# Annual Report and Financial Statements White Oak UK No.5 Limited

For the Year Ended 31 December 2021



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08/07/2022

COMPANIES HOUSE

#117

Registered number: 08822812

# **Company Information**

Directors A Davies

D Banks K Berry T Otte

Company Secretary R Rutherford

Registered Number 08822812

Registered Office Second Floor, HQ Offices

58 Nicholas Street

Chester England CH1 2NP

Bankers Barclays Bank plc

1 Churchill Place

London E14 5HP

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# **Directors' Report**

For the Year Ended 31 December 2021

The Directors present their report and the financial statements for the year ended 31 December 2021.

## Principal activity of the business

The principal activity of White Oak UK No. 5 Limited (the "Company") is that of a funder to commercial counterparties operating in the UK SME market.

## Directors' responsibilities statement

The Directors are responsible for preparing 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 applicable law and United Kingdom Accounting Standards (United Kingdom Generally Accepted Accounting Practice), including FRS 192 "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 UK Accounting Standards have been followed subject to any material departures disclosed and explained in the financial statements; and
- prepare the financial statements on the going concern basis unless it is inappropriate to assume 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.

The Directors are responsible for the maintenance and integrity of the corporate and financial information included on the Company's website. Legislation in the United Kingdom governing the preparation and dissemination of financial statements may differ from legislation in other jurisdictions.

# Results

The results for the year are shown in the Statement of Comprehensive Income on page 6. The loss for the year, after taxation, amounted to £1,813,751 (2020: £Nil).

# Directors

The Directors who served during the year and upto the date of this report were:

A Davies

K Berry (appointed 11 March 2022)

T Otte (appointed 11 March 2022)

D Banks (appointed 26 April 2022)

J Felton (resigned 25 April 2022)

A Gadsby (resigned 18 November 2021)

# Directors' Indemnity and Directors' and Officers' Liability Insurance

The Company maintains a Directors' and Officers' Liability Insurance policy which is a qualifying third party indemnity. In accordance with the Company's Articles of Association, the Board may also indemnify a Director from the assets of the Company against any costs or liability incurred as a result of their office, to the extent permitted by law. Neither the insurance policy nor any indemnities that may be provided by the Company provide cover for fraudulent or dishonest actions by the Directors. However, costs may be advanced to Directors for their defence in investigations or legal actions.

# Directors' Report (continued) For the Year Ended 31 December 2021

# Dividends

Dividends of £Nil were proposed and distributed for the period ending 31 December 2021 (2020: £Nil).

This report was approved by the Board on 26 May 2022 and signed on its behalf.

A Davics

Director

White Oak UK No.5 Limited Registered number, 08822812

# Statement of Comprehensive Income

For the Year Ended 31 December 2021

	Note	2021	2020
Turnover	3	£ 25,901	£
Gross profit		25,901	•
Administrative expenses		(536,452)	
Other operating charges	7	(1,176,207)	-
Operating loss		(1,686,758)	-
Interest payable and similar expense		-	-
Other interest receivable and similar income		-	-
Loss before tax		(1,686,758)	
Tax on loss on ordinary activities	6	(126,993)	-
Loss for the financial year		(1,813,751)	

There are no items of other comprehensive income, therefore a statement of other comprehensive income has not been prepared. All of the above amounts relate to continuing operations and are attributable to equity holders.

The notes on pages 9 to 18 form part of these financial statements.

White Oak UK No.5 Limited Registered number: 08822812

# Statement of Financial Position

As at 31 December 2021

Current Assets	Note	2021 £	2020 £
Debtors: Amounts falling due within one year	8	16,909,843	1
Cash at bank and in hand	9	1,534,254	-
		18,444,097	1
Creditors: Amounts falling due within one year	12	(12,972,730)	-
Net current assets		5,471,367	1
Debtors: Amounts falling due after more than one year	8	22,532,786	
Total assets less current liabilities		28,004,153	1
Creditors: Amounts falling due after more than one year	13	(29,817,903)	-
Net assets		(1,813,750)	1
Capital and reserves			
Called up share capital	17	1	1
Retained earnings		(1,813,751)	-
		(1,813,750)	1

For the financial year in question the company was entitled to exemption under section 479a of the Companies Act 2006. No members have required the company to obtain an audit of its accounts for the year in question in accordance with section 476 of the Companies Act 2006.

