</b>
	<b>£</b>	<b>£</b>	<b>£</b>
<b>Net cash</b>			
Cash at bank and in hand	<u>1,379,518</u>	<u>(299,423)</u>	<u>1,080,095</u>
	<u>1,379,518</u>	<u>(299,423)</u>	<u>1,080,095</u>
<b>Total</b>	<u>1,379,518</u>	<u>(299,423)</u>	<u>1,080,095</u>

The notes form part of these financial statements

**CFE (UK) LTD (REGISTERED NUMBER: 08322531)**

**Notes to the Financial Statements  
for the year ended 31 December 2021**

---

**1. Statutory information**

CFE (UK) Ltd is a private company, limited by shares, registered in England and Wales. The Company's registered number and registered office address can be found on the Company Information page.

**2. Accounting policies**

**Basis of preparing the financial statements**

These financial statements have been prepared in accordance with Financial Reporting Standard 102 "The Financial Reporting Standard applicable in the UK and Republic of Ireland" and the Companies Act 2006. The financial statements have been prepared under the historical cost convention.

Set out below is a summary of the principal accounting policies, all of which have been applied consistently (except as otherwise stated). The financial statements are presented in British Pound Sterling (£).

**Related party exemption**

The Company has taken advantage of exemption, under the terms of Financial Reporting Standard 102 'The Financial Reporting Standard applicable in the UK and Republic of Ireland', not to disclose related party transactions with wholly owned subsidiaries within the group.

**Significant judgements and estimates**

In applying the Company's accounting policies, the directors are required to make judgements, estimates and assumptions in determining the carrying amounts of assets and liabilities. The directors' judgements, estimates and assumptions are based on the best and most reliable evidence available at the time when the decisions are made, and are based on historical experience and other factors that are considered to be applicable. Due to the inherent subjectivity involved in making such judgements, estimates and assumptions, the actual results and outcomes may differ.

The estimates and underlying assumptions are reviewed on an ongoing basis. Revisions to accounting estimates are recognised in the period in which the estimate is revised, if the revision affects only that period, or in the period of the revision and future periods, if the revision affects both current and future periods.

**Critical judgements in applying the company's accounting policies**

The critical judgement that the directors have made in the process of applying the Company's accounting policies that have the most significant effect on the amounts recognised in the statutory financial statements are discussed below:

**(i) Assessing indicators and impairment**

In assessing whether there have been any indicators or impairment assets, the directors have considered both external and internal sources of information such as market conditions, counterparty credit ratings and experience or recoverability. There have been no indicators or impairments identified during the current financial year.

**Key sources of estimation uncertainty**

The key assumptions concerning the future, and other key sources of estimation uncertainty that have a significant risk of causing material adjustment to the carrying amounts of assets and liabilities within the next financial year are discussed below:

**(i) Recoverability of receivables**

The Company establishes a provision for receivables that are estimated not to be recoverable. When assessing recoverability the directors consider factors such as the aging of the receivables, past experience and recoverability, and the credit profile of individual or groups of customers.

**CFE (UK) LTD (REGISTERED NUMBER: 08322531)**

**Notes to the Financial Statements - continued  
for the year ended 31 December 2021**

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**2. Accounting policies - continued**

**Turnover**

Turnover of the Company consists of amounts receivable for the provision of financial services, discretionary asset management and financial advice. It is measured at the fair value of the consideration received or receivable, excluding discounts, rebates, value added tax and other sales taxes. Turnover is recognised in line with accrual accounting bases on fees received for services provided in the financial year.

**Tangible fixed assets**

Depreciation is provided at the following annual rates in order to write off each asset over its estimated useful life

Fixtures and fittings	-	33% Reducing balance
Computer equipment	-	33% Reducing balance

**Taxation**

Taxation for the year comprises current and deferred tax. Tax is recognised in the Income Statement, except to the extent that it relates to items recognised in other comprehensive income or directly in equity.

Current or deferred taxation assets and liabilities are not discounted.

Current tax is recognised at the amount of tax payable using the tax rates and laws that have been enacted or substantively enacted by the statement of financial position date.

