



RBC BlueBay
Asset Management

BlueBay Asset Management LLP

MIFIDPRU 8 Public Disclosure Document

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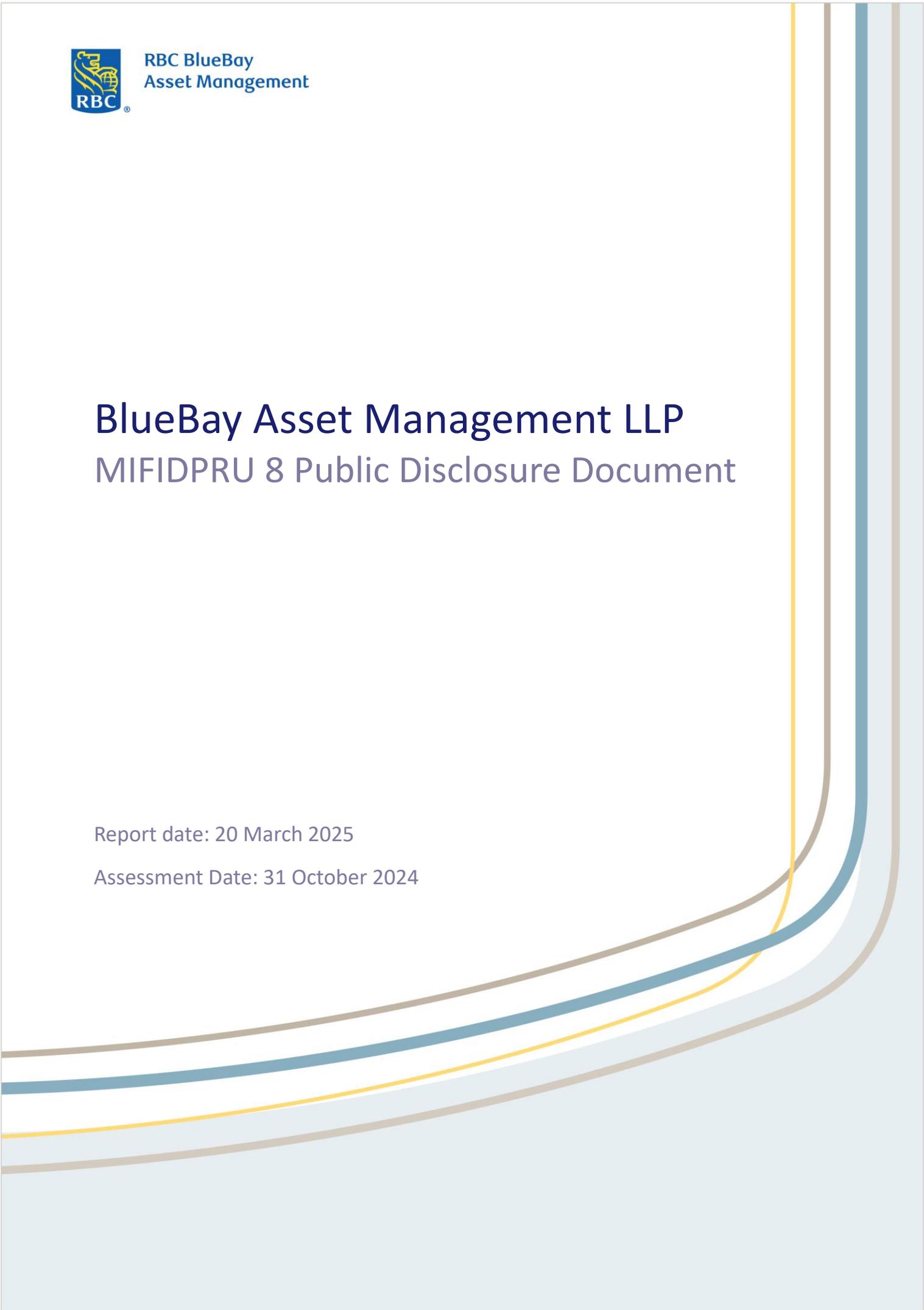




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1 Overview and summary

BlueBay Asset Management LLP (“the LLP”) is regulated by the Financial Conduct Authority (“FCA”) as a full scope UK Alternative Investment Fund Manager (“AIFM”) and is categorised by the FCA for Prudential Regulatory purposes as a Collective Portfolio Management Investment Firm (“CPMI”). Therefore are per the definitions of the FCA, the LLP is treated as a Markets in Financial Instruments (“MiFID”) firm and subject to the rules and requirements of the FCA’s Prudential Sourcebook for MiFID Investments Firms (“MIFIDPRU”) handbook.

For the purposes of MIFIDPRU, the LLP has been classified as a non-small non-interconnected (“SNI”) firm, therefore a non-SNI firm. The LLP has produced this Public Disclosure Document in line with the rules and requirements of MIFIDPRU 8, as applicable to non-SNI firms. This Public Disclosure Document has been prepared based on the audited financials as at 31 October 2024, covering the financial period 01 November 2023 to 31 October 2024.