The directors acknowledge their responsibility for complying with the requirements of the Act with respect to accounting records and for the preparation of accounts.

These accounts have been prepared in accordance with the provisions applicable to companies subject to the small companies' regime.

The financial statements were approved and authorised for issue by the board and were signed on its behalf on 26 May 2022.

**A Davies** Director

The notes on pages 9 to 18 form part of these financial statements.

# Statement of Changes in Equity For the Year Ended 31 December 2021

	Share Capital	Retained Earnings	Total Equity
	£	£	£
At 1 January 2021	1	-	1
Comprehensive income for the year			
Profit/(loss) for the year	-	(1,813,751)	(1,813,751)
Dividends paid	-	-	-
At 31 December 2021	1	(1,813,751)	(1,813,750)
For the Year Ended 31 December 2020	Share Capital	Retained Earnings	Total Equity
	£	£	£
At 1 January 2020	1	-	1
Comprehensive income for the year			
Profit/(loss) for the year	-	-	-
Dividends paid	-	-	
At 31 December 2020	1		1

# Notes to the Financial Statements

For the Year Ended 31 December 2021

## 1. Accounting Policies

## 1.1. General information and Basis of preparation of financial statements

White Oak UK No.5 Limited (the "Company") is a private company limited by shares incorporated in the United Kingdom under the Companies Act and registered in England. The address of the registered office is given on the Company Information page. The principal activities of the company are set out in the Directors' Report on page 4.

The functional currency of the Company is considered to be pounds sterling because that is the currency of the primary economic environment in which the Company operates.

The financial statements are prepared in accordance with applicable law and United Kingdom accounting standards. The principle accounting policies are summarised below. All accounting policies have been consistently applied throughout the year and the preceding year.

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

# 1.2 Financial Reporting Standard 102 - reduced disclosure exemption

# Related party transactions

The Company has taken advantage of the exemptions available under paragraph 33.1A of FRS 102 Related Party Disclosures, not to disclose transactions that have taken place between members of the Group where the party to the transaction is a wholly owned member.

#### Cash flow statement

The Company meets the definition of a 'qualifying entity' under FRS 102 and as such has elected to take the exemption under FRS 102, para 1.12 (b) not to present the Company statement of cash flows.

# 1.3 Going concern

Based on the performance of the portfolio to date, current market conditions and excess interest spread within the portfolio the Directors anticipate that the Company will be profit making across the term of the agreements. The Directors are satisfied they have adequate funds to fund the Company's operations through the substantial support of LDF Group Finance Limited and therefore consider the use of the going concern assumption to be appropriate.

Specifically in relation to Covid-19, the Directors have reviewed and considered the Company's liquidity structure and resilience in the event of an extreme stress scenario and are satisfied that the Company is well positioned to manage any ongoing impacts on new business volumes and potential for increased credit losses. The Company has successfully demonstrated operational capability, with all staff working remotely during the periods of lock-down during the financial year, and is well positioned to continue to support customers and the safety of staff in event of any further periods of remote working

# 1.4 Revenue

Revenue is recognised to the extent that it is probable that the economic benefits will flow to the Company and the revenue can be reliably measured. Revenue is measured as the fair value of the consideration received or receivable, excluding discounts, rebates, value added tax and other sales taxes.

# Interest Income

Income derives from financial assets that are classified as loans and receivables (including finance lease receivables) and is determined using the effective interest method. Effective interest when applied against a financial asset, is a method of calculating the amortised cost of a financial asset and allocating the interest income over the expected life of the asset. The effective interest rate is the rate that exactly discounts estimated future cash flows to the instruments initial carrying value.

# 1.5 Debtors

Short term debtors are measured at transaction price, less any impairment. Loan receivables are measured initially at fair value, net of transaction costs, and are measured subsequently at amortised cost using the effective interest method, less any impairment.

For the Year Ended 31 December 2021

# 1. Accounting Policies (continued)

# 1.6 Provision for bad and doubtful debts

Specific provision is made against trade debtors when, in the opinion of the Directors, full repayment is considered to be unlikely. The level of impairment identified is based on the Directors' calculated estimate of the future recoverable amount, taking into account the level of arrears, security held, past recoveries and other relevant factors.

In addition, a provision is made to reflect losses incurred but not yet recognised, based upon historic experience and the judgement of the Directors.

