

# Elevate Portfolio Services Limited

Annual Report and Financial Statements  
for the year ended 31 December 2024

Registration no: 01128611

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## Company Information

### Directors

Noel Butwell	Director
Hannah Grove	Non-Executive Director
Carolyn Cathleen Raffaeli	Non-Executive Director and Chair
Louise Williams	Director
Jacqueline Kilgour	Non-Executive Director
Rushad Abadan	Non-Executive Director

### Company Secretary

abrdn Corporate Secretary Limited

### Registered Office

280 Bishopsgate  
London, United Kingdom  
EC2M 4AG

### Registered Number

01128611

### Independent Auditor

KPMG LLP  
Chartered Accountants and Statutory Auditors  
Saltire Court  
20 Castle Terrace  
Edinburgh  
EH1 2EG

## Strategic Report for the Year Ended 31 December 2024

The Directors present their strategic report on Elevate Portfolio Services Limited (the "Company") for the year ended 31 December 2024, in accordance with section 414A of the Companies Act 2006.

### Business review and future developments

The Company is part of Aberdeen Group plc ("Aberdeen" or, together with its subsidiaries "Aberdeen Group"). The principal activity of the Company is the provision of the Elevate wrap platform and associated services. The service enables financial advisers, on behalf of their clients, to buy and sell investments through appropriate tax wrappers via an on-line trading platform. The Company is also the manager of individual savings accounts ("ISAs") and Pension schemes. There are no plans to change the principal activity of the Company.

The Company, in partnership with its parent company, Standard Life Savings Limited, is delivering a significant transformation project. This includes a strategic partnership with FNZ for platform custody services, back-office administration and technology change. Through 2024 the Adviser Experience Programme – an overarching programme of activity to make it easier for advisory businesses to partner with the Company to serve more clients and reduce friction in key client facing processes – was focussed on progressing the Aberdeen SIPP onto the parent company's platform, which will replace the previous Phoenix Wrap SIPP. Further costs related to the Adviser Experience Programme will be incurred in 2025.

During 2024, EPSL made key organisational changes and appointments to ensure that the right structure and leadership is in place to deliver on the Company's strategy. Three senior hires were made to strengthen the leadership team through the recruitment of Verona Kenny (CDO), Derek Smith (CPTO) and Louise Williams (CFO).

The Company is a Markets in Financial Instruments Directive investment firm and is regulated by the Financial Conduct Authority under the Investment Firms Prudential Regime.

### Key performance indicators ("KPIs")

The Directors of Aberdeen manage Aberdeen Group's operations on a business segment basis. The development and performance of the Company is discussed in the Adviser Business section within the Strategic Report in Aberdeen's Annual Report and Accounts which does not form part of this report. The performance of the Company's business is not discussed on a standalone basis, however the Company is an integral part of Aberdeen's Adviser proposition which makes a significant contribution to the overall profitability of the Aberdeen business in the UK.

Adjusted profit and its component parts are the key performance indicators used by the Company's Board and executive management to explain the financial performance by the Company. Adjusted profit excludes impacts arising from restructuring costs and corporate transactions and items which are one-off and, due to their size or nature, are not indicative of long-term operating performance. Restructuring and corporate transaction expenses predominantly relate to the Adviser Experience Programme noted above. These costs reflect staff costs and third-party costs specifically relating to the transformation programme and are included within administrative expenses in the profit and loss account on page 14.

	2024 £m	2023 £m
Assets Under Administration (AUA)	15,577	15,684
Net flows	(1,263)	(812)
	2024 £'000	2023 £'000
Income	56,986	52,934
Expenses	(25,201)	(28,961)

The following table shows adjusted profit for the Company reconciled to IFRS profit before tax for the year:

	2024 £'000	2023 £'000
<b>Adjusted profit before tax</b>	<b>34,693</b>	<b>31,077</b>
Restructuring and corporate transactions	(2,908)	(7,104)
<b>Profit before tax</b>	<b>31,785</b>	<b>23,973</b>

## Strategic Report (continued)

### Key performance indicators ("KPIs") *continued*

#### AUA and net flows

AUA has decreased by £107m (1%) due to net outflows offset by favourable market movement. The Company experienced net outflows of £1,263m during 2024 compared to £812m in 2023. Major changes have been made during the year with a view to building positive momentum within the Adviser business, which included enhancing client service and proposition, improving competitive position through strategic repricing and investing in people.

#### Income

Income has increased by £4,052k (8%) largely due to a rise in interest rates throughout 2024 compared to 2023. This contributed to improved cash margin on client accounts and higher interest received on increased balances on the corporate bank account and a short-term money market fund.

#### Expenses

Expenses have decreased by £3,760k (13%) predominantly due to a reduction in the restructuring costs during the year. The administration costs within the Profit and Loss account includes restructuring and corporate transaction expenses.

#### Adjusted profit before tax

Adjusted profit before tax has increased by £3,616k (12%) due to the aforementioned increase in income together with administrative expenses (excluding restructuring and corporate transaction expenses) that have remained in line with last year, driven by disciplined cost management.

#### Enhancing our governance

Section 172 of the Companies Act 2006 requires a Director of a company to act in the way they consider, in good faith, would be most likely to promote the success of the company for the benefit of its members as a whole. In doing this, section 172 requires a Director to have regard, among other matters, to:

- a) the likely consequences of any decision in the long term;
- b) the interests of the company's employees;
- c) the need to foster the company's business relationships with suppliers, customers and others;
- d) the impact of the company's operations on the community and the environment;
- e) the desirability of the company maintaining a reputation for high standards of business conduct; and
- f) the need to act fairly between different members of the company.

The Directors give careful consideration to the factors set out above in discharging their duties under section 172.

