

# Link Treasury Services Limited Public Disclosure Financial Year 22/23



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# 1. Overview

This disclosure is in relation to Link Treasury Services Limited (“LTSL”, “the Firm”). LTSL is a private, UK incorporated company, authorised and regulated by the Financial Conduct Authority (“FCA”) under Firm Reference Number 150403. LTSL is primarily involved in the provision of treasury management and capital (including asset) financing advisory services primarily in the UK. LTSL is a wholly owned subsidiary of Link Group.

This document sets out the public disclosures for LTSL as of 30 June 2023, which represents the end of LTSL’s financial accounting period.

## Basis and Frequency of Disclosure

As a UK investment firm undertaking activities within the scope of the UK Markets in Financial Instruments Directive (“MIFID”), LTSL is subject to the prudential requirements of the Investment Firms Prudential Regime (“IFPR”) contained in the MIFIDPRU Prudential sourcebook for MIFID investment firms of the FCA Handbook.

LTSL is required to publish disclosures in accordance with the provisions outlined in MIFIDPRU 8 of the IFPR. These requirements are supplemented by the guidance set out in MIFIDPRU 8 published by the FCA. Under the IFPR’s firm categorisation, LTSL is categorised as a small non-interconnected (“SNI”) MIFIDPRU investment firm. The disclosure for LTSL is prepared annually on a solo entity (i.e., individual) basis. The disclosed information is proportionate to LTSL’s size and organisation, and to the nature, scope and complexity of LTSL’s activities.

## Policy, Validation and Sign-Off

LTSL is committed to following a robust internal controls framework to ensure the completeness, accuracy and compliance with the relevant standards and regulatory requirements of any external reports and disclosures. As an external publication, this document has been subject to internal verification and approval to ensure compliance with the regulatory requirements contained in MIFIDPRU 8.

The governance in place allows for appropriate challenge and oversight prior to publication. The disclosure is not required to be subject to independent external audit.

## 2. Own Funds

### Composition of Regulatory Own Funds

LTSL's own funds (i.e., capital resources) comprise exclusively CET 1 capital. CET 1 capital consists of fully issued ordinary shares, satisfying all criteria for a CET 1 instrument in accordance with the IFPR.

As at the end of FY on 30 June 2023, LTSL complied with the relevant capital regulatory obligations, as outlined in the IFPR.

Table 1 – Own funds

No.	Item	Amount (GBP thousands)	Source based on reference numbers/letters of the balance sheet in the audited financial statements
1	<b>OWN FUNDS</b>	<b>6,074</b>	
2	<b>TIER 1 CAPITAL</b>	<b>6,074</b>	
3	<b>COMMON EQUITY TIER 1 CAPITAL</b>	<b>6,180</b>	
4	Fully paid up capital instruments	900	E1
5	Share premium	50	
6	Retained earnings	5,230	E3
7	Accumulated comprehensive income other	N/A	
8	Other reserves	N/A	
9	Adjustments to CET1 due to prudential filters	N/A	
10	Other funds	N/A	
11	(-) TOTAL DEDUCTIONS FROM COMMON EQUITY TIER 1	(106)	

19	CET1: Other capital elements, deductions and adjustments	(106)	A1
20	<b>ADDITIONAL TIER 1 CAPITAL</b>	<b>N/A</b>	
21	Fully paid up, directly issued capital instruments	N/A	
22	Share premium	N/A	
23	(-) TOTAL DEDUCTIONS FROM ADDITIONAL TIER 1	N/A	
24	Additional Tier 1: Other capital elements, deductions and adjustments	N/A	
25	<b>TIER 2 CAPITAL</b>	<b>N/A</b>	
26	Fully paid up, directly issued capital instruments	N/A	
27	Share premium	N/A	
28	(-) TOTAL DEDUCTIONS FROM TIER 2	N/A	
29	Tier 2: Other capital elements, deductions and adjustments	N/A	

## Reconciliation of Regulatory Own Funds to Balance Sheet in the Audited Financial Statements

Table 2 – Reconciliation of own funds to the balance sheet

	<b>a</b>	<b>b</b>	<b>c</b>
<b>Amount in GBP (thousands)</b>	<b>Balance sheet as in published/audited financial statements</b>	<b>Under regulatory scope of consolidation</b>	<b>Cross-reference to template OF1</b>
<b>As at period end</b>			

