

DOCUMENTATION

	Do you have in place the following documentation?	When was this last updated?
Compliance Manual		
Compliance Monitoring Schedule		
Risk Management Policy		
Risk Mitigation Monitoring Plan		
Anti-Bribery & Corruption Policy		
Anti-Money Laundering Policy/Procedures		
Best Execution Policy		
Code of Ethics		
Conflicts of Interest Policy		
Conflicts of Interest Register		
Dealing Commission Policy/Procedures		
Gifts & Inducements Policy		
Personal Account Dealing Policy		
Remuneration Code Policy		
TCF Policy		
Organisation Chart		
Corporate Structure Chart		
BCP/Disaster Recovery Procedures		
Locum Agreement/Emergency Arrangements		
PI Insurance Policy		
Business Procedures		

Please provide to Marlborough a copy of your latest Financial Report and Accounts

INFORMATION

General Background	Response	Contact
1.1 Name of Firm		
1.2 Firm Address		
1.3 Firm jurisdiction of incorporation/organisation and jurisdiction of firm's headquarters		
1.4 Who is the firm's primary regulator?		
1.5 What is the firm's official regulatory number?		
1.6 Describe your current regulatory status, including details of permissions and if applicable, any planned amendments?		
1.7 Describe your corporate structure, including a list of parent companies, subsidiaries and affiliated companies.		
1.8 Name and position of your firm's Compliance Contact		

Client Base	Response	Contact
2.1 How do you classify the clients who will use Marlborough's discretionary service?		
2.2 Describe your internal process for review and approval of new products to be distributed (including the process to assess suitability and appropriateness for the targeted market(s) and investors)		
2.3 Please explain the extent to which your firm's Compliance and or Legal Departments are involved in item 2.2 above?		
2.4 Describe the training and ongoing assessment of your sales force for new products and how you ensure that they understand the products they are selling?		

Retail Advice	Response	Contact
3.1 Briefly explain the structure of the retail advisers' team, the number of staff and their levels of experience and expertise. Please outline any external support resource used?		
3.2 Can you confirm that your retail advisers do not receive any additional rewards/compensation for recommending certain funds/investments over and above what they would receive for recommending others?		
3.3 Describe your remuneration arrangements in relation to your retail advisers		
3.4 What monitoring/processes do you have in place to ensure that suitability is achieved for your clients in accordance with consumer's needs and objectives?		

Retail Advice	Response	Contact
3.5 Do you have “know your customer” and “investor suitability” policies and procedures in place with respect to new and existing clients? Briefly describe these.		
3.6 Describe how your firm assesses sophistication and investment experience when considering the suitability of certain investment products for your clients?		
3.7 In addition to your use of Marlborough’s Risk Profiling Tool describe how your firm appropriately assesses a consumer’s risk appetite (attitude to risk, risk tolerance and capacity for loss)?		
3.8 How are the processes outlined above monitored, managed and supervised?		

Marketing	Response	Contact
4.1 How do you ensure that target investors understand the objectives and risks associated with making an investment?		

General Compliance	Response	Contact
5.1 Briefly describe the structure of your Compliance team, the number of staff and their levels of experience and expertise, particularly specific details on your Compliance Officer. Also outline any external compliance services that are used?		
5.2 Do you have an internal audit department? If yes explain the relationship with Compliance and the difference in oversight responsibilities?		
5.3 When was your firm's most recent regulatory visit or review? What was the length and scope of the visit and what were their comments and recommendations?		

General Compliance	Response	Contact
5.4 Describe your firm's internal procedures for resolving customer complaints, including the involvement of Compliance and/or Legal?		
5.5 How many complaints have you received in the last 3 years? Please provide a summary of the nature of the complaints and how they were resolved (including compensation if applicable)		
5.6 Summarise any past, pending or threatened legal action or regulatory enforcement proceedings or action involving your firm, its affiliates or your employees?		
5.7 Please provide details of your PI Insurance cover, including limits, excess levels and ALL policy restrictions		
5.8 Please provide details of your regulatory financial resources requirements; include the amount of capital required to be held, the amount you currently hold and whether you have ever failed to meet the requirements.		

General Compliance	Response	Contact
<p>5.9 Do you provide annual training to staff on anti-money laundering and complaints? Please state when the last training was carried out and whether any changes to company procedures, systems or controls were made as a consequence?</p>		
<p>5.10 What other training do you provide to your staff, such as anti-bribery and on what frequency?</p>		
<p>5.11 What are your Training and Competence arrangements? Briefly describe the procedures you have in place to manage training, to oversee CPD and to ensure the effective supervision of all advisers?</p>		

International Sanctions	Response	Contact
6.1 What anti-money laundering and anti-bribery and corruption controls does your firm have in place with respect to new and existing clients? Briefly describe these?		
6.2 Do you specifically verify a) source of wealth, b) source of funds and c) reputational suitability of your investors? Outline your firm's controls in these respects		
6.3 Do you have a screening process which you undertake on prospective customers against international watch lists or other financial sanctions lists? List these		
6.4 Do you have any investors who are Politically Exposed Persons? If so please provide their full legal name(s) and address(es)		

<p>6.5 Do you have any dealings with clients who appear on international sanctions lists? If so please provide their full legal name(s) and address(es) and the name of the international financial sanctions list</p>		
<p>6.6 What is the broad geographical split of your investors?</p>		
<p>6.7 In the past three years has your firm had any regulatory or criminal actions resulting from violations of Financial Crime laws and regulations or other related Regulations?</p>		

Signed	Name
Date	Title