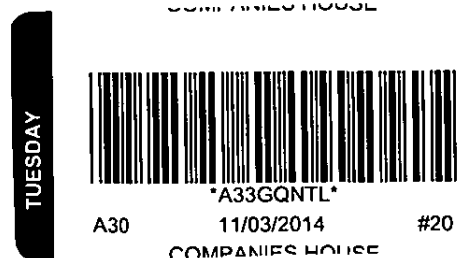


Platinum Capital Management Limited

Report And Financial Statements

30 June 2013

Rees Pollock
Chartered Accountants



COMPANY INFORMATION

Directors	B Sanghvi P A Sprecher S Martin T Scacchi P M Taylor
Registered number	03829996
Registered office	Independent House 18-20 Thorpe Road Norfolk NR1 1RY
Independent auditors	Rees Pollock 35 New Bridge Street London EC4V 6BW
Bankers	The Royal Bank of Scotland 62/63 Threadneedle Street London EC2R 8LA
Solicitors	Mayer Brown International LLP 201 Bishopsgate London EC2M 3AF

DIRECTORS' REPORT

For the year ended 30 June 2013

The directors present their report and the financial statements for the year ended 30 June 2013

Principal activities

The principal activity of the company during the year was the provision of marketing and administration services and investment management services to the Platinum Funds

Business review

The company is dependent on the environment in which it operates. The launch of the Platinum Funds continues to gather momentum. Results for the year are in line with directors' expectations.

Results and dividends

The profit for the year, after taxation, amounted to £5,466 (2012 - £10,431)

The directors have not recommended a dividend.

Directors

The directors who served during the year were

B Sanghvi
P A Sprecher
S Martin
T Scacchi
P M Taylor

Political and charitable contributions

During the year the company made charitable donations of £nil (2012 - £1,000)

Pillar III disclosures

The firm has been documented the disclosures required by the FCA under BIPRU 11.3 as an attachment to the accounts.

DIRECTORS' REPORT

For the year ended 30 June 2013

Statement of directors' responsibilities

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 United Kingdom Generally Accepted Accounting Practice (United Kingdom Accounting Standards and applicable law). 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 judgments 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,
- 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.

Provision of information to auditors


Each of the persons who are directors at the time when this Directors' report is approved has confirmed that

- so far as that director is aware, there is no relevant audit information of which the company's auditors are unaware, and
- that director has taken all the steps that ought to have been taken as a director in order to be aware of any relevant audit information and to establish that the company's auditors are aware of that information.

Auditors

The auditors, Rees Pollock, have expressed their willingness to continue in office.

This report was approved by the board on *14 October 2013* and signed on its behalf



B Sanghvi
Director



REESPOLLOCK

Chartered Accountants

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London EC4V 6BW
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INDEPENDENT AUDITORS' REPORT TO THE SHAREHOLDERS OF PLATINUM CAPITAL MANAGEMENT LIMITED

We have audited the financial statements of Platinum Capital Management Limited for the year ended 30 June 2013, set out on pages 4 to 15. The financial reporting framework that has been applied in their preparation is applicable law and United Kingdom Accounting Standards (United Kingdom Generally Accepted Accounting Practice).

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.

Respective responsibilities of directors and auditors

As explained more fully in the Directors' responsibilities statement, the directors are responsible for the preparation of the financial statements and for being satisfied that they give a true and fair view. Our responsibility is to audit and express an opinion on the financial statements in accordance with applicable law and International Standards on Auditing (UK and Ireland). Those standards require us to comply with the Auditing Practices Board's Ethical Standards for Auditors.

Scope of the audit of the financial statements

An audit involves obtaining evidence about the amounts and disclosures in the financial statements sufficient to give reasonable assurance that the financial statements are free from material misstatement, whether caused by fraud or error. This includes an assessment of whether the accounting policies are appropriate to the company's circumstances and have been consistently applied and adequately disclosed, the reasonableness of significant accounting estimates made by the directors, and the overall presentation of the financial statements. In addition, we read all the financial and non-financial information in the Directors' report to identify material inconsistencies with the audited financial statements. If we become aware of any apparent material misstatements or inconsistencies we consider the implications for our report.

Opinion on financial statements

In our opinion the financial statements

- give a true and fair view of the state of the company's affairs as at 30 June 2013 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.

Opinion on other matter prescribed by the Companies Act 2006

In our opinion the information given in the Directors' report for the financial year for which the financial statements are prepared is consistent with the financial statements.