**Foreign currencies**

Assets and liabilities in foreign currencies are translated into sterling at the rates of exchange ruling at the statement of financial position date. Transactions in foreign currencies are translated into sterling at the rate of exchange ruling at the date of transaction. Exchange differences are taken into account in arriving at the operating result.

**Leasing**

Rentals paid under operating leases are charged to profit or loss on a straight line basis over the period of the lease.

**Pension costs and other post-retirement benefits**

The Company operated a defined contribution pension scheme. Contributions payable to the Company's pension scheme are charged to the Income Statement in the period to which they relate.

**Provisions**

Provisions are recognised when there is a present obligation (legal or constructive) as a result of a past event, it is probable that the obligation will be required to be settled, and a reliable estimate can be made of the amount of the obligation. The amount recognised as a provision is the best estimate of the consideration required to settle the present obligation at the end of the reporting period taking into account the risks and uncertainties surrounding the obligation. Provisions are discounted when the time value of money is material.

**Equity**

Equity instruments are classified in accordance with the substance of contractual agreement. An equity instrument is any contract that evidences a residual interest in the assets of the Company after deducting all of its liabilities.

Equity instruments issued by the Company are recorded at the fair value of the cash or other resources received or receivable, net of direct costs of issuing the equity instruments.

**Fixed Asset Investments**

Investments in subsidiaries and associates are measured at cost less accumulated impairment.

Notes to the Financial Statements - continued  
for the year ended 31 December 2021

2. Accounting policies - continued

**Financial instruments**

Financial assets and liabilities are recognised when the Company becomes party to the contractual provisions of the financial instrument. The Company holds basic financial instruments which comprise cash at bank, trade and other receivables, and trade and other payables. The Company has chosen to apply the provisions of Section 11 Basic Financial Instruments in full.

**Financial assets - classified as basic financial instruments**

(i) Cash at bank and in hand

Cash at bank and in hand include cash in hand, deposits held with banks, and other short-term highly liquid investments with original maturities of three months or less.

(ii) Trade and other receivables

Trade and other receivables are initially recognised at the transaction price, including any transaction costs. Amounts that are receivable within one year are measured at the undiscounted amount of the cash expected to be received, net of any impairment.

At the end of each reporting period, the Company assesses whether there is objective evidence that an receivable amount may be impaired. A provision for impairment is established when there is objective evidence that the Company will not be able to collect all amounts due according to the original terms of the receivables. The amount of the provision is the difference between the asset's carrying amount and the present value of the estimated future cash flows, discounted at the effective interest rate. The amount of the provision is recognised immediately in profit or loss.

**Financial Liabilities - classified as basic financial instruments**

(iii) Trade and other payables and loans and borrowings

Trade and other payables and loans and borrowings are initially measured at the transaction price, including any transaction costs, and subsequently measured at amortised cost using the effective interest method. Amounts that are payable within one year are measured at the discounted amount of the cash expected to be paid.

**Going concern**

These financial statements have been prepared on a going concern basis.

The current economic conditions, together with the COVID-19 pandemic discussed in the Strategic Report, present increased risks for all businesses. In response to such conditions, the directors have carefully considered these risks including a consideration on uncertainty of future trading for a period of at least 12 months from the date of signing the financial statements, and the extent to which they might affect the preparation of the financial statements on a going concern basis. The directors consider the Company to be a going concern as the balance sheet is in a strong position with current net assets of £1,918k at the balance sheet date and the Company is forecast to make a profit for the 2021 financial year.

Based on assessment, the directors consider that the Company maintains an appropriate level of liquidity, sufficient to meet the demands of the business including any capital and servicing obligations and external debt liabilities. In addition, the Company's assets are assessed for recoverability on a regular basis, and the directors consider that the Company is not exposed to losses on these assets which would affect their decision to adopt the going concern basis.

