

CORPORATE GOVERNANCE STATEMENT

23 SEPTEMBER 2022



(The information contained in this document was last reviewed on 12 September 2022 and updated as appropriate)

In this document, unless the context otherwise requires:

- *Reference to Curtis Banks or to the Company is to Curtis Banks Group plc (and reference to our, us and we is to be construed accordingly); and*
- *Reference to the Group is to the group of companies of which Curtis Banks is the parent company.*

Introduction

On 28 August 2018, the board of Curtis Banks decided to fully adopt The QCA Corporate Governance Code (2018 edition) (“the QCA Code”). The Board believes that the QCA Code provides the right governance framework for a company of our size in which we can continue to develop our governance model to support our business.

Corporate governance principles applicable to Curtis Banks

The corporate governance principles contained in the QCA Code are as follows:

1. Establish a strategy and business model which promote long-term value for shareholders
2. Seek to understand and meet shareholder needs and expectations
3. Take into account wider stakeholder and social responsibilities and their implications for long-term success
4. Embed effective risk management, considering both opportunities and threats, throughout the organisation
5. Maintain the board as a well-functioning, balanced team led by the chair
6. Ensure that between them the directors have the necessary up-to-date experience, skills and capabilities
7. Evaluate board performance based on clear and relevant objectives, seeking continuous improvement

8. Promote a corporate culture that is based on ethical values and behaviours
9. Maintain governance structures and processes that are fit for purpose and support good decision-making by the board
10. Communicate how the company is governed and is performing by maintaining a dialogue with shareholders and other relevant stakeholders

Application of the QCA Code and required disclosures in our annual report or on our website

Application of the QCA Code requires us to apply the principles set out above and also to publish certain related disclosures; these can appear in our annual report, be included on our website or we can adopt a combination of the two approaches. Recommended locations for each disclosure are specified in the QCA Code and these have been followed. An index setting out where each required disclosure can be found appears at the end of this document.

Chair's corporate governance statement

The board is committed to maintaining high standards of corporate governance, integrity and business ethics. On 28 August 2018, the board of Curtis Banks Group PLC decided to fully adopt the QCA Corporate Governance Code (2018 edition) ("the QCA Code"). The board believes that the QCA Code provides the right governance framework for a group of our size in which we can continue to develop our governance model to support our business.

The board works together to ensure that these corporate governance standards are adhered to and pages 26-28 of our 2021 Annual Report and the below set out how they are practically implemented.

Website disclosures

Principle 2

Seek to understand and meet shareholder needs and expectations.

Copies of our annual report (and the notice of AGM) and the interim report are sent to all shareholders and copies can be downloaded from the investors section of www.curtisbanks.co.uk. Alternatively, they are available on request by writing to the Company Secretary at 3 Temple Quay, Bristol, BS1 6DZ. Other information for shareholders and other interested parties is also provided on the Investors section of our website, including all RNS Announcements, preliminary and half-year results presentations to the City and other matters relevant to shareholders.

The Group has a programme of meetings with institutional shareholders, potential shareholders, brokers and analysts following the release of preliminary and half-year results. These include formal written presentations that are available on our website. These meetings allow the Executive Chair (subject to regulatory approval), the Chief Financial Officer and the Chief Operating Officer to update shareholders on strategy and the Group's performance. Additional meetings with institutional investors and analysts are arranged from time to time as requested by both our brokers and investor relations agents. Following the formal interim and year end presentations all board members receive copies of feedback reports keeping them in touch with shareholder views.

David Barral, Dan Cowland and Jane Ridgley are the key contacts with the Company's shareholders. Instinctif Partners provide investor public relations support to the Company and joint stock brokers are Peel Hunt LLP and Singer Capital Markets.

David Barral, as the Chair (subject to regulatory approval); Bill Rattray, as the Senior Independent Director; and Jill Lucas as the other independent Non-Executive Director are all willing to engage with shareholders should they have a concern that is not resolved through the normal channels.

The Company Secretary can also be contacted by shareholders on matters of governance and investor relations.

The board also uses the AGM to communicate with investors, including those staff holding shares or options in the Company. The meeting is ordinarily held near the Head Office in Bristol each year and attended by shareholders and professional advisers. All shareholders are given the opportunity to ask questions and raise issues; this can be done formally during the meeting or informally with the directors after it.

Computershare plc ("Computershare") are registrars to the Company and attend the AGM.

