

# Report

Environmental,  
Social & Governance

December 2025

For your brighter future

  
**radiant**  
financial group

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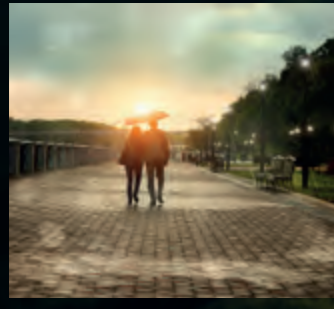
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# The Radiant Financial Group

**radiant**  
financial group

**radiant**  
financial planning

A specialist provider of financial planning, tax planning and business consultancy services.

**radiant**  
platform management

An environment which combines all client investments under one open architecture platform.

**radiant**  
asset management

A Discretionary Fund Manager, taking an innovative approach to clients' investment solutions.

The Radiant Financial Group is a fresh consolidator of financial services businesses, bringing together like-minded IFA businesses with a shared culture and vision - focused on creativity, innovation, integrity and collaboration.

Radiant Financial Planning advises a wide range of clients including large and small businesses, entrepreneurs, owner-managers, senior executives and individuals. As a client of Radiant,

our team of experienced planners and consultants will help you to make life changing decisions - empowering you to take control of your financial future, both personally and in your professional life.

Run by a team of highly experienced industry leaders, we are passionate about client-centric advice and exceptional delivery. Through this commitment we have developed a market-leading range of services through our subsidiary

companies - including financial, tax planning and mortgage advice for individuals, as well as employee benefits, corporate structuring and tax planning for UK businesses.

We have created our own platform and set up our own Radiant investment funds - The Radiant Group now comprises of three operating companies within our group.

# Our brand values

Radiant Financial Group is a national firm of financial advisers, employee benefit consultants, investment platform and investment solution providers.

**W**e have developed into a national business by combining exceptional local and regional businesses into one organisation. Our clients feel the benefits of our scale, scope, governance and resource, whilst keeping local access to exceptional financial planners and their teams. Our PPS team sits as a national veterinary specialisation in the heart of our Group. Our values were created by our staff and

remain reflective of how we want to conduct ourselves across everything we do, both now and into the future.

ESG naturally sits as part of our business DNA. We are mindful of our impact on people, their environment, culture, personal preferences and manage all of this with a strong focus on the governance of our business. At Radiant, the years following COVID have been a time of transformation. We've

embraced this period of change as catalyst to rethink everything: how we did our jobs, how we run the group from the social aspects and the environmental impacts the changes we were making had. In adopting hybrid working, changes in meeting formats and modifying our office space we have seen a huge reduction in our carbon emissions, which is something we are proud to have achieved and a major success for the group.

As we grow it is fundamental to our success to have not only have an operating and measurable ESG policy across the group but also a meaningful policy, which every staff member embraces. Our aim is to ensure we operate in an ethical manner, reduce our carbon footprint year on year and continue to work in line with government targets in protecting our planet.

## Inspiration

### Show enthusiasm

Enjoy what we do and be creative. Be inspiring in our work with clients, partners and colleagues.

## Innovation

### Lead, don't follow

Forward thinking, always looking to improve on what we do for the benefit of our clients.

## In Touch

### Be there

There for our clients, and collaborative with our professional partners. Always with our 'finger on the pulse', knowing our industries inside out.

## Integrity

### Do the right thing

Be thoughtful, open, honest and respectful at all times, in everything we do - from clients, to partners and colleagues.

# Message from our CEO- Simon Cogman-Hellier

## ESG: At the Heart of Our Group's Commitment

Environmental, Social, and Governance (ESG) considerations are more than a regulatory requirement or a passing trend—they are the core metrics by which our Group measures success, resilience, and integrity. As we look to the future, our commitment to ESG reflects not only our responsibility to the wider world, but—most importantly—our duty towards each member of our team. ESG, as a guiding principle, shapes how we operate, how we grow, and how we care for one another.

## ESG as a Key Metric: Strategic Value and Impact

ESG has become the benchmark for responsible business. For our Group, embracing ESG is not about box-ticking; it is about embedding responsibility into every decision, at every level. This approach ensures that our strategies are sustainable, our risks managed, and that we create long-term value for all stakeholders. Our focus on ESG helps us anticipate challenges, adapt to changing expectations, and build trust with both our clients and colleagues.



**Simon Cogman-Hellier**  
CEO

## Environmental Responsibility: Our Commitment and Initiatives

We acknowledge our duty to minimise our environmental footprint. From reducing energy consumption in our offices to adopting greener supply chain practices, environmental stewardship remains a cornerstone of our corporate ethos. These efforts are not just symbolic—they are tangible actions that contribute to a healthier planet and signal our intent to lead by example within our sector. Yet, even as we advance our environmental agenda, we recognise that true sustainability extends beyond the physical environment.

## Social Responsibility: Prioritising Team Wellbeing

The essence of our Group's social responsibility lies in the care and support we offer our team. Our people are our greatest asset, and their mental and emotional wellbeing is paramount. We are committed to fostering a safe, inclusive, and supportive working environment—one where every colleague feels valued, heard, and empowered to thrive. This means providing access to mental health resources, encouraging open dialogue around wellbeing, and ensuring that safety—both physical and psychological—is never compromised.

## Office attendance: Supporting Collaboration, Training, and Wellbeing

Minimum required attendance at our offices marks a significant step in supporting our colleagues' needs. While remote work has offered flexibility, we understand the profound benefits of in-person collaboration, spontaneous knowledge-sharing, and hands-on training. The office is more than a workspace—it is a hub for connection, innovation, and collective growth. By returning to the office, we reaffirm our commitment to nurturing a sense of belonging and supporting the overall wellbeing of our team.

## Governance Structure: Reinforcing Strong Governance Through ESG

Robust governance is the bedrock that underpins our ESG strategy. Strong oversight and transparent decision-making ensure that our commitments are upheld consistently and with integrity. By weaving ESG principles into our governance structure, we not only mitigate risks but also reinforce ethical leadership and accountability throughout the organisation. This empowers us to act responsibly, make informed decisions, and hold ourselves to the highest standards.

## Conclusion: Our Ongoing Commitment

Our journey with ESG is ongoing—a continuous process of learning, adapting, and striving for better. As we advance, our priorities remain clear: champion the environment, place team wellbeing at the forefront, uphold social responsibility, and maintain unwavering governance. Together, we will ensure our Group remains a responsible, sustainable, and a supportive community for all.

“ESG, as a guiding principle, shapes how we operate, how we grow, and how we care for one another”

# Objectives

## Environment

It is crucial for all individuals and organisations to do their part to reduce their environmental impacts in the face of climate change, pollution, and loss of biodiversity. Effectively reducing our impact requires understanding it. This ESG report is a major step towards implementing the necessary data gathering and reporting processes that will enable us to set appropriate targets for reducing our environmental impacts in future years. Our reporting will focus on energy and water consumption, waste and transport as these are areas where we believe we can have the most positive impact. We continue to map out our organisation's carbon footprint and reducing our emissions as far as possible and offsetting our residual emissions to become a carbon neutral organisation.

## Social

We are very proud of the services we offer and are continuously seeking ways to support the development of our staff as we grow. We continue to support and develop processes including fair play, training and health and well-being provision. On an annual basis we review and update our diversity, equity and inclusion policy to reflect our aim of being a diverse, inclusive and representative organisation.

## Governance

Governance is a framework which structures how an organisation meets and delivers its requirements, standards and practices. It provides a platform to enable the organisation and its stakeholders to ensure effective, accurate and legally compliant delivery of services. As we are going through a period of rapid growth it is vital, we have a strong and unified set of policies to guide our operations and to ensure our businesses meet our high standards of performance. We use key performance indicators to measure effectiveness and implement plans accordingly so we can continue to show how we are meeting objectives. As such, we continuously evolve our governance policies and procedures to reflect best practice and to ensure all stakeholders within our organisation are well supported, managed and treated fairly.



# Supporting the United Nations Sustainable Development Goals

The 17 SDG's (The 'Global Goals') is a collection of independent but interconnected goals carefully designed to give all of us on our planet a better future, with hundreds of targets and measurement indicators geared toward a date of 2030.

	Goal	Aim	Our contribution
Good Health and Wellbeing	Ensure healthy lives and promote wellbeing for all	Ensure the safety and health of all employees	We produce ongoing support for our staff health and well-being. We ensure all office spaces are safe and clean with regular office checks.
Quality Education	Quality Education	Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all	The Radiant Academy - Our goal in 2025/26 is to enhance and expand the staff resource available through this in-house education platform.
Ensure the safety and health of all employees	Ensure fair opportunities regardless of gender	Ensure fair hiring evaluations, generation, and rules and regulations	We follow fair hiring practices and undertake HR training to identify and eliminate any gender bias in the hiring process. We also advocate an equal pay policy between males and females.
Decent work and Economic growth	Decent Work and Economic Growth	Ensure that people have a workplace conducive to maintaining good health	We provide access to training, fitness programmes and health schemes. We have a clear sickness policy, 28 days annual leave, birthday - day off plus post company conference day off.
Zero hunger	Zero hunger	Increase involvement within schemes to provide food for all	In July 2025 we introduced an internal policy to support voluntary work, with a strong emphasis on initiatives dedicated to combating hunger. We give quarterly donations to The Trussell Trust.
Climate Action	Take urgent action to combat climate change and its impacts.	Improve education awareness-raising and human and institutional capacity on climate change mitigation, adaptation, impact reduction, and early warning.	In 2025 we offset 241.07 tonnes CO2e via the Climate Fund Portfolio.
Reduced Inequalities	Reduced Inequalities	Support movements and promote equality	In all areas of our business we value and respect every race, culture and empower women and support LGBT rights.
Sustainable cities and communities	Sustainable cities and communities	Invest in renewable energy resources. Reduce usage of consumable natural resources	In July 2025 we updated our 'Business Energy Conservation' policy. For travel the guidelines are: 1. Encourage the use of public transport where feasible 2. Promote route planning to reduce mileage 3. Encourage hybrid client meetings where appropriate to reduce travel frequency 4. Consider taking up the 'cycle to work scheme'.
Responsible consumption and production	Responsible consumption and production	Ensure raw materials used are produced ethically and become can be re-used	We continue to recycle paper, tin and plastics in all offices. And adhere to a 'paperless' office strategy as much as possible. We aim to purchase energy-efficient devices and office equipment.
Affordable and clean energy	Reduce energy usage	Make changes to reduce energy usage	In all our offices we aim to have energy-saving bulbs in place. We follow a policy of all appliances being switched off when not in use and we also install energy meters in offices where appropriate and timers on air conditioning units where feasible.

