

UK CLIENT MONEY POLICY

RUSSELL INVESTMENTS LIMITED & RUSSELL
INVESTMENTS IMPLEMENTATION SERVICES LIMITED



SEPTEMBER 2026

Purpose

This policy sets out the treatment of money received or held by Russell Investments Limited or Russell Investments Implementation Services Limited (collectively the “Firms” and each a “Firm”) in relation to payments, including those arising from errors, in accordance with the Financial Conduct Authority’s (“FCA”) Client Assets Sourcebook (“CASS”).

Regulatory Background

The Firms are authorised and regulated by the FCA but are not permitted to hold client money as part of their normal business activities. However, the Firms may, on an ad-hoc basis, receive or hold money that meets the definition of client money under CASS.

Scope and Exclusions

This policy applies where the Firms receive or hold money that is not due and payable to the Firms, including compensation amounts agreed with clients following the investigation of a potential client money matter.

This Policy does not govern investor subscriptions, redemptions, or distribution of money in respect of Russell Investments’ range of funds except where the Firms themselves receive or hold money that falls within CASS. Obligations owed to fund investors, fund vehicles, depositaries, administrators, or transfer agents must be assessed under the applicable fund documentation, regulatory regime, and operating procedures.

Where a custodian has charged an overdraft fee to a client’s cash account and the Firms reimburse that account for the client’s benefit, the payment is a client money matter. Where the custodian has borne the cost itself and seeks reimbursement from the relevant Firm in its own capacity, the payment will be treated as a payment to the custodian rather than client money.

Key Definitions

“client” means a person to whom the Firms provide, or have provided, a service in the course of carrying on a regulated activity. Where the payment is made to a custodian, administrator, nominee, platform, or other third party, the payment may still be treated as being made to the client where the payment is made to an account held for the client, to the client’s order, or otherwise for the client’s benefit.

A “potential client money matter” includes any:

- 1) Incident or error
- 2) misdirected payment
- 3) compensation payment
- 4) reimbursement
- 5) overpayment
- 6) failed payment return
- 7) custodian reimbursement, or
- 8) other event where the relevant Firm may have received or may be holding money for, or on behalf of, a client.

The following are not automatically client money matters and must be assessed on their facts:

- 1) Amounts due and payable to the relevant Firm
- 2) Payments owed by the relevant Firm as a debtor to a client

- 3) Payments to a custodian acting in its own capacity
- 4) Fund subscription or redemption flows handled outside the relevant Firm
- 5) Intercompany or expense reimbursement payments.

Client Money Classification Principles

The Firms policy is to treat money as client money where, following a full investigation of a potential client money matter, senior management approval determines that:

- the relevant Firm is not entitled to retain the funds; and
- the funds are due to be paid to a client

Senior management approval is the Firms internal control point for confirming the outcome of the investigation, the amount payable, the payee, and the required payment route. It does not override the relevant Firm's obligation to assess promptly whether money received or held by the relevant Firm is client money under CASS. Where there is uncertainty, the matter must be escalated immediately to Compliance and Legal, and the relevant Firm must adopt the more prudent treatment pending resolution.

An amount owed by the relevant Firm to a client is not automatically client money merely because it is payable to the client. The classification depends on whether the relevant Firm has received or holds money for, or on behalf of, a client in circumstances falling within CASS.

Payment Timing

Where the Firms hold client money in these circumstances, they will comply with the applicable client money rules, including the requirement to promptly return such money to the client.

In particular, in accordance with CASS 7.13.39R, where the Firms receive client money which they are not permitted to hold, they must pay that money to the client no later than the end of the business day following the date that the relevant Firm's senior management approves that money is not due a payable to the relevant Firm.

The Firms policy is to ensure that all such client money is returned to the client within one business day of the determination that the money is due to the client.

Operational Process

- A full investigation of a potential client money matter will be conducted promptly in accordance with Russell Investments' Global Events Escalation Policy. The outcome of the investigation will be presented to senior management of the relevant Firm, and senior management will approve whether the event includes money due to the client
- Once the amount due to the client is approved by senior management of the relevant Firm, the funds will be classified as client money
- Payment instructions will be initiated immediately to ensure settlement within one business day. The one-business-day period begins when the relevant Firm's formal determination is made and approved that the amount is due to the client and not due and payable to the relevant Firm. Payment must then be made promptly and, in any event, no later than the end of the next business day.

- To evidence the one business day requirement has been met, the risk Event Notification Report will capture:
 - 1) the date and time senior management approval was obtained; and
 - 2) the date and time when the client money left the relevant Firm's bank account.
- If payment cannot be completed within the required timeframe, the matter must be escalated immediately to Compliance, Legal, and Risk. The Event Notification Report must explain the reason for delay, mitigating steps, client impact, and whether regulatory notification is required.

Governance, Ownership and Review

The Compliance function of each relevant Firm owns this policy and oversees compliance with the requirements set out herein. Each potential client money matter must be reported to Compliance as soon as practicable after becoming identified.

Any breaches in returning client money will be recorded in the relevant Firm's Regulatory Breaches Register and reported by Compliance to the Board of the relevant Firm at the next board meeting or sooner depending on materiality.

Compliance will assess whether any client money breach, delay, control failure, or recurring issue requires notification to the FCA, client notification, remediation, root-cause analysis, or enhancement to related procedures.

Record Keeping

For each potential client money matter, the relevant Firm must retain an evidence pack containing the investigation summary, CASS classification analysis, approvals, payment calculations, client/custodian instructions, payment confirmations, and any related correspondence. Such records will be maintained by Global Risk Management in MetricStream, Russell Investments' Governance, Risk and Compliance system.