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**Assets** – Breakdown by asset classes according to the balance sheet in the audited financial statements

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1	Intangible assets	106	19
2	Deferred tax assets	21	
3	Trade and other receivables	9,652	
4	Cash and cash equivalents	1,166	
5	Property, Plant and Equipment	45	
	<b>Total Assets</b>	<b>10,990</b>	

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**Liabilities** – Breakdown by liability classes according to the balance sheet in the audited financial statements

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1	Trade and other payables	(4,810)	
	<b>Total Liabilities</b>	<b>(4,810)</b>	

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**Shareholders' Equity**

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1	Share capital	(900)	4
2	Share premium	(50)	5
3	Retained earnings	(5,230)	6
	<b>Total Shareholders' equity</b>	<b>(6,180)</b>	

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## Main features of own instruments

The table below provides information on the CET1 Instruments issued by LTSL

Table 3 – Main features of own instruments issued by LTSL

### Own funds: main features of own instruments issued by the firm

Share Capital:

- Class of shares: ordinary £1
- Currency: GBP
- Number allotted: 900,000
- Aggregate nominal value: 900,000
- Amount paid per share: 1
- Amount unpaid per share: 0

Prescribed Particulars: Each share is entitled to one vote in any circumstances. Each share has equal rights to dividends. Each share is entitled to participate in a distribution arising from a winding up of the company.

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## 3. Own Funds Requirements

### K-Factor Requirement and Fixed Overheads Requirement

LTSL is required to disclose the K-Factor requirement (“KFR”) and the fixed overhead requirement (“FOR”) amounts in relation to its compliance with the own funds requirement (“OFR”) set out in MIFIDPRU 4.3. The amounts are presented in the table below. For the definition of each K-factor, please refer to the Appendix.

Table 4 – K-factor and fixed overhead requirements

Item	Total amount in GBP (thousands)	
K-Factor	$\Sigma$ K-AUM, K-CMH and K-ASA	0
	$\Sigma$ K-DTF and K-COH	0
	$\Sigma$ K-NPR, K-CMG, K-TCD and K-CON	0
FOR	75	

### Approach to Assessing the Adequacy of Own Funds

LTSL is further required to disclose its approach to assessing the adequacy of its own funds in accordance with the Overall Financial Adequacy Rule (“OFAR”) as outlined in MIFIDPRU 7.4.7R.

### ICARA Process

The Internal Capital Adequacy and Risk Assessment (“ICARA”) process serves as the means of assessing key risks to which LTSL is exposed. Further, it assists LTSL with identifying and managing material harms that LTSL may cause through its regulated and unregulated activities. The process further seeks to determine the level of own funds and liquidity LTSL needs to hold. The ICARA process has been implemented and embedded within the Link Group’s Risk Management Framework (“RMF”).

The ICARA process, which has replaced the former Internal Capital Adequacy Assessment Process, has been enhanced to improve the effectiveness of the new process, including better alignment of own funds and liquidity stress-testing and wind-down planning.

The following are the key ICARA elements that are assessed as part of the process:

- Business strategy and growth plans.
- Comprehensive key risk and harms assessment.



- Internal assessment of own funds adequacy.
- Internal assessment of liquidity adequacy.
- Capital and liquidity planning (i.e., financial, own funds and liquidity).
- Stress testing.
- Recovery actions.
- Wind-down Plan (“WDP”).

The adequacy of the ICARA process will be reviewed at least annually or more frequently, should there be any material changes to LTSL’s risk profile, business strategy or if requested by the LTSL Board.

## Overall OFAR Compliance

At all times, LTSL must hold adequate financial resources, both in amount and quality, to ensure that the Firm remains financially viable throughout the economic cycle with the ability to address and mitigate any potential harms that may be caused, arising from its ongoing business activities, and that the Firm is prepared for an orderly wind-down while minimising harm to customers or to other market participants, without threatening the integrity of the UK financial system.

As a minimum to meet the OFAR, an FCA standard of determining the adequacy of its financial resources through the internal assessment of its capital and liquidity adequacy, LTSL must meet the OFR and basic liquid assets requirement (“BLAR”).