# Environment

- We continue to work on monitoring and reducing our environmental impact associated with our operations. In April 2025 we re-engaged with Carbon Neutral Britain to measure and offset all our carbon emissions.
- As a specialist provider of financial advice, tax planning, employee benefits and business consultancy services, it was identified that the main emissions occurred from business travel and the mileage accumulated within the reporting period.
- The Carbon Emission report measured and calculated the total greenhouse gas (GHG) emissions produced directly and indirectly from our organisation's activities. For the period 01/01/24-31/12/24 we identified our total emissions to be 215.27 tonnes of carbon dioxide equivalent. This is a decrease on last year's emissions of 301.77 tonnes of carbon dioxide equivalent.
- Measuring in tonnes of carbon dioxide equivalent ensures carbon offsetting is accurate and will reverse the organisations environmental impact to achieve carbon neutral status. An important achievement for our clients, shareholders and employees.

## Measuring our Carbon Footprint - 2024 Jan- Dec

### Calculating Emissions & Emissions Factors

The emissions calculations have been made using client-supplied activity data with assumed full disclosure of all relevant and necessary information. The data received (such as energy usage in kWh, or vehicle mileage) are then multiplied by the relevant emissions factors from published reputable sources. Depending on the needs of the organisation the emissions factors used in some cases are specific research journals or independent studies, but in most cases are from HM Government publications. Reporting (Year 2023, Expiry; 10/06/2024, Version 1.1) - DEBIS / DEFRA). Any assumptions or estimations of relevant dates are published within this report.

### Reporting Standards

GHG emissions reports are most widely carried out in accordance with the ISO 14064"1-2018 and GHG Emissions Protocol Accounting and Reporting Standards, whose methodologies have been used in the creation of this report.

The international Organisation of Standardisation (ISO) created the ISO 14064 standard in 2006, updating in 2018 to specify the principles and requirements at the organisational level for the quantification and reporting of greenhouse gas (GHG) emissions and removals. It includes requirements for the design development, management, reporting and verification of an organisations GHG inventory.

The "Greenhouse Gas Protocol - Corporate Accounting and Reporting Standard" (GHG Protocol, 2011) developed in a partnership of the World Business Council for Sustainable Development (WBCSD) and the World Resource Institute (WRI) follow a similar methodology mirroring those of the ISO standard.

Using the two most widely recognised and used emission standards in the world, ensure all measurements, calculations and subsequent offsetting are completed to the most regulated and accurate standards possible.

### Quality and Accuracy

The accuracy of a GHG assessment is directly related to the quality of the activity data provided, and for this assessment and report, 'primary data' (such as electrical usage in kWh for the reporting period), have been used wherever possible. 'Secondary data' in the form of estimates, extrapolations and/or industry averages has been used when primary data is not available - to provide as accurate estimates of emissions as possible.

In addition, this report has been completed following the WRI GHG protocol principles of relevance, completeness, transparency and accuracy.



## Scope of Emissions

Using the ISO 14064 and GHG Emissions Protocol Standards, business emissions are identified using three scopes of emissions:

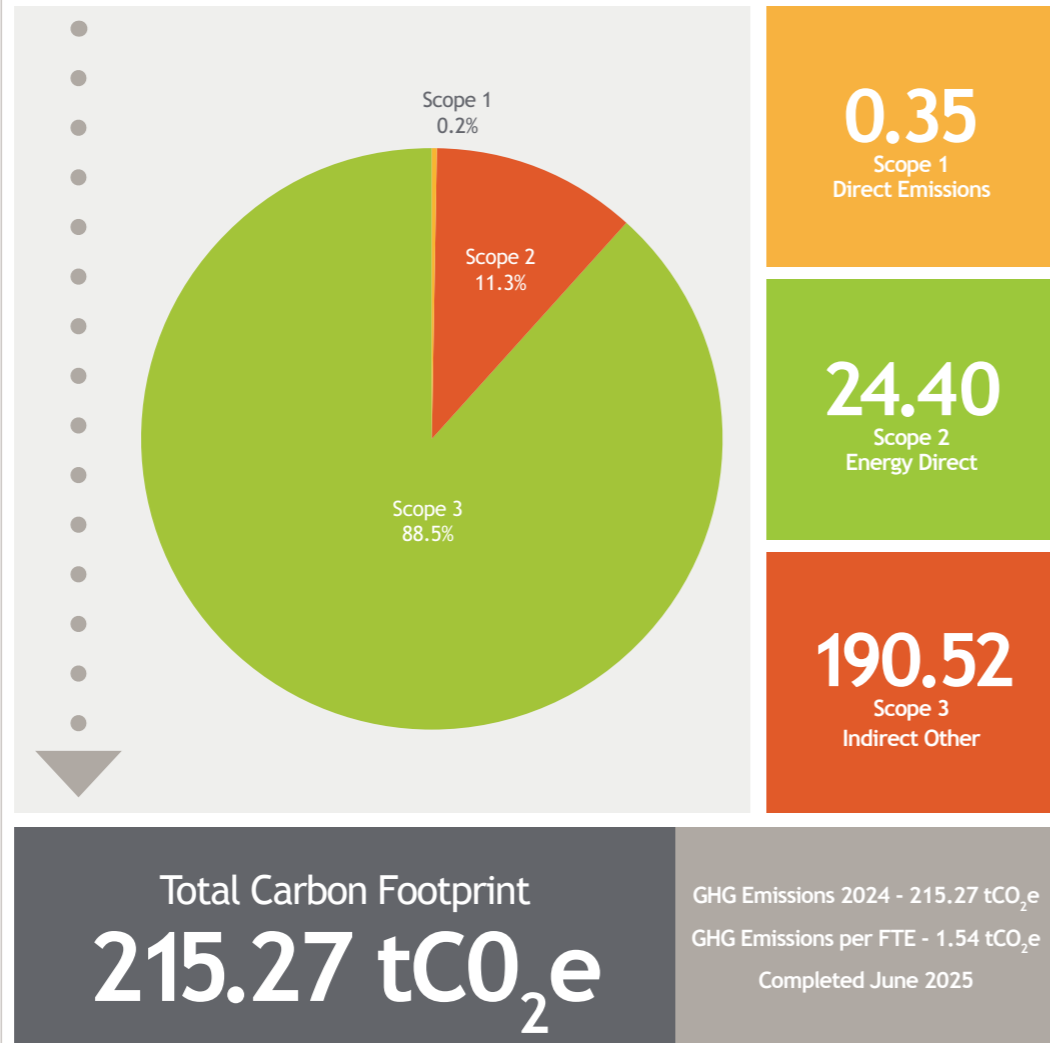
- Scope 1 (Direct emissions)**  
 Activities owned or controlled by the organisation that release emissions straight into the atmosphere. For manufacturing business these would be emissions from equipment and machinery used in production. Businesses that own or lease vehicles are also included within scope 1. For many office-based businesses, scope 1 emissions are usually very small.
- Scope 2 (Energy indirect)**  
 Emissions being released into the atmosphere associated with the consumption of purchased electricity, heat, steam and cooling. These are indirect emissions that are a consequence of the organisation's activities - but occur at sources that the business does not own or control. These emissions would be the energy usage by the organisation and staff working at sites under the operational control of the business.
- Scope 3 (Other indirect)**  
 Emissions that are a consequence of business activity, which occur at sources which are not owned or controlled, which are not classed as scope 2 emissions. Scope 3 emissions can be quite broad, including areas such as waste management, business travel, staff commuting, events, the emissions produced from delivery to and from the organisation (including third party delivery services), transmission and distribution losses associated with electricity usage, and well to tank emissions from fuel combustion.

### Assumptions & Estimations

- Where primary emissions data could not be collected, the following assumptions and estimations were used:
- Vehicle emissions were calculated using Defra vehicle categories and HM Government Emission Factors (2024).
- Throughout the reporting period, some staff worked remotely from home. Due to the unknown primary energy data from staff at home, the energy usage was calculated based on the number of days staff worked, assuming 8 hours per day.
- Transmission and distribution losses associated with electricity usage, as well as 'Well to tank' emissions from combustion fuels were included in the assessment. Any incidental emissions less than 1% from the sources measured were not included within this report.
- Where exact kWh figures were unknown, energy emissions were calculated based on the estimated floorspace, and EPC emissions figures of the building.
- Commuting data was estimated using industry averages, based on staff days within the organisation (HM Government Travel Survey).
- Where exact mileage data was unknown, business travel distances were estimated based on spend based figures.

