

## **ACIM (UK) 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.

ACIM (UK) 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, ACIM (UK) 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 level three firms under the Remuneration code. The governing body will be responsible for setting ACIM (UK)'s policy on remuneration, in accordance with principles and policies set by ACIM (UK)'s ultimate parent company, American Century Companies, Inc. (a corporation organized under the laws of the State of Delaware, U.S.A.) and will take the FCA rules and the proportionality guidance into account when setting its remuneration policy.

ACIM (UK)'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 ACIM (UK)'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 ACIM (UK)'s regulatory monitoring, will include a review of the implementation of this Policy by the firm.

### **Link between pay and performance**

Remuneration at ACIM (UK) is made up of fixed ('salary') and variable ('incentive') components.

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

Any incentive 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. Specific metrics will vary depending on the incentive plan in which an individual participates.

Where remuneration is performance-related, then in addition to the performance of the individual, ACIM (UK) 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 ACIM (UK)'s long term objectives, the assessment of performance will take into

account longer-term performance and payment of any such performance related incentives 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.

Incentive awards will reflect the financial performance of ACIM (UK) and its affiliated companies. Variable remuneration may be adjusted where financial performance exceeds or falls below forecasted results. Oversight of such variable remuneration falls under the responsibility of the Compensation Committee of ACIM (UK)'s ultimate parent. ACIM (UK)'s governing body undertakes an annual review of the ACIM (UK) Remuneration Policy statement.

### **Quantitative remuneration information**

ACIM (UK) 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 ACIM (UK) only has two small business areas (investment management and sales) and the following aggregate remuneration data should be read in that context.

#### **2021 Aggregate Remuneration**

<b>Senior Management &amp; Material Impact Staff<sup>1</sup> (£)</b>	<b>Others (£)</b>
6,491,401	4,640,909

<sup>1</sup>Variable remuneration may include company stock of American Century Companies, Inc., delivered in USD (\$). For purposes of the table above, stock value has been converted to GBP. Additionally, for purposes of this table all other compensation paid in USD (\$) has been converted to GBP using the exchange rate in effect as of the date this disclosure was drafted.

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