At the AGM separate resolutions are proposed on each substantially separate issue. For each resolution, proxy appointment forms are issued which provide voting shareholders with the option to vote in advance of the AGM if they are unable to attend in person. All valid proxy votes received for the AGM by Computershare are properly recorded and counted. Voting at the AGM is by a show of hands unless a poll is called for. As soon as practicable after the AGM has finished, the results of the meeting are released through a regulatory news service, and a copy of the announcement is posted on the Investors section of www.curtisbanks.co.uk.

Principle 3

Take into account wider stakeholder and social responsibilities and their implications for long-term success.

Principal elements of our business model

1. To provide pension administration services to personal pension schemes and small self-administered pension schemes
2. To provide these services principally through authorised financial advisors and not direct to market. Services such as investment management and specific financial advice are not provided to clients
3. To provide all these services to clients and introducers on a fair basis with a personal service
4. To fully comply with all required regulatory rules, in particular those of the Financial Conduct Authority (FCA), Prudential Regulation Authority (PRA), Solicitors Regulation Authority (SRA) and HM Revenue & Customs (HMRC)
5. To grow the business organically and through acquisition and diversification for the benefit of all stakeholders of the business

6. To encourage the development, training and retention of high quality staff to provide the services to clients

The Group's stakeholders include shareholders, members of staff, clients, introducers of business, suppliers, regulators, industry bodies and creditors (including the Group's lending banks). The principal ways in which their feedback on the Group is gathered are via meetings, conversations and correspondence. Following this feedback, the Group has continued its clearly defined service level driven offering. There is a clear career path for all staff and external and in-house training is provided. Staff are also encouraged to take part in the Group's Save as You Earn ("SAYE") scheme and the Group are a Real Living Wage accredited employer.

Group internal policies include those relating to The Bribery Act, The Slavery Act and The Data Protection Act and there are internal policies on dealing in shares of the Company to ensure compliance with Market Abuse Rules of the AIM market.

Principle 5

Maintain the board as a well-functioning, balanced team led by the chair

The Non-Executive Directors of the Company are as follows:

Bill Rattray (Senior Independent Director)
Jill Lucas
Christopher Mills

Bill Rattray and Jill Lucas remain independent. The Chair (temporarily Executive Chair, subject to regulatory approval) is not a full time employee but is devoting significant time in order to effectively lead the business and ensure the proper performance of their duties.

All other Executive Directors are full time employees of the Company. In addition, Executive Directors are required to work such additional hours, over and above normal working hours, that are necessary for the proper performance of their duties.

Non-Executive Directors are expected to devote such time as is necessary for the proper performance of their duties. This is anticipated as an equivalent of a minimum of one day a month on work for the Company including attendance at a minimum of four Board meetings per annum and the AGM and consideration of all relevant papers before each meeting.

During the year ended 31 December 2021 the board and corporate governance committees met formally on four scheduled occasions and all the directors attended these meetings. In addition, ad-hoc meetings and discussions took place as required during the year.

Principle 6

Ensure that between them the directors have the necessary up-to-date experience, skills and capabilities

Both David Barral, Christopher Mills and Bill Rattray have been Executive Directors of UK publicly listed companies and maintain their skill sets through those connections. In addition, Executive and Non-Executive Directors attend external courses where appropriate.

Since listing on the AIM market the Company has used the service of external consultants for guidance on executive remuneration levels and share incentive packages. Consultants have also been engaged to assist in the design and preparation of documentation required for the introduction of various share incentive plans for all levels of staff.

The board regularly consult and meet with both internal and external auditors to the Company.

Executive Directors maintain their skill set through day to day interaction with the industry and attendance at courses, both internal and external.

All directors are required to undertake and record continual professional development training.

Principle 7

Evaluate board performance based on clear and relevant objectives, seeking continuous improvement.

The Chair (temporarily Executive Chair, subject to regulatory approval) currently conducts annual performance appraisals of the other Executive Directors that report to him. This is also supported by regular 1:1 meetings between the executives. The Senior Independent Director, on behalf of the board, has agreed to look into performance evaluation of the Chair (temporarily Executive Chair, subject to regulatory approval) and other Non-Executive Directors, the board and the board's committees.

Performance evaluation - board review

Board reviews have involved the completion of a questionnaire, on an anonymous basis to encourage more open and constructive comment.