**CFE (UK) LTD (REGISTERED NUMBER: 08322531)**

**Notes to the Financial Statements - continued  
for the year ended 31 December 2021**

**2. Accounting policies - continued**

The directors have a reasonable expectation that the Company has adequate resources to continue in operational existence for the foreseeable future and that there are no material uncertainties that lead to significant doubts upon the Company's ability to continue as a going concern. Thus the directors have continued to adopt the going concern basis of accounting in preparing these financial statements.

**3. Turnover**

The turnover and profit before taxation are attributable to the one principal activity of the Company.

An analysis of turnover by geographical market is given below:

	2021	2020
	£	£
United Kingdom	588,707	693,458
Europe	1,456,671	2,875,862
Rest of world	-	162,646
	<u>2,045,378</u>	<u>3,731,966</u>

**4. Employees and directors**

	2021	2020
	£	£
Wages and salaries	936,933	856,477
Social security costs	118,790	111,967
Other pension costs	15,999	14,948
	<u>1,071,722</u>	<u>983,392</u>

The average number of employees during the year was as follows:

	2021	2020
Management	2	3
Operations	6	7
	<u>8</u>	<u>10</u>

**5. Directors' emoluments**

	2021	2020
	£	£
Directors' remuneration	<u>106,125</u>	<u>289,000</u>

**CFE (UK) LTD (REGISTERED NUMBER: 08322531)**

**Notes to the Financial Statements - continued  
for the year ended 31 December 2021**

**6. Interest payable and similar expenses**

	<b>2021</b>	<b>2020</b>
	<b>£</b>	<b>£</b>
Bank interest	<u>1,356</u>	<u>2,239</u>

**7. Profit before taxation**

The profit is stated after charging/(crediting):

	<b>2021</b>	<b>2020</b>
	<b>£</b>	<b>£</b>
Other operating leases	155,275	141,959
Depreciation - owned assets	18,685	25,030
Auditors' remuneration	10,000	6,450
Foreign exchange differences	<u>1,050</u>	<u>(145,639)</u>

**8. Taxation**

**Analysis of the tax charge**

The tax charge on the profit for the year was as follows:

	<b>2021</b>	<b>2020</b>
	<b>£</b>	<b>£</b>
Current tax:		
UK corporation tax	<u>32,011</u>	<u>126,844</u>
Tax on profit	<u>32,011</u>	<u>126,844</u>

UK corporation tax has been charged at 19% (2020 - 19%).

**CFE (UK) LTD (REGISTERED NUMBER: 08322531)**

**Notes to the Financial Statements - continued  
for the year ended 31 December 2021**

**8. Taxation - continued**

**Reconciliation of total tax charge included in profit and loss**

The tax assessed for the year is higher than the standard rate of corporation tax in the UK. The difference is explained below:

	2021	2020
	£	£
Profit before tax	143,937	645,573
Profit multiplied by the standard rate of corporation tax in the UK of 19% (2020 - 19%)	27,348	122,659
Effects of:		
Expenses not deductible for tax purposes	2,059	1,381
Income not taxable for tax purposes	(156)	-
Depreciation in excess of capital allowances	2,803	3,416
Utilisation of tax losses	(43)	-
Overprovision in the prior year	-	(612)
Total tax charge	32,011	126,844

**9. Dividends**

	2021	2020
	£	£
Ordinary shares of £1 each		
Interim	-	1,000,000

**CFE (UK) LTD (REGISTERED NUMBER: 08322531)**

**Notes to the Financial Statements - continued  
for the year ended 31 December 2021**

**10. Tangible fixed assets**

	<b>Fixtures and fittings £</b>	<b>Computer equipment £</b>	<b>Totals £</b>
<b>Cost</b>			
At 1 January 2021	60,405	67,443	127,848
Additions	-	3,931	3,931
At 31 December 2021	60,405	71,374	131,779
<b>Depreciation</b>			
At 1 January 2021	34,595	37,793	72,388
Charge for year	8,518	10,167	18,685
At 31 December 2021	43,113	47,960	91,073
<b>Net book value</b>			
At 31 December 2021	17,292	23,414	40,706
At 31 December 2020	25,810	29,650	55,460

**11. Fixed asset investments**

	<b>Unlisted investments £</b>
<b>Cost</b>	
Additions	853,824
At 31 December 2021	853,824
<b>Net book value</b>	
At 31 December 2021	853,824

During the year, the Company invested into RiverRock European Capital Partners LLP on 15 September 2021 for £853,824, purchasing a holding of 3.50%.