The Board recognises that the long-term success of the business is dependent on the way it works with a large number of important stakeholders. The Directors have had regard to the interests of stakeholders (including clients and customers, our people, society and our shareholders) while complying with their obligations to promote the success of the Company in line with section 172 of the Companies Act. The Board has discussed these obligations throughout the year, including how stakeholder engagement is incorporated into our long-term decision-making and how the Company operates as a subsidiary within the wider Aberdeen group of companies.

In managing the Company, the Directors have taken into account the requirements of section 172 (1) of the Companies Act 2006 as summarised below:

**The likely consequence of any decision in the long term** - The Board of Directors of the Company operate the Company in accordance with the Company's Articles, the Board Charter and the overall Aberdeen business plan, which considers the long term success of the Company, Adviser Business and Aberdeen Group as a whole, and the likely long term consequences of any decisions by the Company are taken into account. For example, the Company has determined that it is in the long term interests of the member to combine the back-end administration technology stacks for the Elevate and Wrap platforms operated by the Company and its immediate parent company Standard Life Savings Limited respectively.

**The interests of the company's employees** - The Company has no direct employees. Within the Aberdeen Group of companies, engagement with employees is considered at group level and employee engagement matters have been disclosed in the Aberdeen Annual Report and Accounts which does not form part of this report. The Directors

## Strategic Report (continued)

### Enhancing our governance *continued*

have determined that there are no company specific matters appropriate to disclose in relation to engagement with employees.

**The need to foster the company's business relationships with suppliers, customers and others** - Supplier relationships within Aberdeen Group are managed under the Procurement, Outsourcing and Third Party Management Policy, which applies to all subsidiary companies. Engagement with suppliers, customers and others is considered at group level and engagement matters have been disclosed in the Aberdeen Annual Report and

Accounts which does not form part of this report. In addition the Board of Directors receives reports regarding customer services as part of its regular meetings, and regularly discusses engagement with key suppliers in particular Phoenix and FNZ. The Directors have determined that there are no company specific matters appropriate to disclose in relation to suppliers.

**The impact of the company's operations on the community and the environment** - Engagement on environmental and community matters is considered at Aberdeen level and such matters have been disclosed in the Aberdeen Annual Report and Accounts which does not form part of this report. Matters relevant to the Company are considered as part of this review and the Directors have determined there are no company specific matters appropriate to disclosure in relation to community and environmental impacts.

**The desirability of the company maintaining a reputation for high standards of business conduct** - Maintaining a reputation for, and upholding, high standards of business conduct is vital to the ongoing success of the Aberdeen Group, including the Company.

**The need to act fairly as between members of the company** - The Company has a single member, which is Standard Life Savings Limited and is a wholly owned subsidiary of Aberdeen.

### Managing Risk for Better Outcomes

The company has committed to put clients and customers first and safeguard the interests of our shareholders.

The Aberdeen Group, of which the Company is a part, has an Enterprise Risk Management Framework ("ERMF") comprising 'three lines of defence' model with defined roles and responsibilities. The ERMF underpins risk management throughout the Aberdeen Group and is adopted by this company. In 2024, improvements to the framework included:

- Delivering a new approach to Risk and Control Self Assessments, focussed on key business outcomes and executive accountability.
- Evolving the company's risk appetite monitoring process.
- Simplification of the risk taxonomy.
- Delivering improved risk reporting.
- Improved accessibility of the ERMF and its supporting materials.

### Business Risk environment

Business planning assumptions are more prone to external market developments than before. The global political and economic environment has the potential for surprise.

Developments in technology and changes in client expectations, mean that the Company must continue to adapt and deliver further improvements to achieve sustainable growth, in a competitive market. We continue to manage change delivery across the business to further improve the breadth of proposition offered to clients.

Operational resilience is a key focus as the risks from cyber, technology and third-parties continue to evolve. The company continues to build capabilities and develop mitigation plans to deal with areas of vulnerability in order to minimise (and if necessary, mitigate) the risk of disruption to clients and customers.

The UK regulator has extensive policy and supervisory agendas. The Company works diligently and steadfastly to understand regulators' expectations, especially in the areas of consumer duty, operational resilience and anti-financial crime.

## Strategic Report (continued)

### Evolving and emerging risks

The Aberdeen Group is vigilant to risks that could crystallise over different horizons and impact on strategy, operations and clients. These risks vary in nature as they cover geopolitical, economic, societal, technological, legal, regulatory and environmental themes. Internal and external research is reviewed to consider how risks could emerge and evolve.

Some notable risks (and opportunities) for the Aberdeen Group include adoption of modern technologies, uncertainty driven by geo-politics, unprecedented market shifts, evolving cyber threats and climate change.

### ESG risks

The Aberdeen Group continues to deepen its understanding of these risks for the benefit of all stakeholders and use these insights to help clients and as a Group, advocate for positive policy change. In December 2024, the Company launched the ESG Hub analytics tool, enabling clients to review the ESG characteristics of their portfolio and make more informed decisions on investment allocations.

### Principal risks and uncertainties

The company categorises risks across fewer principal risk categories in the current year which have both internal and external drivers. This simplification ensures continued focus on key exposures and supports the corporate priority of simplifying how the Aberdeen Group thinks about and manages its business.

