



Saveable Limited

**MIFIDPRU8 Annual Disclosure Report as at 31 March 2024
(PILLAR III)**

Table of contents

1. Introduction	2
2. Risk Management Objectives and Policies (MIFIDPRU 8.2)	4
3. Governance Arrangements (MIFIDPRU 8.3)	7
4. Own Funds (MIFIDPRU 8.4)	9
5. Own Funds Requirement (MIFIDPRU 8.5)	12
6. Remuneration Policy and Practices (MIFIDPRU 8.6)	13
7. Investment Policy (MIFIDPRU 8.7)	15

1. Introduction

Overview

On 1 January 2022, the Investment Firms Prudential Regime (IFPR) took effect in the United Kingdom, becoming mandatory for investment firms regulated by the Financial Conduct Authority (FCA). The IFPR, similar to its European counterpart, was introduced to provide a more suitable prudential regime for non-bank investment firms compared to the previous Capital Requirements Directive and Regulations (CRD/CRR) framework, which was more appropriate for credit institutions.

The disclosure requirements under the IFPR are outlined in MIFIDPRU chapter 8. These requirements introduce proportionality, dividing obligations between small and non-interconnected (SNI) investment firms and those classified as "non-SNI" investment firms. Saveable Limited falls into the "non-SNI" category. The disclosure document is prepared following the FCA MIFIDPRU8 standards.

Public disclosure is crucial for promoting market discipline and ensuring the stability of financial markets by allowing market participants to evaluate key information on capital adequacy, risk, and control processes. Quantitative disclosures are provided as of 31 March, 2024.

Saveable Limited ("Saveable Limited" "Saveable","Firm"), FCA FRN: 739214, is authorised and regulated by the Financial Conduct Authority to carry out investment and credit broking services. Saveable is an affiliate of Plum Fintech Limited ("Plum Fintech"), FCA FRN 836158. Plum Fintech is authorised to carry on payment services activities as a Registered Account Information Service Provider ("AISP") and registered a distributor of Modulr FS Limited, FRN 900573, authorised and regulated by the FCA as an EMI.

Together Saveable, Plum Fintech Limited and its affiliates are referred to as 'Plum'.

This document refers to Plum when discussing the general frameworks, methodologies, systems, and controls implemented across Plum. As relevant, certain services and frameworks may be provided to Saveable by Plum Fintech Limited with the Plum group structure.

Means of Disclosure (MIFIDPRU8.1.13)

The disclosure report for UK regulated entities is made available according to MIFIDPRU 8.1.13 on the website of Plum.

Consumer Duty

The FCA's new Consumer Duty (the "Duty") came into force in 2023. The Duty applies to the regulated and ancillary activities of all firms regulated under the Financial Services and Markets Act 2000, the Payment Services Regulations 2017 and E-money Regulations 2011 in respect of products and services for prospective and actual retail customers. For new and existing products or services that are open to sale or renewal the rules came into force on 31 July 2023. For closed products or services, the rules will come into force on 31 July 2024.

The Duty requires firms to act to deliver good outcomes for their retail customers. Firms are expected to provide customers with products and services that meet their needs and offer fair value. Retail customers should receive communications they can understand and get the customer support they need, and when they need it. The Duty also requires firms to demonstrate that their products consistently deliver good outcomes.

Consumer Duty governance and implementation programmes were established to coordinate and oversee the required changes. Plum implemented the necessary regulatory obligations pursuant to the Consumer Duty before the compliance date of 31 July 2023. Work is now being undertaken to further embed and operationalise the Duty.

2. Risk Management Objectives and Policies (MIFIDPRU 8.2)

Introduction

Saveable Limited is committed to a robust risk management framework that ensures effective identification, assessment, and mitigation of risks inherent in its operations. This policy outlines Saveable Limited's risk management objectives and practices, designed to protect the firm's financial stability, operational effectiveness, and reputation while supporting its strategic goals.

Risk Management Objectives

- **Promote Resilience:** Safeguard the firm's capital and operational base against potential risks and adverse events.
- **Support Strategic Goals:** Ensure that risk-taking aligns with the firm's strategic objectives and risk appetite.
- **Maintain Regulatory Compliance:** Adhere to all applicable regulatory requirements and standards, including those outlined in MIFIDPRU 8.2.
- **Foster a Risk-Aware Culture:** Encourage a culture where risk management is integrated into everyday business processes and decision-making.

Risk Management Framework

Saveable Limited employs a risk management framework that integrates risk management into all aspects of its operations. The framework encompasses:

- **Risk Identification:** Ongoing identification of potential risks across operational, financial, and strategic domains.
- **Risk Assessment:** Regular assessment of risks to determine their potential impact and likelihood.
- **Risk Mitigation:** Implementation of controls and measures to mitigate identified risks to acceptable levels.
- **Risk Monitoring:** Continuous monitoring of the risk environment and effectiveness of risk mitigation strategies.
- **Risk Reporting:** Regular reporting to senior management and the Board on risk exposures, control effectiveness, and significant risk events.