The aim of the review is to review the frequency and format of board meetings, to review the effectiveness of board processes, including its accountability, to review the skills and capabilities of the board needed to meet current and future business need, to assess the level and quality of information the board receives and to review the effectiveness of board relationships and its role as a team and how improvements could be made

Completed questionnaires are then submitted to the Senior Independent Director who, where necessary, will seek clarification on any responses given. He will then collate and consolidate the responses so that he can report back to the board and the board can have an open follow-up discussion. This will result in actions being agreed for any areas requiring improvement.

Performance evaluation - committee review

As part of the board performance evaluation exercise, each director is asked to consider the extent to which the board's committees are properly constituted, perform their delegated roles and report back clearly and fully to the board.

Performance evaluation - Chair

The Senior Independent Director will appraise the Chair's performance (temporarily Executive Chair, subject to regulatory approval), having first consulted with the Executive and the other Non-Executive Directors. Excluding the matters generic to the Non-Executives (see below under the heading

“Performance evaluation - Non-Executive Directors”), the review will look at the following specific aspects of the Chair’s role:

- To chair board meetings and general meetings of the Company, including the setting of agendas for board meetings and ensuring adequate time is available for discussion of all agenda items at board meetings, in particular strategic issues
- To set clear expectations concerning the Company’s culture, values and behaviours and the style and tone of discussions at board meetings
- To demonstrate ethical leadership and promotion of the highest standards of integrity, probity and corporate governance throughout the Company and particularly at board level
- To ensure that the board determines the nature and extent of the significant risks that the Company is willing to embrace in implementing its strategy
- To ensure that the board has effective decision-making processes
- To ensure that board committees are properly structured with appropriate terms of reference and are run effectively
- To encourage all board members to engage in board and committee meetings by drawing on their skills, experience, knowledge and, where appropriate, independence
- To develop productive working relationships with all Executive Directors, including the Chief Executive Officer (once appointed)
- To consult the senior independent director on board matters, as appropriate
- To ensure that the board receives accurate, timely and clear information
- To promote a culture of mutual respect, openness and debate by facilitating the effective contribution of Non-Executive Directors in particular and ensuring constructive relations between Executive and Non-Executive Directors

Performance evaluation - Non-Executive Directors

Following consultation with the Executive team, the Non-Executive Directors will be appraised by the Senior Independent Director, with a particular focus on the following:

- Participation at board and committee meetings
- Strategic planning
- Financial management
- People management and relationships
- Knowledge and skill

Performance evaluation - Executive Directors

Main areas to be focussed on in appraising the Executive Directors:

The what

To what extent is the Executive Director leading the organisation to accomplish what it should be accomplishing? Are they leading the organisation to deliver results in the short and longer term?

The how

To what extent is “how the Executive Director is leading” consistent with our values and our beliefs about what skills they need to be effective?

The what next

Moving forward, what are the implications of this review in terms of the Executive Director's role, areas in which they should continue performing well, and areas in which they can improve? As part of the appraisal, the following areas will be discussed: relationships with the board of directors, strategic planning, financial management, people management and relationships, and conduct of business. Specific criteria against which these areas are to be judged are included in the appraisal form. The appraisal will conclude by summarising the goals for the coming year, job-related strengths and plans to strengthen performance.

Frequency of evaluations

The evaluation process is expected to be performed annually.

Approach to succession planning

Succession planning is the processes by which board and other senior management appointments are determined.

Succession planning is regarded by the board as vitally important in maintaining a strong board and the continued success of the business. Through regular reviews and management discussions, the Company's future business leaders are identified and personal development plans are put in place to harness their potential and plan for job growth and career progression.

In practice, the Chair (temporarily Executive Chair, subject to regulatory approval) and the Chief Executive Officer (once appointed) lead on the board nomination and appointment process. They consider the balance of skills, knowledge and experience on the board and make appropriate recommendations for consideration by the whole board. Each board member is invited to meet with the candidate. Other senior appointments are made by the Chief Executive Officer (once appointed) in discussion with the Chair.

Principle 8

Promote a corporate culture that is based on ethical values and behaviours.

Our success depends on everyone within Curtis Banks working together with respect, loyalty and pride. The tone is set by the Board and senior executives who all operate an 'open door' policy.

Each staff member is issued with a comprehensive and supportive staff handbook and encouraged to undertake formal training that is designed to assist their development and value to the Company.

The Group overall is run by an Executive Committee ("EXCO") that reports to the Executive Chair (subject to regulatory approval). There is an integrated structure in place whereby the organisation operates through teams, all led by experienced team leaders who report into a member of the EXCO. All senior staff meet with their teams, individually and collectively on a regular basis. There is formal appraisal process for all staff on a semi-annual basis.