The principal risks and uncertainties facing the Company are set out below:

Principal risks to our business	Our approach to managing these risks:
<b>Strategic Risk:</b> These are risks that could prevent the company from successfully delivering business plans. These could include failing to meet client expectations, poor strategic decision-making or failure to adapt.	The Company has a strategy and business plan. The company continues to progress the Adviser Experience Programme, aiming to deliver proposition enhancements and complete transformation activity. The company continues to plan to transfer Elevate clients to Standard Life Savings Ltd (SLSL) Wrap in the future.
<b>Financial risk:</b> This is the risk of having insufficient financial resources, suffering losses from adverse markets or the failure or default of counterparties. It is impacted by flows experience, global market conditions, the fees we charge and margins on platforms.	Business planning is focussed on generating sustainable capital growth. Risks to that plan are informed by projections of financial resources under a range of stress scenarios that help calibrate buffers that ensure financial resilience. We have arrangements in place to ensure that optimal levels of financial resources are held by the company in order to meet regulatory requirements.
<b>Conduct risk:</b> We are committed to meeting clients' expectations for service delivery. There is a risk this is not achieved through operational activities or through the implementation of change programmes.	The company is organised to ensure clear focus on Adviser firms and clients. There is a client-first culture and the focus on operational and change plans. The ERMF framework supports the management of conduct risk with clear expectations around conduct goals and responsibilities. There is a clear Global Code of Conduct and the FCA's Consumer Duty has been implemented with continued focus on embedding the Duty further.
<b>Regulatory and legal risk:</b> High volumes of regulatory change can create interpretation, operational and implementation risks. Compliance failures can lead to poor customer and client outcomes, sanctions, reputation damage and income loss.	Relationships with regulators are based on trust and transparency with compliance and legal teams supporting senior managers across the business. The three lines of defence model supports the embedding of compliance expectations across the business and oversight with these expectations. Compliance advisory, monitoring and financial crime testing activity are established oversight and assurance activities undertaken on an ongoing basis. Regulatory developments are actively monitored and

Principal risks to our business	Our approach to managing these risks:
	there is engagement with regulators and industry groups on new regulatory policy initiatives.
<b>Process execution and trade errors:</b> This is the risk that processes, systems or external events could produce operational errors that impact client, customer or shareholder outcomes.	Processes are established for reporting and managing incidents, risk events and issues. Underlying causes of error are monitored to identify areas for action, promoting a culture of accountability and continuously improving how issues are addressed. Incidents are reviewed using established incident management processes. Risks are assessed and managed in change activities.
<b>People:</b> People are the company's greatest asset and the engagement and stability of the workforce is critical to the delivery of key business outcomes. Attrition in key teams can be disruptive and costly.	Through ongoing colleague engagement, close focus is maintained on engagement, morale and attrition levels. The company aims to ensure that compensation and benefits remain competitive.  In 2024, there has been a particular focus on career development, operating model changes, succession planning and regular colleague engagement. Colleague engagement improved and there is commitment to continue to invest in and develop our people.
<b>Technology:</b> There is a risk that technology may fail to keep pace with the business needs. With the increasing sophistication of external threat actors, there is also the significant risk of unauthorised access to systems and cyber attacks.  Third-party suppliers also present risks to the Aberdeen Group technology estate. These risks are relevant to a wide range of potential threats to the business including internal failure, external intrusion, supplier failure and weather events.	The company continues to invest in technology and plan to move to a single platform, with the migration of Elevate customers to the Wrap platform in the future.  The company will also continue to invest in and enhance IT infrastructure controls and oversight of third-party suppliers. Heightened vigilance is maintained for cyber intrusion, with dedicated teams monitoring and managing cyber security risks. Mindful of internal (business) changes and the evolution of the external (threat) landscape, there is focus to strengthen operational resilience and cyber defences. Incident management and contingency planning processes are regularly reviewed and tested. Changes will be implemented related to the UK Operational Resilience Regulations (in March 2025).
<b>Third party management:</b> There is reliance on third parties to deliver key business activities and services and are exposed to a variety of delivery, operational, regulatory and reputational risks as a result.	The Third Party Risk Management Framework is well established. We have oversight arrangements in place to oversee services provided by third party suppliers.

### Environmental matters

The Company follows the environmental strategy of the Aberdeen Group which is disclosed within the Aberdeen Annual Report and Accounts which does not form part of this report.

This report was approved by the Board and signed on its behalf.



Noel Butwell  
Director  
15 April 2025

## Directors' Report for the Year Ended 31 December 2024

The Directors present their annual report together with the audited financial statements of the Company for the year ended 31 December 2024. The Company is an investment company incorporated in England (registration number 01128611) and is part of Aberdeen.

The Company's business review, key performance indicators, principal risks and uncertainties and companies act s172 summary are set out in the Strategic Report.

### Directors of the Company

The directors, who held office during the year and to date, were as follows:

Jonathan Black	(resigned 31 December 2024)
Noel Butwell	
Stuart MacLennan	(resigned 29 January 2025)
Aileen Gillan	(resigned 19 February 2025)
Hannah Grove	
David Marock	(resigned 31 December 2024)
Carolyn Cathleen Raffaeli	
Louise Williams	(appointed 29 January 2025)
Jacqueline Kilgour	(appointed 28 January 2025)
Rushad Abadan	(appointed 1 January 2025)

The Company's ultimate parent company, Aberdeen maintains directors' and officers' liability insurance on behalf of its directors and officers.

The appointment of Directors is not subject to retirement by rotation.

### Company secretary

The Company secretary during the year, was:

abrdn Corporate Secretary Limited.

### Going concern

The Company has made profits in the financial year and is forecast to make profits for the next 12 months, has sufficient financial resources and a strong cash position. The Board's assessment of going concern is underpinned in Company forecasts that model severe market shocks to ensure the Company could continue to satisfy ongoing operating, liquidity and regulatory capital requirements. Based on their assessment, the Board is satisfied that the Company has and will maintain sufficient resources to continue to meet its liabilities as they fall due for at least 12 months from the date of approval of the financial statements. Further information is provided in Note 1.

### Dividends

The Company paid £nil dividends in 2024 (2023: £nil) to the Company's immediate parent company, namely Standard Life Savings Limited.

### Political contributions

It is the Company's policy not to make donations for political purposes.

### Independent auditor

The Independent Auditor, KPMG LLP, has indicated their willingness to continue in office.

### Disclosure of information to the auditors

The Directors who held office at the date of approval of this Directors' Report confirm that, so far as they are each aware, there is no relevant audit information of which the Company's auditor is unaware; and each Director has taken all the steps that they ought to have taken as a Director to make themselves aware of any relevant audit information and to establish that the Company's auditor is aware of that information.