## Measuring our Carbon Footprint - 2024

Reporting Period 01/01/24 - 31/12/24



## Measuring our Carbon Footprint - 2024 Jan-Dec

Organisation	Radiant Financial Planning Limited
Reporting Period	1st January 2024 - 31st December 2024
Consolidation Approach	Operational Control
Base Year	2019 - 138.90 Tonnes of Carbon Dioxide Equivalent
Second Year	2022 - 139.23 Tonnes of Carbon Dioxide Equivalent
Third Year	2023 - 301.77 Tonnes of Carbon Dioxide Equivalent
Current Total Emissions	2024 - 215.27 Tonnes of Carbon Dioxide Equivalent

Scope 1		
Stationary or Mobile Combustion Source	-	kg CO <sub>2</sub> e
Mains Gas	351.17	kg CO <sub>2</sub> e
Company Owned/ Lease Vehicles	-	kg CO <sub>2</sub> e
Refridgement Gas Loss Recharge	-	kg CO <sub>2</sub> e
Total	351.17	kg CO <sub>2</sub> e
Total (Tonnes)	0.35	t CO <sub>2</sub> e
Scope 2		
Total Organisation Energy Usage on Site	22,272.35	kg CO <sub>2</sub> e
Total Electric Vehicle Energy usage	2,127.29	kg CO <sub>2</sub> e
Total	24,399.64	kg CO <sub>2</sub> e
Total (Tonnes)	24.40	t CO <sub>2</sub> e
Scope 3		
Total Organisation Energy Usage WFH	81,682.94	kg CO <sub>2</sub> e
Organisation Waste	7,822.92	kg CO <sub>2</sub> e
Business Travel (not using owned/leased Vehicles)	54,755.66	kg CO <sub>2</sub> e
Staff commuting (not using owned/leased Vehicles)	18,218.98	kg CO <sub>2</sub> e
Business Hotel or Event Activities	3,001.50	kg CO <sub>2</sub> e
Organisation Water Usage	32.13	kg CO <sub>2</sub> e
Transmission & Distribution Losses	1,860.95	kg CO <sub>2</sub> e
Well to Tank	23,143.64	kg CO <sub>2</sub> e
Total	190,518.72	kg CO <sub>2</sub> e
Total (tonnes)	190.52	t CO <sub>2</sub> e
Total		
Total Organisation Emmissions	215.27	t CO <sub>2</sub> e

## Comparing 2023 and 2024

Our Carbon Footprint has **decreased** from 2023-2024:

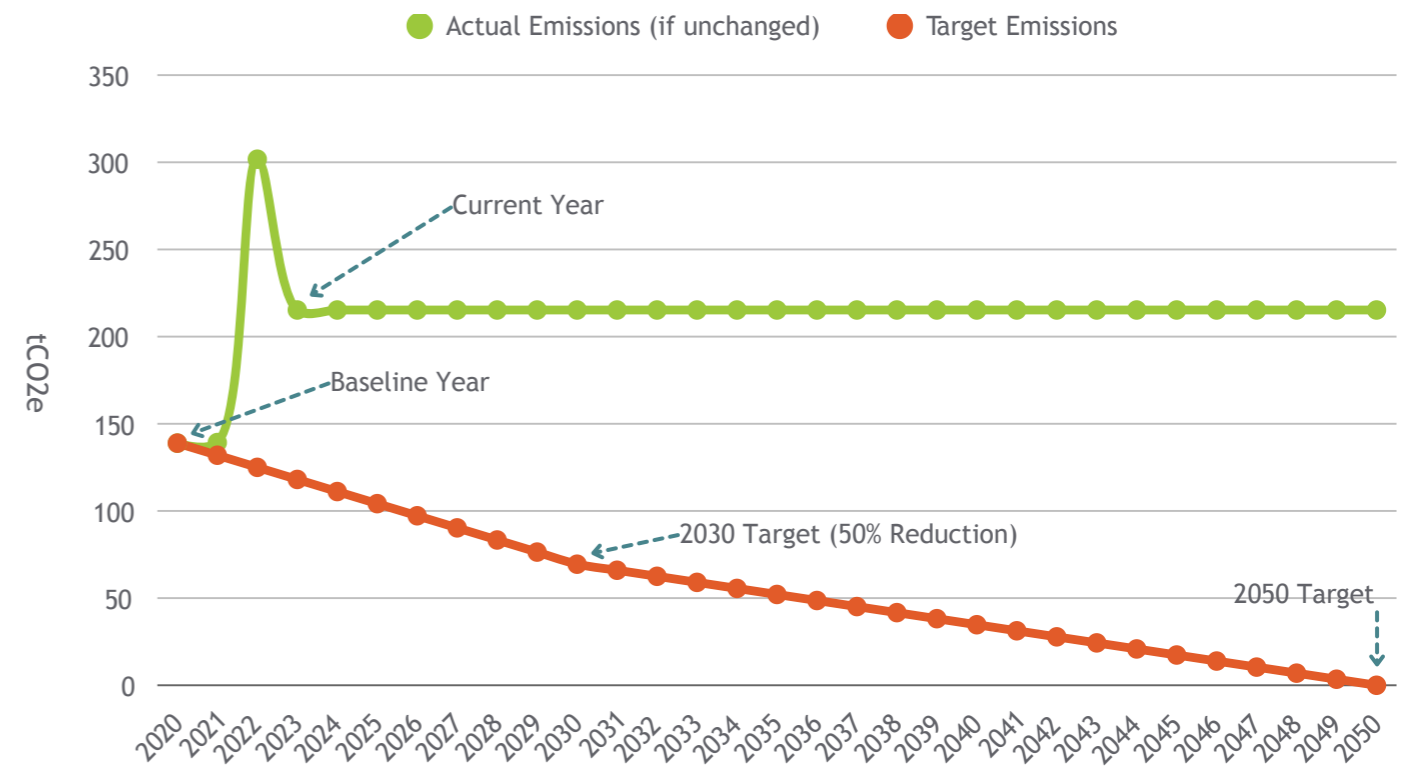
### Assumptions & Estimations

The recent decrease in our carbon emissions is primarily linked to the strategic management of our office footprint and the careful consideration of how our growing workforce operates. While the expansion in the number of offices in previous years had contributed to increased emissions, we have shifted our focus toward optimising space usage and reducing environmental impact. Throughout 2024, and continuing into 2025, we have been actively identifying offices that are under-utilised and either closing them entirely or relocating to more efficient premises. Since 2024, we have closed one of our largest offices in Bromsgrove, along with locations in Perth and Delph and Stonehaven. In both Delph and Stonehaven, these sites have been replaced with smaller, modern serviced facilities that offer improved energy efficiency and reduced operational overheads.

Beyond physical space management, we continue to closely monitor office usage patterns, staff commuting habits, and the associated environmental impacts. This data-driven approach helps us maintain a carbon-positive stance while seeking new ways to reduce our footprint further. In all owned offices, we have transitioned to renewable energy sources where possible, significantly lowering our reliance on fossil fuels. We have also invested in energy-saving technologies, such as smart lighting and heating systems, and implemented building upgrades to improve energy efficiency. Alongside these infrastructure changes, we actively promote remote and hybrid working arrangements, reducing the need for daily commuting.

Equally important is the cultural shift we are fostering within the organisation. Through awareness campaigns, training sessions, and internal sustainability initiatives, we encourage employees to adopt environmentally conscious practices both in the workplace and at home. Together, these combined measures form a holistic strategy aim to embed sustainability into our operations, ensuring that our growth aligns with our long-term commitment to environmental responsibility.

## Reduction Target Plan



- In order to achieve a 50% reduction in emissions by 2030, Radiant Financial Group is required to reduce its emissions by 69.45 tCO2e from the 'Baseline' (first year) assessment by 2030.
- This will require a reduction of 5% (6.95 tCO2e) per year from the 'Baseline' (first year) assessment of the organisation. A further reduction of 2.5% (3.47 tCO2e) each year is then required in order to achieve Net Zero.
- Should significant changes to the business size and structure occur in the future - Carbon Neutral Britain will amend the 'baseline' assessment year, as well as look at intensity values (tCO2e per million turnover, FTE or other metrics), to further track and implement reduction strategies.

“By accurately measuring, offsetting and committing to annually reduce emissions 50% by 2030, Radiant Financial Group is not only Carbon Neutral, but in alignment with both science based and UK Government targets for Carbon Emissions Reductions”

James Poynter  
Director - Carbon Neutral Britain



Carbon Neutral Britain Certification™  
IS PRESENTED TO

# Radiant Financial Planning Limited

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## Certified Carbon Neutral

JULY 2025 - JUNE 2026

This certificate is to verify that Radiant Financial Planning Limited as met all Carbon Neutral Britain Certification™ standards in measuring, calculating and carbon offsetting organisational carbon emissions selected within the Scope 1, 2, and 3 GHG emissions boundary during the period of 1<sup>st</sup> January 2024 to 31st December 2024.

Certificate No: BCNB - 05639

Calculations made following the ISO 14064-1:2018 and GHG Protocol Emissions Standards. Credits Issued from one or more of the International Carbon Offsetting standards.

*Christina Willoughby*  
**CHRISTINA WILLOUGHBY**  
Credit Officer

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*James Poynter*  
**JAMES POYNTER**  
Director





Certification is awarded based on accurate and assumed full disclosure of all relevant and necessary data by the Company. United Nations Credits issued via the Clean Development Mechanism (CDM). VCS is a certification standard for carbon projects and credits. VCS does not oversee retail markets nor does it certify or endorse any retailer or broker of VCU's. visit verra.org. Gold Standard is a certification standard for carbon projects and is a registered trademark.



Certificate of Credit Retirement  
IS PRESENTED TO

# Radiant Financial Planning Limited

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## 241.07 Tonnes CO<sub>2</sub>e Emissions Offset

via the Climate Fund™ Portfolio of verified carbon offsetting projects around the world

Batch Serial #: 9101-0039-0084980-VCS-VCU-029-VER-CER-413-000646594555496511

### IN THE MONTH OF JULY 2025

Certificate No: BCNB - 05639

Credits Issued from one or more of the International Carbon Offsetting standards.

*Christina Willoughby*  
**CHRISTINA WILLOUGHBY**  
Credit Officer

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*James Poynter*  
**JAMES POYNTER**  
Director





United Nations Credits issued via the Clean Development Mechanism (CDM). VCS is a certification standard for carbon projects and credits. VCS does not oversee retail markets nor does it certify or endorse any retailer or broker of VCU's. visit verra.org. Gold Standard is a certification standard for carbon projects and is a registered trademark.

## Carbon Offsetting Projects

Through internationally certified carbon offsetting projects, specifically the Carbon Neutral Britain Climate Fund™, Radiant Financial Planning Limited has offset its total carbon emissions.