**12. Debtors: amounts falling due within one year**

	<b>2021 £</b>	<b>2020 £</b>
Trade debtors	2,400	2,400
Other debtors	613,103	490,519
VAT	31,725	19,822
Prepayments and accrued income	407,376	120,932
	<u>1,054,604</u>	<u>633,673</u>



**CFE (UK) LTD (REGISTERED NUMBER: 08322531)**

**Notes to the Financial Statements - continued  
for the year ended 31 December 2021**

**13. Creditors: amounts falling due within one year**

	<b>2021</b>	<b>2020</b>
	<b>£</b>	<b>£</b>
Trade creditors	18,237	24,824
Tax	(50,989)	13,141
Social security and other taxes	154,446	79,755
Other creditors	9,918	8,739
Accruals and deferred income	85,382	96,584
	<u>216,994</u>	<u>223,043</u>

**14. Leasing agreements**

Minimum lease payments under non-cancellable operating leases fall due as follows:

	<b>2021</b>	<b>2020</b>
	<b>£</b>	<b>£</b>
Within one year	155,820	155,820
Between one and five years	90,895	246,715
	<u>246,715</u>	<u>402,535</u>

During 2018 the Company entered into an operating lease for offices premises, the lease ends on 15 July 2023.

**15. Financial instruments**

The company's financial instruments may be analysed as follows:

	<b>2021</b>	<b>2020</b>
	<b>£</b>	<b>£</b>
<b>Financial assets</b>		
Financial assets that are measured at amortised cost	<u>2,030,023</u>	<u>1,918,041</u>
<b>Financial liabilities</b>		
Financial liabilities measured at amortised cost	<u>113,537</u>	<u>84,765</u>

Financial assets measured at amortised cost comprise cash, trade debtors, other debtors and accrued income.

Financial liabilities measured at amortised cost comprise trade creditors, other creditors and accruals.

Information regarding the Company's exposure to risks are included in the Strategic Report.

**CFE (UK) LTD (REGISTERED NUMBER: 08322531)**

**Notes to the Financial Statements - continued  
for the year ended 31 December 2021**

**16. Called up share capital**

**Allotted, issued and fully paid:**

<b>Number:</b>	<b>Class:</b>	<b>Nominal Value:</b>	<b>2021£</b>	<b>2020£</b>
380,000	Ordinary	£1	380,000	380,000
854,701	Ordinary	£1	854,701	-
			<u>1,234,701</u>	<u>380,000</u>

On 27th August 2021, the Company allotted 854,701 £1 ordinary shares which were paid in full for cash at par during the year.

**17. Reserves**

	<b>Retained earnings £</b>
At 1 January 2021	1,465,608
Profit for the year	111,926
At 31 December 2021	<u>1,577,534</u>

**18. Pension commitments**

Defined contribution schemes

	<b>2021 £</b>	<b>2020 £</b>
Charge to profit and loss in respect of defined contribution schemes	<u>15,999</u>	<u>21,218</u>

A defined contribution pension scheme is operated for all qualifying employees. The assets of the scheme are held separately from those of the Company in an independently administered fund.

**19. Ultimate parent company**

Corporation Financière Européenne S.A. (incorporated in Luxembourg) is regarded by the directors as being the Company's ultimate parent company.

The registered address is:

Corporation Financière Européenne S.A.  
32 Boulevard Royal  
L-2449 Luxembourg

A copy of the group accounts can be requested from here.

The ultimate controlling party is considered to be Mario Cordoni.

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**CFE (UK) LTD (REGISTERED NUMBER: 08322531)**

**Notes to the Financial Statements - continued  
for the year ended 31 December 2021**

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**20. Related party disclosures**

During the year the Company received administrative and advisory services totalling £109,314 (2020: £86,611) from ISC Institutional Service Center Limited. M Eleuteri is a director of ISC Institutional Service Center Limited. The balance outstanding at the year end was £30,000 (2020: £22,867).