Matters on which we are required to report by exception

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.

Simon Rees (Senior statutory auditor)
for and on behalf of
Rees Pollock
Statutory Auditor

14 October 2013

PROFIT AND LOSS ACCOUNT
For the year ended 30 June 2013

	Note	2013 £	2012 £
TURNOVER	1.2	2,072,038	1,074,915
Administrative expenses		(2,066,394)	(1,060,526)
OPERATING PROFIT	3	5,644	14,389
Interest receivable and similar income		69	643
Interest payable and similar charges	6	(233)	(44)
PROFIT ON ORDINARY ACTIVITIES BEFORE TAXATION		5,480	14,988
Tax on profit on ordinary activities	7	(14)	(4,557)
PROFIT FOR THE FINANCIAL YEAR	16	5,466	10,431

All amounts relate to continuing operations

There were no recognised gains and losses for 2013 or 2012 other than those included in the profit and loss account

The notes on pages 7 to 15 form part of these financial statements

BALANCE SHEET
As at 30 June 2013

	Note	£	2013 £	£	2012 £
FIXED ASSETS					
Tangible assets	8		10,168		8,315
Investments	9		314		-
			<u>10,482</u>		<u>8,315</u>
CURRENT ASSETS					
Debtors	10	357,747		269,787	
Cash in hand		88,068		250,630	
		<u>445,815</u>		<u>520,417</u>	
CREDITORS amounts falling due within one year	11	(223,818)		(301,719)	
NET CURRENT ASSETS			<u>221,997</u>		<u>218,698</u>
NET ASSETS			<u><u>232,479</u></u>		<u><u>227,013</u></u>
CAPITAL AND RESERVES					
Called up share capital	15		15,030		15,030
Capital redemption reserve	16		14,970		14,970
Profit and loss account	16		202,479		197,013
SHAREHOLDERS' FUNDS	17		<u><u>232,479</u></u>		<u><u>227,013</u></u>

The financial statements were approved and authorised for issue by the board and were signed on its behalf on
14 October 2013



B Sanghvi
Director

The notes on pages 7 to 15 form part of these financial statements

CASH FLOW STATEMENT
For the year ended 30 June 2013

	Note	2013 £	2012 £
Net cash flow from operating activities	18	(155,259)	(178,670)
Returns on investments and servicing of finance	19	(164)	599
Taxation		-	(100)
Capital expenditure and financial investment	19	(7,139)	(916)
DECREASE IN CASH IN THE YEAR		(162,562)	(179,087)

RECONCILIATION OF NET CASH FLOW TO MOVEMENT IN NET FUNDS
For the year ended 30 June 2013

	2013 £	2012 £
Decrease in cash in the year	(162,562)	(179,087)
MOVEMENT IN NET FUNDS IN THE YEAR	(162,562)	(179,087)
Net funds at 1 July 2012	156,630	335,717
NET (DEBT)/FUNDS AT 30 JUNE 2013	(5,932)	156,630

The notes on pages 7 to 15 form part of these financial statements

NOTES TO THE FINANCIAL STATEMENTS
For the year ended 30 June 2013

1 ACCOUNTING POLICIES

1.1 Basis of preparation of financial statements

The financial statements have been prepared under the historical cost convention and in accordance with applicable accounting standards

1.2 Turnover

Turnover comprises revenue recognised by the company in respect of services supplied during the year, exclusive of Value Added Tax

1.3 Tangible fixed assets and depreciation

Tangible fixed assets are stated at cost less depreciation. Depreciation is provided at rates calculated to write off the cost of fixed assets less their estimated residual value, over their expected useful lives on the following bases

Leasehold Property	-	amortised over the period of the lease
Computer equipment	-	25% on cost

1.4 Investments

Investments held as fixed assets are shown at cost less provision for impairment

1.5 Operating leases

Rentals under operating leases are charged to the profit and loss account on a straight line basis over the lease term

Benefits received and receivable as an incentive to sign an operating lease are recognised on a straight line basis over the period until the date the rent is expected to be adjusted to the prevailing market rate

1.6 Deferred taxation

Full provision is made for deferred tax assets and liabilities arising from all timing differences between the recognition of gains and losses in the financial statements and recognition in the tax computation

A net deferred tax asset is recognised only if it can be regarded as more likely than not that there will be suitable taxable profits from which the future reversal of the underlying timing differences can be deducted

Deferred tax assets and liabilities are calculated at the tax rates expected to be effective at the time the timing differences are expected to reverse

Deferred tax assets and liabilities are not discounted

1.7 Financial instruments

Financial instruments are classified and accounted for according to the substance of the contractual arrangement, as either financial assets, financial liabilities or equity instruments. An equity instrument is any contract that evidences a residual interest in the assets of the company after deducting all of its liabilities

NOTES TO THE FINANCIAL STATEMENTS

For the year ended 30 June 2013

2 TURNOVER

The turnover and operating profit for the year was derived from the company's principal continuing activity which was carried out wholly in the UK. All turnover arises from outside the UK.