The LLP’s is a UK limited liability partnership, which main business activity is to be a manager and risk retention holder of three Collateralised Loan Obligations (“CLOs”).

The LLP is a Subsidiary of BlueBay Asset Management (Services) Ltd (“BBAMS”). BBAMS is the Parent Company of six directly and indirectly owned Subsidiaries (referred to as “BlueBay” or the “BlueBay Group”). BBAMS is 100% owned by the Royal Bank of Canada (“RBC”).

The LLP is the risk retention holder and investment manager of the three CLO funds.

2 Governance arrangements

The LLP’s ultimate decision making and oversight body is the Board of BlueBay Asset Management LLP (“the Board”).

The Board is responsible for setting the LLP’s business objectives, strategy and annual budgets. The Board is governed by its Terms of References, which include all responsibilities and requirements as per SYSC 4.3A.1 and the LLP has accordingly implemented segregation of duties between its business functions and control functions.

The LLP has a Conflicts of Policy and procedures in place and potential conflicts of interests are continually monitored and assessed by Compliance as an independent control function, as well as being reported to the Board on a regular basis.

In line with MIFIDPRU 7.3.1 the LLP has established a Risk Committee. The roles and members of the LLP’s Risk Committee are as follows:

The Board receives regular reporting and management information on the LLP’s operations, specifically reporting and escalation of any compliance, financial, legal and risk matters. The Board receives independent reporting for internal control functions as well as external independently appointed auditors and consultants on the effectiveness of the LLP’s operations, systems and control arrangements.



2.1 External Directorships

In line with MIFIDPRU 8.3.1 (2), the LLP has detailed below the number of external appointments, both as executive and non-executive roles of its Board members:

Name / role	# of external executive roles	# of external non-executive roles
Erich Gerth	0	0
Mark Dowding	0	0
Malena Ljungkvist	0	0

2.2 Promoting diversity and inclusion

With the implementation of the CRC Framework in 2019, the Responsibility to Our People Pillar was formed, which has three priorities; (i) Diversity and Inclusion (“D&I”); (ii) Health and Wellbeing; and (iii) Talent Management.

The Company has a strong culture, supported by a transparent approach to keeping employees informed, particularly of the Group’s financial and economic performance. This is achieved by the Company’s employees receiving regular updates including the monthly CEO’s Business Dashboard Summary which covers; (i) Business Update; (ii) Compliance, Legal and Governance; (iii) Finance and Global Business Development; (iv) Human Resources; (v) Infrastructure Operations; (vi) Marketing and Communications; (vii) Product Development; and (viii) Risk.

In addition to the monthly CEO’s Business Dashboard Summary, there is a monthly Corporate Responsibility Committee Newsletter which is sent to all employees, plus periodic Town Halls which are held in a hybrid format to enable staff from all locations to take part.

D&I is a key focus within the Company. RBC BlueBay has in place an established, employee-led D&I Forum. The Forum works with several external charities, organisations and think tanks to help drive our D&I work including City Hive, Reboot and EMpower. We are also members of the D&I Committees at the Alternative Investment and Manager Association, and the Standards Board for Alternative Investment. As well as the European Leveraged Finance Association, where we have also been contributing to the Association’s Inclusion Initiative.

For the last four years, we have partnered with three organisations to run our summer internship programme 10,000 Interns Foundation, Girls are Investors and Sponsors for Educational Opportunity, with the aim of promoting a more diverse generation of future investment professionals.

In 2023, we also launched a pilot two-year Graduate Rotation Programme to help foster junior staff within the organisation.

Our people also have access to a mentoring programme open to all staff and a GAM leadership development programme that aims to accelerate development of high-potential staff into leadership roles.

In line with the Equality Act 2010 (Gender Pay Gap Information) Regulations 2017, the Group publishes a Gender Pay Gap Report annually, which covers the employees of the Company. The Company takes equality very seriously and the principle we stand by is to pay our people fairly, immaterial of gender, with individuals are compensated solely based on their role and performance. Our approach is based on the following principles of attract, retain, and promote. Some initiatives to help us achieve our objectives in addressing the pay gap disparity include recruitment training, internships, leadership



commitment, compensation review process, learning and development, mentoring programmes and Forums supporting diversity.

The Board receives a Human Resources Update at every Board Meeting, at which the Head of Human Resources provides information on employees, raising any matters where required and provides information on, but not limited to: (i) leavers; (ii) joiners; (iii) recruitment; and (iv) learning and development.

An annual Employee Engagement Survey is conducted, with deep dives into the results, with the commitment that points raised will be discussed and explored.

Risk management objectives and policies

The LLP has implemented and embedded risk management framework, policies and procedures across all relevant risk areas of the LLP. The Board sets the business strategy and risk appetite statement of the LLP, which flows through to the risk management framework of the LLP.

In line with the LLP's business strategy, risk appetite and risk management framework the LLP identifies and further assesses key risks within the LLP's Internal Capital and Risk Assessment ("ICARA") process.

