**Distributor Oversight - Ongoing Due Diligence** 

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| **Legal name:** |
| **Registered address:** |

**If you answer “no” to any question, additional information should be supplied at the end of the questionnaire**

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|  | **Corporate information** |
| 1.1 | Ultimate parent/holding company: |  |
| 1.2 | List significant corporate reorganisation, affecting your group of companies, for the last 3 years: |  |
| 1.3 | Are you a regulated entity/representing a regulated entity? | [ ] Yes[ ] NoIf yes list regulator and regulatory reference: |
| 1.4 | What type of license do you hold in relation to distribution/placement activity? List any substantive changes impacting the licensing arrangements in scope for the last 3 years: |  |
| 1.5 | List key contacts from your firmOperations:Compliance/AML/MLRO:Sales:Legal: | Name:Email: Phone number:Name:Email: Phone number:Name:Email: Phone number:Name:Email: Phone number: |

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|  | **Business context** |
| 2.1 | Business type / distribution activity: | [ ] Retail / Private Bank[ ] Financial Adviser[ ] Wealth Manager[ ] Fund Platform[ ] Family Office[ ] Pension scheme/provider[ ] Multi Manager / Fund of Funds[ ] Insurance Wrap[ ] Custodian[ ] Nominee[ ] Financial Institution[ ] Non-Financial[ ] Other (please specify): |
| 2.2 | Relationship type: | [ ] Discretionary *(portfolio  management)*[ ] Advisory *(investment advice)*[ ] Execution only *(placing)*[ ] Non-Advice[ ] Reception and transmission of  orders[ ] Execution of orders on behalf of  clients |
| 2.3 | What type of sub-distributor you rely on? | [ ] Retail / Private Bank[ ] Financial Adviser[ ] Wealth Manager[ ] Fund Platform[ ] Family Office[ ] Pension scheme/provider[ ] Saving Plans[ ] Multi Manager / Fund of Funds[ ] Insurance Wrap[ ] Custodian [ ] Nominee [ ] Financial Institution[ ] Non-Financial[ ] None[ ] Other (please specify): |
| 2.4 | Are all your sub-distributors regulated for the purpose of distribution of funds? | [ ] Yes[ ] No |
| 2.5 | Do you perform due diligence on the sub-distributors you work with? | [ ] Yes[ ] No |
| 2.6 | Please list the full legal name of all sub-distributors including their country of domicile and the registration number at the local commercial register or Legal Entity Identifier (LEI). |  |
| 2.7 | For each sub-distributor, which funds (ISIN) are distributed? |  |
| 2.8 | For each sub-distributor, in which country (ies) is the sub-distributor permitted to distribute the fund? |  |
| 2.9 | Type of customers / end investors: | [ ] Retail / Non professional clients[ ] Professional clients[ ] Other (please specify): |
| 2.10 | List the jurisdictions in which you distribute /offer the funds: |  |
| 2.11 | List any significant changes to your customer base or revenue model in the last 3 years: |  |
| 2.12 | Types of financial products / funds you distribute: | [ ] UCITS[ ] AIF [ ] Hedge funds [ ] Structured products[ ] Wrapped products[ ] Other (please specify): |

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|  | **Sales structure and organization** |
| 3.1 | Please describe the nature of your sales force (by region if different) | [ ] Tied[ ] Bank or office based[ ] Field based[ ] Network[ ] N/A (e.g. Fund Platform)[ ] Other (please specify): |
| 3.2 | Do you maintain systems and/or procedures to comply with the provisions of the applicable prospectus, distribution agreement and local laws in countries in which you plan to offer our funds? | [ ] Yes[ ] Yes, under responsibility of underlying intermediary[ ] No |
| 3.3 | Have you implemented ongoing training and development programs for your sales force? | [ ] Yes[ ] Yes, outsourced[ ] No |
| 3.4 | Do you monitor your sales force to ensure compliance at the point of sale? | [ ] Yes[ ] Yes, under responsibility of underlying intermediary[ ] No |
| 3.5 | Do you have procedures to deliver fund offering documents (e.g. KIID) to clients in accordance with applicable law (including prior to subscription where required)?  | [ ] Yes[ ] No  |
| 3.6 | What type of standard fund documentation produced by us do you use to sell our funds? | [ ] Prospectus[ ] KIID[ ] Factsheet[ ] Other (please specify): |
| 3.7 | If you produce your own marketing to sell our funds, have you submitted this to us for approval? | [ ] Yes[ ] No [ ] N/A |
| 3.8 | Do you maintain procedures ensuring that your marketing materials (as they relate to our funds) are compliant with local laws and regulations on marketing?  | [ ] Yes[ ] No |
| 3.9 | Confirm that you perform initial and ongoing suitability / appropriateness checks to ensure funds meet customer needs and risk profile. | [ ] Yes[ ] Yes, under responsibility of underlying intermediary[ ] No  |
| 3.10 | Do you maintain procedures ensuring that you promote the funds in compliance with the target market definition? | [ ] Yes[ ] Yes, under responsibility of underlying intermediary[ ] No |
| 3.11 | Do you maintain procedures ensuring effective control over the product governance process, including escalation to the management? | [ ] Yes[ ] Yes, under responsibility of underlying intermediary[ ] No  |
| 3.12 | Has your company reported complaints related to our funds during the past three years? If yes, please explain. | [ ] Yes[ ] No |
| 3.13 | Have you experienced any issues with our funds, including any customer complaints or outcomes that did not reflect the purpose of our funds? If yes, please explain. | [ ] Yes[ ] No |
| 3.14 | Do you ensure our funds are not sold to non-eligible investors, incl. US persons? | [ ] Yes[ ] No |
| 3.15 | Do you maintain policies and procedures to monitor and prevent market timing and frequent trading for your clients investing in our funds? | [ ] Yes[ ] Yes, under responsibility of underlying intermediary[ ] No |
| 3.16 | Confirm that all compensation collected in the context of our agreement complies with applicable laws. | [ ] Yes[ ] No  |