### Modern Slavery Act

As a global investment company, Aberdeen wants to do all it can to help tackle human trafficking, forced labour, bonded labour and child slavery by focusing on its operations, supply chain and investment process. Aberdeen has published a modern slavery statement, reinforcing its commitment to this important issue. This can be found on the Aberdeen website.

## **Directors' report (continued)**

### **Engagement with suppliers**

The s172 statement in the Strategic Report references that engagement with suppliers is considered at the Aberdeen level where full details can be found in the Aberdeen annual report and accounts.

### **People**

The majority of the staff who manage the affairs of the Company are employed by abrdn Corporate Services Limited ("aCSL"), a related party and their costs are recharged to the Company.

aCSL is committed to an equal opportunities policy. The sole criterion for selection or promotion is the suitability of any applicant for the job regardless of ethnic origin, religion, religious belief, sex, sexual orientation, marital status or disablement. The Company will continue to employ, arrange for retraining, or retire on disability pension, any member of staff who becomes disabled, as may be appropriate. The Company communicates with its employees on a regular basis, with an emphasis on listening and responding to staff aspirations and development needs, making it clear how their role contributes to the Aberdeen Group's goals, either through the Aberdeen Group's intranet facility or through regular meetings with management. All employees are encouraged to participate in the Aberdeen Group's share schemes.

Additional details relating to employees are disclosed within the Aberdeen Annual Report and Accounts, which does not form part of this report.

## Directors' Report (continued)

### Statement of Director's Responsibilities in respect of the Strategic Report, the Director's Report and the financial statements

The directors are responsible for preparing the Strategic Report, the Directors' Report, and the financial statements in accordance with applicable law and regulations.

Company law requires the directors to prepare financial statements for each financial year. Under that law they have elected to prepare the financial statements in accordance with UK accounting standards and applicable law (UK Generally Accepted Accounting Practice), including FRS 101 *Reduced Disclosure Framework*.

Under company law the directors must not approve the financial statements unless they are satisfied that they give a true and fair view of the state of affairs of the Company and of the profit or loss of the Company for that period. In preparing these financial statements, the directors are required to:

- select suitable accounting policies and then apply them consistently;
- make judgements and estimates that are reasonable and prudent;
- state whether applicable UK accounting standards have been followed, subject to any material departures disclosed and explained in the financial statements;
- assess the Company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern; and
- use the going concern basis of accounting unless they either intend to liquidate the Company or to cease operations, or have no realistic alternative but to do so.

The directors are responsible for keeping adequate accounting records that are sufficient to show and explain the Company's transactions and disclose with reasonable accuracy at any time the financial position of the Company and enable them to ensure that the financial statements comply with the Companies Act 2006. They are responsible for such internal control as they determine is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error, and have general responsibility for taking such steps as are reasonably open to them to safeguard the assets of the Company and to prevent and detect fraud and other irregularities.

This report was approved by the Board and signed on its behalf.



**Noel Butwell**  
**Director**  
**15 April 2025**

## **Independent Auditor's Report to the Members of Elevate Portfolio Services Limited**

### **Opinion**

We have audited the financial statements of Elevate Portfolio Services Limited ("the Company") for the year ended 31 December 2024 which comprise the Profit and Loss Account, Balance Sheet, Statement of Changes in Equity and related notes, including the accounting policies in note 1.

In our opinion the financial statements:

- give a true and fair view of the state of the Company's affairs as at 31 December 2024 and of its profit for the year then ended;
- have been properly prepared in accordance with UK accounting standards, including FRS 101 *Reduced Disclosure Framework*; and
- have been prepared in accordance with the requirements of the Companies Act 2006.

### **Basis for opinion**

We conducted our audit in accordance with International Standards on Auditing (UK) ("ISAs (UK)") and applicable law. Our responsibilities are described below. We have fulfilled our ethical responsibilities under, and are independent of the Company in accordance with, UK ethical requirements including the FRC Ethical Standard. We believe that the audit evidence we have obtained is a sufficient and appropriate basis for our opinion.

### **Going concern**

The directors have prepared the financial statements on the going concern basis as they do not intend to liquidate the Company or to cease its operations, and as they have concluded that the Company's financial position means that this is realistic. They have also concluded that there are no material uncertainties that could have cast significant doubt over its ability to continue as a going concern for at least a year from the date of approval of the financial statements ("the going concern period").

In our evaluation of the directors' conclusions, we considered the inherent risks to the Company's business model and analysed how those risks might affect the Company's financial resources or ability to continue operations over the going concern period.

Our conclusions based on this work:

- we consider that the directors' use of the going concern basis of accounting in the preparation of the financial statements is appropriate;
- we have not identified, and concur with the directors' assessment that there is not, a material uncertainty related to events or conditions that, individually or collectively, may cast significant doubt on the Company's ability to continue as a going concern for the going concern period.

However, as we cannot predict all future events or conditions and as subsequent events may result in outcomes that are inconsistent with judgements that were reasonable at the time they were made, the above conclusions are not a guarantee that the Company will continue in operation.

### **Fraud and breaches of laws and regulations – ability to detect**

#### *Identifying and responding to risks of material misstatement due to fraud*

To identify risks of material misstatement due to fraud ("fraud risks") we assessed events or conditions that could indicate an incentive or pressure to commit fraud or provide an opportunity to commit fraud. Our risk assessment procedures included:

- Enquiring of directors and management as to the Company's high-level policies and procedures to prevent and detect fraud, as well as whether they have knowledge of any actual, suspected or alleged fraud.
- Reading Board minutes to assess for any discussion of fraud.

We communicated identified fraud risks throughout the audit team and remained alert to any indications of fraud throughout the audit.