The LLP maintains a risk register, which includes risk assessment and rating methodologies in accordance with its risk appetite statement. Key risks are reported to the Board at each meeting.

2.3 Own funds requirements – MIFIDPRU 4

The K-factor applicable to the LLP is K-AUM, which covers the average assets under management that the business manages.

The LLP's investments risks are captured within its K-AUM calculation and operational risks are predominantly captured within its Fixed Overhead Requirement ("FOR") calculation. The LLP has further assessed any operational risks within its ICARA and quantified additional own funds and liquidity, where required.

2.4 Concentration risk – MIFIDPRU 5

The LLP does not conduct any trading on own account and does not have regulatory permissions for dealing as principal. The LLP therefore does not have any concentration risks on or off-balance sheet and does not operate a trading book.

2.5 Liquidity – MIFIDPRU 6

The LLP maintains minimum liquidity at all times in compliance with the Basic Liquid Assets Requirement (BLAR), being at least 1/3 of its FOR. The LLP does not provide any client guarantees and therefore its entire liquidity requirement is driven by its expenses, as captured by the FOR.

As part of the ICARA, the LLP also maintains liquidity to satisfy its net wind-down costs and any additional liquidity requirements which the ICARA identified for supporting the ongoing business activities of the LLP.



3 Own funds

3.1 Own funds resources

In line with MIFIDPRU 8.4 the LLP has prepared the reconciliation of own funds in line with MIFIDPRU 8 Annex 1 as follows:

Composition of regulatory own funds			
#	Item	Amount (GBP thousands)	Source
1	OWN FUNDS	48,100	
2	TIER 1 CAPITAL	48,100	
3	COMMON EQUITY TIER 1 CAPITAL	48,100	
4	Fully paid up capital instruments	48,100	
5	Share premium	0	
6	Retained earnings	0	
7	Accumulated other comprehensive income	0	
8	Other reserves	0	
9	Adjustments to CET1 due to prudential filters	0	
10	Other funds	0	
11	(-) TOTAL DEDUCTIONS FRO COMMON EQUITY TIER 1	0	
19	CET1: Other capital elements, deductions and adjustments	0	
20	ADDITIONAL TIER 1 CAPITAL	0	
21	Fully paid up, directly issued capital instruments	0	
22	Share premium	0	
23	(-) TOTAL DEDUCTIONS FROM ADDITIONAL TIER 1	0	
24	Additional Tier 1: Other capital elements, deductions and adjustments	0	
25	TIER 2 CAPITAL	0	
26	Fully paid up, directly issued capital instruments	0	
27	Share premium	0	
28	(-) TOTAL DEDUCTION FROM TIER 2	0	
29	Tier 2: Other capital elements, deductions and adjustments	0	



Own funds: reconciliation of regulatory own funds to balance sheet in the audited financial statement				
GBP (thousands)				
		a	b	c
	Item	Balance sheet as in audited financial statement	Under regulatory scope of consolidation	Cross reference to own funds table
Assets – Breakdown by asset classes according to the balance sheet in the audited financial statements				
1	Financial assets - FVTPL	50,009		
2	Trade and other receivables	1,136		
3	Amounts due from former Members	148		
4	Cash and cash equivalents	20,906		
	Total Assets	72,199		
Liabilities – Breakdown by liability classes according to the balance sheet in the audited financial statements				
1	Amounts due to Members	-		
2	Trade and other payables	1,087		
3	Amounts due to Members and former Members	14,879		
	Total Liabilities	15,966		
Shareholders' Equity				
1	Members' capital classified as equity	48,100		
2	Other reserves	8,133		
	Total Shareholders' equity	56,233		



3.2 Own funds requirements

The LLP calculates its own funds requirements as a non-SNI firm in line with the rules and requirements in MIFIDPRU 4.3 for non-SNI firms.

LLP Own Funds Threshold Requirement (OFTR)	£000s
Permanent Minimum Capital Requirement (A)	75
Fixed Overheads Requirement (B)	52
K-AUM Requirement	204
K-Factor Requirement (C)	204
Own funds to address risks from ongoing activities (D)	1,150
Total Own Funds Threshold Requirement (highest of A, B, C or D above)	1,150
Own Funds	48,100
Surplus over Own Funds	46,950

In addition, the LLP has completed its ICARA and analysis to determine its net wind-down requirements and any additional own fund requirements to fund its on-going operations.

The LLP's risk appetite statement and assessment of risks through its risk management framework and risk register form the basis of its ICARA and assessment of the overall financial adequacy rule in line with MIFIDPRU 7.4.7.

The Board reviews, challenges and approves the ICARA and conclusions of own funds requirements.

4 Remuneration arrangements

Remuneration arrangements for the LLP, can be found on BlueBay's website [BlueBay Remuneration Policy](#) and [FCA Remuneration Code Remuneration Policy Statement](#).

5 Investment policy

The LLP is purely a risk retention holder and investment manager for three CLOs, which are closed-ended investments. As such, there is no investment policy for CLOs.