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|  | **Governance & AML/KYC** |
| 4.1 | Tick the applicable policies you have in place in your firm: | [ ] Code of Ethics / Behaviour / Conduct (incl. insider dealing and personal transactions)[ ] Anti-Bribery & Corruption[ ] Conflicts of Interest (incl. inducements)[ ] Whistleblowing[ ] Data Protection & Confidentiality[ ] Business Continuity[ ] Customer Complaints[ ] Customer suitability[ ] Late trading and market timing[ ] Gift & entertainment [ ] Remuneration[ ] Other (please specify): |
| 4.2 | Tick the applicable AML/KYC policies you have in place in your firm: | [ ] Know Your Customers (KYC)  including identification and  verification of customers and  ultimate beneficial owners where  applicable[ ] Anti-Money Laundering (AML) &  Counter Terrorism[ ] Screening of clients against sanctions lists[ ] Transaction monitoring and  reporting[ ] Reporting of suspicious or unusual  activity or transactions[ ] PEPs monitoring (including family  and associates and approval process)[ ] Customers risk profile assessment[ ] Enhanced due diligence for “high  risk” clients[ ] Appointment of an AML officer [ ] Periodic review of AML procedures  by an independent auditor[ ] The Wolfsberg Group Anti-Money  Laundering Questionnaire[ ] Record retention[ ] Other (please specify): |
| 4.3 | Have you implemented training and development programs for your staff about the principles described in the above listed policies?  | [ ] Yes[ ] No  |
| 4.4 | Have you implemented a process to comply with all sanctions related laws and regulations from the United States of America, the European Union, the UN and other locally applicable laws and regulations and can you confirm that this process applies to new clients as well as the continuing compliance of existing clients? | [ ] Yes[ ] No  |
| 4.5 | Please confirm that you have an adequate and formal escalation process to inform us about any material breach and/or changes in relation to your company’s regulatory status. | [ ] Yes[ ] No |
| 4.6 | Is your firm FATCA compliant? | [ ] Yes[ ] No[ ] ExemptIf yes, please provide your FATCA status and GIIN No: |
| 4.7 | Please provide your CRS status and TIN: |  |

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|  | **Risk Management & Internal Controls** |
| 5.1 | Do you carry insurance on key individuals? | [ ] Yes[ ] No |
| 5.2 | Name of your independent auditors: |  |
| 5.3 | Please provide a copy of your latest audited annual report | [ ] Yes[ ] No |
| 5.4 | Please indicate any findings and/or exceptions in the last external audit report of your company. |  |
| 5.5 | Please provide your latest SSAE16 or similar internal controls attestations. | [ ] Yes[ ] No |
| 5.6 | Do you have an internal audit function? | [ ] Yes[ ]  Yes, outsourced[ ] No |
| 5.7 | Do you have a compliance function? | [ ] Yes[ ]  Yes, outsourced[ ] No |
| 5.8 | Do you have a risk management function? | [ ] Yes[ ]  Yes, outsourced[ ] No |
| 5.9 | Has your regular compliance monitoring, internal audit or risk management reviews led to any material findings in the last 3 years? If yes, please explain. | [ ] Yes[ ] No |
| 5.10 | Have you been sanctioned by any regulatory authorities in the last 3 years?If yes, please explain. | [ ] Yes[ ] No |
| 5.11 | Have you been subject to legal or regulatory investigation, fine or litigation in the last 3 years? If yes, please explain. | [ ] Yes[ ] No |
| 5.12 | Please describe any key services outsourced relevant to the distribution process. If yes, how do you perform due diligence on providers? |  |

**Space for additional information:**

(Please indication which question the information is referring to)

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| **Name:** |
| **Title:** |
| **Signature:** |
| **As of date:** |