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**CFE (UK) LTD**

**APPENDIX 1 – PILLAR 3 DISCLOSURE (UNAUDITED)**

**FOR THE YEAR ENDED 31 DECEMBER 2021**

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**The following does not form part of the financial statements and is unaudited.**

**CFE (UK) LTD**

**APPENDIX 1 – PILLAR 3 DISCLOSURE (UNAUDITED)**

**FOR THE YEAR ENDED 31 DECEMBER 2021**

The Capital Requirements Directive ('The Directive') of the European Union establishes a regulatory capital framework across Europe governing the amount and nature of capital that credit institutions and investment firms must maintain.

In the United Kingdom, the Directive has been implemented by the Financial Conduct Authority ("FCA") in its regulations through the General Prudential Sourcebook ("GENPRU") and the Prudential Sourcebook for Banks, Building Societies and Investments Firms ("BIPRU").

The FCA framework consists of three "Pillars":

- Pillar 1 sets out the minimum capital amount that meets the Firm's credit, market and operational risk capital requirement.
- Pillar 2 requires the Firm to assess whether its capital reserves, processes, strategies and systems are adequate to meet pillar 1 requirements and further determine whether it should apply additional capital, processes, strategies or systems to cover any other risks that it may be exposed to.
- Pillar 3 requires disclosure of specified information about the underlying risk management controls and capital position, and remuneration policy and amounts to encourage market discipline.

The rules in BIPRU 11 set out the provision for Pillar 3 disclosure. This document is designed to meet our Pillar 3 obligations.

The Pillar 3 disclosure document has been prepared by CFE (UK) Limited ("The Firm") in accordance with the requirements of BIPRU 11 and is verified by management. Unless otherwise stated, all figures are as at the financial year end.

Pillar 3 disclosures will be issued on an annual basis after the year end and published with the annual accounts.

We are permitted to omit required disclosures if we believe that the information is immaterial such that omission would be unlikely to change or influence the decision of a reader relying on that information for the purpose of making economic decisions about the Firm.

In addition, we may omit required disclosures where we believe that the information is regarded as proprietary or confidential in our view, proprietary information is that which, if it were shared would undermine our competitive position information is considered to be confidential where there are obligations binding us to confidentiality with our customers, suppliers and counterparties.

We have no omissions on the grounds that it is immaterial, proprietary or confidential.

**Scope and application of the requirements**

The Firm is authorised and regulated by the FCA and as such is subject to minimum regulatory capital requirements. The Firm is categorised as a Limited Licence Firm by the FCA for capital purposes.

**CFE (UK) LTD**

**APPENDIX 1 – PILLAR 3 DISCLOSURE (UNAUDITED)**

**FOR THE YEAR ENDED 31 DECEMBER 2021**

It is an investment management and brokerage firm and as such has no trading book exposures.

**Risk management**

The Firm has established a risk management process in order to ensure that it has effective systems and controls in place to identify, monitor and manage risks arising in the business. The Senior Management team takes overall responsibility for this process and the fundamental risk appetite of the Firm. The team has responsibility for the implementation and enforcement of the Firm's risk principles.

Senior Management meet to discuss current projections for profitability, cash flow, business planning and risk management. Senior Management engage in the Firm's risk management through a framework of policy and procedures having regard to the relevant laws, standards, principles and rules, (including FCA principles and rules) with the aim to operate a defined and transparent risk management framework. These policies are updated as required.

The Senior Management team has identified that business, operations, market and credit are the main areas of risk to which the Firm could be exposed. Annually the Senior Management team formally review their risks, controls and other risk mitigation arrangements and assess their effectiveness. Management accounts demonstrate continued adequacy of the Firm's regulatory capital, which is reviewed on a regular basis.

Appropriate action is taken where risks are identified which fall outside of the Firm's tolerance levels or where the need for remedial action is required in respect of identified weaknesses in the Firm's mitigating controls.

**Business risk**

The company is now expanding the brokerage business and the consulting for securitization spv.