The Executive Chair (subject to regulatory approval), Executive Directors and members of the EXCO are regularly engaging with staff, clients and others, both informally and formally by bi annual presentations to all staff once final and interim results are announced.

The Executive Directors are based across the Group's locations and EXCO meetings are rotated between Bristol, Ipswich and Portsmouth locations. This provides EXCO members with plenty of opportunities to see and hear how people interact both with their work colleagues and others outside of the business (and would enable them to address things if they were at odds with the right way of behaving).

Clear statements of behaviour are required and formal policies issued by the board. The Group has an anti-bribery policy. Both the statement and policy confirm that the Group has a zero tolerance stance on bribery and they repeat the board's expectation that everyone behaves at all times honestly, professionally, fairly and with integrity. The policy is circulated to all staff and interactive training is provided to all members of staff on anti-bribery.

The Group's published slavery and human trafficking statement also explains that we seek to conduct our business honestly and with integrity at all times and that we recognise that it is not acceptable to put profit above the welfare and wellbeing of our employees and those working on our behalf. Steps to combat modern slavery are therefore taken seriously, and efforts to prevent abuses are fully embedded throughout our organisation to ensure we play our part in helping to stamp out slavery and human trafficking.

The Group has also put a whistleblowing policy in place. This allows staff to raise any concerns in confidence directly with the Chair or Executive Directors.

The Company also supports and encourages corporate and social responsibility. As well as making charitable contributions, a number of charity events are held each year and staff volunteer for assisting local charities during normal working hours.

Principle 9

Maintain governance structures and processes that are fit for purpose and support good decision-making by the board.

Roles and responsibilities of the Chair (temporarily Executive Chair, subject to regulatory approval) Chief Executive Officer (once appointed) and any other Directors who have specific individual responsibilities or remits (e.g. for engagement with shareholders or other stakeholder groups)

David Barral, as Chair (temporarily Executive Chair, subject to regulatory approval) , is responsible for leading an effective board, fostering a good corporate governance culture and ensuring appropriate strategic focus and direction.

The Chief Executive Officer (once appointed), has overall responsibility for proposing the strategic focus to the board, implementing the strategy once it has been approved and managing the Group's business. This is temporarily vested with the Executive Chair.

All Executive and Non-Executive Directors are all willing to engage with shareholders should they have a concern that is not resolved through the normal channels.

The Executive Directors have particular roles and areas of responsibility (Dan Cowland: Chief Financial Officer; Jane Ridgley Chief Operating Officer). As such, they continually engage with the Group's stakeholders, whether these be shareholders, members of staff, clients, suppliers, regulators, industry

bodies and creditors (including the Group’s lending banks). There is a degree of overlap here, with individual roles and responsibilities touching many areas of the business.

Roles of any committees (e.g. Audit, Remuneration and Risk Committees)

EXCO: the EXCO comprises of all three of the Executive Directors together with senior individuals in the Group. It is responsible for the daily running of the Group and the execution of approved policies and the business plan.

Audit Committee: its primary focus is on corporate reporting (from an external perspective) and on monitoring the Company’s internal control and risk management systems (from an internal perspective). Further details on the Committee’s responsibilities and activities are on page 27 of our 2021 annual report.

Remuneration Committee: its primary function is to determine, on behalf of the board, the remuneration packages of the Executive Directors and the bonus and share option schemes to be offered to employees. Further details on the Committee are on page 27 of our 2021 annual report.

Risk & Compliance Committee: its primary function is to consider the Group’s appetite to risk, to review and monitor the risk process undertaken by the Group and adherence to the risk profile and monitor procedures for identifying and controlling risk. Further details on the committee’s responsibilities and activities are on page 27 of our 2021 annual report.

The terms of reference for the Audit, Remuneration and Risk committees can be found in the “Investors” section of www.curtisbanks.co.uk.

Matters reserved for the board

The board has a formal written schedule of matters reserved for its review and approval; this schedule includes those matters described in the following table:

Category	Examples
Strategy and management	Approval of the Group’s long-term objectives and commercial strategy; approval of the Group’s annual budgets and any material changes to them; extension of the Group’s activities into new business areas; cessation of the operation of all or any material part of the Group’s business; overseeing the Group’s operations, ensuring competent and prudent management, sound planning, and compliance with statutory and regulatory obligations.
Structure and capital	Changes relating to the Group’s capital structure; major changes to the Group’s corporate or management and control structure; changes to the Company’s listing or its status as a plc.
Financial reporting and controls	Approval of the following: annual report and accounts, preliminary announcements of results, significant changes in accounting policies or practices, treasury policies, operating expenditure; declaration or recommendation of dividends; review and approval of expenditure authorisation limits.