Three Lines of Defence Model

First Line of Defence: Operational Management

- **Responsibilities:**
 - Directly responsible for managing risks and implementing controls within their areas of operation.
 - Accountable for ensuring that risks are identified, managed, and controlled effectively.
 - Monitor performance against risk appetite and control effectiveness.
 - Collaborate with the second line to enhance risk management processes and controls.

Second Line of Defence: Risk, Compliance, and Legal Departments

- **Responsibilities:**
 - Develop and oversee risk management frameworks, policies, and procedures.
 - Provide independent oversight and challenge to the first line's risk management efforts.
 - Define risk appetite and control limits to ensure that risks are managed within acceptable boundaries.
 - Report on risk management effectiveness to senior management and the Board.
 - Conduct periodic Risk and Control Self-Assessments (RCSAs).

Third Line of Defence: Internal and External Audit

- **Responsibilities:**
 - Provide independent assurance on the effectiveness of risk management and internal controls.
 - Evaluate the adequacy of the risk management framework and its implementation.
 - Report findings to the Board and senior management for corrective action.

Risk Appetite and Tolerance

- **Risk Appetite:** Defined by the Board, outlining the level of risk the firm is willing to accept in pursuit of its strategic objectives. Risk appetite statements are both qualitative and quantitative.
- **Risk Tolerance:** Specific limits and thresholds for various risk types to ensure that the firm operates within acceptable risk boundaries.

Key Risk Types and Management

1. **Operational Risk:** Risks arising from inadequate or failed internal processes, people, and systems, or from external events.
 - **Controls:** Process documentation, regular reviews, and contingency planning.
2. **Liquidity Risk:** The risk of being unable to meet short-term financial obligations.
 - **Controls:** Liquidity forecasting, stress testing, and maintaining contingency funding.
3. **Credit Risk:** The risk of loss due to a counterparty's failure to meet its financial obligations.
 - **Controls:** Credit assessment procedures, counterparty limits, and diversification.
4. **Business Risk:** Risks associated with the firm's business model and strategic objectives.
 - **Controls:** Strategic planning, performance monitoring, and scenario analysis.
5. **Conduct Risk:** Risks arising from unethical behaviour or failure to adhere to regulatory and ethical standards.
 - **Controls:** Code of conduct, training programs, and compliance monitoring.
6. **Market Risk:** Risks of financial loss due to changes in market conditions (e.g., interest rates, exchange rates).
 - **Controls:** Market risk limits, hedging strategies, and portfolio diversification.
7. **Concentration Risk:** Risks associated with having a high level of exposure to a single counterparty, sector, or market.
 - **Controls:** Concentration limits, diversification strategies, and regular reviews.

Risk Management Policies

- **Risk Management Policy:** Defines the overall approach to risk management, including risk identification, assessment, mitigation, and reporting.
- **Liquidity Management Policy:** Outlines procedures for managing liquidity to ensure the firm can meet its financial obligations.
- **Credit Risk Management Policy:** Establishes guidelines for assessing and managing credit risk.
- **Operational Risk Management Policy:** Details controls and procedures for managing operational risks.
- **Market Risk Management Policy:** Sets out strategies for managing exposure to market risks.
- **Conduct Risk Management Policy:** Defines expectations for ethical behaviour and compliance with regulations.

Governance and Oversight

- **Board of Directors:** Provides overall oversight and approval of the risk management framework and policies. Reviews risk appetite and tolerance.
- **Risk Committee:** Assists the Board in overseeing risk management practices and reporting.
- **Senior Management:** Implements risk management policies and ensures compliance across the firm.

Monitoring and Review

- **Regular Reviews:** The risk management framework and policies are reviewed annually or more frequently if necessary.
- **Continuous Improvement:** The firm adopts a proactive approach to improve risk management practices based on lessons learned and changes in the risk environment.

By adhering to these risk management objectives and policies, Saveable Limited aims to effectively manage risks and safeguard its operations while supporting its strategic goals and maintaining regulatory compliance.

3. Governance Arrangements (MIFIDPRU 8.3)

Governance Summary

Ownership and Oversight: The governance framework of Saveable Limited is the responsibility of the Board of Directors of Saveable Limited (“Board”). This framework is aligned with firmwide and regional governance standards to ensure compliance with applicable laws and regulations.