As required by auditing standards, and taking into account our overall knowledge of the control environment, we perform procedures to address the risk of management override of controls, in particular the risk that management may be in a position to make inappropriate accounting entries.

On this audit we have rebutted the fraud risk related to revenue recognition because of the relative simplicity of the calculation of the most significant revenue streams and the segregation of duties between management and third-party service providers.

## **Independent Auditor's Report to the Members of Elevate Portfolio Services Limited (continued)**

We did not identify any additional fraud risks.

We also performed procedures including identifying journal entries to test based on high-risk criteria and comparing the identified entries to supporting documentation. These included journal entries posted by senior finance management and those posted to unusual accounts, as well as those which comprised unexpected posting combinations. We have also tested all material post year-end closing journals.

### *Identifying and responding to risks of material misstatement due to non-compliance with laws and regulations*

We identified areas of laws and regulations that could reasonably be expected to have a material effect on the financial statements from our general commercial and sector experience, through discussion with the directors and other management (as required by auditing standards), and from inspection of the Company's regulatory and legal correspondence, and discussed with the directors and other management the policies and procedures regarding compliance with laws and regulations.

As the Company is regulated, our assessment of risks involved gaining an understanding of the control environment including the entity's procedures for complying with regulatory requirements, how they analyse identified breaches and assessing whether or not there were any implications of identified breaches in our audit.

We communicated identified laws and regulations throughout our team and remained alert to any indications of non-compliance throughout the audit.

The potential effect of these laws and regulations on the financial statements varies considerably.

Firstly, the Company is subject to laws and regulations that directly affect the financial statements including financial reporting legislation (including related companies legislation), distributable profits legislation, and taxation legislation and we assessed the extent of compliance with these laws and regulations as part of our procedures on the related financial statement items.

Secondly, the Company is subject to many other laws and regulations where the consequences of non-compliance could have a material effect on amounts or disclosures in the financial statements, for instance through the imposition of fines or litigation or the loss of the Company's license to operate. We identified the following areas as those most likely to have such an effect: Key areas of financial services regulations, including Client Assets, Anti-Money Laundering and market abuse regulations and specific areas of regulatory capital and liquidity and certain aspects of company legislation recognising the financial and regulated nature of the Company's activities and its legal form.

Auditing standards limit the required audit procedures to identify non-compliance with these laws and regulations to enquiry of the directors and other management and inspection of regulatory and legal correspondence, if any. Therefore, if a breach of operational regulations is not disclosed to us or evident from relevant correspondence, an audit will not detect that breach.

### *Context of the ability of the audit to detect fraud or breaches of law or regulation*

Owing to the inherent limitations of an audit, there is an unavoidable risk that we may not have detected some material misstatements in the financial statements, even though we have properly planned and performed our audit in accordance with auditing standards. For example, the further removed non-compliance with laws and regulations is from the events and transactions reflected in the financial statements, the less likely the inherently limited procedures required by auditing standards would identify it.

In addition, as with any audit, there remained a higher risk of non-detection of fraud, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal controls. Our audit procedures are designed to detect material misstatement. We are not responsible for preventing non-compliance or fraud and cannot be expected to detect non-compliance with all laws and regulations.

### **Strategic report and directors' report**

The directors are responsible for the strategic report and the directors' report. Our opinion on the financial statements does not cover those reports and we do not express an audit opinion thereon.

Our responsibility is to read the strategic report and the directors' report and, in doing so, consider whether, based on our financial statements audit work, the information therein is materially misstated or inconsistent with the financial statements or our audit knowledge. Based solely on that work:

## **Independent Auditor's Report to the Members of Elevate Portfolio Services Limited (continued)**

- we have not identified material misstatements in the strategic report and the directors' report;
- in our opinion the information given in those reports for the financial year is consistent with the financial statements; and
- in our opinion those reports have been prepared in accordance with the Companies Act 2006.

### **Matters on which we are required to report by exception**

Under the Companies Act 2006, we are required to report to you if, in our opinion:

- adequate accounting records have not been kept, or returns adequate for our audit have not been received from branches not visited by us; or
- the financial statements are not in agreement with the accounting records and returns; or
- certain disclosures of directors' remuneration specified by law are not made; or

we have not received all the information and explanations we require for our audit. We have nothing to report in these respects.

### **Directors' responsibilities**

As explained more fully in their statement set out on page 8, the directors are responsible for: the preparation of the financial statements and for being satisfied that they give a true and fair view; such internal control as they determine is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error; assessing the Company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern; and using the going concern basis of accounting unless they either intend to liquidate the Company or to cease operations, or have no realistic alternative but to do so.

### **Auditor's responsibilities**

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue our opinion in an auditor's report. Reasonable assurance is a high level of assurance, but does not guarantee that an audit conducted in accordance with ISAs (UK) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of the financial statements.

A fuller description of our responsibilities is provided on the FRC's website at [www.frc.org.uk/auditorsresponsibilities](http://www.frc.org.uk/auditorsresponsibilities).

### **The purpose of our audit work and to whom we owe our responsibilities**

This report is made solely to the Company's members, as a body, in accordance with Chapter 3 of Part 16 of the Companies Act 2006. Our audit work has been undertaken so that we might state to the Company's members those matters we are required to state to them in an auditor's report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Company and the Company's members, as a body, for our audit work, for this report, or for the opinions we have formed.



**Matthew Humphrey (Senior Statutory Auditor)**  
**for and on behalf of KPMG LLP, Statutory Auditor**  
*Chartered Accountants*  
Saltire Court  
20 Castle Terrace  
Edinburgh  
EH1 2EG  
15 April 2025

## Profit and loss account for the year ended 31 December 2024

	Notes	2024 £'000	2023 £'000
<b>Income</b>			
Fee income and cash margin	3	51,582	49,233
Finance income	4	5,404	3,701
<b>Income</b>		<b>56,986</b>	<b>52,934</b>
<b>Expenses</b>			
Administration expenses		25,201	28,961
<b>Total expenses</b>		<b>25,201</b>	<b>28,961</b>
<b>Profit before tax</b>		<b>31,785</b>	<b>23,973</b>
Tax charge	6	8,193	5,551
<b>Profit for the year</b>		<b>23,592</b>	<b>18,422</b>

The Company has not recorded any other comprehensive income during the years to 31 December 2024 or 31 December 2023. A separate statement of comprehensive income is therefore not disclosed.