Contracts	Contracts in the ordinary course of business which are material strategically or by reason of size (e.g. bank borrowings and material acquisitions); contracts not in the ordinary course of business; major investments.
Communication	Approval of resolutions, circulars, prospectuses and press releases concerning matters decided by the board.
Board membership and other appointments	Changes to the structure, size and composition of the board; ensuring adequate succession planning for the board and senior management; board appointments; selection of the Chair and the Chief Executive Officer; appointment of the Senior Independent Director; membership and Chairing of board committees; continuation in office of Directors; appointment or removal of the Company Secretary; appointment, reappointment or removal of the external auditor to be put to shareholders for approval, appointment of stockbrokers.
Remuneration	Approving the remuneration policy for the directors; determining the initial remuneration of the Non-Executive Directors; introduction of new share incentive plans or major changes to existing plans.
Delegation of authority	Division of responsibilities between the Chair and the Chief Executive Officer; establishing board committees and approving their terms of reference.
Corporate governance	Undertaking any formal and rigorous review of the board's own performance, that of its committees and individual directors, and the division of responsibilities; determining the independence of Non-Executive Directors; review of the Group's overall corporate governance arrangements; authorising conflicts of interest where permitted by the Company's articles of association.
Policies and procedures	Approval of the following: manual on compliance with the AIM Rules and aspects of the Market Abuse Regulation, Company's insider list manual, dealing code, anti-bribery policy, whistleblowing policy.

Plans for evolution of the governance framework in line with the Company's plans for growth

We are working towards further improvements to our corporate governance structure and the Executive Chair role is only a temporary position, whilst we recruit a new Chief Executive Officer. This will allow the Chair to revert to the role of Non-Executive Chair.

Principle 10

Communicate how the company is governed and is performing by maintaining a dialogue with shareholders and other relevant stakeholders.

Clear and transparent disclosure of voting outcomes

As soon as practicable after any general meeting has concluded, the results of the meeting are released through a regulatory news service and a copy of the announcement is posted in the investors relations section of www.curtisbanks.co.uk.

Explanation of actions where a significant proportion of votes (e.g. 20% of independent votes) is cast against a resolution at any general meeting

The Company has committed to do this where relevant, principally through the direct conversations with those shareholders casting a vote against a resolution.

Inclusion of historical annual reports and other governance-related material, including notices of all general meetings over the last five years

The investors section of www.curtisbanks.co.uk includes this information for all periods since the Company has been quoted on the AIM market. Notices of the annual general meetings held in the same period are also included on the website. No other general meetings have been held since the listing of the Company on AIM.

Index

Set out in the following table is a list of the disclosures required to be published by us under the QCA Code. The table also indicates where each disclosure appears in our annual report or in this document. As explained on page 1 of this document, the disclosures appear in the locations recommended in the QCA Code. Unless stated otherwise, reference to a page is to a page in this document.

Corporate Governance Principle	Disclosure	Location
1	Explain the company's business model and strategy, including key challenges in their execution (and how those will be addressed).	Our 2021 Annual Report - page 2; and pages 13 to 16
2	Explain the ways in which the company seeks to engage with shareholders and how successful this has been. This should include information on those responsible for shareholder liaison or specification of the point of contact for such matters.	Pages 2-3 and 10 above
3	Explain how the business model identifies the key resources and relationships on which the business relies. Explain how the company obtains feedback from stakeholders and the actions that have been generated as a result of this feedback (e.g. changes to inputs or improvements in products).	Page 3 above Page 4 above
4	Describe how the board has embedded effective risk management in order to execute and deliver strategy. This should include a description of what the board does to identify, assess and manage risk and how it gets assurance that the risk management and related control systems in place are effective.	Our 2021 Annual Report -pages 13 to 16
5	Identify those directors who are considered to be independent; where there are grounds to question the independence of a director, through length of service or otherwise, this must be explained.	Our 2021 Annual Report - page 26; and page 4 above