All turnover arose within the United Kingdom.

3 OPERATING PROFIT

The operating profit is stated after charging/(crediting)

	2013 £	2012 £
Depreciation of tangible fixed assets		
- owned by the company	4,972	3,564
Auditors' remuneration	9,500	8,500
Auditors' remuneration - non-audit	11,730	10,400
Operating lease rentals		
- other operating leases	83,460	85,180
Difference on foreign exchange	7,031	3,829
	<u>111,693</u>	<u>109,473</u>

4 STAFF COSTS

Staff costs, including directors' remuneration, were as follows:

	2013 £	2012 £
Wages and salaries	932,486	386,423
Social security costs	119,922	49,708
	<u>1,052,408</u>	<u>436,131</u>

The average monthly number of employees, including the directors, during the year was as follows:

	2013 No.	2012 No.
Number of administrative staff	8	5

5 DIRECTORS' REMUNERATION

	2013 £	2012 £
Remuneration	155,769	152,468

NOTES TO THE FINANCIAL STATEMENTS
For the year ended 30 June 2013

6 INTEREST PAYABLE

	2013	2012
	£	£
Bank interest payable	233	44

7 TAXATION

	2013	2012
	£	£
Analysis of tax charge in the year		
Current tax (see note below)		
UK corporation tax charge on profit for the year	14	-
Deferred tax (see note 12)		
Reversal/(recognition) of deferred tax asset	-	4,557
Tax on profit on ordinary activities	14	4,557

Factors affecting tax charge for the year

The tax assessed for the year differs from the standard rate of corporation tax in the UK of 20% (2012 - 20%) The differences are explained below

	2013	2012
	£	£
Profit on ordinary activities before tax	5,480	14 988
Profit on ordinary activities multiplied by standard rate of corporation tax in the UK of 20% (2012 - 20%)	1,096	2,998
Effects of:		
Expenses not deductible for tax purposes other than goodwill amortisation and impairment	416	350
Timing differences on fixed assets	(513)	338
Utilisation of tax losses	(985)	(3,686)
Current tax charge for the year (see note above)	14	-

NOTES TO THE FINANCIAL STATEMENTS
For the year ended 30 June 2013

8 TANGIBLE FIXED ASSETS

	S/Term Leasehold Property £	Computer equipment £	Total £
Cost			
At 1 July 2012	3,710	62,146	65 856
Additions	-	6,825	6 825
At 30 June 2013	3,710	68,971	72 681
Depreciation			
At 1 July 2012	3,710	53,831	57,541
Charge for the year	-	4,972	4 972
At 30 June 2013	3,710	58,803	62,513
Net book value			
At 30 June 2013	-	10,168	10,168
At 30 June 2012	-	8,315	8,315

9 FIXED ASSET INVESTMENTS

	Unlisted investments £
Cost or valuation	
At 1 July 2012	-
Additions	314
At 30 June 2013	314
Net book value	
At 30 June 2013	314
At 30 June 2012	-

NOTES TO THE FINANCIAL STATEMENTS
For the year ended 30 June 2013

10 DEBTORS

	2013 £	2012 £
Due after more than one year		
Other debtors	33 981	33,981
Due within one year		
Other debtors	149 513	69 898
Prepayments and accrued income	170,360	162,015
Deferred tax asset (see note 12)	3,893	3 893
	<u>357 747</u>	<u>269,787</u>

11 CREDITORS

Amounts falling due within one year

	2013 £	2012 £
Subordinated loan	34,000	34 000
Trade creditors	35,736	45,450
Corporation tax	14	-
Other taxation and social security	42,103	24,536
Other creditors	8	93,150
Accruals and deferred income	51,957	44,583
Share capital treated as debt (Note 15)	60,000	60 000
	<u>223,818</u>	<u>301 719</u>

Disclosure of the terms and conditions attached to the non-equity shares are made in note 15

The company has an obligation to redeem 30,000 Redeemable Preference "C" shares of £1 each at the request of its founder shareholder at a price of £2 per share. The "C" shares were to be redeemed on or before 30th October 2009, and are now repayable upon demand of the shareholders.