The off-setting schemes have been certified via the Verra - Verified Carbon Standard (VCS), the Gold Standard - Voluntary Emission Reductions (VER) or the United Nations - Certified Emission Reductions (CER) programmes, the projects have also been selected based on their direct and indirect impact around the world - not just in offsetting, but also in supporting education, employment and clean water, as well as having net positive impact on the local wildlife and ecology.

As the three largest, and most regulated voluntary offsetting standards used by organisations and even countries in their emissions reductions - all measurements and tonnes of CO<sub>2</sub>e offset are accurate and verified.

An example of projects supported include:

**Project 1088:**  
Hydroelectric Power in Chile

**Project 1163:**  
Cook Stove Project in Malawi

**Project 1162:**  
Energy Efficient Lighting in India

**Project 1165:**  
Salkhit Wind Farm in Mongolia



### The offsetting project strive to achieve:

Affordable  
and  
clean energy

Decent Work  
and Economic  
Growth

Climate  
Action

Life  
on  
Land

### Radiant Financial Group - Carbon Positive

In 2025 Radiant Financial group again opted to become 'climate positive' (sometimes know as carbon positive) which means we go beyond achieving a net-zero carbon emissions and remove more greenhouse gases from the atmosphere that we emit. This year we increased our donation by 100% more than in 2024.



## How does Radiant Asset Management implement ESG?

### Introducing The Sustainable Finance Disclosure Regulation (SFDR)

The SFDR is a regulation which requires asset managers to classify their funds as either an article 6, 8 or 9 depending on their level of sustainability.

Whilst SFDR is a European Union (EU) regulation, it is relevant for the UK as many EU funds are marketed and sold within the UK.

- Article 6: Funds without a sustainability scope

- Article 8: Funds that promote environmental or social characteristics (light green)
- Article 9: Funds that have sustainable investment as their objective (dark green)

### How we implement ESG into the RAM investment models

- The RAM model portfolios are first and foremost designed to deliver your clients' financial objectives. We then look at the best ways to integrate sustainable practices that drive positive change.

- RAM have partnered with global investment titan SEI to help power the investment models. SEI manage over £380 billion of assets (Source: SEI)
- All of the SEI equity funds used within the RAM models are classified as Article 8 (light green) according to SFDR.
- Note that the RAM bond holdings do not have any ESG focus. Therefore, the lowest risk portfolios, which are predominantly made up of bonds, have a lower ESG involvement.

## RAM's three layers of ESG implementation

### Layer 1: Light Screening

- A core belief to RAM's investment approach is that they favour engagement over disinvestment.
- However, through SEI, RAM do actively screen out some of the worst ESG offenders. Companies screened out includes thermal coal producers, and cluster munitions companies.
- This creates a simple foundation for incorporating ESG into RAM's investment approach by removing the most problematic companies from consideration.

### Layer 2: ESG Optimisation

- RAM believe ESG factors (such as biodiversity/health & safety/tax transparency) do financially affect businesses and their share prices.
- Therefore, RAM believe ESG factors can and should be integrated into an investment process, to manage risks and identify opportunities.
- By integrating with portfolio managers held within the portfolio, RAM are able to optimise portfolios based on not just financial metrics, but also ESG metrics.

### Layer 3: Engagement

- Through SEI, RAM retain the share voting rights for the companies they invest client wealth. This gives them the unique opportunity to engage these companies.
- To increase the strength of clients' voice, SEI collaborate with Sustainalytics, pooling over £2 trillion worth of assets to work together and drive positive change across ESG issues.
- SEI engage with the managers hired. In the same way that scale and experience enable SEI to partner with specialist managers, these factors also enable SEI to drive positive change through engagement with their managers and across the industry.

## ESG - ESOS Reporting

### ESOS Reporting - Requirement for Radiant to comply with the Energy Savings Opportunities Scheme (ESOS)

#### Background:

- ESOS is a mandatory energy savings opportunity scheme for organisations in the UK that meet the qualification criteria.
- The scheme is operated by the Environment Agency. This year Radiant qualified in meeting the requirements to report our energy conservation plans via the government portal.
- Radiant commissioned a third party company called Sustainable Advantage to assess our energy consumption and produce the necessary ESOS Phase 3 energy assessment report and ESOS Action Plan.

#### Actions taken:

- Data request on energy consumption - Completed (buildings and transport)
- Site survey (Market Harborough) - completed and report concluded with recommendations to reduce energy consumption
- Report - signed off by Group CEO and uploaded to the Environment Agency MESOS portal
- Action plan created detailing steps Radiant will be taking to reduce energy consumption.
- Action plan signed off by Simon Cogman-Hellier and submitted to the MESOS portal.
- Radiant Financial Group fully ESOS compliant until Dec 2027

## ESOS report on Market Harborough site survey

### Site audit overview

Sustainable Advantage Limited visited Radiant Financial Group's Market Harborough office on 10th April 2025 to conduct a physical ESOS audit.

Radiant qualify under ESOS regulations as they are owned by Apiary Capital, a private equity investment company. Other businesses within the Apiary portfolio qualify for ESOS, therefore, Radiant is included under the legislation.

The following report has been produced to document our observations and recommend energy saving opportunities accordingly.

The following activities took place throughout the audit visit and production of this report where possible:

- Understanding of on-site metering equipment and suitability.
- Understanding of each area audited to determine temperature, lighting, and heating conditions.
- Checked to determine where possible that the on-site technical systems can cope with intended design.
- Evaluate where possible the technical systems performance.
- Understand where possible the drivers for possible change in the technical systems.

- Identify potential energy efficiency opportunities.
- Understanding of potential recommendations for cost effective energy improvements.
- Collection of verifiable data including invoices, site plans / layouts.

### Building overview

The building is a bespoke office located in Market Harborough on an office complex. The business employs a maximum of 30 personnel in a variety of roles including financial planners, administrators and finance.

Hybrid working means that many employees spend time working from home, so the offices are not 100% occupancy all the time.

Operationally, the offices are open from 8.45 am to 17.15 Monday to Thursdays and 08.45 to 14.15 on a Friday.

Building construction was cavity brick although it could not be determined if the walls were insulated. The building was originally constructed in the 1990s we believe. No issues were observed or commented upon in relation the building infrastructure.

The site is leased to Radiant with five years left to run.



**Metering overview**

The following energy sources have been identified for this building using 12 months of data for the period January to December 2022:

Gross Internal Area	Fuel	Meter reference	Total consumption - kWh	Total cost - £	Total emissions - tCO2e	Unit rate p/kWh
283 m <sup>2</sup>	Electric	N/A	43,944	£13,195	8.498	30.03
(EPC)		<b>TOTALS</b>	<b>43,944</b>	<b>£13,195</b>	<b>8.498</b>	

The site is leased to Radiant with five years left to run.

**Carbon impact factors:** To calculate the total emissions in tCO2e we have used 2022 CO2e UK Government conversion factors:

- 0.19338 kgCO2e per kWh electricity

**Prices:** The unit rate is based on total costs given and average where appropriate. Total cost is therefore just for consumption and does not include non -energy related costs, taxes and levies that may be included in your invoices from your supplier.

**Estimated data:** No data has been estimated.

**Electricity analysis**

The below table shows electricity consumption as received via the client for the period January to December 2022:

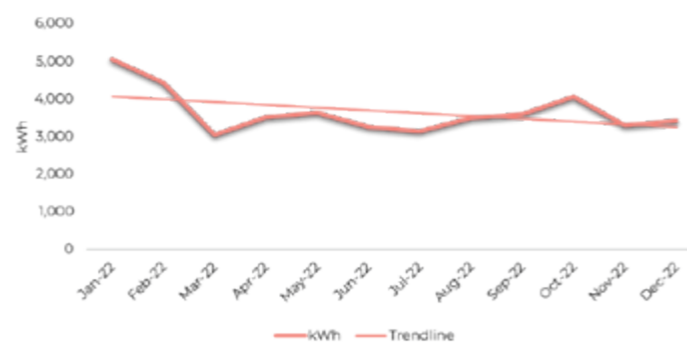
Market Harborough			
Month	Day kWh	p/kWh	£
Jan 22	5,058.50	14.7342	£745.33
Feb 22	4,426.90	17.6491	£783.30
Mar 22	3,045.97	22.5143	£685.78
Apr 22	3,507.10	45.9645	£1,612.02
May 22	3,507.10	45.9645	£1,612.02
Jun 22	3,263.50	18.5267	£604.62
July 22	3,148.70	34.0795	£1,073.06
Aug 22	3,489.30	29.7163	£1036.89
Sept 22	3,591.60	31.9217	£1,146.50
Oct 22	4,062.10	29.0153	£1,178.63
Nov 22	3,307.95	40.2297	£1,330.78
Dec 22	3,418.22	40.5363	£1,385.62
<b>Total</b>	<b>43,943.85</b>	<b>TOTALS</b>	<b>£13,194.55</b>

The above data has been analysed to produce the adjacent graph:

The supply, apart from January 2022, shows a relatively flat profile; there is no gas in situ, therefore, heating is from fixed heaters and existing cooling / heating air conditioning units.

During the reference period, the supply showed a downward trendline, which is positive.