# 1.7 Cash and cash equivalents

Cash is represented by cash in hand and deposits with financial institutions repayable without penalty on notice of not more than 24 hours. Cash equivalents are highly liquid investments that mature in no more than three months from the date of acquisition and that are readily convertible to known amounts of cash with insignificant risk of change in value.

## 1.8 Leasing

Assets obtained under finance leases are capitalised as tangible fixed assets and are depreciated over the shorter of the lease term and their useful lives. Finance leases are those where substantially all of the benefits and risks of ownership are assumed by the Company. Obligations under such agreements are included in creditors net of the finance charge allocated to future periods. The finance element of the rental payment is charged to the Statement of Comprehensive Income so as to produce a constant periodic rate of charge on the net obligation outstanding in each period.

When acting as a lessor the advance is shown within debtors not of future finance charges. This is split between debt due within and over one year. The interest element of the repayments received is credited to the Statement of Comprehensive Income across the life of the lease. Where a lease is repaid early the remaining interest due on the lease is recognised at that point.

# 1.9 Financial Instruments

The Company only enters into basic financial instruments transactions that result in the recognition of financial assets and liabilities like trade and other accounts receivable and payable, loans from banks and other third parties, loans to related parties and investments in non-purtable ordinary shares.

Debt instruments (other than those wholly repayable or receivable within one year), including loans and other accounts receivable and payable, are initially measured at present value of the future cash flows and subsequently at amortised cost using the effective interest method. Debt instruments that are payable or receivable within one year, typically trade payables or receivables, are measured, initially and subsequently, at the undiscounted amount of the cash or other consideration, expected to be paid or received. However if the arrangements of a short-term instrument constitute a financing transaction, like the payment of a trade debt deferred beyond normal business terms or financed at a rate of interest that is not a market rate or in case of an out-right short-term loan not at market rate, the financial asset or liability is measured, initially, at the present value of the future cash flow discounted at a market rate of interest for a similar debt instrument and subsequently at amortised cost.

Financial assets that are measured at cost and amortised cost are assessed at the end of each reporting period for objective evidence of impairment. If objective evidence of impairment is found, an impairment loss is recognised in the Statement of Comprehensive Income.

For financial assets measured at amortised cost, the impairment loss is measured as the difference between an asset's carrying amount and the present value of estimated cash flows discounted at the asset's original effective interest rate. If a financial asset has a variable interest rate, the discount rate for measuring any impairment loss is the current effective interest rate determined under the contract.

Financial assets and liabilities are offset and the net amount reported in the Statement of Financial Position when there is an enforceable right to set off the recognised amounts and there is an intention to settle on a net basis or to realise the asset and settle the liability simultaneously.

The Company assesses at each reporting date whether there is objective evidence that a financial asset or group of financial assets are impaired. A financial asset, or a group of financial assets, is impaired and impairment losses are incurred if, and only if, there is objective evidence of impairment as a result of one or more events that occurred after the initial recognition of the asset (a loss event) and that loss event (or events) has an impact on estimated future cash flows of the financial asset or group of financial assets that can be reliably estimated.

For the Year Ended 31 December 2021

# 1. Accounting Policies (continued)

## 1.9 Financial Instruments (continued)

Objective evidence that a financial asset, or group of assets, is impaired includes observable data that comes to the attention of the Company about the following loss events:

- delinquency in contractual payments of principal or interest;
- cash flow difficulties;
- breach of loan covenants or conditions; and
- initiation of hankruptcy proceedings.

#### 1.10 Creditors

Short term creditors are measured at the transaction price. Other financial liabilities, including bank loans, are measured initially at fair value, net of transaction costs, and are measured subsequently at amortised cost using the effective interest method.

#### 1.11 Finance Costs

Finance costs are charged to the Statement of Comprehensive Income over the term of the debt using the effective interest method so that the amount charged is at a constant rate on the carrying amount. Issue costs are initially recognised as a reduction in the proceeds of the associated capital instrument.

#### 1.12 Taxation

The tax expense for the year comprises current and deferred tax. Tax is recognised in the Statement of Comprehensive Income, except that a change attributable to an item of income and expense recognised as other comprehensive income or to an item recognised directly in equity is also recognised in other comprehensive income or directly in equity respectively.