The £34,000 subordinated loan is interest free and repayable upon one month's written notice.

NOTES TO THE FINANCIAL STATEMENTS
For the year ended 30 June 2013

12 DEFERRED TAX ASSET

	2013	2012
	£	£
At beginning of year	3,893	8,450
Gains/(losses) recognised during the year	-	(4,557)
	<u>3,893</u>	<u>3 893</u>
At end of year	<u><u>3,893</u></u>	<u><u>3 893</u></u>

The deferred tax asset is made up as follows

	2013	2012
	£	£
Accelerated capital allowances	(871)	(871)
Tax losses carried forward	4,764	4,764
	<u>3,893</u>	<u>3,893</u>
	<u><u>3,893</u></u>	<u><u>3,893</u></u>

13 OPERATING LEASE COMMITMENTS

At 30 June 2013 the company had annual commitments under non-cancellable operating leases as follows

	Land and buildings	
	2013	2012
	£	£
Expiry date		
Within 1 year	17,496	75,336
Between 2 and 5 years	57,840	-
	<u><u>57,840</u></u>	<u><u>-</u></u>

NOTES TO THE FINANCIAL STATEMENTS
For the year ended 30 June 2013

14 RELATED PARTY TRANSACTIONS

The following information relates to transactions and balances with other companies in which the directors have a material interest

During the year income of £1,570,292 (2012 £654,988) was receivable from Platinum Trading Management Limited, a company in which P A Sprecher has a material interest. At the year end an amount of £62,779 was owed from (2012 £85,720 owed to) Platinum Trading Management Limited

Additionally, during 2009 Platinum Trading Management Limited granted Platinum Capital Management Limited a subordinated loan of £34,000, the terms of which are given in note 11. This loan was outstanding at the year end

During the year the company incurred consultancy fees of £30,000 (2012 £30,000) to S Martin. At the year end there were no amounts outstanding in relation to this (2012 £2,500)

During the year the company incurred consultancy fees of £nil (2012 £2,184) to P Taylor. At the year end, there were no amounts outstanding in relation to this (2012 £nil)

During the year the company incurred marketing and distribution fees of £136,468 (2012 £112,967) to T Scacchi. At the year end there were no amounts outstanding in relation to this (2012 £11,417)

All of the above transactions have been undertaken on normal commercial terms

15 SHARE CAPITAL

	2013	2012
	£	£
Shares classified as capital		
Allotted, called up and fully paid		
7,515 Class A Ordinary shares of £1 each	7,515	7,515
7,515 Class B Ordinary shares of £1 each	7,515	7,515
	<u>15,030</u>	<u>15,030</u>
Shares classified as debt		
Allotted, called up and fully paid		
30,000 Class C Redeemable Preference shares of £2 each	<u>60,000</u>	<u>60,000</u>

NOTES TO THE FINANCIAL STATEMENTS
For the year ended 30 June 2013

16 RESERVES

	Capital redempt'n reserve £	Profit and loss account £
At 1 July 2012	14,970	197,013
Profit for the financial year		5,466
	<u>14,970</u>	<u>202,479</u>
At 30 June 2013	<u>14,970</u>	<u>202,479</u>

17. RECONCILIATION OF MOVEMENT IN SHAREHOLDERS' FUNDS

	2013 £	2012 £
Opening shareholders' funds	227,013	216,582
Profit for the financial year	5,466	10,431
	<u>232,479</u>	<u>227,013</u>
Closing shareholders' funds	<u>232,479</u>	<u>227,013</u>

18 NET CASH FLOW FROM OPERATING ACTIVITIES

	2013 £	2012 £
Operating profit	5,644	14,389
Depreciation of tangible fixed assets	4,972	3,564
Increase in debtors	(87,960)	(51,016)
Decrease in creditors	(77,915)	(145,607)
	<u>(155,259)</u>	<u>(178,670)</u>
Net cash outflow from operating activities	<u>(155,259)</u>	<u>(178,670)</u>

19 ANALYSIS OF CASH FLOWS FOR HEADINGS NETTED IN CASH FLOW STATEMENT

	2013 £	2012 £
Returns on investments and servicing of finance		
Interest received	69	643
Interest paid	(233)	(44)
	<u>(164)</u>	<u>599</u>
Net cash (outflow)/inflow from returns on investments and servicing of finance	<u>(164)</u>	<u>599</u>