The notes on pages 17 to 22 form an integral part of these financial statements.

## Balance sheet as at 31 December 2024

	Notes	2024 £'000	2023 £'000
<b>Non-current assets</b>			
Deferred acquisition costs	8	31	130
Deferred tax assets	7	4	330
<b>Total non-current assets</b>		<b>35</b>	<b>460</b>
<b>Current assets</b>			
Trade and other receivables	9	12,994	15,337
Cash and cash equivalents	10	130,395	101,210
<b>Total current assets</b>		<b>143,389</b>	<b>116,547</b>
<b>Total assets</b>		<b>143,424</b>	<b>117,007</b>
<b>Current liabilities</b>			
Trade and other payables	11	17,870	15,045
<b>Total liabilities</b>		<b>17,870</b>	<b>15,045</b>
<b>Capital and reserves</b>			
Share capital	12	219,275	219,275
Retained earnings		(93,721)	(117,313)
<b>Total equity</b>		<b>125,554</b>	<b>101,962</b>
<b>Total liabilities and equity</b>		<b>143,424</b>	<b>117,007</b>

Approved by the Board of Directors and signed on its behalf by:



**Noel Butwell**  
Director  
15 April 2025

Company Registration number: 01128611

The notes on pages 17 to 22 form an integral part of these financial statements.

## Statement of changes in equity for the year ended 31 December 2024

	Share capital 2024 £'000	Retained earnings 2024 £'000	Total equity 2024 £'000
<b>At 1 January</b>	<b>219,275</b>	<b>(117,313)</b>	<b>101,962</b>
Profit for the financial year		23,592	23,592
<b>At 31 December</b>	<b>219,275</b>	<b>(93,721)</b>	<b>125,554</b>

	Share capital 2023 £'000	Retained earnings 2023 £'000	Total equity 2023 £'000
<b>At 1 January</b>	<b>219,275</b>	<b>(135,735)</b>	<b>83,540</b>
Profit for the financial year	-	18,422	18,422
<b>At 31 December</b>	<b>219,275</b>	<b>(117,313)</b>	<b>101,962</b>

The notes on pages 17 to 22 form an integral part of these financial statements.

## Notes to the financial statements

### 1. Accounting policies

#### Summary of significant accounting policies and key accounting estimates

The following accounting policies have been applied consistently to all years presented when dealing with items which are considered material in relation to the Company's financial statements.

#### Basis of preparation

The Company meets the definition of a qualifying entity under Application of Financial Reporting Requirements 100 as issued by the Financial Reporting Council. Accordingly, the financial statements for the year ended 31 December 2024 have been prepared in accordance with Financial Reporting Standard 101 Reduced Disclosure Framework as issued by the Financial Reporting Council.

In preparing these financial statements, the Company applies the recognition, measurement and disclosure requirements of International Financial Reporting Standards as adopted by the UK (UK-adopted international accounting standards), but makes amendments where necessary in order to comply with the Companies Act 2006 and to take advantage of FRS 101 disclosure exemptions.

#### Summary of disclosure exemptions

In these financial statements, the Company has applied the exemptions available under FRS 101 in respect of the following disclosures:

- International Accounting Standard ("IAS") 1 Presentation of Financial Statements requirement for comparative period reconciliations for share capital;
- IAS 1 Presentation of Financial Statements disclosures in respect of capital management;
- IAS 7 Statement of Cash Flows and related notes;
- IAS 8 Accounting Policies requirement to disclose the effects of new but not yet effective International Financial Reporting Standards ("IFRSs");
- IFRS 15 Revenue from Contracts with Customers;
- IAS 24 Related Party disclosures in respect of transactions with wholly owned subsidiaries; and
- IAS 24 Related Party disclosures in respect of the compensation of Key Management Personnel.

As the consolidated financial statements of Aberdeen include the equivalent disclosures, the Company has also taken the exemptions under FRS 101 available in respect of the following disclosures:

- Certain disclosures required by IFRS 7 Financial Instrument Disclosures; and
- International Tax Reform - Pillar Two Model Rules - Amendments to IAS 12.

#### Going concern

The Company's business activities, together with the factors likely to affect its future development and financial position, are set out in the Strategic Report.

The Company has made profits in the financial year and is forecast to make profits for the next 12 months, has sufficient financial resources and strong cash position. In preparing these financial statements, the Directors have also considered the impact of severe market shocks on Company forecasts, focussing specifically on:

- the current level of regulatory capital, which was £26.0m in excess of capital requirements at 31 December 2024;
- the level of liquid resources, including cash and cash equivalents, which far exceed the level of liquidity requirements;
- the potential impact of potential downside scenarios on revenue, assets flows and costs, including potential management actions;
- the effectiveness of the Company's operational resilience processes including the ability of key outsourcers to continue to provide services; and
- consideration of the going concern assessment of the Aberdeen Group.

In forming this opinion, the Directors have also considered any potential impact of macro-economic events like market volatility on the going concern and viability of the Company.

Based on a review of the above factors the Board is satisfied that the Company remains well capitalised and has sufficient liquidity to withstand potential severe market shocks.

## Notes to the financial statements (continued)

### 1. Accounting policies *continued*

Consequently, the Board is satisfied that the Company has and will maintain sufficient resources to continue to meet its liabilities as they fall due for at least 12 months from the date of approval of the financial statements. Accordingly, the financial statements have been prepared on a going concern basis.

