

Financial & Risk Transaction Services Ireland Limited

REMUNERATION DISCLOSURES 2022

ARTICLE 51 INVESTMENT FIRMS REGULATION – REMUNERATION POLICY AND PRACTICES

Financial & Risk Transaction Services Ireland Limited (FRTSIL) is authorised and regulated in Ireland by the Central Bank of Ireland (“CBI”) with Reference Number C185017. FRTSIL is incorporated in Ireland and is a wholly owned subsidiary of Refinitiv Limited, itself a wholly owned indirect subsidiary of London Stock Exchange Group plc, the parent entity of the London Stock Exchange Group of companies (the “Group”).

FRTSIL has adopted remuneration policies and procedures that comply with the relevant remuneration requirements and are in accordance with EBA Guidelines on sound remuneration policies, in designing and maintaining its remuneration policy and procedures.

In light of the size, internal organisation and the nature, scope and profile of FRTSIL’s activities, FRTSIL does not have a Remuneration Committee and allocated responsibility for decisions regarding remuneration to the Board of Directors.

FRTSIL identifies staff to whom the relevant remuneration requirements apply in accordance with the relevant CBI rules, the Investment Firms Regulation (EU2019/2033) (**IFR**) and the Investment Firms Directive (EU2019/2034) (**IFD**) – FRTSIL maintains records of those categories of staff whose professional activities have a material impact on FRTSIL’s risk profile and monitors this on an ongoing basis.

Following the identification of relevant staff, FRTSIL applies a remuneration approach which seeks to incentivise staff to perform effectively whilst adhering to FRTSIL’s risk appetite and risk management framework.

FRTSIL considers that its remuneration policy, which details the applicable remuneration structure, is in compliance with the requirements under IFR/IFD. In reviewing and approving the policy, the Board of Directors assesses whether it is in line with FRTSIL’s business strategy, objectives, values and long-term interests on at least an annual basis. For detailed information on the remuneration policy please see the specific disclosures made by FRTSIL under Article 51 IFR below.

ARTICLE 51 – REMUNERATION DISCLOSURE

FRTSIL’s remuneration policy is established and monitored by the Board of Directors. The Board of Directors considers the Group-level remuneration policies/procedures and then utilises these to adopt appropriate local-level remuneration policies and procedures which are reflective of the risk management framework applicable to FRTSIL. The Board of Directors reviews and approves amendments to these policies and procedures as required by changes in legal requirements, staffing and/or the business of FRTSIL. The Board is also responsible for ensuring the appropriate disclosures have been made in relation to the remuneration policy.

The remuneration structure adopted by FRTSIL includes both fixed and variable elements – which are appropriately balanced to minimise risk. The remuneration policy ensures that the fixed element of an individual’s remuneration is based on professional experience and organisational responsibility. Variable remuneration is subject to performance and includes annual discretionary bonus awards,

commission plans and share based incentives (payable in shares of LSEG plc), depending on role seniority. Details regarding the level of variable remuneration and criteria for awarding variable remuneration, pay out in instruments policy, deferral policy and vesting criteria is disclosed below.

1. INFORMATION ON THE MOST IMPORTANT DESIGN CHARACTERISTICS OF THE REMUNERATION SYSTEM, INCLUDING THE LEVEL OF VARIABLE REMUNERATION AND CRITERIA FOR AWARDING VARIABLE REMUNERATION, DEFERRAL POLICY AND VESTING CRITERIA (ARTICLE 51(a) IFR)

- 1.1 The remuneration policy is designed to ensure that effective performance is encouraged in a manner that mitigates and manages risk taking. It is a key principle of the policy that effective risk management is promoted at all levels of FRTSIL, and that all Staff Members¹ operate within the risk parameters set by the Board of Directors and do not undertake unnecessary risks.
- 1.2 The remuneration policy is gender neutral and does not discriminate on the basis of the protected characteristics of an individual. FRTSIL aims to reward all employees fairly, regardless of job function, race, religion, colour, national or ethnic origin, sex, sexual orientation, marital status, pregnancy, maternity, disability or age.
- 1.3 FRTSIL compensates Staff Members through both fixed and variable remuneration.
- 1.4 Fixed remuneration comprises base salaries which are reviewed annually in accordance with the relevant Staff Member's appraisal process, market standards, the experience of the individual and their level of responsibility, and other benefits (e.g. certain insurance benefits and pension contributions).
- 1.5 A Staff Member may then also be awarded an element of variable remuneration to recognise:
 - a. the overall performance of LSEG in total (of which FRTSIL is a part);
 - b. the extent to which the Staff Member achieved/exceeded their agreed objectives (determined as part of the Staff Member's appraisal process); and
 - c. the overall conduct of the Staff Member (monitored in relation to a number of matters on an ongoing basis).
- 1.6 This variable remuneration (if earned) is awarded by means of a discretionary bonus scheme. The Group's Group Leader population are subject to bonus deferral. If their annual bonus exceeds £150,000 (€150,000 or \$200,000), 50% will be deferred into LSEG plc shares, vesting in equal tranches over three years.
- 1.7 The Global Commission Plan (the Commission Plan) is the principal form of incentive compensation that applies to all commissionable sales roles within the Sales and Account Management division (SAM). The Commission Plan has been designed to align the objectives that have been set for participants in the Commission Plan with the objectives of SAM and it aims to drive motivation and desired behaviours. All awards are based on revenues collected. Non-performance related matters are also taken into consideration before allocating any compensation in accordance with the Group's performance management process.