	<p>Describe the time commitment required from directors (including Non-Executive Directors as well as part-time Executive Directors).</p> <p>Page 4 above</p> <p>Include the number of meetings of the board (and any committees) during the year, together with the attendance record of each director.</p> <p>Page 4 above</p>	
6	<p>Identify each director</p> <p>Describe the relevant experience, skills and personal qualities and capabilities that each director brings to the board (a simple list of current and past roles is insufficient); the statement should demonstrate how the board as a whole contains (or will contain) the necessary mix of experience, skills, personal qualities (including gender balance) and capabilities to deliver the strategy of the company for the benefit of the shareholders over the medium to long-term.</p> <p>Explain how each director keeps his / her skillset up-to date.</p> <p>Where the board or any committee has sought external advice on a significant matter, this must be described and explained.</p> <p>Where external advisers to the board or any of its committees have been engaged, explain their role.</p> <p>Describe any internal advisory responsibilities, such as the roles performed by the Company Secretary and the senior independent director, in advising and supporting the board.</p>	<p>Our 2021 Annual Report - pages 21 & 22</p> <p>Our 2021 Annual Report - page 27; and pages 4 and 5 above</p> <p>Our 2021 Annual Report - page 27; and pages 4 and 5 above</p> <p>Our 2021 Annual Report - page 27; and pages 4 and 5 above</p> <p>Our 2021 Annual Report - page 27; and pages 4 and 5 above</p>
7	<p>Include a high-level explanation of the board performance effectiveness process.</p> <p>Where a board performance evaluation has taken place in the year, provide a brief overview of it, how it was conducted and its results and recommendations. Progress against previous recommendations should also be addressed.</p>	<p>Our 2021 Annual Report - page 27; and pages 5 to 7 above</p>

	<p>Include a more detailed description of the board performance evaluation process/cycle adopted by the company. This should include a summary of:</p> <ul style="list-style-type: none"> • The criteria against which board, committee, and individual effectiveness is considered; • How evaluation procedures have evolved from previous years, the results of the evaluation process and action taken or planned as a result; and • How often board evaluations take place. <p>Explain how the company approaches succession planning and the processes by which it determines board and other senior management appointments, including any links to the board evaluation process.</p>	<p>Pages 5 to 7 above</p> <p>Pages 5 to 7 above</p> <p>Page 7 above</p>
8	<p>Include in the Chair’s corporate governance statement how the culture is consistent with the company’s objectives, strategy and business model in the strategic report and with the description of principal risks and uncertainties. The statement should explain what the board does to monitor and promote a healthy corporate culture and how the board assesses the state of the culture at present.</p> <p>Explain how the board ensures that the company has the means to determine that ethical values and behaviours are recognised and respected.</p>	<p>Our 2021 Annual Report - pages 26 to 28</p> <p>Pages 7 and 8 above</p>
9	<p>In addition to the high level explanation of the application of the QCA Code set out in the chair’s corporate governance statement:</p> <ul style="list-style-type: none"> • Describe the roles and responsibilities of the Chair, Chief Executive Officer and any other directors who have specific 	<p>Page 8 above</p>

	<p>individual responsibilities or remits (e.g. for engagement with shareholders or other stakeholder groups).</p> <ul style="list-style-type: none"> • Describe the roles of any committees (e.g. Audit, Remuneration and Nomination committees) setting out any terms of reference and matters reserved by the board for its consideration. • Describe which matters are reserved for the board. • Describe any plans for evolution of the governance framework in line with the company's plans for growth. 	<p>Pages 9-11 above</p> <p>Pages 9-11 above</p> <p>Pages 9-11 above</p>
10	<p>Describe the work of any board committees undertaken during the year.</p> <p>Include an Audit Committee report (or equivalent report if such committee is not in place).</p> <p>Include a Remuneration Committee report (or equivalent report if such committee is not in place).</p> <p>If the company has not published one or more of the disclosures set out under Principles 1-9, the omitted disclosures must be identified and the reason for their omission explained.</p> <p>Disclose the outcomes of all votes in a clear and transparent manner.</p> <p>Where a significant proportion of votes (e.g. 20% of independent votes) have been cast against a resolution at any general meeting, the company should include, on a timely basis, an explanation of what actions it intends to take to understand the reasons behind that vote result, and, where appropriate, any different action it has taken, or will take, as a result of the vote.</p> <p>Include historical annual reports and other governance related material, including notices of all general meetings over the last five years.</p>	<p>Our 2021 annual report - pages 29 & 30</p> <p>Our 2021 annual report - page 29</p> <p>Our 2021 annual report - page 30</p> <p>Not applicable</p> <p>Disclosure to be included within the 2021 annual report regarding direct communication with shareholders</p> <p>See Investor Relations section of website www.curtisbanks.co.uk</p>