- **Board of Directors Responsibilities:**
 - **Oversight and Compliance:** The Board ensures the entity operates within strategic and regulatory frameworks.
 - **Internal Control and Risk Management:** The Board is informed of significant control issues and developments that could impact the entity. It approves the risk appetite and reviews risks at the entity level, ensuring alignment with firmwide controls.
 - **Capital and Liquidity Management:** The Board oversees capital positions, delegating day-to-day oversight to the Finance Committee.
 - **Regulatory Responsibilities:** Compliance with Senior Managers Regime, ensuring senior managers have defined roles and certifications.

Diversity Policy

Saveable Limited is committed to fostering a diverse and inclusive workplace, reflecting a broad range of backgrounds and perspectives. Appointments to the Board are based on merit, considering skills, expertise, and diversity factors such as gender, age, and geographical provenance.

Board Composition

The Board consists of three directors:

1. **Victor Trokoudes (CEO & Executive Director)**
2. **Apostolos Foteniakis (Non-Executive Director)**

Committee Structure

Board Committees:

Risk Committee:

- Ensures integrity of risk and controls framework.
- Manages external and internal audit arrangements, financial reporting, and compliance.
- Meets at least six times a year.

Executive Management Committee:

- Manages day-to-day operations and aligns activities with long-term strategy.
- Oversees risk management, capital, and liquidity.
- Meets monthly or as required.

CASS Committee:

- Ensures compliance with FCA's Client Assets Sourcebook.
- Monitors CASS controls and performance, addressing any issues promptly.
- Meets monthly or as required.

Risk Management Framework

The Risk Management Framework is referred to above in Section 2 "Risk Management Objectives and Policies"

4. Own Funds (MIFIDPRU 8.4)

Table 1: OF1 – Composition of Regulatory Own Funds

Item	Amount (£'000)	Source/Reference
OWN FUNDS	1,080	-
TIER 1 CAPITAL	1,080	-
COMMON EQUITY TIER 1 CAPITAL	1,080	-
Fully paid-up capital instruments	0	Note a
Share premium	1,863	Note b
Retained earnings	-784	Note c
Other reserves	0	Note d
(-) TOTAL DEDUCTIONS FROM CET1	0	-

Notes for Table 1

- **Note a:** Represents the amount of fully paid-up capital instruments.
- **Note b:** Represents the amount of share premium.
- **Note c:** Represents the amount of retained earnings.
- **Note d:** Represents the amount of other reserves.

Table 2: OF2 – Reconciliation of Regulatory Own Funds to Balance Sheet in the Audited Financial Statements

Balance Sheet Item	Amount (£'000)	Cross-reference to OF1
Assets		
Intangible assets	0	
Property and equipment	0	
Total non-current assets	0	
Trade and other receivables	690	
Cash and cash equivalents	725	
Total current assets	1,416	
Total assets	1,416	
Liabilities		
Trade and other payables	335	
Lease liabilities	0	
Provisions	0	
Total current liabilities	335	
Total liabilities	335	
Net assets	1,080	
Shareholders' Equity		
Called-up share capital	0	Note a
Share premium account	1,863	Note b
Other reserves	0	Note d
Retained earnings	-784	Note c
Total Shareholders' equity	1,080	

Table 3: OF3 – Main Features of Own Instruments Issued by Saveable Limited

Allots and fully paid	No.	£
As at 31 March 2023	14,481,071	1,163,404
Issued during the year	0	700,000
At 31 March 2024	14,481,071	1,863,404

The shareholders' equity consists of 13,056,570 ordinary shares and 1,424,501 Seed Preferred shares both of nominal value £0.00001 each at a premium.

In March 2024 there was a capital contribution from the parent entity of £700,000. Following the Mar-24 year end, and not included in the above there was an additional capital contribution from the parent entity of £2,000,000. Both capital contributions did not involve any issuance of additional shares.

This structure ensures that Saveable Limited's Own Funds disclosure is comprehensive, transparent, and aligned with regulatory requirements, providing clear and detailed information about Saveable's capital composition and its alignment with the audited financial statements.

5. Own Funds Requirement (MIFIDPRU 8.5)

Table OFR1 – Own Funds Requirements

Own Funds Requirement	(£'000)
Sum of K-ASA, K-CMH, K-COH	74
Sum of K-NPR	0
Sum of K-TCD, K-DTF	0
K-FactorTotal	74
Total Fixed Overhead Requirement	831

Explanation of K-Factors:

- **K-ASA (Assets Safeguarded and Administered):** This captures the value of assets that Saveable Limited safeguards and administers for clients.
- **K-CMH (Client Money Held):** This represents the amount of client money held by Saveable Limited.
- **K-COH (Client Orders Handled):** This captures the value of client orders handled.
- **K-NPR (Net Positions Risk):** This captures the exposure-based risks, including market risk.
- **K-TCD (Trading Counterparty Default):** This captures the risk of trading counterparty default.
- **K-DTF (Daily Trading Flow):** This represents the daily value of transactions entered into through dealing on own account or execution of orders on behalf of clients.

