**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  No  If 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 firm  Operations:  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  Exempt  If 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:** |