The current income tax charge is calculated on the basis of tax rates and laws that have been enacted or substantively enacted by the reporting date in the countries where the Company operates and generates income.

# 2. Critical accounting judgements and key sources of estimation uncertainty

In the application of the Company's accounting policies the Directors are required to make judgements (other than those involving estimations) that have a significant impact on the amounts recognised and to make estimates and assumptions about the carrying amounts of assets and liabilities that are not readily apparent from other sources. The estimates and associated assumptions are based on historical experience and other factors that are considered to be relevant. Actual results may differ from these estimates.

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 Group's accounting policies

There are no critical judgements involved in applying the Group's accounting policies, apart from those involving estimations (which are dealt with separately below), which affect the amounts recognised in the financial statements.

# Key sources of estimation uncertainty

The accounting estimates and assumptions which affect the reported amounts of assets and liabilities within the financial statements are set out below:

For the Year Ended 31 December 2021

# 2. Critical accounting judgements and key sources of estimation uncertainty (continued)

## Impairment of receivables

The main area in the financial statements where a judgement is made is in the impairment of its own book agreements. Receivables are written off when there is judged to be no realistic prospect of recovery. Specific provisions are made to reduce all impaired balances to their estimated realisable values. A provision is also made to reflect impaired balances within the general population of receivables where no specific indicators of impairment have yet been demonstrated. This provision is calculated using historical arrears experience, credit risk characteristics and expected cashflows. The Company has considered the potential impact of Covid 19 as part of the calculation.

The Company assesses at each reporting date whether there is objective evidence that a financial asset or group of financial assets are impaired. A financial asset, or a group of financial assets, is impaired and impairment losses are incurred if, and only if, there is objective evidence of impairment as a result of one or more events that occurred after the initial recognition of the asset (a loss event) and that loss event (or events) has an impact on estimated future cash flows of the financial asset or group of financial assets that can be reliably estimated.

Objective evidence that a financial asset, or group of assets, is impaired includes observable data that comes to the attention of the Company about the following loss events:

- delinquency in contractual payments of principal or interest;
- cash flow difficulties;
- breach of loan covenants or conditions; and
- initiation of bankruptcy proceedings.

The provisioning rates applied when a loan hits a loss event trigger are informed by historical experience and are deemed a key source of estimation uncertainty.

# 3. Analysis of turnover

The total turnover of the Company for the year has been derived from its principal activities wholly undertaken in the United Kingdom and relates to funder services to commercial counterparties. None of this income is derived from group undertakings.

An analysis of turnover by class of business is as follows:

	2021	2020
	£	£
Interest Income	25,901	

# 4. Operating profit

Auditor's fees were borne by LDF Operations Ltd and for the year ended 31 December 2021, the amount relating to the Company was £4,000 (2020: £Nil). These costs were recharged in 2021 (2020: £Nil).

# 5. Employees

The Company has no employees other than the Directors, who did not receive any remuneration (2020: £Nil). The Directors' emoluments were borne by other Group companies during the current and prior year.

# 6. Taxation

	2021	2020
	£	£
Current tax:		
UK Corporation tax on profits for the year	-	-
Adjustments in respect of previous periods	-	-
		_
Total current tax		-

For the Year Linded 31 December 2021

6. Taxation (continued)
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	2021	2020
	£	£
Deferred tax:		
Origination and reversal of timing differences	94,172	-
Adjustment in respect of previous periods	-	-
Effect of changes in tax rates	32,821	-
Fotal deferred tax:	126,993	
Total tax per Statement of Comprehensive Income	126,993	
Factors affecting tax charges for the year		
The charge for the year can be reconciled to the profit per the Statement of Comprehensive Income as for	llows:	
	2021	2020
	£	£
Profit for the period	(1,686,758)	
Tax on loss at standard UK tax rate of 19% (2020: 19%).	(320,484)	-
Effects of:		
Group relief/other reliefs	414,656	-
Adjustment from previous periods	-	-
Tax rate changes	32,821	-
Tax charge for the period	126,993	
7. Management Recharge		
	2021	2020
	£	£
Intercompany management recharge	1,176,207	
8. Debtors		
	2021	2020
	£	£
Due after more than one year		
Loan and lease receivables	22,532,786	-
Deferred tax		
	22,532,786	-