Approach to Assessing the Adequacy of Own Funds

Saveable Limited assesses its own funds adequacy through the Internal Capital And Risk Assessment (ICARA) process, as required under MIFIDPRU 7 and the Overall Financial Adequacy Rule (OFAR). This ensures that the firm holds adequate own funds and liquid assets to remain financially viable throughout the economic cycle and address any material potential harm.

ICARA Process

- **Capital Monitoring:** Regular monitoring of capital to ensure adequacy in relation to risk profile and appetite.
- **Stress Testing:** Performing stress tests to assess the impact of severe but plausible scenarios on earnings, capital resources, and own funds requirements.
- **Risk Appetite and Strategy:** Aligning capital and risk management frameworks with the firm's strategy and risk appetite.
- **Recovery and Wind-Down Planning:** Ensuring the firm can recover from adverse conditions and wind down in an orderly manner if needed.

6. Remuneration Policy and Practices (MIFIDPRU 8.6)

Saveable Limited's remuneration policy is designed to align with MIFIDPRU 8.6, promoting sound risk management while aligning employee interests with the firm's long-term strategy. The policy is gender-neutral, complies with the Equality Act 2010, and is reviewed annually by the Board.

Remuneration Governance

- **Senior Management** determines the remuneration strategy and establishes the policy, which is ratified by the Board.
- **Review:** The Board reviews the remuneration arrangements and ensures it aligns with the firm's objectives and regulatory requirements.

Key Principles

Saveable Limited's remuneration policy is guided by the following principles:

1. **Risk Management:** Promotes sound and effective risk management.
2. **Alignment with Strategy:** Aligns employee interests with the firm's long-term strategy and objectives.
3. **Responsible Conduct:** Encourages responsible business conduct and prudent risk-taking.
4. **Risk Tolerance:** Discourages risk-taking beyond the firm's risk tolerance levels.
5. **Conflict of Interest:** Avoids conflicts of interest.
6. **ESG Considerations:** Considers environmental, social, and governance issues.
7. **Capital Preservation:** Ensures remuneration incentives do not jeopardise the firm's capital base.
8. **Gender Neutrality:** Ensures compliance with the Equality Act 2010, with objectives based on role performance.
9. **Performance Metrics:** Considers both financial and non-financial measures.

Remuneration Structure

Staff remuneration consists of two components:

- **Fixed Remuneration:** Includes base salary and benefits such as pension contributions, death in service, and health insurance. The performance of each member of staff is reviewed every six months. Assessment of performance is based on the achievement of objectives, their conduct, behaviour, and how this aligns to Saveable company values. The leadership team has budgetary control over the remuneration of staff, within salary bands which are benchmarked by the People team and approved every year.
- **Variable Remuneration:** Saveable does not pay cash bonuses; however, Saveable does offer variable remuneration in the form of share options. Share options are awarded to all employees upon joining the Firm according to their seniority, department and salary. Additionally, further options are granted on a discretionary basis based on annual performance reviews and promotions. These options

typically vest over four years. However, they can be reduced or clawed back as a result of an employee being classified as a “bad leaver” or when other conduct issues arise as outlined in the Remuneration Policy.

Breakdown for Year ended March 2024

Category	Number of Staff	Fixed Remuneration (£'000)
Senior Management	6	371
Other Material Risk Takers	5	281
Other Staff	167	2,763
Total	178	3,414

Employer pension contributions have been included in fixed remuneration. Other benefits are also available including pension contributions, death in service and health insurance.

Quantitative Disclosures

Table: Total Remuneration Awarded for Year ended March 2024

Category	Senior Management (£'000)	Other Material Risk Takers (£'000)	Other Staff (£'000)	Total (£'000)
Total Remuneration	617	452	3,259	4,328

7. Investment Policy (MIFIDPRU 8.7)

Overview

Saveable Limited is committed to transparency and regulatory compliance regarding its investment activities. The following policy outlines our approach to managing and disclosing investments in accordance with MIFIDPRU 8.7.

Investment Policy Disclosures

1. General Provisions:

- **Regulated Market Holdings:** Saveable Limited does not hold any shares in legal entities that are admitted to trading on a regulated market.
- **Voting Rights:** Saveable Limited does not hold, directly or indirectly, more than 5% of voting rights in any legal entity. Therefore, the specific investment policy disclosures required under MIFIDPRU 8.7.6 do not apply.

2. Compliance with MIFIDPRU 8.7:

- **Disclosure Requirements:** As Saveable Limited does not meet the conditions specified in MIFIDPRU 8.7.6, there is no requirement for detailed disclosures regarding the firm's investment policy related to holdings in legal entities with trading shares on regulated markets or significant voting rights.