NOTES TO THE FINANCIAL STATEMENTS
For the year ended 30 June 2013

19 ANALYSIS OF CASH FLOWS FOR HEADINGS NETTED IN CASH FLOW STATEMENT (continued)

	2013 £	2012 £
Capital expenditure and financial investment		
Purchase of tangible fixed assets	(6,825)	(916)
Purchase of unlisted and other investments	(314)	-
Net cash outflow from capital expenditure	<u>(7,139)</u>	<u>(916)</u>

20 ANALYSIS OF CHANGES IN NET FUNDS

	1 July 2012 £	Cash flow £	30 June 2013 £
Cash at bank and in hand	250,630	(162,562)	88,068
Debt:			
Debts due within one year	(94,000)	-	(94 000)
Net funds	<u>156,630</u>	<u>(162,562)</u>	<u>(5,932)</u>

21 ULTIMATE CONTROLLING PARTY

The company's ultimate controlling party is P A Sprecher, by virtue of his controlling interest in the company's issued share capital

Platinum Capital Management Limited Pillar 3 disclosure

Disclosure Policy

The Pillar 3 rules in BIPRU 11 set out the need for firms to have a formal disclosure policy. In accordance with the rules of the Financial Conduct Authority ("FCA") Firm Name (the "Firm") will disclose the information set out in BIPRU 11 (the Pillar 3 rule) on at least an annual basis. The Pillar 3 disclosure will be made in the annual accounts. Where a Pillar 3 disclosure is not made by way of annual accounts or the Firm's website, details of how to obtain the Pillar 3 disclosure shall be made in the annual accounts and contact details for the Compliance Officer.

The Firm may omit information it deems as immaterial, in accordance with the rules. Materiality is based on the criterion that the omission or misstatement of any information would be likely to change or influence the decision of a reader relying on that information. Accordingly, where the Firm has considered an item to be immaterial it has not been disclosed.

In addition, if the required information is deemed to be proprietary or confidential then the Firm may take the decision to exclude it from the disclosure. In the Firm's view, proprietary information is that which, if it were shared, would undermine its competitive position. Information is considered to be confidential where there are obligations binding the Firm to confidentiality with our customers, suppliers or counterparties. Where information is omitted for either of these reasons this is stated in the relevant section of the disclosure, along with the jurisdiction.

Introduction

The Firm is authorised and regulated by the FCA and as such is subject to minimum regulatory capital requirements. The Firm is categorised by the FCA, for capital purposes, as a limited licence firm. It is an investment management firm, it has no trading book exposures. The Firm is not required to prepare consolidated reporting for prudential purposes.

The FCA's current prudential regime can be split into three "pillars"

- Pillar 1 – prescribes the minimum capital requirements that authorised firms need to hold. This is the higher of €50k, quarter of the firm's annual adjusted expenditure (the Fixed Overheads Requirement), or the sum of the firm's prescribed Credit risk + Market risk.
- Pillar 2 – requires firms to analyse the risks to the business and then consider whether the risks are mitigated to an appropriate standard. If the firm feels that the risks are not adequately mitigated then they should allocate capital against those risks. Stress and scenario tests are conducted to ensure that the processes, strategies and systems are comprehensive and robust and that the allocation of capital is sufficient.
- Pillar 3 - requires firms to develop a set of disclosures which will allow market participants to assess key information about the Firm's underlying risks, risk management controls and capital position.

The Fixed Overheads Requirement determines the Firm's Capital Resources Requirement

The Firm is a Limited Company and its capital is summarised as follows

	£
Permanent Share Capital	15,000
Retained Profits	217,000

Permanent Share Capital and other reserves	232,000
	=====

The main features of the Firm's Capital Resources Requirement are as follows

Capital Item	£
Tier 1 capital less innovative tier 1 capital	232,000
Total tier 2, innovative tier 1 and tier 3 capital	34,000
Deductions from tier 1 and tier 2 capital	nil
Total capital resources, net of deductions	266,000

Risk Management

Due to the size, nature, scale and complexity of the Firm, there is no independent risk management function. The Directors of the Firm determine the business strategy and risk appetite along with the risk management policies and procedures. An identification of risks to the Firm is considered and the Firm's resultant exposure is assessed after the application of both management and mitigation of these risks. Furthermore the Firm then conduct a series of stress tests and scenario analyses on these risks to determine the effect they would have on the firm.