This risk is mitigated by the appropriate levels of capital held by the firm which will continue to cover all the expenses of the business. The risk is also mitigated by diversification as there is more than one line of business.

**Operational risk**

The Firm places strong reliance on the operational procedures and controls that it has in place in order to mitigate risk and seeks to ensure that all personnel are aware of their responsibilities in this respect.

The Firm has identified a number of potential key operational risks to manage. These relate to systems failure, failure of a third party service provider, reputational risk and potential for a regulatory breach. Appropriate policies are in place to mitigate against these risks, which includes compliance training for employees and business continuity planning and compliance monitoring.

**Credit risk**

**CFE (UK) LTD**

**APPENDIX 1 – PILLAR 3 DISCLOSURE (UNAUDITED)**

**FOR THE YEAR ENDED 31 DECEMBER 2021**

The Firm is exposed to credit risk in respect of its debtors, in respect of its debtors and cash held on deposit.

The Firm considers that there is little risk of default by its clients. All bank accounts are held with prime credit institutions.

All brokerage business is done on a delivery versus payment basis so there is only minor credit risk.

Given the nature of the Firm's exposures, no specific policy for hedging and mitigating credit risk is in place. The Firm uses the simplified standardised approach detailed in BIPRU 3.5.5 of the FCA Handbook.

**Market risk**

The Firm takes no market risk other than foreign exchange risk in respect of its accounts receivable and cash balances held in currencies other than GBP.

Since the Firm takes no trading book positions, the primary market risk relates to fluctuations in the value of its revenues due to movements in currency rates. The Firm maintains multi-currency bank accounts.

The Firm calculates its foreign exchange risk by reference to the rules of BIPRU 7.5.1 of the FCA Handbook.

**Liquidity risk**

The Firm is required to maintain sufficient liquidity to ensure that there is no significant risk that its liabilities cannot be met as they fall due or to ensure that it can secure additional financial resources in the event of a stress scenario.

The Firm retains an amount it considers suitable for providing sufficient liquidity to meet the working capital requirements under normal business conditions. The firm has always had sufficient liquidity within the business to meet its obligations and there are no perceived threats to this given the cash deposits it holds. Additionally, it has historically been the case that all management fee debtors are settled promptly, thus ensuring further liquid resources are available to the firm on a timely basis. The cash position of the firm is monitored on a monthly basis.

The Firm maintains a liquidity risk policy which formalises this approach.

**Securitisation**

The firm acts as an arranger for healthcare securitisations, there is no significant risk from arranging these securitizations as the firm does not hold any securitised assets but is merely acting as the arranger.

## CFE (UK) LTD

### APPENDIX 1 – PILLAR 3 DISCLOSURE (UNAUDITED)

FOR THE YEAR ENDED 31 DECEMBER 2021

#### Regulatory capital

The main features of the Firm's capital resources for regulatory purposes are as follows.

	31 December 2021
	£
Total tier 1 after deductions	2,812,000
Total tier 2 capital	-
Total tier 3 capital	-
FCA Capital resource requirement	435,000
Surplus	2,377,000

The Firm is small with simple operational infrastructure. Its market risk is limited to foreign exchange risk on its accounts receivable in foreign currency, and credit risk from fees receivable. The Firm follows the standardised approach to market risk and the simplified standard approach to credit risk.

Limited License – The Firm is subject to the Fixed Overhead Requirement ("FOR") and is not required to calculate an operational risk capital charge though it considers this as part of its process to identify the level of risk based capital required.

As discussed above the Firm is a limited licence Firm and as such its Pillar 1 capital requirement is the higher of;

- €50,000
- The sum of the market & credit risk requirements
- It's FOR

The FOR is the higher measure and is calculated, in accordance with FCA rules based on the Firm's current year's audited expenditure. The Firm is not subject to an operational risk requirement.

The Firm's Pillar 2 Internal Capital Adequacy Assessment Process indicates that no capital in addition to the Pillar 1 level is required.