#### Changes in accounting policy

No new standards, interpretations and amendments effective for the first time from 1 January 2024 are deemed to have had a significant impact on the Company.

#### Revenue recognition

Fee income from fund platforms arises from the provision of investment management and administration services as well as investment contracts and cash margin, being the share of client money interest to which the entity is entitled. Cash margin related to the retained interest income is derived from surplus client cash and is recognised on an accruals basis using the effective interest rate method. This income is recognised as services are provided i.e. as the performance obligation is satisfied and it is highly probable that a significant reversal will not occur in future periods.

#### Finance income

Interest income is derived on cash and cash equivalents and is recognised on an accruals basis using the effective interest rate method.

#### Administrative expenses

Expenditure incurred by the Company is recognised in the month to which it relates. Expenses relating to a month that have not been invoiced are accrued, while invoices received and paid for expenses relating to future periods are recognised as prepayments.

#### Restructuring costs

Restructuring costs are recognised on an accruals basis, and mainly relate to ongoing transformation costs incurred in connection with the Adviser Experience Programme.

#### Financial assets

##### *Amortised cost*

These instruments are non-derivative financial assets with fixed or determinable payments that are not quoted in an active market. These instruments are included in current assets and consist of cash and cash equivalents, trade and other receivables, accrued income and prepayments. These instruments are initially recognised at fair value, net of any transaction costs, and subsequently at amortised cost using the effective interest rate method.

The Company has adopted trade date accounting. Accordingly, a financial asset is recognised on the date the Company commits to its purchase and derecognised on the date on which the Company commits to its sale.

#### Impairment of financial assets

An expected credit loss impairment model is applied to financial assets measured at amortised cost. Impairment losses representing the expected credit loss in the next 12 months are recognised unless there has been a significant increase in credit risk from initial recognition or they relate to trade receivables in which case lifetime expected losses are recognised.

#### Financial liabilities

##### *Amortised cost*

These instruments include trade payables, group relief, amounts owed to Aberdeen Group undertakings and other payables. These instruments are initially recognised at fair value and subsequently at amortised cost using the effective interest rate method.

#### Cash and cash equivalents

Cash and cash equivalents are basic financial instruments and includes cash at bank and highly liquid investments.

#### Deferred acquisition costs

Under IFRS 15 incremental costs that are directly attributable to securing a contract to provide access to investment services are deferred.

Deferred acquisition costs are amortised over the life of the contract, estimated to be 5 years, as the related revenue is recognised. After initial recognition deferred acquisition costs are reviewed and are written off to the extent that they are no longer considered to be recoverable.

## Notes to the financial statements (continued)

### 1. Accounting policies *continued*

#### Current & deferred tax

The tax expense comprises both current tax and deferred tax expense.

Current tax is the expected tax payable on taxable profit for the year and is calculated using tax rates and laws substantively enacted at the balance sheet date.

A deferred tax asset represents a tax deduction that is expected to arise in a future period. It is only recognised to the extent that there is expected to be future taxable profit or investment return to offset the tax deduction. A deferred tax liability represents taxes which will become payable in a future period as a result of a current or prior year transaction.

Where local tax law allows, deferred tax assets and liabilities are netted off on the statement of financial position. The tax rates used to determine deferred tax are those enacted or substantively enacted at the balance sheet date that are expected to apply when the deferred tax asset or liability are realised.

Deferred tax is recognised on temporary differences arising from investments in subsidiaries and associates unless the timing of the reversal is in our control and it is expected that the temporary difference will not reverse in the foreseeable future.

Current tax and deferred tax is recognised in the profit and loss account except when it relates to items recognised in other comprehensive income or directly in equity, in which case it is credited or charged to other comprehensive income or directly to equity respectively.

#### International Tax Reform - Pillar Two Model Rules - Amendments to IAS 12

In May 2023, amendments to IAS 12 were issued which were endorsed by the UK endorsement board on 19 July 2023. The amendments were effective immediately.

The amendments clarify that IAS 12 applies to income taxes arising from tax law enacted or substantively enacted to implement the Pillar Two Model Rules published by the Organization for Economic Cooperation and Development, including tax law that implements qualified domestic minimum top-up taxes. However, the amendments also introduce a mandatory exception in IAS 12 from recognising and disclosing deferred tax assets and liabilities related to Pillar Two income taxes which the Company and Group have applied.

#### Contingent liabilities

Contingent liabilities are disclosed if the future obligation is less than probable but greater than remote or if the obligation is probable but the amount cannot be reasonably estimated.

### 2. Critical accounting judgements and key sources of estimation uncertainty

The preparation of financial statements can necessitate the use of key estimates and judgements. These estimates and judgements can affect the reported amounts of assets and liabilities, contingent or otherwise, at the balance sheet date as well as affecting the reported profit or losses for the year.

#### Critical judgements:

*Provision for potential cost* - A provision of £1.0m was established in 2024 for a potential cost arising in lifetime allowance tax disclosures.

### 3. Fee income and interest on client money

	2024 £'000	2023 £'000
Fee income from Elevate fund platform	37,517	37,228
Cash margin	14,065	12,005
<b>Total income</b>	<b>51,582</b>	<b>49,233</b>

Fee income from Elevate fund platform is driven by assets under administration. Cash margin is the share of client money interest to which the entity is entitled.

## Notes to the financial statements (continued)

### 4. Finance income

	2024 £'000	2023 £'000
Interest income	5,404	3,701
<b>Total finance income</b>	<b>5,404</b>	<b>3,701</b>

Interest income has increased due to higher interest rates throughout 2024 compared to 2023 and a rise in cash liquidity.

### 5. Auditor's remuneration

Auditor's remuneration in respect of the audit of the Company's financial statements amounted to £155k (2023: £124k). Amounts receivable by the Company's auditor in respect of services to the Company, other than the audit of the Company's financial statements, have not been disclosed as the information is required instead to be disclosed on a consolidated basis in the consolidated financial statements of Aberdeen, which does not form part of this report.