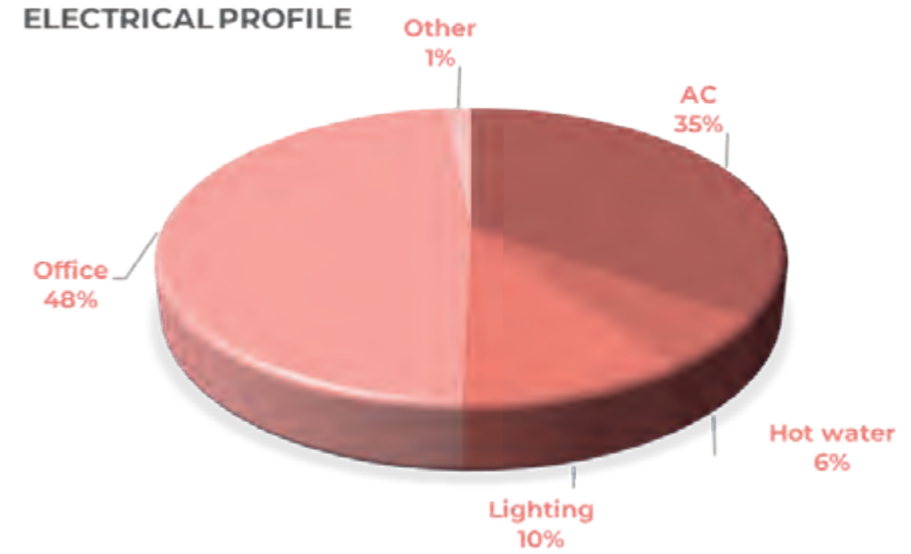
**Electricity consumption by month (kWh)**



**Indicative breakdown of electricity usage (profile)**

The indicative breakdown of total electricity use for this site is shown in the below chart. This is based on our observations on the day.

**Electrical Profile**



We summarise the results of the audit of these high consuming areas in the following section.

**Energy saving opportunities**

Opportunity	Action
Hot water timers	Deferred until 2026/27
AC Controls	Done
Wind Turbine	-
Solar PV	-
Motion Sensors / Separate Lighting Circuits	Done
Energy Policy	Done
Behavioral Change Programme	In action

## ESG Update

The Board is focused on the following objectives in 2025:

Objective	Current Position
Carbon Neutral Accreditation	Carbon Neutral Accreditation for 2025 awarded. Carbon footprint has reduced by 28.67% from last year.
ESG Committee	Radiant Financial group awarded 'Climate Positive' status for 2025.
Charities	Partnerships formally agreed with Trussell Trust and VetLife
Volunteer days	In Q2 2025 the SLT board committed to support staff support giving paid time off for volunteering work.
Social Committee Fund	A budget provision has been ring-fenced for staff to use on social/team building activities - to date this has had a very positive impact on staff morale
Revision of Radiant Academy	Project commenced in 2025 to review and uplift current proposition
In-Office Days	Q2 2025 - Mandated office days implemented - 1 day per week. Seeing positive impact with staff collaboration and social activities
Salary Benchmarking	Completed Q1 2025 and all staff updated
Employee Affirmation programme	Initiative set up on internal intranet and being used regularly - Positive impact on staff morale
Early Finish on a Friday	Continues to be valued and a differentiation on recruitment
Suggestion Box	Initiative launched in Feb 2025 - To date +45 suggestions submitted and reviewed with a good spread across departments
Tracking Diversity and Board Management	We continue to assess. Radiant is a meritocracy and run as such
Business Continuity Plan	Currently under review - revised plan to be in force 2026
Energy Saving Measures	Air Conditioning system in Market Harborough office updated with time controls
Energy Saving policy	Updated policy live and housed on company intranet

## Business Energy Conservation Policy

### What (Policy Statement)

We are committed to reducing our energy consumption across all facets of our operations—whether in our offices, during travel, or for staff working remotely. This policy outlines how we will actively manage and reduce our energy use to improve sustainability, cut operational costs, and support our corporate responsibility goals.

### Why (Purpose and Rationale)

Energy conservation is essential for:

- Reducing our carbon footprint.
- Lowering operational costs and increasing efficiency.
- Complying with regulatory requirements and aligning with industry best practices.
- Demonstrating our commitment to sustainability to clients, partners, and employees.
- Supporting a healthier work environment and responsible business conduct.

### How (Implementation Measures)

#### Office-Based Measures:

- Air conditioning units to be operated on timers or smart thermostats where possible and set to optimal energy-efficient temperatures (e.g. 24°C for cooling).
- Lights should be turned off in unused meeting rooms, kitchens, and toilets. Automatic motion sensors to be installed where practical.
- Water coolers and shared appliances to be switched off outside office hours unless required for health or safety.
- Staff should be encouraged to power down equipment (PCs, monitors, chargers) at the end of each working day.
- Use energy-efficient LED lighting across all locations.
- Offices should be fitted with energy consumption meters where possible to monitor and track usage.

#### Remote Working Measures:

- Guidelines and education have been produced for home workers to reduce their own energy use (e.g. natural lighting, equipment shutdowns).
- Encourage energy-efficient home office setups and consider incentives or education on sustainable home practices.

#### Travel & Client Visit Measures:

- Encourage use of public transport where feasible.
- Promote route planning to reduce mileage.
- Encourage hybrid client meetings (virtual + physical) where appropriate to reduce travel frequency.”

#### Technology and Procurement:

- Purchase energy-efficient devices and office equipment.
- Maintain IT systems regularly for optimal efficiency.

### When (Application Timeline)

- Policy effective from 01 August 2025.
- Review of implementation and impact to take place half yearly to update and monitor progress.
- Annual policy review to align with changing technologies, regulations, or operational needs.

### Where (Scope of Application)

This policy applies to:

- All leased offices nationwide.
- All employees working remotely or in hybrid settings.
- Any business-related travel and client visits.
- All contractors and service providers operating within company premises.

### How Much (Targets and Monitoring)

- Aim to reduce overall office energy usage by 15% over the next 12 months.
- Each office will have an energy consumption baseline established by Q4 of the current year.

### Employee Responsibilities

- Follow the energy-saving guidelines relevant to their work environment.
- Report faults or opportunities to improve energy efficiency.
- Engage in training and awareness initiatives as they are rolled out.

# Social

## Social Policy for Clients

“Unlike most financial advisory businesses, we focus on financial well-being. Our key differentiator is that we are interested in employees at all levels - unlike many of our competitors who only have solutions for the affluent.

While we all know deep down there are many more important things in life than money, when you're struggling financially fear and stress can take over your world. It can damage your self-esteem, make you feel flawed, and fill you with a sense of despair. When financial stress becomes overwhelming, your mind, body, and social life can pay a heavy price.

Our specialist Financial Education Team provides literature, videos, seminars and other educational materials to ensure that Employers have access to a wide range of tools to assist their workforce at every level. In this way, we help employers combat the following for their employees:

1. Financial problems adversely impact your mental health. The stress of debt or other financial issues leaves you feeling depressed or anxious.
2. The decline in your mental health makes it harder to manage money. You may find it harder to concentrate or lack the energy to tackle a mounting pile of bills. Or you may lose income by taking time off work due to anxiety or depression.
3. These difficulties managing money leads to more financial problems and worsening mental health problems, and so on. You become trapped in a downward spiral of increasing money problems and declining mental health.

### Self actualisation

- Financial security
- Using assets to live life on their own terms

### Differ / Release

- Succession planning
- Tax efficient savings and investments
- Inheritance tax planning

### Financial planning for the business

- Staff retention: Employee Benefits
- Pension & benefits provisions for Directors / Shareholders / Owners
- Tax mitigation for Higher and Additional Rate earners

### Growing the business

- Funding
- Cashflow modelling - forecasting financial requirements to achieve objectives
- Tax efficiency & mitigation - evolving structure, use of pensions

### Protecting business assets

- Keyman Assurance
- Shareholder Protection
  - Loan Protection
- Cross Option Agreements
  - Wills and Trusts

## The Radiant Culture

Radiant's culture makes us stand out. Our values are embedded within everything that we do: from how we treat our clients to how we value our people that work for us. Our Equality and Diversity Policy shows our people the processes that we have in place to ensure that we are going above and beyond to reward, recruit and treat our people fairly, equally and with respect.

### Developing our People

One of Radiant's greatest strengths is providing our people with the opportunity to develop.

Radiant recognises the importance of the valuable contributions all of our people make to ensure our organisation is a success.

We understand that to maintain a motivated, committed and competent culture, we need to provide adequate learning and development for all employees so that our business continues to develop and grow within our competitive marketplace.

We are committed to making the most effective use of the talents, skills, knowledge and abilities of our personnel and to help all employees to maximise the contribution they can make to the success of the organisation. To demonstrate our commitment, we have formalised our approach to professional development through our Radiant Academy.

### The Radiant Academy

The Radiant Academy offers our people the opportunity to develop in areas of the business that interest them.

Traditionally, there was only one development route in financial services, however with the Radiant Academy, the opportunities have no boundaries. The Academy supports our people holistically with four major elements. Qualifications, Soft skills, Applied learning and Mentoring. This is combined and reviewed monthly with participants managers in their one-to-one meetings.

We currently have +25% of our staff on a development plan as part of the Academy. At senior levels, evidence of development can be seen through various appointment to board of directors. Over the next year, we aim to develop further by strategically aligning the Radiant Academy with other areas of the business such as Operations, Sales and Compliance training.

### New Initiatives 2024/25

#### Upgraded Intranet

We have migrated our intranet to an enhanced platform that provides greater functionality and improved usability. This upgrade enables us to create more intuitive, user-friendly pages and thus use our intranet communication tool in a more effective way. The new system supports stronger employee engagement, it is easier access to information, and provides a collaborative way of working.

#### Appraisals

During 2025 we introduced 360° Appraisals for all employees at Radiant. This approach provides a balanced and comprehensive view of each individual's performance by incorporating feedback from a range of colleagues.

The insights from other staff members support personal and professional development, help identify training needs, and contribute to building a culture of continuous growth and improvement.

#### Appreciations

A new section on our intranet has been added where employees can thank colleagues for their support across the business. Each message of appreciation is linked to one of our four core values—Inspiration, Innovation, Integrity, or In Touch. Every month, all recognised employees are entered into a prize draw for a chance to win a £20 voucher.

## Diversity & Inclusion

Radiant values the importance of diversity and inclusion and believes this should be continuously reviewed to ensure that we are demonstrating and following our core values, in particular integrity.

Our Equality and Diversity policy details what Radiant does to support fair recruitment, annual

in depth pay and bonus reviews and support for those at work who need additional assistance due to disability.

The Financial Services Industry has a clear gender gap in terms of remuneration and Radiant is no exception to this. This is something that will take generations to completely

eradicate, however, we have taken steps to be part of this journey by providing equal opportunities to our people through the Radiant Academy, enabling our staff equal opportunity to progress within the company.