#### Remuneration Code Disclosure

CFE (UK) Limited ("The Firm") is authorised and regulated by the Financial Conduct Authority as a Limited Licence Firm and so it is subject to FCA Rules on remuneration. These are contained in the FCA's Remuneration Code located in the SYSC Sourcebook of the FCA's Handbook. The Remuneration Code ("the RemCode") covers an individual's total remuneration, fixed and variable. The Firm incentivises staff through a combination of the two.

The Firm's business is to provide brokerage services and investment advisory services to professional counterparties.



CFE (UK) LTD

**APPENDIX 1 – PILLAR 3 DISCLOSURE (UNAUDITED)**

**FOR THE YEAR ENDED 31 DECEMBER 2021**

Our Policy is designed to ensure that we comply with the RemCode and our compensation arrangements;

1. Are consistent with and promote sound and effective risk management
2. Do not encourage excessive risk taking
3. Include measures to avoid conflicts of interest, and
4. Are in line with the Firm's business strategy, objectives, values and long term interests

**Application of the requirements**

We are required to disclose certain information on at least an annual basis regarding our remuneration policy and practices for those staff whose professional activities have a material impact on the risk profile of the Firm. Our disclosure is made in accordance with our size, internal organisation and the nature, scope and complexity of our activities.

1. Summary of information on the decision-making process used for determining the Firm's remuneration policy including use of external benchmarking consultants where relevant;

The Firm's policy has been agreed by the Management in line with the RemCode principles laid down by the FCA

- Due to the size, nature and complexity of the Firm, we are not required to appoint an independent remuneration committee
- The Firm's policy will be reviewed as part of annual process and procedures, or following a significant change to the business.
- The Firm's ability to pay bonuses is based on the performance of the firm overall and takes into consideration the long-term interests of the firm, its staff, shareholders and clients, specifically in the context of identifying and managing potential conflicts of interest.

2. Summary of how the Firm links between pay and performance

Overall firm and specific Code staff remuneration is determined with reference to a number of factors including, but not limited to, the performance of:

- the individual, contribution to the business unit itself (where relevant) and the overall results of firm; and
- an assessment of an individual's adherence to the firm's risk management and compliance procedures including whether their behaviour posed any risk to firm's corporate values.

3. All discretionary remuneration is directly related to the performance of the company and as such staff interests are intrinsically aligned with the interest of the Firm and its Clients vis-a-vis remuneration and performance.

Taking into consideration the aforementioned requirements, the Firm's remuneration policy has been prepared by the board in consultation with our compliance officer.

Employees receive a base salary and may be awarded a discretionary bonus. The amount of any discretionary award is determined by the firm's directors acting in the capacity of the Firm's remuneration committee. The Firm's code staff, all of whom have been approved by the FCA under section 59 of the Financial Services and Markets Act 2000 Act to perform a controlled function,

**CFE (UK) LTD**

**APPENDIX 1 – PILLAR 3 DISCLOSURE (UNAUDITED)**

**FOR THE YEAR ENDED 31 DECEMBER 2021**

received aggregate remuneration of £936,933. This was split between fixed remuneration of £721,933 and variable remuneration of £215,000.

**Stewardship code**

The Stewardship Code (the Code) was published by the Financial Reporting Council (FRC), the UK's independent regulator responsible for promoting high quality corporate governance and reporting in order to foster investment. The Code sets out good practice for institutional investors in their dealings with the companies in which they have invested.

The FCA regulations outline a Firm's obligations in relation to the Code and for firms who manage assets for corporate professional clients to disclose to these clients the nature of their commitment to the Code, or where it does not commit to the Code its alternate business strategy. Although the Firm recognises the aims and benefits of the Code the Firm's investment strategy is such that it does not engage directly with companies and therefore the Code in the context of the Firm's investment strategy does not apply and the Firm does not consider that its clients expect such engagement.

It is however important to note that the Firm has developed internal policies and procedures for managing conflicts of interest. This non commit disclosure fully encompasses the Firm's regulatory obligations in complying with the FRC's Stewardship Code where applicable and the FCA's regulatory requirements.

April 6<sup>th</sup>, 2022