For the Year Ended 31 December 2021

8. Debtors (continued)	2021	2020
	£	£
Due within one year		
Loan and lease receivables	9,031,751	-
Prepayments and accrued income	-	=
Trade debtors	6,053	-
Other debtors	7,872,039	1
	16,909,843	1
	39,442,629	1
9. Cash and cash equivalents		
	2021	2020
	£	£
Cash at bank and in hand	1,534,254	
10. Loan and lease receivables		
	2021	2020
	£	£
Finance lease	31,900,775	-
Loans	-	-
Less: allowance for impairment	(336,238)	-
	31,564,537	-
44.44		
11. Allowance for impairment	2024	2020
	2021	2020
	£	£
At 1 January		-
Charge for the year	336,238	-
Reversal of impairment losses	u u	-
Utilisation of the impairment allowance		<u>-</u>
At 31 December	336,238	<u>-</u> _
12. Creditors: Amounts falling due within one year		
	2021	2020
	£	£
Trade creditors	2,613	-
Other loans	-	-
Other creditors	292,524	•
Amounts owed to group undertakings	12,677,593	
	12,972,730	<u>-</u>

For the Year Ended 31 December 2021

# 13. Creditors: Amounts falling due after more than one year

	2021	2020
	£	£
Other loans	29,690,910	-
Deferred Tax	126,993	
	29,817,903	•

At the reporting date, Other loans comprised of the funding agreements between the Company and facility provider.

On the 26th August 2021 a floating charge was created in favour of White Oak UK No.5 (Blue) Limited over all property and undertaking of the Company.

# 14. Loans

Analysis of the maturity of loans is given below:

Amounts falling due within one year Other loans	2021 £	2020 £
Amounts falling due 1-2 years Other loans	-	-
Amounts falling due 2-5 years Other loans	30,919,483	-
	30,919,483	
Total	30,919,483	-

The above loans comprise both a block discounting and a warehousing facility. All loans are at a fixed rate of interest with a fixed repayment profile and the terms of these loans match the underlying customer agreements to which they relate. Values shown above reflect actual amounts to be repaid, including interest.

# 15. Deferred taxation

	2021	2020
	£	£
(Asset)/Provision at start of period	-	-
Adjustment in respect of previous years	-	-
Deferred tax charge to Statement of Comprehensive Income for the period	126,993	
(Asset)/Provision at end of period	126,993	
		<del></del>
The deferred taxation balance is made up as follows:		
	2021	2020
	£	£
Fixed asset timing differences	136,753	-
Other timing differences	(9,760)	
Deferred tax asset	126,993	

For the Year Ended 31 December 2021

# 16. Financial instruments

	2021	2020
	£	£
Financial assets		
Financial assets that are basic debt instruments, including trade debtors and finance lease receivables that are measured at amortised cost or net investment, less any impairment provision	31,570,590	-
Other financial assets including other debtors, amounts owed by group undertakings and cash and cash equivalents, that are measured at amortised cost	8,344,978	
	39,915,568	-
Financial liabilities		
Financial liabilities that are external and internal financial debt liabilities including overdrafts, loans and borrowings, measured on an amortised cost basis	42,368,503	-
Other financial liabilities, including trade and other payables that are measured on an amortised cost basis	295,138	-
	42,663,641	<u>-</u>

# Financial assets

The objective of credit risk management is to enable the Group to achieve the appropriate risk versus reward performance whilst maintaining credit risk exposure in line with the approved appetite for the risk that customers will be unable to meet their obligations to the Group. The following table provide an analysis of the credit quality of third party financial assets based on the performing/impaired status of the asset.

	2021	2020
	£	£
Neither past due nor impaired	31,621,960	-
Past due and not impaired	=	=
Past due and impaired	284,868	-
Impairment provision	(336,238)	-
	31,570,590	-
Aging of past due but not impaired debtors:		
	2021	2020
	£	£
30-60 days		-
60-90 days	-	-
90-120 days	-	-
More than 120 days	<u> </u>	

When considering whether a financial asset is impaired the Company considers any change to the credit quality of the debtor from the date credit was initially granted up to the reporting date. The concentration of credit risk is limited due to the customer base being large and unrelated.