We have promoted several females into management roles,

which has narrowed the gender pay gap divide.

Additionally, we have recently appointed several members of staff to our board of directors to allow holistic decision making for the good of Radiant as a whole.

## Employee Engagement

Employee voice is a central part of Radiant's culture. Over the past year, we have introduced a new employee-focused communication strategy designed to strengthen open, two-way communication across the organisation. We remain committed to ensuring that our people are heard and are kept informed directly and transparently.

#### Town Halls

To support this commitment, we hold a company-wide Town Hall each month, led by our CEO. These sessions provide updates on our strategy, ongoing projects, and long-term vision, while also giving employees the opportunity to ask questions and share feedback.

#### Company Tours

In addition, we now run quarterly in-person office tours across the country. These sessions allow senior management to meet directly with employees, engage in meaningful two-way

discussions, provide business updates and training, and foster a greater sense of connection and camaraderie within our teams.

#### Suggestion Box

We actively encourage ideas from our people and have launched a live "Suggestion Box" on our intranet. Employees can submit recommendations at any time, ranging from business process improvements to social initiatives. Every suggestion is reviewed, and we implement those that are feasible and beneficial.

#### Annual Conference

We host an annual conference, bringing together the entire Radiant team along with key external partners. This event offers an important opportunity for collaboration, engagement and shared learning — helping us collectively shape the future direction of Radiant. It is also a chance to celebrate our successes together!

#### Tea and Biscuits with the CEO

We believe open access to leadership supports a transparent and inclusive culture. As part of our induction, every new employee joins a virtual "Tea and Biscuits" session with the CEO and receives a small welcome package, creating a warm, informal space to discuss the company's vision and values.

#### Annual employee Survey

In September this year, we carried out our annual Employee Survey, which was mandatory for all staff and designed to provide a comprehensive view of how our people experience every aspect of the business. The survey covered a broad range of themes—including workplace culture, leadership, communication, professional development, wellbeing, and operational effectiveness—ensuring that every voice had the opportunity to shape our future direction.

The results and key insights were shared openly at our Annual

Conference, reinforcing our commitment to transparency and continuous improvement. We are grateful for the high level of engagement and the honest, constructive feedback provided across the organisation.

All comments and recommendations gathered through the survey will directly inform our improvement plans for the coming year. Several workstreams are already being developed to address identified opportunities, strengthen areas of success, and ensure that our workplace continues to evolve in line with employee expectations. The survey remains a vital part of our ESG strategy, helping us measure progress, identify emerging needs, and ensure that our people feel heard, valued, and supported. Through this ongoing feedback loop, we aim to foster a stronger, more resilient, and more inclusive organisation year after year.

## Equality and Diversity Policy

### The purpose of this policy is to:

- Promote equality, fairness and respect for job applicants and all staff, whether temporary, part-time, or full-time irrespective of length of service with the Company.
- Comply with the Equality Act 2010 and prevent unlawful discrimination against the protected characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex (gender) and sexual orientation. This list is not limited.

- Oppose and avoid all forms of unlawful discrimination. This includes in pay and benefits, terms and conditions of employment, dealing with grievances and discipline, dismissal, redundancy, leave for parents, requests for flexible working, recruitment and selection, promotion, training or other developmental opportunities.
- Promote equality and diversity in alignment with the Company's values of Inspiration, Innovation, Integrity, In Touch.
- The Company's workforce may have individual's representative of all sections of society and therefore everyone to feel respected

in order for them to perform to the best of their ability. To ensure this happens all employees must abide by the Equality Act.

- The Company, in providing a high standard of service, is also committed against the unlawful discrimination of customers, suppliers or the general public.

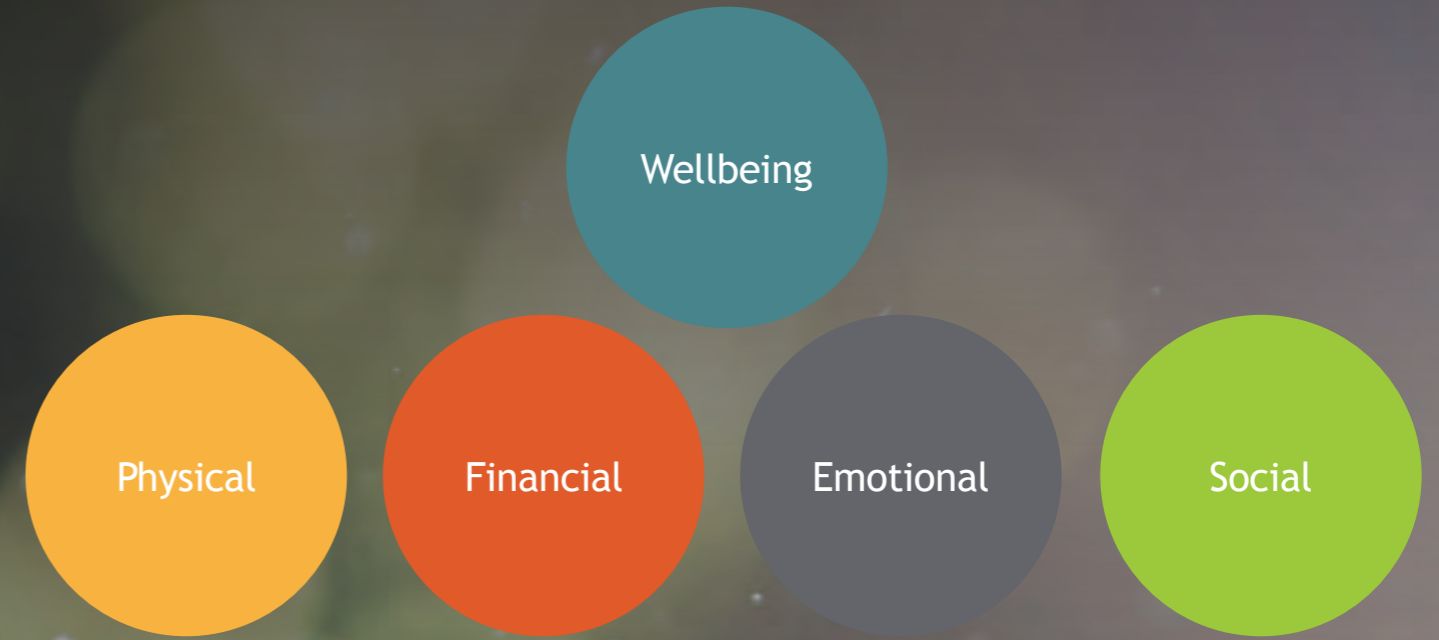
### Staff at all levels of the business can promote equality and diversity by:

- Treating all staff and colleagues fairly.
- Creating an inclusive culture.
- Ensuring equal access to opportunities to enable staff to fully participate in their working activities.

- Enabling all staff to develop to their full potential.
- Equipping staff with the skills to challenge inequality and discrimination in their work environment.
- Making certain that any work materials do not discriminate against any individuals or groups.
- Ensuring policies, procedures and processes do not discriminate in accordance with the Equality Act.
- Participating in training through onboarding or ongoing management training.

## Wellbeing

Radiant understands that without its people, we will not be the success that we are. Therefore, wellbeing is a high priority within the Company. To show this, we have engaged with our people to obtain their views on how we can support them. Our strategy takes the approach of aligning our practices to the four pillars of wellbeing:



Physical wellbeing was found to be the most important aspect of wellbeing to most of our people with the majority trying to include this as part of their daily lives.

Due to the nature of Radiant being a Financial Services Company, there is a high emphasis on our people's financial wellbeing. Therefore, we have offer holistic financial advice to all of our people. To support this further, recently we have recently upgraded our sick pay to give peace of mind along with increasing our holiday allowance further.

Most of our people feel that they are comfortable speaking to their manager about their mental health. They felt that the support given by their managers in their one-to-one meetings was good. However, when speaking to managers, they were nervous to deal with mental health concerns due to saying the wrong thing As a result, internal Management training has been provided. To assist with creating an emotionally safe place of work, we have assigned a number of Mental Health First Aiders at all levels of the business.

To ensure that we are offering a work life balance as part of our well-being strategy, we offer a number of flexible working initiatives to support our people. These include part time hours, hybrid working, working from home and flexible start and finish times. We have further supported this by giving all of our people a day off to focus on themselves on their birthday.

## Radiant- Together

Reward is not just salary and traditional benefits like a pension and life cover.

Well-being is not just about a safe and communicative working environment.

At Radiant, we are aware of the wider needs of our employees, their socialisation and their need to access a wide range of advice to

assist in their long-term wellbeing.

And although we already reward our staff well, and certainly above the industry average for our sector, we also deploy solutions to enable our staff to learn more about money and access to schemes that allow them to make their money go further.

To strengthen our reward package we focused mainly on the financial and emotional wellbeing. Radiant has invested heavily in enhancing the support that it provides for our employees through an enhanced Employee Assistance programme. To align with wider goals within the business and financial wellbeing, we have opened up a Company share scheme, available to all.

For other areas of wellbeing, Radiant has focused on education and getting our people involved. We are in the process of obtaining feedback to roll out flexible working, in addition to hybrid and remote working.



## Radiant Social Fund

At the heart of our culture is the belief that strong teams are built not only through hard work and shared goals, but also through genuine connections, laughter, and shared experiences. That's why we've set aside a dedicated budget known as The Social Fund – a special pot of money reserved exclusively for activities that bring our people together outside of the usual work routine. This isn't about corporate away-days or compulsory team-building exercises; it's about empowering our staff to decide what fun

means to them. Whether it's a friendly sports match, a quiz night, a creative workshop, a volunteering day, or even something completely out of the box, employees are encouraged to submit their ideas, and once approved, we help make them a reality. The process is simple but powerful: a spark of inspiration from a team member can quickly turn into a memorable event that strengthens bonds, boosts morale, and creates a sense of belonging. Over the years, we've seen how these moments – the shared

meals, the bursts of laughter, the unexpected victories, and the quiet conversations between colleagues who rarely work together – have a lasting impact on how we collaborate back in the workplace. The Social Fund is more than just a budget line; it's a tangible expression of our commitment to building a workplace where people feel connected, valued, and part of something bigger than their own role. By giving teams the freedom to shape their own social experiences, we're fostering

creativity, encouraging cross-department friendships, and reinforcing the collaborative spirit that runs through everything we do. In a fast-paced world where it's easy to lose sight of human connection, this initiative reminds us that our greatest strength lies in the relationships we build with one another.