No employee is automatically entitled to participate in the Commission Plan. An employee who is a participant in the Commission Plan is not eligible to participate in the discretionary bonus scheme or any other Group annual and/or incentive compensation plan that is not specifically designated as applying to such participants. There is no deferred portion of the payout pursuant to the

¹ LSEG employees, consultants, agents, secondees and appointed representatives acting on behalf of FRTSIL

Commission Plan. There is no vesting period as such, but the Commission Plan pays out at the end of every quarter. The payout is made at the end of each quarter in full and in cash only.

- 1.8 Individuals at the Group Director level are eligible for awards under the Restricted Share Plan. This is a three-year plan where employees are typically granted 40% of their base salary as shares, vesting in equal tranches over three years.
- 1.9 Individuals at Group Leader level are eligible to participate in LSEG's Long Term Incentive Plan ("LTIP"). Vesting occurs over a three-year period subject to the following performance measures: 60% against Adjusted Earnings Per Share ("AEPS") performance and 40% against relative Total Shareholder Return ("TSR") performance.
- 1.10 Variable remuneration may be subject to performance adjustment prior to vesting. Furthermore, in certain circumstances and where legally possible, clawback may be exercised, pursuant to which it may be required for deferred variable remuneration to be repaid (or deducted from future payments) for up to three years following the date of payment.

2 RATIOS BETWEEN FIXED AND VARIABLE REMUNERATION (ARTICLE 51(b) IFR)

- 2.1 The Group's single aligned global reward framework is scaled according to seniority and defines the target and maximum variable remuneration opportunity based on percentages of salary for individuals at each global grade. No individual can exceed the maximum opportunity for their grade. The effective ratio between variable remuneration awarded and fixed remuneration increases with performance achieved with maximum opportunity only achievable in the event of exceptional performance.

3 QUANTITATIVE INFORMATION ON REMUNERATION (ARTICLE 51(c) IFR)

- 3.1 The information below relates to the financial year ending 31 December 2022. The MRT aggregates are shared below.

Year		<i>Total</i>
		€'000
2022	Fixed Remuneration	2,487
	Variable Remuneration	1,671
	Total Remuneration	4,158
	Number of Staff	16

- 3.2 The amounts and forms of variable remuneration are shown below.

Year		<i>Total</i>
		€'000
2022	Cash	952
	Shares	719

3.3 Information on deferred remuneration awarded for previous performance periods is shown below.

Deferred remuneration (all figures in €'000)	Total amount of deferred remuneration awarded for previous performance periods	Of which due to vest in the financial year	Of which vesting in subsequent financial years	Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in the financial year	Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in future performance years	Total amount of adjustment during the financial year due to ex post implicit adjustments	Total amount of deferred remuneration awarded before the financial year actually paid out in the financial year
Cash	-	-	-				-
Shares	793	223	570				223
Total amount	793	223	570				223

3.4 There were no guaranteed variable remuneration awards made to FRTSIL MRTs in 2022.

3.5 FRTSIL has omitted disclosure of details of severance payments as this may result in an individual staff members' remuneration information being identifiable, and therefore place FRTSIL in breach of its data protection and privacy obligations. All necessary information will be made available to the CBI on request.

4 INFORMATION ON DEROGATIONS LAID DOWN IN ARTICLE 32(4)(a) OF IFD (ARTICLE 51(d) IFR)

4.1 FRTSIL benefits from a derogation from Article 32(1)(j) & (l) on the basis that the value of its on and off-balance sheet assets is on average equal to or less than EUR 100 million over the four-year period immediately preceding the given financial year.