As a SNI firm, LTSL has to comply with the provisions of the OFR contained within MIFIDPRU 4.3.3R by holding the highest of:

1. Its Permanent Minimum Capital Requirement (“PMR”). (Per MIFIDPRU 4.4).
2. Its FOR (per MIFIDPRU 4.5); or

LTSL complies with its PMR of £75,000 being a fixed requirement based on the permissions the Firm has to undertake its regulated activities. The FOR, which is an amount equal to one quarter of LTSL’s expenditure from the preceding year after the distribution of its profits and deduction of certain non-fixed expenditure items, is calculated from LTSL’s audited annual financial statements.

Further, LTSL performs an internal assessment of the own funds and liquid assets required to support its ongoing operations and to support an orderly wind-down of the Firm. The Firm also undertakes stress testing and scenario analysis as key inputs in these internal assessments of the adequacy of its financial resources. These internal assessments, alongside the OFR and BLAR, help inform the adequate level of financial resources required to be maintained by LTSL in compliance with the OFAR.

## Own Funds Adequacy and Monitoring

LTSL's approach to ensuring that it has appropriate own funds is its alignment with its strategy and risk appetite. All identified key risks are individually assessed. Additionally, LTSL carries out stress testing of business specific and macro events which are outside the firm's control.

This testing provides confidence to LTSL's board and management that the capital and liquid resources currently held by the business are sufficient to withstand the impact of these stressed events.

## Liquid Assets Adequacy and Monitoring

LTSL has documented systems and controls in place at both a Company and Group level to actively monitor and manage liquidity risk. The systems and controls are regularly reviewed by and reported on by senior management, as is the liquidity risk appetite.

The Company has a low tolerance for, and exposure to, liquidity risk. This is due to its business and cash flow model and the ongoing requirement to be able to meet contractual payments as they fall due. Liquidity risk tolerance is reviewed by senior management on an ongoing basis. The Board has defined a minimum approved liquidity balance of £750k as defined in its Contingency Funding Plan.

## Wind-Down

The Company has assessed the realistic net cost to wind down at approximately £465k and as such it will also have sufficient capital resources to cover these costs. The wind down assessment has also been subject to stress testing of the key assumptions and in all cases the Company has assessed that it will continue to have sufficient capital and liquid resources to cover the wind down.

Having considered the various scenarios that could give rise to a wind down decision, it is anticipated that a similar approach would be taken for each scenario. This approach considers the diversity and complexity of each product along with the impact that wind down would have upon consumers. The approach taken is deemed to have the least impact upon individual investors within each product group.

The wind down will take one year in total with differing timeframes for each product.

## Overview of Risk Management and Control Environment

LTSL operates in line with the Link Group Enterprise Risk Management Framework (ERMF) which provides a consistent methodology, approach and process for risk management across the businesses within the Group. This Framework sets out the Link Group Risk Appetite requirements, segregation of duties and management risks via the Three Lines of Defence model, which applies to all entities within the global Link Group. The principal additions incorporated into the framework reflect the differences in the local regulatory and sector environment.

This helps the Board and management answer pertinent questions facing the Group, including questions around the risks to our business strategy; our appetite relating to material risks; our approach to controlling, monitoring and managing these risks; and how we respond to possible scenarios that could impact Link Group.

The Group's approach to the Three Lines of Defence model is designed with clear roles and accountabilities to enable all employees to play an active role in the end-to-end management of risk. This helps the Group work together effectively ensuring there are no gaps in risk coverage. The Standard supports the Enterprise Risk Management Framework (ERMF).

## 4. Remuneration

Being an SNI firm, LTSL is not required to disclose remuneration arrangements.

# 5. Appendix

## K-Factor Definitions

The Prudential sourcebook for MIFID investment firms (i.e., MIFIDPRU) of the FCA Handbook sets out the KFR methodology for calculating own funds requirements effective from 1 January 2022. The IFPR introduced nine K-factors. The application of each K-factor at individual investment firms is determined by a firm's regulatory permissions.

K-factor	Description
K-AUM	Assets under management
K-COH	Client orders handled
K-ASA	Assets safeguarded and administered
K-CMH	Client money held
K-NPR	Net position risk
K-CMG	Clearing margin given
K-TCD	Trading counterparty default
K-DTF	Daily trading flow
K-CON	Concentration risk

## 6. Disclaimer

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