For the Year Ended 31 December 2021

17. Share	Capital
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		2021	2020
		£	£
Authorised, allotted, called up and fully paid			
1 ordinary share of £1	=	1	1
18. Lessor			
	Gross Investment	Uncarned Income	Capital
	£	£	£
2021			
Not later than 1 year	2,069,211	547,043	1,522,168
Later than 1 year and not later than 5 years	4,325,685	491,246	3,834,439
	6,394,896	1,038,289	5,356,607
	Gross Investment	Uncarned Income	Capital
	£	£	£
2020	~	~	
Not later than 1 year	•		-
Later than 1 year and not later than 5 years	<u> </u>		

These figures do not include hire purchase agreements which are included in the overall balance of Finance leases in note 11. The accumulated allowance for uncollectible lease payments is £284,868

# 19. Ultimate parent undertaking

100% of the share capital of White Oak UK No.5 Limited is owned by LDF Group Finance Limited. LDF Group Finance Limited is owned by LDF Group Holdco Limited. The ultimate controlling party of LDF Group Holdco Limited is White Oak Europe Acquisition Limited as it holds the majority shareholding in LDF Group Holdco Limited.

The smallest group into which the results of the Company are consolidated is LDF Group Holdco Limted. Copies of these consolidated financial statements can be obtained from its registered office at Second Floor, HQ Offices, 58 Nicholas Street, Chester, England, CH1 2NP. The largest group into which the results of the Company are consolidated is White Oak Europe Limited. Copies of these consolidated financial statements can be obtained from its registered office at Second Floor, HQ Offices, 58 Nicholas Street, Chester, England, CH1 2NP.

# 20. Risk management

# Credit risk

Credit risk is one of the main risks the Company faces as it is principally linked to the performance of the loans and finance leases on its own books. All applications for funding are considered by the Group's Credit Team and must adhere to the Group's credit policy and credit appetite. The performance of the portfolio is regularly discussed and reviewed by the Directors and mitigating action is taken where necessary.

For the Year Ended 31 December 2021

# 20. Risk management (continued)

## Credit risk (continued)

The maximum exposure to credit risk for the Company is as follows:

	2021	2020
	£	£
Cash at bank	1,534,254	-
Loan and lease receivables	31,564,537	-
Trade and other debtors	7,878,092	1
	40,976,883	1

The above table represents the maximum credit risk exposure, net of impairment, to the Company at 31 December 2021 without taking into account any collateral held or other credit enhancement. No assets have been found to be individually impaired as a result of this risk.

The Company defines three classifications of credit quality (low, medium and higher risk) for all credit exposures. These classifications are based on the maturity of the outstanding loan and collateral held against it. The Company considers all assets shown in the above table to be low risk.

## Liquidity risk

The Company mitigates this risk by financing itself to the level required to meet its liquidity needs. Cash flows for the business are monitored by the Directors on a frequent basis.

## Reputational risk

The Company mitigates this risk by putting TCF (Treating Customers Fairly) at the heart of the business and providing exceptional customer service to its client base. This is evidenced by the amount of repeat business it provides for its clients. The company regularly benchmarks its performance through customer feedback, complaints and internal reviews. All complaints are handled in a fair and transparent manner and are reported to the Board on a monthly basis.

# Operational risk

The Company mitigates this risk by undertaking regular risk reviews of the operational procedures. There is a commitment by the business to report and review any operational failings and these are reported to the Board on a monthly basis.

# Regulatory risk

The Company is subject to regulatory control and supervision by the Financial Conduct Authority (FCA). The Company has successfully gained all the permissions required by the FCA to perform its trade. The Company continually assesses the changing regulatory requirements and its adherence to them through regular reviews and updates to the Board.

# Interest rate risk

Interest rate risk is the risk of a rise or fall in interest rates and the potential impact on underlying profitability through both assets and liabilities. The Company minimises its exposure to interest rate risk by managing the interest rate characteristics of its assets and liabilities. Where necessary the Company may enter into derivative financial instruments with market counterparties to manage this interest rate risk.

# Financing risk

Key to the Company's success is the availability of funding for its own book. To ensure this availability the Company has a funding facility that enables it to continue writing business to it's own book.

# Currency risk

The Company manages it's foreign exchange risk against its functional currency. Foreign exchange risk arises when the Company's currency income and the cost of services provided to the Company from external suppliers are denominated in a currency that is not the Company's functional currency. Currency risk to the Company is deemed to be minimal.

2020