That's why we've set aside a dedicated budget known as The Social Fund – a special pot of money reserved exclusively for activities that bring our people together outside of the usual work routine.



## Social Summary

### It's a great place to work

Collaboration and openness are important to us, ensuring everyone has the opportunity to share their views, ideas and opinions. We are also committed to the well-being of our team, promoting a healthy work / life balance because happiness outside of work is equally important.

### We care about what we do

Culture is key to our success - this is why we strive to what's right for our clients colleagues and professional partners. At Radiant, everything we do aligns with our values of inspiration, innovation, integrity and In touch.

### Everyone is equal and treated fairly

At Radiant we are a diverse team that recruits, rewards, trains and promotes based solely on an individual's abilities. We respect the unique differences of our people and foster a safe environment where everyone can thrive in their career.

### We reward generously

We regularly benchmark our market to ensure our pay and rewards are competitive. In addition to a generous salary, you'll receive substantial holiday and sickness allowances to support our culture of wellbeing. All of our benefits have been carefully handpicked by our in-house benefits consultancy, ensuring we offer the most suitable employee benefits and wellbeing options available.

### We're a friendly, sociable team

We enjoy socialising as a team, whether through office-based events or nights out. We also come together for group events such as staff conferences or fundraising activities.

### The Radiant Academy

We provide every staff member with opportunities to advance their careers and expand their knowledge. Through the Radiant Academy, you can create a personalised development plan that includes qualifications, soft skills, on the job training, and ongoing monitoring. Alongside this sits access to online learning to support your development.

## 2024 Staff Survey

Following the staff Survey, the ESG Committee is focused on the following objectives:

Objective	Current Position
Updated and revised set of staff contracts to be issued removing complexities and differences between employees with regards to holiday entitlement, sick pay, Medicash, notice periods and study/exam support	Completed.
Review of Private Medical Health Care - companywide	In progress.
Enhanced parental leave	Considered - But decided against in order to focus improvements in other areas where a higher percentage of staff would benefit.
Opportunity to sell holiday leave	Ongoing - consideration being assessed by Finance and HR.
Incentivise staff to use social fund via team building activities	Process in place and social fund budget actively being used.
Rewards for length of service	Length of service to be celebrated via our intranet on anniversaries.
Define new charities to work with for 2025	VetLife now added to our official charity list with quarterly donations being made.

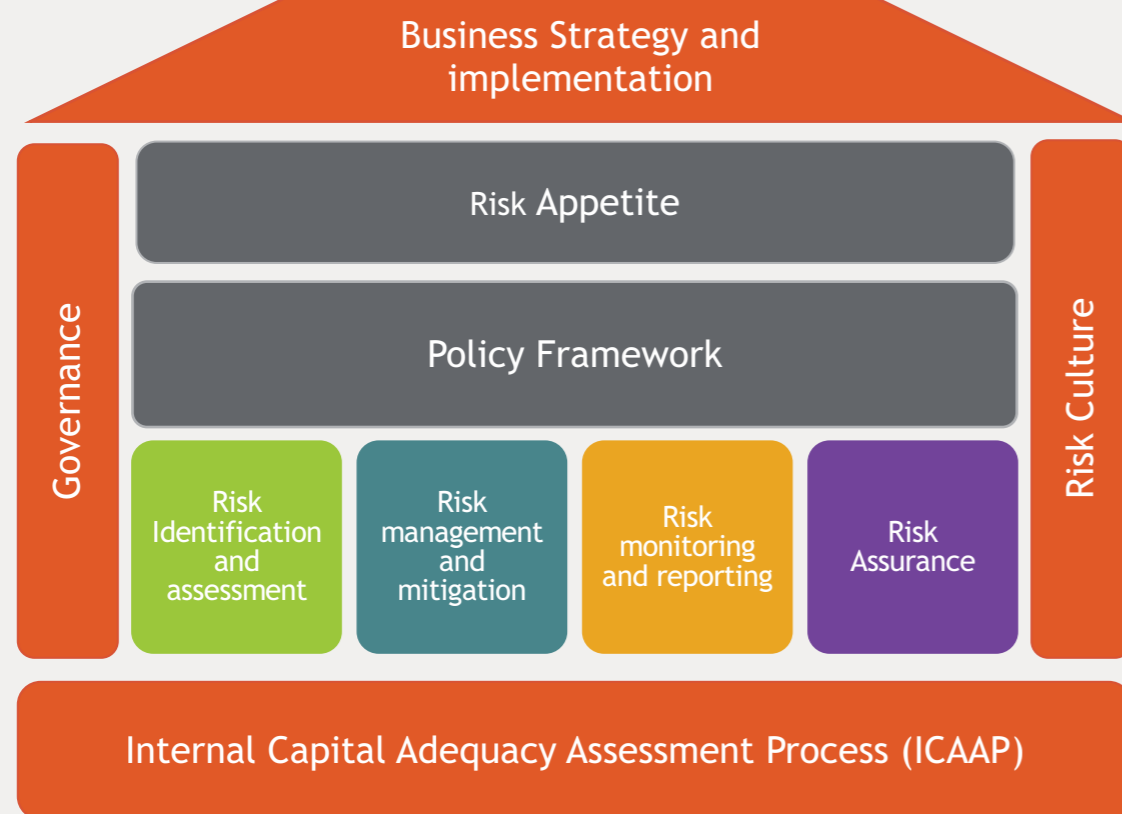
# Governance

## Governance Policies

Our Risk and Governance processes are appropriate for a business of our size and deployment and continue to evolve as the group grows and develops.

The Risk and Governance Committees oversee our risk and governance framework, with key oversight of:

- our relationship with the regulator
- our three operational businesses, each of which sits in a different regulatory and risk and governance environment,
- client outcomes,
- business continuity,
- operational framework,
- staffing policies and procedures
- Insurances and risk mitigation



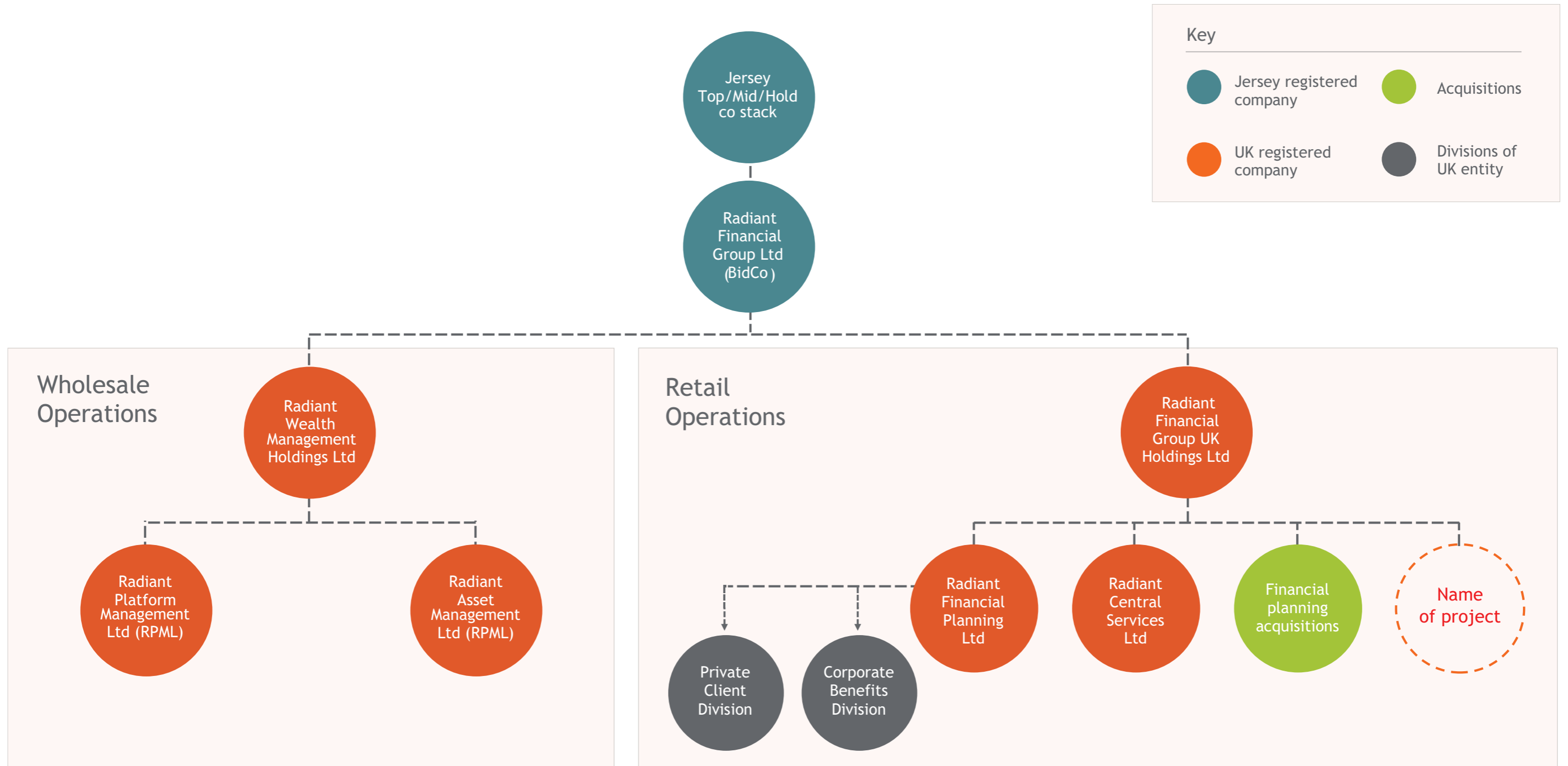
## Governance Structure of the Group

In a complex Group, regulated under different frameworks, with one direction (namely consumer outcome), our Risk and Governance structure forms a key principle of our success.