If necessary the Firm would allocate extra capital to the relevant risk, as per the Pillar 2 requirement this has not been deemed necessary. This process is conducted at Board meetings which are held on a quarterly basis and the relevant policies and procedures are updated where necessary.

The Directors have identified the below as the main area of risk to which the firm is exposed

Material Risks

PCM has taken the approach to be risk adverse and the firm takes reasonable steps to manage its risks. This is reflected in their low appetite for taking on risk in any of its activities. Risks to income generating capability are mitigated wherever possible and measures against actual and potential operating risks are taken where the Board of Directors judge the benefit or the potential of the mitigation to exceed the costs of the mitigating controls. The same low tolerance to risk is reflected on the costs side of the business with minimal long term cost commitments. PCM has little to no tolerance for engaging in activity that adversely influences its risk profile. All risks of any significance are identified, assessed and controlled on an on-going basis.

Risk Category	Applicable?	Impact	Likely
Concentration risk	Y	MH	ML
Credit risk	Y	MH	L
Foreign exchange risk	Y	ML	L
Key person risk	Y	MH	ML
Liquidity risk	Y	MH	L
Market risk	Y	MH	MH
Operational risk	Y	ML	ML
Regulatory and Legal risk	Y	ML	L
Reputational risk	Y	MH	L
Settlement risk	Y	L	L
Strategic risk	Y	ML	L

The Firm has concluded that its Capital Resources I is sufficient to cover its Pillar 1 and Pillar 2 requirements.

Platinum Capital Management Limited

Remuneration disclosure

Governance

The purpose of the Remuneration Code is to ensure firms establish, implement and maintain remuneration policies, procedures and practices that are consistent with, and promote, sound and effective risk management

The Remuneration Code applies to 'Remuneration Code Staff' ('Code Staff') This includes senior management, risk takers, staff engaged in control functions and any employee receiving total remuneration that takes them into the same remuneration bracket as senior management and risk takers, whose professional activities have a material impact on the firm's risk profile

Platinum Capital Management Limited ("Platinum") has considered the contribution that can be made by a remuneration committee In order to take a proportionate approach given the size and non-complex nature of both the activities undertaken and the organisation, Platinum has decided that the governing body will undertake the role which would otherwise be undertaken by a remuneration committee This is in line with guidance provided by the FCA for tier 4 firms under the Remuneration code The governing body will be responsible for setting Platinum's policy on remuneration.

Platinum's Remuneration Policy will be reviewed, at least, annually by the governing body to ensure that it remains consistent with the Remuneration Code Principles and Platinum's objectives. The governing body will use all information available to it in order to carry out its responsibilities under the code, for example, information on risk and financial performance In addition, the Compliance Officer, as part of Platinum's regulatory monitoring, will include a review of the implementation of this Policy by the firm

Link between pay and performance

Remuneration at Platinum is made up of fixed ('salary') and variable ('bonus') components

Salary is set in line with the market at a level to retain, and when necessary attract, skilled staff

Any bonus paid is designed to both reflect the performance of a person in contributing to the success of the firm and their success in meeting, or exceeding, targets that have been set by the firm on an individual basis

Where remuneration is performance-related then in addition to the performance of the individual Platinum will also take into account the performance of the business unit concerned and the overall results of the firm Performance assessment will not relate solely to financial criteria but will also include compliance with regulatory obligations and adherence to effective risk management In keeping with Platinum's long term objectives, the assessment of performance will take into account longer-term performance and payment of any such performance related bonuses may need to be spread over more than one year to take account of the firm's business cycle

The measurement of financial performance will be based principally on profits and not on revenue or turnover

Awards will reflect the financial performance of Platinum and as such variable remuneration may be contracted where subdued or negative financial performance occurs Platinum will not ordinarily make any variable remuneration awards should the firm make a loss In exceptional circumstances

such payments may need to be considered. In such cases the governing body, in conjunction with the Compliance Officer, will consider and document whether such an award would be in keeping with the Remuneration policy.

Quantitative remuneration information

Platinum is required to disclose aggregate information on remuneration in respect of its Code Staff, broken down by business area and by senior management and other Code Staff. The relatively small size and lack of complexity of the firm's business is such that Platinum only has the one business area (investment management) and does not regard itself as operating, or needing to operate, separate 'business areas' and the following aggregate remuneration data should be read in that context.

Aggregate Remuneration

Senior Management	£	Others	£
	640,000		270,000

This remuneration disclosure is made under the Basel Pillar 3 framework.