### 6. Tax charge

#### (a) Tax charge

	2024 £'000	2023 £'000
<b>Current tax:</b>		
Current tax charge	7,868	5,626
Adjustments in respect of previous periods	-	250
<b>Total current tax</b>	<b>7,868</b>	<b>5,876</b>
<b>Deferred tax:</b>		
Arising from origination and reversal of temporary differences	329	-
Adjustments in respect of previous periods	(4)	(325)
	<b>325</b>	<b>(325)</b>
<b>Total tax charge</b>	<b>8,193</b>	<b>5,551</b>

#### (b) Reconciliation of tax charge

	2024 £'000	2023 £'000
<b>Profit before tax</b>	<b>31,785</b>	<b>23,973</b>
<b>Tax at 25% (2023 : 23.5% )</b>	<b>7,947</b>	<b>5,634</b>
Permanent differences	-	(7)
Adjustments to tax charge in respect of prior periods	(4)	(76)
Expenses not deductible	250	-
<b>Total tax charge for the year</b>	<b>8,193</b>	<b>5,551</b>

The standard UK Corporation Tax rate for the accounting period is 25% (2023:23.5%).

### 7. Deferred tax asset

	2024 £'000	2023 £'000
At 1 January	330	5
Amounts credited / (charged) to the profit and loss account	(326)	325
<b>Total deferred tax asset at 31 December</b>	<b>4</b>	<b>330</b>

The deferred tax asset recognised is in respect of capital allowances. Deferred tax assets are recognised to the extent that it is probable that the capital allowances will be capable of being offset against future taxable profits.

## Notes to the financial statements (continued)

### 8. Deferred acquisition costs

	2024 £'000	2023 £'000
<b>At 1 January</b>	<b>130</b>	<b>366</b>
Amortisation charge	(99)	(236)
<b>At 31 December</b>	<b>31</b>	<b>130</b>

All of the deferred acquisition costs above are costs deferred on investment contracts (known as deferred origination costs).

The amount of deferred acquisition costs expected to be recovered after more than 12 months is £0k (2023: £31k).  
The amount of deferred acquisition costs expected to be recovered in the next 12 months is £31k (2023: £99k).

### 9. Trade and other receivables

	2024 £'000	2023 £'000
Trade and other receivables	7,445	7,927
Accrued income	5,432	7,317
Prepayments	117	93
<b>Total trade and other receivables</b>	<b>12,994</b>	<b>15,337</b>

The 'Trade and other receivables' balance consists of client money funding £5,902k (2023: £5,851k), client prefunding £1,400k (2023: £1,768k) and other receivables £143k (2023: £308k).

### 10. Cash and cash equivalents

	2024 £'000	2023 £'000
Cash at bank	48,055	47,247
Short term money market funds	82,340	53,963
<b>Total cash and cash equivalents</b>	<b>130,395</b>	<b>101,210</b>

### 11. Trade and other payables

	2024 £'000	2023 £'000
Trade payables	4,655	5,622
Amounts owed to Aberdeen group undertakings	2,431	1,932
Other payables	2,922	1,607
Group relief	7,862	5,884
<b>Total trade and other payables</b>	<b>17,870</b>	<b>15,045</b>

Amounts owed to Aberdeen group undertakings are unsecured, interest free, have no fixed date of repayment and are repayable on demand and as such they have been classified as current based on expected settlement date.

The "Other payables" balance principally relates to taxes deducted from clients at source, which are due to HMRC.

### 12. Share capital

Allotted, called up and fully paid shares:

	2024		2023	
	Number	£'000	Number	£'000
<b>Ordinary shares of £1 each</b>	<b>219,275,000</b>	<b>219,275</b>	<b>219,275,000</b>	<b>219,275</b>

## Notes to the financial statements (continued)

### 13. Directors' emoluments

Directors' aggregate remuneration and pension for the year was £304k (2023: £110k) and £8k (2023: £nil). During year ending 31 December 2024, in addition to the fees for Non-Executive directors, the above amounts include estimated recharges for remuneration and pension contributions to the Company and its subsidiaries for the costs incurred by other Group companies for directors not employed by the Company. None of these directors receive any incremental remuneration for being a director of the Company. The comparative balances have not been restated and include fees for certain Non-Executive directors only.

During 2024 3 directors were accruing benefits under defined contribution pension plans. In addition, 3 directors received share awards in the year for shares of the Company's ultimate parent company, Aberdeen Group plc and 2 directors exercised share options over Aberdeen Group plc shares in the year.

Of the aggregate remuneration above, £117k related to the highest paid director during the year. There were £nil pension contributions. The highest paid director received share awards in 2024 and exercised options in 2024.

### 14. Related party transactions

The Company has taken advantage of the exemption under paragraph 8(k) of FRS 101 not to disclose transactions with fellow wholly owned subsidiaries.

Certain members of key management personnel hold investments on the platform operated by the Company and also investments in investment products managed by the broader Aberdeen Group. None of the amounts concerned are material in the context of funds managed by the Company or the Group. All transactions between key management and their close family members and products which are managed by the Company or the Group during the year are on terms which are equivalent to those available to all employees of the Group.

### 15. Parent and ultimate parent undertaking

The Company's immediate parent undertaking is Standard Life Savings Limited and its ultimate parent is Aberdeen, both of which are incorporated in the United Kingdom and registered in Scotland.

The most senior parent entity producing publicly available financial statements is Aberdeen. Copies of the consolidated Annual Report and Accounts are available to the public from 1 George Street, Edinburgh, EH2 2LL, or to download on the website [www.aberdeenplc.com](http://www.aberdeenplc.com).

### 16. Events after the balance sheet date

To the knowledge of the Directors, there have been no material events after the reporting period.