Key policies that are followed include:

- ✓ Each of our key boards/committees run within the framework of a Terms Of Reference, which has been signed and adopted and approved by its parent board.
- ✓ Each board/committee runs with its own independence for each other, and as a Group we ensure that less than 50% commonality exists with regard to participants in each of these boards.
- ✓ Reporting occurs to each "parent board" in writing on at least a quarterly basis in a pre-agreed format, with key event notification and whistle-blowing sitting outside of this reporting framework.
- ✓ The TOR and Constitution of the Boards are reviewed annually.

# Structure of the Group



## Key Governance Policies

Business and Client Policies	HR and People Policies
<ul style="list-style-type: none"> <li>Risk and Governance Policies</li> <li>Business Continuity Policies</li> <li>Advice Process Policies</li> <li>Whistleblowing</li> <li>Anti-Corruption and Bribery</li> <li>Code of Conduct - Compliance</li> <li>Data protection policy</li> <li>IT and communications policy</li> <li>Social Media policy</li> </ul>	<ul style="list-style-type: none"> <li>Health and Safety</li> <li>Equal Opportunities</li> <li>Anti-Harassment and Bullying</li> <li>Attendance and work life balance</li> <li>Maternity, paternity, adoption &amp; shared parental leave</li> <li>Disciplinary and diversity policy</li> <li>Data protection policy</li> <li>IT and communications policy</li> <li>Social Media policy</li> </ul>

## Key Policies for Staff

### Attendance & Work Life Balance

The aim of this policy is to make sure that all employees understand company procedures involving attendance and to outline the procedures in place to ensure employees can obtain a good work-life balance to improve motivation, performance and productivity.

- Birthday Leave
- 28 days holiday
- Study Leave
- Compassionate Leave
- Parental leave
- Time off for Dental/Medical appointments
- Jury service/public duties
- Career breaks/Sabbaticals
- Flexible working
- Remote working

### Grievance & Complaints Policy

The aim of this policy is to make sure that an individual who has a problem or concern about work, such as working conditions or relationships with colleagues, can raise these with management and that they can be resolved as quickly as possible. This policy also ensures that the Company complies with the requirements of the ACAS Code of Practice on disciplinary and grievance procedures.

The primary purpose of this grievance procedure is to enable staff to air any concerns that

they may have about practices, policies or treatment from other individuals at work or from the Company, and to produce a speedy resolution where genuine problems exist. It is designed to help all employees to take the appropriate action, when they are experiencing difficulties, in an atmosphere of trust and collaboration.

### Health & Safety Policy

Radiant Financial Group is committed to ensuring the health and safety of everyone who works for the Company and everyone who may be affected by the Company's work activities, including clients, visitors, contractors and the public.

The Company will ensure, so far as is reasonably practicable, that:

- Safe equipment is provided, and safe systems of work are devised and implemented
- Adequate arrangements are in place for the safe use, handling, storage and transport of materials, substances and equipment
- Sufficient information, instruction, training and supervision is given to ensure the health and safety of employees and others affected by their actions
- A safe workplace, including safe access and egress, is provided and maintained
- The working environment is without risks to health and

adequate welfare facilities are provided

- There is an annual risk and fire risk assessment of the office. This will be undertaken by the dedicated Health & Safety representative from the office.

### Speak Up (Whistleblowing)

The Public Interest Disclosure Act 1998 gives legal protection to employees against being dismissed or penalised by the Company because of publicly disclosing certain serious concerns.

It is fundamental that an employee will be loyal to his or her employer and will not disclose confidential information outside the Company. However, if an employee discovers information which they believe shows wrongdoing or malpractice within the organisation, it must be made possible for the information to be disclosed without fear of reprisal and where appropriate, to someone other than the direct line manager.

The aims of this policy are:

- To encourage staff to report suspected wrong doing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, whilst respecting their confidentiality.
- To provide guidance on how to raise relevant concerns.

- To reassure staff that they should be able to raise genuine concerns in good faith, without fear of reprisal, even if they turn out to be mistaken.

### The Radiant Academy

The Radiant Financial Group recognises the importance of the valuable contributions all our people make to ensure our organisation is a success. We understand that to maintain a motivated, committed and competent culture, we need to ensure that there is adequate learning and development is provided for all employees to ensure that our business continues to develop and grow within our competitive marketplace.

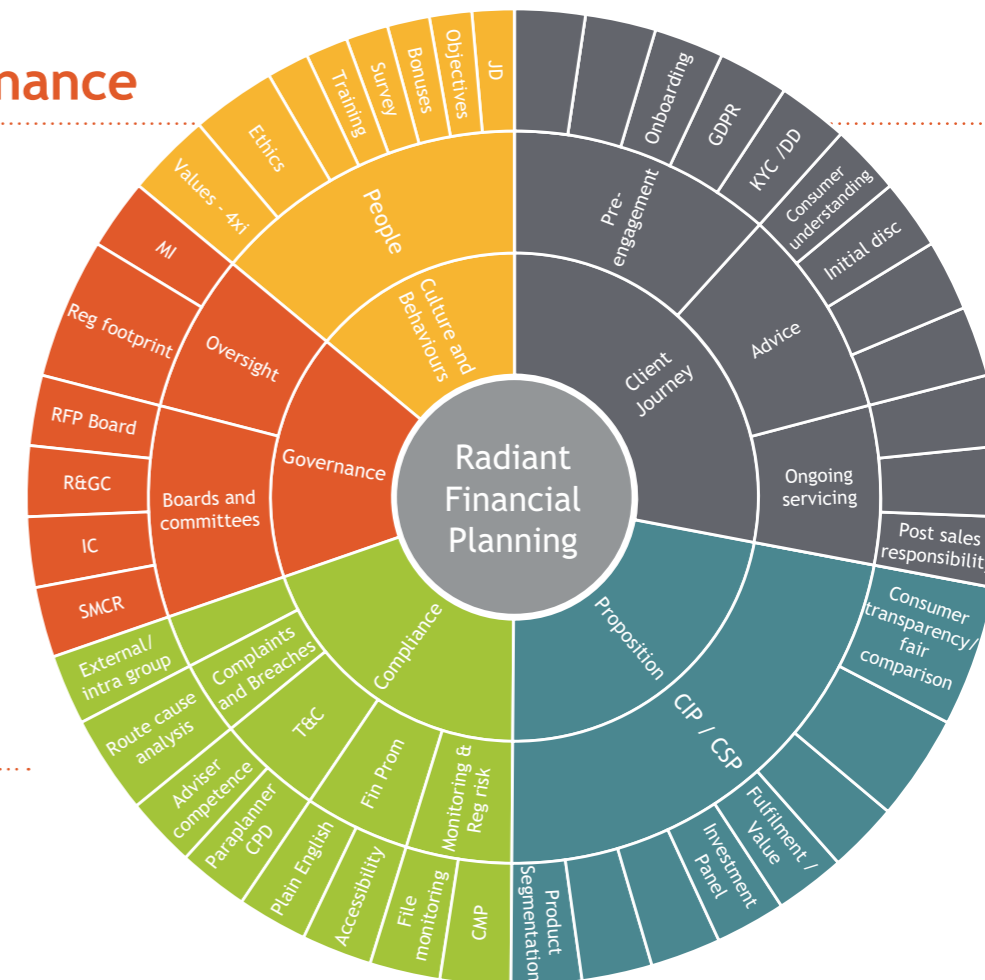
We are committed to making the most effective use of the talents, skills, knowledge and abilities of our personnel and to help all employees to maximise the contribution they can make to the success of the organisation. To demonstrate our commitment, we have formalised our approach to professional development through this policy statement and through the allocation of specific support in terms of budget and resources.

We are committed to delivering ongoing professional development which is bespoke to the learning and development needs of our people as well as to support the delivery of our business needs and commercial objectives.

## Update - Governance

As a Group we run three FCA regulated businesses and governance therefore sits at the core of our operational focus. All three businesses are now fully Consumer Duty Compliant, and a fuller annual updated of our Governance policies will be contained in our Annual Report.

In line with Consumer Duty, we continue focus on all aspect of our Governance as indicated by our Consumer Duty Wheel.



## 2024 Annual Consumer Duty Report - Group

As of 31 July 2025 our annual consumer duty report was updated, reviewed challenged and signed off by the regulated group boards.

## Business Focus for 24/25 Financial Year - Governance

Business and Client Policies	HR and People Policies
Review of our Central Investment Proposition Panel (CIP) which included re-assessment of our ESG panel recommended to clients. We have considered the FCA's sustainability label regime and greenwashing rules as part of our approach.	Firms can start to use the FCA's ESG labelling regime from 31st July 2024 with the full rules coming into force between December 2024 and December 2026. We will keep our ESG panel under review and consider the impact of the FCA rules through the embedding phase.
Embedding of the new Redmill LMS tool which provides ESG learning as part of the available training catalogue.	Redmill LMS tools is now embedded and actively being used.
Completion of the annual Consumer Duty Report for the businesses - RFG, RAM and RPM.	Reports for all three business entities have been signed off by the Risk and governance committees and their respective boards. Our CD report contains objectives for further refinement of our CIP and advice process.
Creating of Advice Committee	In August 2025 a new Advice Committee was set up to provide structured oversight, decision-making, and accountability for the quality and direction of financial advice within Radiant.
Head of Advice	In August 2025 we appointed a Head of Advice for Radiant Financial Planning. This person is responsible for ensuring the quality, consistency and compliance of the financial advice delivered by Radiant.
Review of compliance policies is completed annually or as required.	We review and update where appropriate all our governance policies on an annual basis.



To find out more call us on  
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